PROMOTION OF ACCESS TO INFORMATION MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act, No. 2 of 2000 ("PAIA"), as amended, read with the Protection of Personal Information Act, No. 4 of 2013 ("POPIA")

Inspired Schools Pty Ltd, trading as Reddam House Schools (as defined below)

Date of compilation: June 2026

1. Definitions

Term	Meaning
"Company"	Inspired Schools Pty Ltd, trading as the Schools, respectively.
"Group"	Inspired Education Group
"Information Officer" or "IO"	The head of the Company as contemplated in section 1 of PAIA, being the Chief Executive Officer or equivalent, or any person duly authorised by that officer
"Deputy Information Officer" or "DIO"	A person designated in terms of section 56 of POPIA to perform the duties set out in section 55(1) of POPIA
"PAIA"	Promotion of Access to Information Act, No. 2 of 2000, as amended
"POPIA"	Protection of Personal Information Act, No. 4 of 2013
"Regulator"	The Information Regulator established in terms of section 39 of POPIA
"Republic"	The Republic of South Africa
"Schools"	Each of the following schools: Reddam House Constantia, Reddam House Atlantic Sea Board, Reddam House Durbanville, Reddam House Umhanga, Reddam House Ballito, Reddam House Waterfall, Reddam House Bedfordview, Reddam House Helderfontein, Reddford House Northcliff, Reddford House The hills, Zig Zag School

2. Introduction

2.1 PAIA was enacted to give effect to the constitutional right of access to information held by the State and by private bodies, as enshrined in section 32 of the Constitution of the Republic of South Africa, 1996. It aims to foster a culture of transparency and accountability in both the public and private sectors.

2.2 Section 51 of PAIA requires every private body to compile and make available a manual that describes the records it holds and the procedures a person must follow to request access to those records.

2.3 POPIA has amended certain provisions of PAIA and requires private bodies to include additional information in this Manual relating to the processing of personal information.

2.4 This Manual is compiled in accordance with section 51(1) of PAIA, read with the relevant provisions of POPIA, and applies to the Company in its operation of the Schools.

2.5 The inclusion in this Manual of information beyond what is specifically required by section 51 does not create any right or entitlement (contractual or otherwise) to receive such information, other than in terms of PAIA.

3. Key Contact Details (Section 51(1)(a))

3.1 Information Officer

Name	**Ravi Nadasen**
Designation	**CEO, Africa**
Postal address	Reddam Avenue, Constantia, Cape Town, 7800
Email	DPO@inspirededu.com

3.2 Deputy Information Officer

Please see the Deputy Information Officer by School:

School	Deputy IO and contact information
Reddam House Constantia,	Alex Gitlin (Head of School), Email: FAO Alex Gitlin dpo@inspirededu.com

Reddam House Atlantic Sea Board,	Lisette Noonan (Head of School) Email: FAO Lisette Noonan dpo@inspirededu.com
Reddam House Durbanville,	barry.nieuwoudt@inspirededu.com (Head of School) Email: FAO Barry Nieuwoudt dpo@inspirededu.com
Reddam House Umhanga,	Chad Moses (Head of School) Email: FAO Chad Moses dpo@inspirededu.com
Reddam House Ballito,	Catherine Raw (Head of School) Email: FAO Catherine Raw dpo@inspirededu.com
Reddam House Waterfall	Quinton Pascoe (Head of School) Email: FAO Quinton Pascoe dpo@inspirededu.com
Reddam House Bedfordview	Stephen Hazley (Head of School) Email: FAO Stephen Hazley dpo@inspirededu.com
Reddam House Helderfontein	Nicola Crooks (Head of School) Email: FAO Nicola Crooks dpo@inspirededu.com
Reddford House Northcliff,	Caryn Brinkley (Head of School) Email: FAO Caryn Brinkley dpo@inspirededu.com
Reddford House The hills,	Grant Ferreira (Head of School) Email: FAO Grant Ferreira dpo@inspirededu.com
Zig Zag School	(Head of School) Email: FAO dpo@inspirededu.com

3.3 Registered Office

Physical address	Please refer to the relevant School's webpage showing the School's address and contact information

4. Section 10 Guide on How to Use PAIA (Section 51(1)(b)(i))

4.1 The Information Regulator has, in terms of section 10(1) of PAIA, updated and made available the Guide on how to use PAIA ("the Guide") in an easily comprehensible form.

4.2 The Guide is available in each of the official languages and in braille.

4.3 The Guide contains a description of:

- the objects of PAIA;
- the contact details of every Information Officer and Deputy Information Officer of every public and private body;
- the manner and form of a request for access to a record;
- the assistance available from Information Officers and the Regulator;
- all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA;
- the provisions of sections 14 and 51 requiring public and private bodies to compile a manual; and
- the notices issued regarding fees payable and the regulations made in terms of section 92.

4.4 The Guide is available from:

Body	The Information Regulator
Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
Telephone	(010) 023 5200
Email	enquiries@inforegulator.org.za

Website	https://inforegulator.org.za

5. Categories of Records Available Without a Request (Section 51(1)(b)(ii))

The following categories of records are freely available to the public, whether on the School's website or upon request, without the need to submit a formal PAIA request:

Category	Types of Records	Availability
School information	Prospectus, admissions information, fee schedules, academic calendar	Website / School office
Public-facing policies	Privacy Notice, Cookies Policy, Website Terms of Use	Website
PAIA Manual	This Manual	Website / School office
Marketing materials	Newsletters, brochures, event information	Website / School office

6. Records Available in Terms of Other Legislation (Section 51(1)(b)(iii))

The Company holds records that may be available in terms of the following legislation. Access to such records is subject to the requirements of the relevant legislation:

In addition to PAIA, the following legislation may create rights and procedures in terms of which you may obtain certain records held by us:

- Skills Development Levies Act 9 of 1999
- Financial Intelligence Centre Act 38 of 2001
- Companies Act 71 of 2008
- Labour Relations Act 66 of 1995
- Basic Conditions of Employment Act 75 of 1997
- Employment Equity Act 55 of 1998
- Income Tax Act 58 of 1962
- Value Added Tax 89 of 1991

- Unemployment Insurance Act 63 of 2001
- Compensation for Occupational Injuries and Diseases Act 130 of 1993
- Protection of Personal Information Act 4 of 2013
- South African Schools Act 84 of 1996
- South African Council for Educators Act 31 of 2000 and rules issued in terms thereof
- Independent Schools of South Africa constitution and rules issued in terms thereof
- Skills Development Act 97 of 1998
- Occupational Health and Safety Act 85 of 1993
- Unemployment Insurance Contributions Act 4 of 2002
- Tax Administration Act 28 of 2011
- Pension Funds Act 24 of 1956
- Electronic Communications and Transactions Act 25 of 2002
- Children's Act 38 of 2005

7. Subjects and Categories of Records Held (Section 51(1)(e))

The Company holds records relating to the following subjects. The listing of a record does not create any entitlement to access; all requests will be assessed in accordance with PAIA. For more information please see the School's privacy notice available on its website.

7.1 Student Records

- Admissions and enrolment records
- Academic records (examination and assessment results, reports, curriculum timetables)
- Attendance and disciplinary records
- Safeguarding records
- Health and medical information, dietary requirements, special educational needs
- Passport, identity, visa and immigration status information
- Images (photographs and videos) of pupils
- Correspondence with and concerning pupils

7.2 Parent / Guardian Records

- Contact details (name, address, email, telephone)
- Banking and financial information (fee payments, bursary/scholarship records)
- Identity and source of funds / anti-money laundering information

- Correspondence with parents

7.3 Employee and Staff Records

- Employment contracts and terms of engagement
- Payroll and tax records
- Performance evaluations
- Disciplinary records
- Health and safety records
- Training and skills development records

7.4 Operational and Corporate Records

- Company registration documents and memorandum of incorporation
- Financial statements and accounting records
- Insurance records
- Contracts and service level agreements with third party suppliers
- IT and communications records
- CCTV and security records
- Property and facilities records

7.5 Marketing and Communications

- Marketing materials and promotional content
- Alumni database records
- Event records
- Website analytics

8. Processing of Personal Information (Section 51(1)(c), read with POPIA)

8.1 Purpose of Processing

The Company processes personal information for the following purposes (as more fully described in the School's Privacy Notice):

- Supporting the learning, development, and welfare of pupils
- Admissions, enrolment, and pupil selection
- Providing education services (including via technology platforms and AI systems)
- Safeguarding and pastoral care

- Fee collection and financial administration
- Credit, identity, and source of funds checks
- Communication with parents and the school community
- Compliance with legal and regulatory obligations
- Security (including CCTV)
- Alumni relations and marketing
- Management planning, research, and statistical analysis

8.2 Categories of Data Subjects

Category	Description
Current, past, and prospective pupils	Children aged 1 to 18 attending or applying to attend the School
Parents, guardians, and carers	Individuals responsible for pupils
Fee payers and next of kin	Individuals responsible for fee payment or emergency contacts
Employees and staff	Teaching, administrative, and support staff
Third party service providers	Contractors, suppliers, visiting professionals
Donors and fundraising contacts	Individuals involved in bursary or scholarship funding

8.3 Categories of Recipients

Personal information may be shared with:

- The Inspired Education Group and other entities within the Group
- External health professionals (educational psychologists, speech therapists)
- Appropriate contractors and third party suppliers (e.g. visiting music teachers, caterers)
- Government and local authorities, statutory agencies, and regulatory bodies
- Examination boards and assessment centres
- Exit or destination schools (including confidential references)
- Professional advisers (lawyers, insurers, accountants)
- Bursary and scholarship funding organisations
- Courts or debt collection agencies (in the event of non-payment of fees)

- Third parties in connection with any actual or potential sale, merger, or restructuring

8.4 Cross-Border Transfers

The Company may transfer personal information outside of South Africa, including to other schools within the Inspired Education Group. Where such transfers occur, the Company ensures that appropriate measures are in place to protect personal information in accordance with applicable data protection laws.

8.5 Information Security Measures

The Company implements the following categories of security measures to ensure the confidentiality, integrity, and availability of personal information:

- Physical security measures at School premises
- Access control protocols (information processed on a "need to know" basis)
- Contractual data processing agreements with third party service providers
- IT security measures, e.g. encryption, firewalls, access controls, password management
- Staff training on data protection and information security
- Incident response procedures

9. Request Procedure (Sections 53 and 54)

9.1 How to Submit a Request

9.1.1 A requester must complete the prescribed form (Form 02), available from the Information Regulator's website at: https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf

9.1.2 The completed form must be submitted to the Information Officer at the address, email, or fax number set out in section 3 above.

9.1.3 The requester must provide:

- sufficient information to identify the requester;
- sufficient information to identify the record(s) requested;
- the form of access required;
- the requester's postal address or fax number;
- identification of the right sought to be exercised or protected; and
- an explanation of why the record is required for the exercise or protection of that right.

9.1.4 A copy of the requester's identity document must accompany the request.

9.2 Decision on Request

9.2.1 The Information Officer will inform the requester of the decision within 30 days of receipt of the request.

9.2.2 The 30-day period may be extended by a further period of not more than 30 days if the request is for a large number of records, or the search for the records requires a search through a large number of records, and compliance within the original period would unreasonably interfere with the activities of the Company.

9.2.3 The requester will be notified of any extension before the expiry of the initial 30-day period.

10. Prescribed Fees (Section 54)

10.1 A request fee of R50.00 is payable by a requester other than a personal requester (i.e. a person requesting access to their own personal information).

10.2 An access fee is payable in all instances where a request for access is granted, except where payment is specifically excluded by the Act.

10.3 The prescribed fees are set out in the regulations to PAIA (Government Notice No. R. 757, published in Government Gazette No. 45057 of 27 August 2021) and include, among others:

Item	Fee
Request fee (other than personal requester)	R50.00
Photocopy of A4-size page or part thereof	R1.50
Printed copy of A4-size page or part thereof	R1.50
Copy in computer-readable form (e.g. CD)	R70.00
Transcription of visual images per A4-size page	R40.00
Copy of visual images	R60.00
Transcription of audio record per A4-size page	R20.00
Copy of audio record	R30.00

10.4 The Information Officer will notify the requester of any deposit payable (being not more than one-third of the access fee) before processing the request.

11. Grounds for Refusal of Access

The Company may refuse a request for access to a record in the circumstances contemplated in Chapter 4 of Part 3 of PAIA, which include (but are not limited to) instances where disclosure would:

- unreasonably disclose the personal information of a third party (section 63);
- involve the disclosure of a trade secret or financial, commercial, scientific, or technical information that could harm the commercial or financial interests of the Company (section 64);
- constitute a breach of a duty of confidence owed to a third party (section 65);
- endanger the life or physical safety of an individual (section 66);
- prejudice or impair the security of property or the protection of a person (section 66);
- prejudice the Company in negotiations or in commercial competition (section 64); or
- constitute privileged information in connection with legal proceedings (section 67).

12. Remedies

12.1 If a requester is dissatisfied with the Information Officer's decision, the requester may:

- lodge a complaint with the Information Regulator using the prescribed form (Form 05), available at: https://inforegulator.org.za; or
- apply to a court for appropriate relief within 180 days of the decision.

12.2 The Information Regulator's contact details are set out in section 4.4 above.

13. Availability of This Manual

13.1 This Manual is available:

- on the School's website a;
- to any person upon request and upon payment of a reasonable fee for reproduction. Please contact DPO@inspirededu.com if you would like a copy; and
- to the Information Regulator upon request.