

## **Deutscher Schulverein Kapstadt (DSK) (NPO Reg. 021-564NPO)**

**INFORMATION MANUAL Prepared in terms of Section 51 of the Promotion of Access to Information Act, No. 2 of 2000 (PAIA) (and as referred to in Section 17 and Section 23 of the Protection of Personal Information Act, No. 4 of 2013 (POPIA))**

**Date of Revision: July 2025**

### **INDEX**

1. Introduction
2. Contact Details
3. Definitions and How to Use This Manual
4. The Promotion of Access to Information Act (PAIA) and the Protection of Personal Information Act (POPIA)
5. Applicable Legislation
6. Schedule of Records
7. Processing of Personal Information
8. How to Request Records (Form of Request)
9. Time Periods for Processing Requests for Records
10. Prescribed Fees
11. When Access to a Record May Be Denied
12. Appeals to Decisions of the Information Officer
13. Availability of the **Manual**

### **1. Introduction**

The Deutscher Schulverein Kapstadt (DSK) is a meeting school characterized by an open and lively atmosphere. We teach native-speaking German students from grades 1-12 as well as English-speaking students from grades 5-12. A special feature of the DSK is that our graduates complete the school with one of two double degrees: they either acquire the National Senior Certificate (NSC, South African degree) and the German language diploma level B2/C1, or the combined degree with NSC and German International Abitur.

### **2. Contact Details**

- **Information Officer:** Mrs Sabrina Gellerman (Principal)
- **Postal Address:** 28 Bay View Avenue, Tamboerskloof, Cape Town, 8001, South Africa
- **Street Address:** 28 Bay View Avenue, Tamboerskloof, Cape Town, 8001, South Africa
- **Telephone Number:** +27 21 480 3840
- **Fax Number:** +27 21 480 3863
- **Email Address:** [compliance@dsk.co.za](mailto:compliance@dsk.co.za)
- **Website:** [www.dsk.co.za](http://www.dsk.co.za)

### **3. Definitions and How to Use This Manual**

#### **3.1. Definitions:**

- **"Data Subject"** means a person to whom Personal Information relates.
- **"Information Regulator"** means the regulator established in terms of POPIA.
- **"the/this manual"** means this document together with all annexures thereto as available at the offices of DSK.
- **"PAIA"** means the Promotion of Access to Information Act, No. 2 of 2000, as amended, together with all relevant regulations.
- **"Personal Information"** has the meaning given thereto in POPIA.
- **"POPIA"** means the Protection of Personal Information Act, No. 4 of 2013, as amended, together with all relevant regulations.
- **"Requester"** means (i) any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of DSK; or (ii) a person acting on behalf of the person contemplated in (i) above.
- **"SAHRC"** means the South African Human Rights Commission.

**3.2. How to Use This Manual:** This manual aims to assist potential Requesters on how to request access to information or documents from DSK and sets out the procedure that must be followed, as well as the types of documents held by DSK. This manual may be amended from time to time, and as soon as any amendments have been finalized, the latest version of the manual will be made available on our website. Any potential Requester is advised to contact the Information Officer if he/she requires assistance on how to use this manual and/or how to request documents or information from DSK.

**3.3. Guide in terms of Section 10 of PAIA:** In terms of section 10 of PAIA, the Information Regulator must update and make available the existing guide that has been compiled by the SAHRC (as updated by the Information Regulator) containing such information, in an easily comprehensible form and manner, to assist people in exercising their rights under PAIA and POPIA. For a copy of this guide, please contact:

#### **The Information Regulator**

- **Physical address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg
- **Telephone:** 010 023 5200
- **E-mail:** [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)
- **Website:** [www.inforegulator.org.za](http://www.inforegulator.org.za)

#### **4. The Promotion of Access to Information Act (PAIA) and the Protection of Personal Information Act (POPIA)**

The Act grants a requester access to records of a private body if the record is required for the exercise or protection of any rights. Requests in terms of PAIA shall be made in accordance with the prescribed procedures and at the rates provided. This manual also considers the provisions of POPIA, which regulates the processing of personal information.

#### **5. Applicable Legislation**

DSK keeps records in accordance with various legislation, which includes but is not limited to, the following:

- Basic Conditions of Employment Act No. 75 of 1997
- Companies Act, No. 71 of 2008
- Compensation for Occupational Injuries & Diseases Act No. 130 of 1993
- Consumer Protection Act, No. 68 of 2008
- Electronic Communications and Transactions Act No. 25 of 2002
- Employment Equity Act No. 55 of 1998
- Income Tax Act No. 58 of 1962
- Labour Relations Act No. 66 of 1995
- Occupational Health and Safety Act No. 85 of 1993
- Pensions Fund Act No. 24 of 1956
- Prevention and Combating of Corrupt Activities Act, No. 12 of 2004
- Promotion of Access to Information Act No. 2 of 2000
- Protection of Personal Information Act No. 4 of 2013
- Regional Services Council Act No. 109 of 1985
- Skills Development Levies Act No. 9 of 1999
- Skills Development Act, No. 97 of 1998
- Unemployment Insurance Act No. 30 of 1996
- Value Added Tax Act, No. 89 of 1991

## 6. Schedule of Records

DSK maintains various types of records, categorized as follows:

- **Public Affairs:**
  - Media releases: Freely available on request
  - Company registration: Freely available on request
- **Financial:**
  - Annual Financial Statements: Freely available to members on request; Other organizations request in terms of PAIA
  - Other financial and tax records: Not generally available
  - Asset register: Not generally available
- **Managerial:**
  - Minutes of Council, Exco and other meetings: Request in terms of PAIA
  - Internal correspondence: Not generally available
- **Human Resources:**
  - List of employees: Freely available on request
  - Employment contracts: Not generally available
  - Internal policies and procedures: Not generally available
  - Workplace skills plans: Request in terms of PAIA
  - Health and safety records: Request in terms of PAIA
  - **Special Considerations for Health Records:** Where a record contains information about an individual's physical or mental health, or well-being, and was provided by a health practitioner, special considerations apply to ensure the individual's well-being. If direct access might cause serious harm, the Information Officer may consult with the health practitioner. DSK may require the Requester to nominate a health professional (e.g., doctor, counsellor) to review the record first and advise. If the nominated person

believes direct disclosure could still cause serious harm, access will only be granted if appropriate counselling is arranged. For requests on behalf of those under 16 or incapacitated, the nomination must come from their parent/guardian or court-appointed representative.

- **ICT:**
  - Software license information: Request in terms of PAIA
  - Support agreements: Request in terms of PAIA
- **Marketing:**
  - Database of member schools: Specific details should be requested in terms of PAIA. Requests should generally be directed to the relevant school as the primary source of this information.

## **7. Processing of Personal Information**

7.1. DSK processes Personal Information primarily for educational purposes, to manage student and staff records, to carry out obligations in terms of agreements (e.g., enrolment contracts, employment contracts), to communicate with parents, students, and staff, and to otherwise conduct, monitor, and analyze its operations, or where it is in DSK's legitimate interests.

7.2. The categories of Data Subjects whose Personal Information is processed by DSK include students, prospective students, parents/guardians, employees, prospective employees, service providers, and visitors to our premises. The type of Personal Information includes, but is not limited to, contact information, personal identification information, academic records, health information, financial information (for fee payments), employment history, and disciplinary records.

7.3. DSK may share Personal Information with entities such as educational authorities, relevant government departments (e.g., Department of Basic Education), extramural activity providers, and essential service providers (e.g., medical personnel, transport providers). We will only share a Data Subject's sensitive Personal Information, such as health details or financial information, when authorized to do so by the Data Subject or their legal guardian, or if DSK is required to do so by law or court order.

7.4. Where Personal Information is transferred outside of South Africa (e.g., to educational exchange programs, international examination bodies, or for communication with international parent bodies), DSK will ensure that the recipient is subject to a law, binding corporate rules, or a binding agreement which provides an adequate level of protection. We will only share Personal Information outside of South Africa where it is necessary to do so.

7.5. DSK implements appropriate and reasonable technical and organizational measures to ensure that Personal Information in its possession remains secure, confidential, and its integrity is protected. DSK adheres to industry best practices as regards physical, technical, and operational safeguards to protect Personal Information.

## **8. How to Request Records (Form of Request)**

The following procedures must be followed:

8.1. The Requester must use the prescribed request form to make the request for access to a record held by DSK. This form can be downloaded from the Information Regulator's website at [www.inforegulator.org.za/paia-forms](http://www.inforegulator.org.za/paia-forms).

8.2. All requests for information in terms of this manual should be directed to the Information Officer:

- For **attention:** Information Officer (Headmaster)
- **Postal Address:** 28 Bay View Avenue, Tamboerskloof, Cape Town, 8001, South Africa
- **E-mail:** [compliance@dsk.co.za](mailto:compliance@dsk.co.za)

8.3. The Requester must provide sufficient detail on the request form to enable the Information Officer to clearly identify the record, as well as the Requester's identity. The Requester must also indicate which form of access he/she requires, for example, copies of documents or an opportunity to view the documents without receiving copies.

8.4. The Requester must also indicate if he/she wishes to be informed of the decision in any particular manner, for example, e-mail instead of via post, and if so, state the necessary particulars required to be so informed.

8.5. The Requester must identify the right that he/she is seeking to protect or exercise and must provide an explanation as to why the requested record is required for the protection or exercise of that right.

8.6. If the Requester is making the request on behalf of another person, the Requester must submit proof, to the satisfaction of the Information Officer, of the capacity in which he/she is making the request.

8.7. The prescribed fee (if any) must be paid as set out in clause 10 below. Once the request has been reviewed, DSK will make a decision in respect of the request and will notify the Requester of its decision.

## **9. Time Periods for Processing Requests for Records**

9.1. The Information Officer shall, within thirty (30) days of receipt of a request for access to a Record, respond to the Requester about whether the request has been granted or denied.

9.2. The Information Officer may request an extension if the request involves a large volume of documents or if consultation with public or other private bodies are required.

9.3. If a request is denied, the Information Officer shall provide reasons.

## **10. Prescribed Fees**

10.1. Once a request is made, a Requester will receive notice from DSK to pay the prescribed fee, if any. This prescribed fee must be paid before a request will be processed, and payment of this fee is to be made as directed by the Information Officer.

10.2. If a Requester is making a request in their personal capacity, payment of the prescribed fee may not be required.

10.3. If a request is granted, the Requester may have to pay a further access fee for the search, reproduction, and preparation of the record, as well as for any time that has exceeded the prescribed hours to search and in order to prepare the record for disclosure to the Requester (in terms of section 54(6) of PAIA).

10.4. The fee for a copy of the manual as contemplated in regulation 9(2)(c), for every photocopy of an A4 size or part thereof: **R1,10**

10.5. The fees for reproduction referred to in regulation 11(1) are as follows:

- For every photocopy of an A4-sized page or part thereof: **R1,50**
- For every printed copy of an A4-sized page or part thereof held on a computer or in electronic or machine-readable form: **R1,00**
- For a copy in a computer-readable form on compact disk: **R70,00**
- For a copy of visual images, for an A4-sized page or part thereof: **R60,00**

10.6. The request fee payable by a requester, other than a personal requester, referred to in regulation 11(2): As per latest PAIA regulations.

10.7. The access fees payable by a requester referred to in regulation 11(3) are as follows:

- For every photocopy of an A4-sized page or part thereof: As per latest PAIA regulations.
- For every printed copy of an A4-sized page or part thereof held on a computer or in electronic or machine-readable form: As per latest PAIA regulations.
- For a copy in a computer-readable form on compact disk: As per latest PAIA regulations.
- For a copy of visual images, for an A4-sized page or part thereof: As per latest PAIA regulations.
- To search for and prepare the record for disclosure, for each hour or part of an hour: As per latest PAIA regulations.

10.8. For purposes of section 54(2) of the Act, the following applies:

- Six hours as the hours to be exceeded before a deposit is payable.
- One third of the access fee is payable as a deposit by the requester.
- The actual postage is payable when a copy of a record must be posted to a requester.

## **11. When Access to a Record May Be Denied**

11.1. By law, the Information Officer may or must deny access to a Record under certain circumstances. Generally, the Information Officer must deny access to a Record when granting access will cause more harm than non-disclosure would.

11.2. Mandatory grounds of refusal may include any of the following:

- The protection of personal or commercial information of another party;
- The protection of safety and property of another party;
- When required to comply with a confidentiality agreement it had entered into with another party;
- Information that is legally privileged or which may not be shared by order of a Court or legislation;
- Vexatious or frivolous requests or requests that may require an unreasonable amount of time to investigate.

## **12. Appeals to Decisions of the Information Officer**

12.1. A Requester who is dissatisfied with a decision by the Information Officer may apply to a court for a review of the decision of the Information Officer.

12.2. A "court" includes a Magistrate's Court or the High Court. An application for review must be submitted to the court within 180 days of receiving notice of the decision of the Information Officer that has caused the grievance.

## **13. Availability of the Manual**

This manual is available for inspection during office hours, at no cost, at our head office, situated at 28 Bay View Avenue, Tamboerskloof, Cape Town, 8001, South Africa, or on our website at [www.dsk.co.za](http://www.dsk.co.za). Copies of the manual are available from our website.

# FORM 2

## REQUEST FOR ACCESS TO RECORD

[Regulation 7]

**NOTE:**

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

**TO:** The Information Officer


(Address)

E-mail address: 

--

Fax number: 

--

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made (when made on behalf of another person)				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile: <table border="1"><tr><td></td></tr></table>	
Cellular:				
Full names of person on whose behalf request is made (if applicable):				
Identity Number				
Postal Address				



Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
<p align="center"><b>PARTICULARS OF RECORD REQUESTED</b></p> <p><i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<p align="center"><b>TYPE OF RECORD</b></p> <p align="center"><i>(Mark the applicable box with an "X")</i></p>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

<b>FORM OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b> <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
Indicate which right is to be exercised or protected	

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

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>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.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

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**FOR OFFICIAL USE**

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

\_\_\_\_\_  
**Signature of Information Officer**