



**PROMOTION OF ACCESS TO INFORMATION ACT  
("PAIA")  
AND  
PROTECTION OF PERSONAL INFORMATION ACT  
("POPIA")**

**SECTION 51 MANUAL**

Prepared in accordance with Section 51 of the Promotion of Access to  
Information Act, No. 2 of 2000

This document serves as the information manual as required by Section 51(1) of the Promotion of Access to Information Act, No.2 of 2000 (the "Act") for a private body. It provides information on the records held and the process that is to be followed to request access to such records

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## **PART 1: INTRODUCTION**

1. Henley Business School Limited (Incorporated in the United Kingdom), hereinafter referred to as Henley Business School Africa, endorses the spirit of the Promotion of Access to Information Act, No. 2 of 2000 (“the Act”) and believes that this Manual will assist requesters in exercising their rights. The Act seeks, inter alia, to give effect to the constitutional right of access to any information held by the state or by any other person where such information is required for the exercise or protection of any right.
2. Section 51 of the Act requires Private Bodies to compile a Manual setting out the procedure and requirements to be adhered to in seeking to obtain access to information held by that Private Body.
3. The motivation for giving effect to the right of access to information is to:
  - 3.1. Foster a culture of transparency and accountability in both public and private bodies,
  - 3.2. Promote a society in which the people of the Republic of South Africa have effective access to information to enable them to fully exercise and protect all their rights,
4. Section 9 of the Act, however recognises that such right of access to information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:
  - 4.1. Limitation aimed at the reasonable protection of privacy,
  - 4.2. Commercial confidentiality; and
  - 4.3. Effective, efficient and good governance,
  - 4.4. and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

## **PURPOSE**

1. This PAIA Manual was compiled in terms of Section 51 of the Act to facilitate access to records held by Henley Business School Africa. It contains information required by a person wishing to exercise any right, contemplated by the Act. It is available in English.
2. Requesters are advised to familiarise themselves with the provisions of the Act before making any requests to Henley Business School Africa in terms of the Act.
3. All users irrevocably agree to submit exclusively to the law of the Republic of South Africa and to the exclusive jurisdiction of the Courts of South Africa in respect of any dispute arising out of the use of this manual or any information provided by Henley Business School Africa.

## **BACKGROUND TO HENLEY BUSINESS SCHOOL AFRICA**

1. Henley Business School Africa, situated in the Paulshof suburb of Johannesburg, is a campus of the UK-based Henley Business School, one of the oldest business schools in Europe with operations in 17 countries across the globe.
2. The South African campus has offered the MBA in South Africa since 1992. In 2002, the South African location became a branch of the UK parent. As the operation in South Africa is the only Henley Business School in the African continent, it has students living in neighbouring countries studying and being supported through this office.

**PART 2: CONTACT DETAILS****ORGANISATION CONTACT DETAILS**

<b>Henley Business School Limited (Incorporated in the United Kingdom)</b>	
Registration Number:	2009/023510/10
Physical Address:	Henley Business School Africa Campus Corner of Milcliff & Witkoppes Roads, Paulshof, 2191
Postal Address:	P.O. Box 2890, Sunninghill, 2157
Telephone Number:	(+27) 011 808 0860
E-Mail:	info@henleysa.ac.za
Web Site:	<a href="https://www.henleysa.ac.za/">https://www.henleysa.ac.za/</a>

**INFORMATION OFFICER CONTACT DETAILS**

The Dean of Henley Business School Africa as defined in the Act and in accordance with a resolution of the Henley Business School Africa Board has duly authorised the contact person below to ensure that the Act is complied with.

<b>Name:</b>	<b>Mr. Jacques le Roux – General Manager</b>
<b>Physical Address:</b>	Henley Business School Africa Campus Corner of Milcliff & Witkoppes Roads, Paulshof, 2191
<b>Postal Address:</b>	P.O. Box 2890, Sunninghill, 2157
<b>Telephone Number:</b>	(+27) 11 808 0870
<b>E-Mail:</b>	Jacqueslr@henleysa.ac.za
<b>Web Site:</b>	<a href="https://www.henleysa.ac.za/">https://www.henleysa.ac.za/</a>

**SCOPE**

The scope of this Manual excludes Henley Business School Africa's operations outside the Republic of South Africa and will serve to provide a reference regarding the records held by Henley Business School Africa at its Registered Office and various operations within the borders of the Republic of South Africa.

**POLICY WITH REGARD TO CONFIDENTIALITY AND ACCESS TO INFORMATION**

1. Henley Business School Africa will protect the confidentiality of information provided to it by third parties, subject to Henley Business School Africa's obligations to disclose information in terms of any applicable law or regulation or a court order requiring disclosure of information. If access is requested to a record that contains information about a third party, Henley Business School Africa is obliged to attempt to contact such third party to inform him/her/it of the request.

2. Henley Business School Africa will give the third party an opportunity of responding by either consenting to the access or by providing reasons why the access should be denied. In the event that the third-party furnishing reasons for the support or denial of access, the Information Officer will consider these reasons in determining whether access should be granted to the requestor or not.

## **PART 3: THE ACT AND SECTION 10 GUIDE**

### **SECTION 10 GUIDE**

*Information required by section 51(1)(b) of the Act*

A guide has been compiled, in terms of section 10 of the Act, by the South African Human Rights Commission. It contains information to assist a person wishing to exercise a right, in terms of the Promotion of Access to Information Act, No. 2 of 2002. This guide is available for inspection, inter alia as follows:

<b>Contact body:</b>	<b>The South African Human Rights Commission</b>
Physical Address:	PAIA Unit 29 Princess of Wales Terrace Cnr York and Andrew Streets Parktown
Postal Address:	Private Bag 2700, Houghton 2041
Telephone Number:	(+27) 11 484 8300
E-Mail:	PAIA@sahrc.org.za
Web Site:	<a href="https://www.henleysa.ac.za/">https://www.henleysa.ac.za/</a>

### **RECORDS AUTOMATICALLY AVAILABLE**

*Information required by section 51(1)(c) of the Act*

At this stage, no notice(s) has/have been published in terms of section 52 of the Act on the categories of records that are automatically available without a person having to request access in terms of the Act.

### **RECORDS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION**

*Information required by section 51(1)(d) of the Act*

Information is available in terms of the following legislation to the persons or entities specified in such legislation, as well as the specific protections offered by such laws. As legislation changes from time to time, and new laws may stipulate new procedures and scopes of access, this list should not be read as a final and complete list without recourse to amendments, if any, of the relevant legislation. Henley Business School Africa holds records in terms of the following legislation: (This list is not exhaustive).

1. Higher Education Act 101 of 1997;

2. Basic Conditions of Employment Act 75 of 1997;
3. Companies Act 61 of 1973 and 71 of 2008;
4. Compensation for Occupational Injuries and Diseases Act 130 of 1993;
5. Employment Equity Act 55 of 1998;
6. Skills Development Levies Act 9 of 1999;
7. Income Tax Act 58 of 1962;
8. Labour Relations Act 66 of 1995;
9. Occupational Health & Safety Act 85 of 1993;
10. Protection of Personal Information Act 4 of 2013;
11. Unemployment Insurance Contributions Act 4 of 2002;
12. Unemployment Insurance Act 63 of 2001;
13. Broad-based Black Economic Empowerment Act 53 of 2003;
14. Electronic Communications and Transactions Act 25 of 2002; and
15. Value Added Tax Act 89 of 1991.

## SUBJECTS AND CATEGORIES OF RECORDS HELD

*Information required by section 51(1)(e) of the Act*

PLEASE NOTE: The fact that a record type is listed here does not necessarily mean that the records therein will be disclosed. All access is subject to the evaluation processes outlined herein, which will be exercised in accordance with the requirements of the Act.

The following subjects and categories of records are held –

Subject	Category
Corporate governance	<ul style="list-style-type: none"> <li>• Board of Directors' minutes and records</li> <li>• Risk management reports</li> </ul>
Administrative and operational	<ul style="list-style-type: none"> <li>• Asset registration records</li> <li>• Contracts and agreements</li> <li>• General correspondence</li> <li>• Health and safety records</li> <li>• Insurance records and correspondence</li> <li>• Service level agreements</li> </ul>
Student records	<ul style="list-style-type: none"> <li>• Academic records</li> <li>• Contact information</li> <li>• Disciplinary information</li> </ul>
Human resources	<ul style="list-style-type: none"> <li>• BEE statistics, certificates and audit reports</li> <li>• Employment Equity reports</li> <li>• Leave records</li> <li>• Letters of employment</li> </ul>

Subject	Category
	<ul style="list-style-type: none"> <li>• Medical aid records</li> <li>• PAYE records and returns</li> <li>• Payroll records</li> <li>• Personnel files and records</li> <li>• Policies and procedures</li> <li>• Retirement benefit records</li> <li>• Staff attendance records</li> <li>• Training material</li> <li>• Training statistics</li> <li>• UIF records and returns</li> <li>• Workman's Compensation records</li> </ul>
Finances	<ul style="list-style-type: none"> <li>• Accounting records</li> <li>• Annual financial statements</li> <li>• Banking records</li> <li>• Business contracts</li> <li>• General correspondence</li> <li>• Internal control reports</li> <li>• Invoices, credit notes, statements etc.</li> <li>• Management accounts</li> <li>• Property leases</li> <li>• Proposal and tender documents</li> <li>• Statistics SA returns and correspondence</li> <li>• Statutory records</li> <li>• Tax returns and SARS correspondence</li> </ul>
Information technology	<ul style="list-style-type: none"> <li>• Register of software and hardware</li> </ul>
Marketing and Public affairs	<ul style="list-style-type: none"> <li>• Contracts and agreements</li> <li>• Marketing brochures and advertising records</li> <li>• New business development</li> <li>• Media releases</li> </ul>
Library materials	<ul style="list-style-type: none"> <li>• Books, articles, magazines and other printed academic matter</li> <li>• Electronic academic databases and other electronic academic resources</li> </ul>

## REQUEST FOR ACCESS TO RECORDS

*Information required by section 51(1)(e) of the Act*

1. It is important to note that the successful completion and submission of an access request form does not automatically allow the requester access to the requested record. An application for

access to a record is subject to certain limitations if the requested record falls within a certain category as specified within Part 3 Chapter 4 of the Act.

2. If it is reasonably suspected that the requester has obtained access to records through the submission of materially false or misleading information, legal proceedings may be instituted against such requester.
3. Completion of Access Request form
  - 3.1. In order to facilitate a timely response to requests for access to records, all requesters should take note of the following when completing the Access Request Form -
  - 3.2. The Access Request Form must be completed. On the Access Request Form all details must be completed, including the right the requester wants to protect by requesting the information;
  - 3.3. If the Requester is acting on behalf of someone else (e.g. an attorney acting on behalf of a client), the signature of the other person (i.e. the client) must appear on the form and Henley Business School Africa shall have the right to verify that the person on whose behalf the request is being made did indeed authorise such request;
  - 3.4. Proof of identity is required to authenticate the identity of the requester. Therefore, in addition to the access form, requesters will be required to supply a copy of their identification document;
  - 3.5. Type or print in BLOCK LETTERS an answer to every question;
  - 3.6. If a question does not apply, state "N/A" in response to that question;
  - 3.7. If there is nothing to disclose in reply to a particular question state "nil" in response to that question;
  - 3.8. If there is insufficient space on a printed form, additional information may be provided on an additional attached folio; and
  - 3.9. When the use of an additional folio is required, precede each answer with the applicable title.
  - 3.10. The Access Request Form is included in this manual as an appendix.
4. Submission of Access Request form and request fee payable
  - 4.1. The completed Access Request form together with a copy of the requester's identity document must be submitted either via conventional mail, e-mail or fax and must be addressed to the designated contact person as indicated above.
  - 4.2. An initial, request fee of R57.00 (incl. VAT) is payable on submission.
  - 4.3. This fee is not applicable to Personal Requesters referred to in section 54(1) of the Act being any person seeking access to records that contain their personal information
5. Notification
  - 5.1. Henley Business School Africa will within 30 days of receipt of the request to access records decide whether to grant or decline the request and give notice with reasons (if required) to that effect.
  - 5.2. The 30 day period within which Henley Business School Africa has to decide whether to grant or refuse the request, may be extended for a further period of not more than thirty days, if the request is for a large volume of information, or the request requires a search for



information held at premises other than those of Henley Business School Africa and the information cannot reasonably be obtained within the original 30 day period.

- 5.3. Henley Business School Africa will notify the requester in writing should an extension be sought.

## **GROUNDINGS FOR REFUSAL OF ACCESS TO RECORDS**

*Chapter 4 of the Act is applicable*

The main grounds for refusal of a request for access to records are -

1. Mandatory protection of the privacy of a third party who is a natural person if its disclosure would involve the unreasonable disclosure of personal information;
2. Mandatory protection of the commercial information of a third party if its disclosure contains trade secrets, financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party or information disclosed in confidence by a third party if the disclosure thereof could reasonably put that third party at a disadvantage in contractual negotiations or in commercial competition;
3. Mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
4. Mandatory protection of the safety of individuals and the protection of property;
5. Mandatory protection of records which could be regarded as privileged in legal proceedings;
6. The commercial information of Henley Business School, Africa which may include trade secrets, financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Henley Business School Africa, or information, the disclosure thereof could reasonably put Henley Business School Africa at a disadvantage in contractual negotiations or in commercial competition; and
7. Mandatory protection of research information of a third party or Henley Business School Africa.

## **PRESCRIBED FEES**

1. A requester who seeks access to a record containing personal information about that requester is not required to pay the request fee. Every other requester must pay the required request fee. The following applies to requests other than personal requests:
  - 1.1. A requestor is required to pay the prescribed request fee of R57.00 before a request will be processed;
  - 1.2. if the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours (six hours) to search and prepare the record for disclosure. If the preparation of the record requested requires more than the prescribed hours (six), a deposit shall be paid (of not more than one third of the access fee which would be payable if the request were granted); and
  - 1.3. records may be withheld until the fees have been paid in full.
2. The following fees are payable:

Type of activity involved in producing the record or personal information	Rate (inc. VAT)
For every photocopy of an A4-size page or part thereof.	R1.25
For every printed copy of an A4-size page or part thereof. Held on a computer or in electronic or machine readable form.	R0.86
For a copy in a computer-readable form on stiffy disk.	R8.55
For a copy in a computer-readable form on CD.	R79.80
For a transcription of visual images, for an A4-size page or part thereof.	R45.60
For a copy of visual images.	R68.40
For a transcription of an audio record, for an A4-size page or part thereof.	R22.80
For a copy of an audio record.	R34.20
Each hour or part of an hour (excluding the first hour) reasonably required to search for and prepare the record/personal information for disclosure.	R34.20
For posting the record/personal information.	Actual postage incurred
For confirming whether or not <b>Henley Business School Africa</b> handles personal information of the requestor (POPI s23(1)(a) request)	Free of charge

3. Exemptions from paying "access fees". Person or persons exempted from paying access fees:
- 3.1. A single person whose annual income does not exceed R14,712.00; or
  - 3.2. Married persons or a person and his/her life partner whose annual income does not exceed R27,192.00.

#### AVAILABILITY AND UPDATING OF THE PAIA MANUAL

1. This manual is made available in terms of Regulation Number R. 187 of 15 February 2002. The public are able to obtain a copy of this manual on request from:
  - 1.1. the designated contact person.
  - 1.2. It is also available at our website: <https://www.henleysa.ac.za/>
  - 1.3. It is available at the offices of the South African Human Rights.

#### PART 4: PROTECTION OF PERSONAL INFORMATION ACT, 2013

##### Purpose of the processing [S 51(1)(c)(i)]

##### 1. General

- 1.1. We mainly use the personal information we hold about Data Subjects where it is necessary for us to perform our contract with Data Subjects and/or to enable us to comply with legal obligations. Data Subject's personal information will also be used when it is in our legitimate interest. A legitimate interest is when we (and sometimes third parties) have an academic, business or commercial reason to use a Data Subject's information. But even then, our legitimate interest must not unreasonably go against what is right and best for the Data Subject.

1.2. Each of these categories is a 'legal basis' that allows us to process Data Subject's information under data protection law (GDPR and POPI). We have provided further information below about what this actually means, in terms of how we process, or the purposes for processing Data Subject's personal information relevant to each legal basis.

2. ***Necessary use of Data Subject's personal information so that we can fulfil our obligations to Data Subjects and provide Data Subjects with the agreed products and services, including:***

- 2.1. to communicate with Data Subjects about our service, to verify that Data Subject's instructions are genuine and to process them accordingly;
- 2.2. to enable us to process Data Subject's student registration, switch, conversion or redemption instruction;
- 2.3. to recover any money amount owed to us;
- 2.4. to investigate and deal with complaints or disputes;
- 2.5. to contact Data Subjects when we have updated this Privacy Notice and consider that it is necessary to advise Data Subjects about any changes to the way we are processing Data Subject's personal information;
- 2.6. to transfer Data Subject's personal information to any third party who replaces Henley Business School Africa as a provider of services to Data Subjects; and/or
- 2.7. to share Data Subject's personal information with third parties (such as our internet service provider who assists us in administering or process transactions on our behalf) if required for the management of Data Subject's product or service.

***We need to use some personal information to provide Data Subjects with our service and to fulfil our contract with Data Subjects.***

3. ***Use of Data Subject's information is necessary for us to comply with our legal obligations***

- 3.1. to verify Data Subject's identity and to carry out regulatory checks (such as identity verification checks);
- 3.2. to comply with audit requests from our auditor;
- 3.3. to comply with requests made by Data Subjects when exercising Data Subject's legal rights (such as those contained within this Privacy Notice);

***We need to use some personal information to comply with legal obligations.***

4. ***Use of Data Subject's information which is necessary to pursue our "legitimate interests"***

- 4.1. We are allowed to use Data Subject's personal information to pursue our own interests as long as Data Subject's fundamental interests do not override these.
- 4.2. This will include processing which, on balance, we consider is in our legitimate interests and which do not cause Data Subjects undue prejudice. Our legitimate interests which are applicable to our processing of Data Subject's personal information include:

- (a) administering and managing Data Subject's account(s) and services relating to that, updating Data Subject's records, tracing Data Subject's whereabouts to contact Data Subjects about Data Subject's studies and account;
- (b) to adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as tax authorities, ombudsmen and regulators;
- (c) for management and audit of our business operations including accounting;
- (d) conducting analysis required to detect malicious data and understand how this may affect Data Subject's IT system;
- (e) for statistical monitoring and analysis of current attacks on devices and systems and for the on-going adaptation of the solutions provided to secure devices and systems against current attacks;
- (f) to carry out searches at identity verification agencies pre-application, at the application stage, and periodically after that;
- (g) to determine the target market for our existing and future products;
- (h) to contact Data Subjects when we have updated this Privacy Notice and consider that it is necessary to advise Data Subjects about any changes to the way we are processing Data Subject's personal information;
- (i) to achieve the above purposes, we share Data Subject's personal information with the following categories of individuals or organisations:
  - our legal and other professional advisers, auditors;
  - governmental and regulatory bodies such as tax authorities, ombudsmen and regulators (depending on the circumstances of the sharing);
  - other organisations and businesses who provide services to us under contract such as agents that recover money owed to us, back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;

*(Should Data Subjects have any questions about the above listed categories of people and/or organisations, please contact us using the contact information provided in this Privacy Notice.)*

## **5. Use of Data Subject's personal information with Data Subject's consent**

- 5.1. Where we are relying on Data Subject's consent to process Data Subject's personal information, Data Subjects are entitled to withdraw Data Subject's consent at any time.
- 5.2. However, as noted above, we are usually processing Data Subject's personal information based on another reason, in which case withdrawing Data Subject's consent will not change how we process Data Subject's personal information.
- 5.3. Unlike the uses described above, sometimes we rely on Data Subject's consent to use Data Subject's personal information. We will rely on Data Subject's consent:
  - (a) when Data Subjects request that we share Data Subject's personal information with someone else and consent to that (for example if Data Subjects apply for a job and

request that we provide information about Data Subject's study record to that potential employer);

- (b) where Data Subjects have submitted an application for employment on the Henley Business School Africa Website, to process Data Subject's application;
- (c) where Data Subjects have opted-in to receiving marketing communications (and have not subsequently opted-out or requested to be removed from any marketing list); and/or
- (d) where Data Subjects have opted-in (and have not subsequently opted-out) for the processing of Data Subject's personal information for analysing purposes by means of cookies and other technologies, e.g. to provide Data Subjects with a better user experience; and/or
- (e) when Data Subjects volunteer information to us in correspondence, which information we need in order to respond to Data Subject's enquiry, and only where lawful to do so.

5.4. *Data Subjects have the right to withdraw Data Subject's consent at any time* – the contact information is given in Part B. Please note, if Data Subjects do withdraw Data Subject's consent, this will mean that we will stop similar future processing. However, the withdrawal of Data Subject's consent will not invalidate any processing which we previously undertook before Data Subjects withdrew Data Subject's consent.

5.5. Please note that, where we rely on another lawful reason to process Data Subject's personal information which does not require Data Subject's consent, withdrawing Data Subject's consent will not affect that processing. This is the case where the processing is necessary for our performing our contact with Data Subjects, or where we must process Data Subject's personal information to comply with law, as described above. We will continue to process Data Subject's personal information for those lawful purposes notwithstanding the fact that Data Subjects have withdrawn Data Subject's consent for one of the above listed purposes that requires Data Subject's consent.

**6. *Categories of data subjects and of the information or categories of information relating thereto and potential recipients [S 51(1)(c)(ii)]***

Henley Business School Africa holds the categories of records and personal information in respect of the categories of data subjects specified below. The potential recipients of the personal information processed by Henley Business School Africa are also specified. Information and records are only disclosed as may be required in terms of the law or otherwise with the consent of the relevant data subjects.

Section 51 PAIA Manual

DATA SUBJECTS	CATEGORIES OF RECORDS	CATEGORIES OF PERSONAL INFORMATION	CIPIENTS OF THE PERSONAL INFORMATION
Directors, shareholders and employees	Employment contracts, records and policies; Insurance policies; Complaints; Disciplinary and court proceedings; Employment equity and skills development plans and records; Salary and payroll records; Leave records; Tax records, including PAYE, UIF (Unemployment Insurance Fund) and SDL (Skills Development Levies) returns and related records; Correspondence with the insurers and other persons / bodies;	Names and surnames; Contact details e.g. address, telephone and fax numbers, e-mail addresses; Identity numbers / dates of birth; Race; Gender; Nationality; Qualifications; Registered profession; Category of registration; Employment history and information; Position held; Banking details; Relevant medical history; Criminal behaviour and history; Correspondence; Notes, reports and records created by these data subjects in respect of patients; Tax numbers, returns and certificates; Leave periods; Medical certificates; Remuneration; Employment benefits; Absenteeism information; Next-of-kin details	SA Revenue Services (SARS); Relevant statutory bodies; Companies and Intellectual Property Commission (CIPC); Medical schemes; Contractors and vendors; Relevant public bodies, including government departments, e.g. Compensation Commissioner, Road Accident Fund (RAF), UIF, Department of Labour; Banks; Professional societies; Vetting agencies (e.g. of qualifications); Hospitals
Other contractors, vendors and suppliers, e.g. IT vendors, claims switching companies, auditors, legal counsel, consultants, debt collectors	Agreements with contractors, vendors and suppliers; Non-Disclosure Agreements; Debt Collection Agreements; Legal opinions and advice; Invoices; Correspondence	Names and surnames; Company names; Relevant staff details; Contact details e.g. address, telephone and fax numbers, e-mail addresses, website addresses; Opinions; Correspondence; Track records; Price structures; Financial arrangements	Banks; Auditors; Legal practitioners; Medical schemes
Insurers	Insurance policies; Payment of premiums; Claims' records and related documents	Names and contact details e.g. addresses, telephone and fax numbers, e-mail addresses; Premiums	Auditors; Legal practitioners; Relevant public bodies
Students	Student records,	Names and surnames; Contact details e.g. address, telephone and fax numbers, e-mail addresses; Identity numbers / dates of birth; Race; Gender; Nationality; Employers and their contact details; and dependant status; Payments received and payment history; Referral notes; Complaints lodged; Correspondence; Consent forms;	Employers; Debt collectors; Credit Bureau lists (Blacklists); Bodies performing peer review; Statutory / Governmental bodies; Next-of-kin

Public Bodies (e.g. Department of Health, RAF, Compensation Commissioner, UIF) and Statutory Bodies (e.g. HPCSA, CMS)	Complaints submitted to statutory bodies and related documents; Correspondence; Newsletters and circulars issued by these bodies and councils; Payment of fees	Names; Contact details e.g. addresses, telephone and fax numbers, e-mail addresses; Office bearers; Fee structures	As the law allowed for
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**7. Planned trans-border flows of personal information [S 51(1)(c)(iv)]**

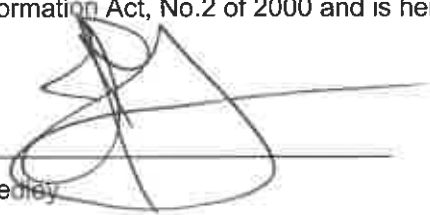
We do transmit Personal Information to the UK. Henley Business School Africa will make all reasonable efforts to secure said Personal Information.

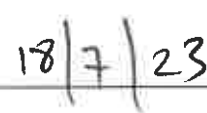
**8. Security Measures to Protect Personal Information**

- 8.1. Henley Business School Africa takes the privacy of persons seriously and is therefore committed to ensuring that personal information in its possession or under its control is secure.
- 8.2. In order to prevent unauthorised access or disclosure of information, appropriate physical, electronic and managerial procedures have been implemented to safeguard and secure the information.
- 8.3. Access to electronic records is password controlled.
- 8.4. A privacy policy has been implemented to ensure that personal information is processed and stored strictly in accordance with the law and all persons who have access to that information are aware of their responsibilities.
- 8.5. Records are maintained in a structured filing system for as long as it is necessary in accordance with the relevant laws.
- 8.6. A risk assessment of the organisational and technical processes and procedures is conducted on a regular basis to ensure a continuous monitoring and enhancement of security measures in the practice.
- 8.7. Staff and contractors are required to adhere to the strict policies and processes implemented by Henley Business School Africa and are subject to sanctions for any security breach.
- 8.8. All security breaches are taken seriously and are addressed in accordance with the law.

**PART 5: APPROVAL OF INFORMATION MANUAL**

This information manual has been prepared in accordance with Section 51(1) of the Promotion of Access to Information Act, No.2 of 2000 and is hereby approved:

  
 Jon Foster-Pedley  
 Dean and Director Henley Business School Africa

  
 Date

**ANNEXURE A**

**FORM C**

**REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY**

In terms of Section 53(1) of the Promotion of Access to Information Act 2 of 2000

**1. PARTICULARS OF PRIVATE BODY**

Name of company: \_\_\_\_\_  
Information Officer: \_\_\_\_\_

**2. PARTICULARS OF PERSON REQUESTING ACCESS TO THE RECORD**

Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname: \_\_\_\_\_  
Identity number: \_\_\_\_\_  
Postal address: \_\_\_\_\_  
Fax number: \_\_\_\_\_  
Telephone number: \_\_\_\_\_  
E-mail address: \_\_\_\_\_  
Capacity in which request is made, when  
made on behalf of another person: \_\_\_\_\_

**3. PARTICULARS OF PERSON ON WHOSE BEHALF REQUEST IS MADE**

- This section must be completed *ONLY* if a request for information is made on behalf of another person.
- Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname: \_\_\_\_\_

**4. PARTICULARS OF RECORD**

- Provide full particulars of the record to which access is requested, including the reference number if available.
- If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

Description of record or relevant part of the record: \_\_\_\_\_  
\_\_\_\_\_

Reference number, if available: \_\_\_\_\_

Any further particulars of record: \_\_\_\_\_



**5. FEES**

- A request for access to a record, other than a record containing personal information about Data Subject's self, will be processed only after a request fee has been paid.
- Data Subjects will be notified of the amount required to be paid as the request fee.
- The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.
- If Data Subjects qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**6. FORM OF ACCESS TO RECORD**

- If Data Subjects are prevented by a disability to read, view or listen to the record in the form of access provided hereunder, state Data Subject's disability and indicate in which form the record is required.

Disability and indicate in which form the record is required:

\_\_\_\_\_

- Compliance with Data Subject's request in the specified form may depend on the form in which the record is available.
- Access in the form requested may be refused in certain circumstances. In such a case Data Subjects will be informed if access will be granted in another form.
- The fee payable for access for the record, if any, will be determined partly by the form in which access is requested.

Please indicate the relevant form of access:

- If the record is in written or printed form: copy of record/inspection of record?
- **If record consists of visual images** (this includes photographs, slides, video recordings, computer-generated images, sketches): view the images/copy of the images/transcription of the images?
- If record consists of recorded words or information which can be reproduced in sound: listen to the soundtrack or audio cassette/transcription of soundtrack?
- **If record is held on computer or in an electronic or machine-readable form:** copy of record/printed copy of information derived from the record/copy in computer readable form (removable media or compact disc)?
- **If Data Subjects requested a copy or transcription of a record** (above), do Data Subjects wish the copy or transcription to be posted to Data Subjects: Yes/No?

**7. PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED**

- If the provided space is inadequate, please continue on a separate folio and attach it to this form.

The requester must sign all the additional folios.

Indicate which right is to be exercised or protected:

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Explain why the record requested is required for the exercise or protection of the aforementioned right:

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**8. NOTICE OF DECISION REGARDING REQUEST FOR ACCESS**

- Data Subjects will be notified in writing whether Data Subject's request has been approved/denied. If Data Subjects wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with Data Subject's request.

How would Data Subjects prefer to be informed of the decision regarding Data Subject's request for access to the record?

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Signed at..... this ..... day of..... 20.....

.....

SIGNATURE OF REQUESTER /

PERSON ON WHOSE BEHALF REQUEST IS MADE