



Section 51 PAIA Manual (Private Body)

Organisation (Private Body): SUMMERHILL PRIVATE SCHOOL (Pty) Ltd

Registered Address: Cnr 8th & 10th Road, Erand, Gauteng, South Africa

Postal Address: PO Box 2465, Halfway House, 1685

Website: <https://summerhill-school.co.za/>

Information Officer: Chantelle Jacobs — **Email:** chantelle@summerhill-school.co.za • **Tel:** 011 468 1414 **Deputy Information Officer(s):** None

Effective date: 19 August 2025 • **Last updated:** 19 August 2025

1) Purpose of this Manual

This Manual is compiled in terms of the **Promotion of Access to Information Act, 2000 (PAIA)**. It explains what records we hold, how to request access, applicable fees, and how we protect personal information in line with **POPIA**.

2) Guide to PAIA

A guide on how to exercise access rights is available from the **Information Regulator (South Africa)** (see contacts at the end). We will assist requesters who need help completing forms.

3) Contact for PAIA requests

Direct formal PAIA requests to the **Information Officer** at the details above. Office hours for delivery/inspection: 9:00-17:00 weekdays.

4) Records held by the School (categories)

- **Governance & Compliance:** PAIA Manual, privacy notices/policies, risk registers, minutes/resolutions.
- **Admissions & Learner Records:** applications and supporting documents, enrolment agreements, academic records, learner support and medical information provided to the

School, discipline records where applicable.

- **Parent/Guardian Records:** contact details, fee accounts and statements, consents, correspondence.
- **Staff & HR:** employment contracts, qualifications, performance and payroll records.
- **Finance & Procurement:** budgets, invoices, receipts, supplier agreements, asset registers.
- **Health & Safety:** incident logs, access/security logs.
- **ICT & Website:** system and access logs, backups, change logs, website content and submissions.
- **Marketing & Communications:** newsletters, website/blog posts, photographs (with consent).
- **Facilities & Operations:** maintenance records, insurance, service contracts.

5) Records automatically available (without a PAIA request)

- Public pages and resources on the website (e.g., policies posted for download, codes of conduct, uniform lists).
- Public brochures/prospectus and fee schedules where published.
Access method: via the website or on request from the office.

6) Records available on request (PAIA)

Certain records may be available on request, subject to lawful grounds for refusal, protection of third-party/personal information, and payment of prescribed fees.

7) How to request access

1. Complete **PAIA Form 2** ("Request for Access to Record of a Private Body").

2. Submit to the **Information Officer** with adequate **proof of identity** and a description of the records requested.
3. Indicate the **form of access** required (inspection, copies, electronic) and any special access needs.
4. Pay the **request fee** (if applicable). We will advise any **access/reproduction fees** before providing records.
5. We respond within statutory timelines, stating whether access is granted, partially granted (with redactions), or refused (with reasons).

Forms & fee schedule: available from the Information Officer or the **Information Regulator** (<https://info regulator.org.za>).

8) Fees (prescribed)

- **Request fee:** payable by a requester who is not a “personal requester”.
- **Access fees:** for search, preparation, and reproduction per the PAIA regulations. A current fee schedule is available on request.

9) Grounds for refusal (summary)

We may refuse access to protect:

- personal information of a **third party**;
- commercial or confidential information of a third party or the School;
- legally privileged records;
- life, health, or security;
- safety or security measures;
- research in progress; or
- information whose disclosure would contravene **POPIA** or any other law. Where possible, we grant **partial access** with redactions.

10) Remedies

There is **no internal appeal** for private bodies. If dissatisfied, you may lodge a **complaint with the Information Regulator** or apply to court for appropriate relief.

11) POPIA privacy statement (overview)

- **Categories processed:** learner, parent/guardian, and staff identifiers; admissions data; academic and behavioural records; medical and support information necessary for schooling; billing/financial records; website analytics/technical logs where used.
- **Purposes:** admissions and enrolment, academic administration, communication with parents/guardians, fee billing and finance, compliance, and website operation/security.
- **Lawful bases:** **consent, contract/steps to contract, legal obligation, and legitimate interests** of the School.
- **Operators:** hosting (Xneelo), email relay, Gravity Forms, **Google Drive/Sheets**, Google Analytics, Google Maps/YouTube/Instagram (Smash Balloon), and (if enabled) **PayFast** — all engaged under operator terms and confidentiality.
- **Transfers:** where operators process information outside South Africa, we implement **section 72 POPIA safeguards**.
- **Security:** role-based access, least-privilege, administrator MFA, encryption in transit, updates/backups, and incident response.
- **Retention:** kept only as long as necessary for the purposes and legal duties, then securely destroyed or anonymised.
- **Data subject rights:** access, correction, deletion, objection; contact the Information Officer.

12) Availability of this Manual

This Manual is available on the website and at the School office during business hours (reasonable reproduction fees may apply).

13) Approval & review

- **Compiled by:** Lisa Leathes
- **Approved by:** Summerhill School Board
- **Next review:** August 2026

Information Regulator (South Africa) — Contacts

- Website: <https://inforegulator.org.za>
- General enquiries: **inforeg@inforegulator.org.za**
- POPIA complaints: **POPIAComplaints@inforegulator.org.za**
- PAIA complaints: **PAIAComplaints@inforegulator.org.za**
- Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001, South Africa.