

PROMOTION OF ACCESS TO INFORMATION ACT

SECTION 51 MANUAL

HUMANA PEOPLE TO PEOPLE SOUTH AFRICA

Registration No: NPC (RF)1995/004741/08- Registered:005-055NPO

This manual has been prepared in terms of the section 51 of the Promotion of Access to Information Act 2/2000 and to address the requirements of the Protection of Personal Information Act 4/2014.

Date of Issue: 30th June 2015

Date Updated: 22nd May 2025

TABLE OF CONTENTS

	Page
Introduction	3
Definitions	3
Overview of The Company	3
1. Compliance Framework	4
2. Contact details of the Information Officer and Information Officer duties	4
3. Personal Information Impact Assessment	5
4. Guide to the Act	6
5. Automatic disclosure - categories of Records available without having to request access	6
6. Records available in terms of legislation	7
7. Categories of Records held and subject to Request	7
8. Data Subject Request Access (UPDATED 2025)	9
9. Security Compromise Notifications	11
10. Consent Management & Special Personal Information (UPDATED 2025)	11
11. Third- Party data sharing compliance	13
12. Access: procedure, availability and fees	13
13. Multi-Channel Request Processing	17
14. Complaint Handling Procedures	18
15. Code of Conduct Applications	19

INTRODUCTION

This Manual has been prepared in accordance with section 51 of the Promotion of Access to Information Act (PAIA) and aims to facilitate a Request for access to a Record held by a private body that is required for the exercise or protection of any rights.

DEFINITIONS

Unless the context clearly indicates otherwise, the following terms shall have the meanings assigned to them hereunder, namely -

- “Act” means the Promotion of Access to Information Act, Act 2 of 2000, as amended from time to time;
- “HPPSA” means Humana People to People in South Africa as more fully described in the overview hereunder;
- “Guide” refers to the guide drafted and made available by the Information Regulator to inform the Requester on how to access Records
- “Information Regulator” means the regulator with the powers and functions set out in s40 of the Protection of Personal Information Act (4 of 2013);
- “Information Officer” means the person acting on behalf of HPPSA and discharging the duties and responsibilities assigned to the head of HPPSA by the Act. The Information Officer is duly authorised to act as such and such authorisation has been confirmed by the “head” of HPPSA in writing;
- “Manual” means this manual published in compliance with Section 51 of the Act;
- “Record” means any recorded information, regardless of form or medium, which is in the possession or under the control of HPPSA, irrespective of whether or not it was created by HPPSA;
- “Request” means a request for access to a Record of HPPSA;
- “Requestor” means any person, including a public body or an official thereof, making a Request for access to a Record of HPPSA and includes any person acting on behalf of that person; and
- “SAHRC” means the South African Human Rights Commission.

Unless a contrary intention clearly appears, words signifying:-

- the singular includes the plural and vice versa;
- any one gender includes the other genders and vice versa; and
- natural persons include juristic persons.

Unless otherwise stated, terms defined in the Act shall have the same meaning in this Manual.

OVERVIEW OF HPPSA

Humana People to People South Africa (HPPSA) is a registered South African non-profit company (RF) 1995/004741/08 & non-profit organization (005-055-NPO).

From humble beginnings, in 1995, in Soweto, when a small group of pioneers made a commitment to contribute to the development of the country back in 1995.

HPPSA believes poverty can only be overcome through coordinated, community-wide approaches combining education, adult literacy, sustainable livelihoods, women empowerment and environmental

protection, and also by involving many people: children, parents, teachers, farmers, health workers, members of the community, local leaders, national governments and international partners. Since its establishment, HPPSA has built a strong network of partners and supporters across government agencies, civil society, the private sector and multilateral institutions.

HPPSA is governed by a Board of Directors, which meets each quarter or as required. The organization has its National Headquarters in Pinetown, KwaZulu-Natal; a Partnership Office in Johannesburg. HPPSA is a member of "The Federation of Associations connected to the International Humana People to People Movement" (or Humana People to People - HPP). The Federation is an international network of non-profit organizations engaged in solidarity, cooperation and development in countries across Europe, Southern Africa, Asia and the Americas.

1. POPIA COMPLIANCE FRAMEWORK

HPPSA has developed, implemented, monitored, and maintains a compliance framework in accordance with Regulation 4(1)(a) of the POPIA Regulations. This framework consists of:

1. **Data Flow Mapping:** Comprehensive documentation of how personal information moves through our organization from collection to deletion, including all processing activities and third-party transfers.
2. **Risk and Impact Assessments:** Regular assessments to identify, evaluate, and mitigate risks associated with our processing activities, ensuring appropriate safeguards are in place.
3. **Roles and Responsibilities:** Clear allocation of privacy responsibilities within HPPSA, with the Information Officer having overall accountability for ensuring compliance.
4. **Legal Basis for Processing:** Documentation of the lawful basis for processing personal information in accordance with Section 11 of POPIA, ensuring all processing activities are justified.
5. **Audit and Review Schedules:** Regular internal audits and reviews to ensure ongoing compliance with POPIA requirements and to address any gaps or changes in our processing activities.

This framework is maintained in a dedicated compliance folder accessible to key staff and is reviewed annually by the Information Officer to ensure it remains current and effective.

2. CONTACT DETAILS OF INFORMATION OFFICER (SECTION 51(1)(a))

The Board of Directors has appointed to the Country Director as Information Officer, whose details appear hereunder for purposes of dealing with all matters in connection with Requests for information and the Protection of Personal Information Act (POPIA) on The Company's behalf and to ensure compliance with the Act.

Information Officer name:	Mr Kilford Zimondi
Street address:	5/11 Richmond Road Pinetown 3610
Telephone:	031 701 9280/ 011 664 7261
E-mail:	zimondik@hpp-sa.org
Website:	https://www.hpp-sa.org

Deputy Information Officer:	Pobraj Dehaloo
Street address:	5/11 Richmond Road

Pinetown
3610
Telephone: 031 701 9280
E-mail: pobraj@hpp-sa.org
Website: <https://www.hpp-sa.org>

DUTIES OF THE INFORMATION OFFICER

In accordance with Section 55 of POPIA and Regulation 4 of the POPIA Regulations, the Information Officer of HPPSA is responsible for:

1. **Compliance Framework:** Developing, implementing, monitoring, and maintaining a compliance framework for POPIA (Regulation 4(1)(a)).
2. **Personal Information Impact Assessments:** Ensuring that personal information impact assessments are conducted to ensure adequate measures exist to comply with the conditions for lawful processing (Regulation 4(1)(b)).
3. **Manual Development:** Developing, publishing, and maintaining a manual as prescribed in sections 14 and 51 of the Promotion of Access to Information Act (Regulation 4(1)(c)).
4. **Internal Measures and Processes:** Developing internal measures and adequate systems to process requests for information or access to information (Regulation 4(1)(d)).
5. **Awareness Sessions:** Conducting internal awareness sessions regarding the provisions of POPIA, the POPIA Regulations, codes of conduct, or information obtained from the Regulator (Regulation 4(1)(e)).
6. **Data Subject Requests:** Managing requests from data subjects to exercise their rights under POPIA, including rights to access, correction, and deletion of personal information.
7. **Regulator Interaction:** Serving as the primary point of contact for the Information Regulator on all matters relating to POPIA compliance.
8. **Security Measures:** Ensuring appropriate security measures are in place to prevent unauthorized access to personal information.
9. **Breach Notification:** Overseeing the notification process in the event of security compromises in accordance with Section 22 of POPIA.

The Information Officer's performance in fulfilling these duties is evaluated as part of their Key Performance Indicators (KPIs) and regular performance reviews.

3. PERSONAL INFORMATION IMPACT ASSESSMENTS (PIAs)

In compliance with Regulation 4(1)(b) of the POPIA Regulations, HPPSA conducts Personal Information Impact Assessments (PIAs) to ensure adequate measures exist for the lawful processing of personal information.

1. **PIA Schedule:** PIAs are conducted annually for all significant processing activities and whenever new high-risk processing is introduced.
2. **PIA Template:** Our standard PIA template includes:
 - a. Description of the processing activity
 - b. Categories of personal information processed
 - c. Purpose and necessity of processing
 - d. Legal justification under Section 11(1) of POPIA
 - e. Assessment of potential impact on data subjects
 - f. Identification and evaluation of risks
 - g. Security measures implemented in accordance with Sections 19-22 of POPIA
 - h. Recommendations for risk mitigation

3. **PIA Management:** The Data Privacy Lead is responsible for documenting and tracking all PIAs. Completed assessments are retained in a secure compliance registry and are periodically reviewed to ensure continued relevance and effectiveness.
4. **PIA Results:** Results of PIAs are used to inform decisions about processing activities and the implementation of appropriate safeguards. Any high-risk activities identified through PIAs are subject to additional controls or may be modified to reduce risk.

4. GUIDE TO THE ACT (SECTION 51(1)(b) READ WITH SECTION 10)

The SAHRC has compiled a guide, as required by Section 10 of the Act, containing such information as may reasonably be required by a person who wishes to exercise any right contemplated in this Act.

The guide is available on the SAHRC website, <http://www.sahrc.org.za>.

The SAHRC can be contacted directly at:

The South African Human Rights Commission: PAIA Unit

Postal address:	Private Bag X2700 HOUGHTON 2041
Physical address:	2nd Floor Braampark Forum 3 33 Hoofd Street Braamfontein
Telephone:	+27 11 877 3600 (Switchboard) +27 11 877 3750 (Gauteng Office) +27 11 887 3803
Facsimile:	+27 11 403 0668 (Gauteng Office) +27 11 403 0625
E-mail:	section51.paia@sahrc.org.za
Website:	http://www.sahrc.org.za

5. AUTOMATIC DISCLOSURE - CATEGORIES OF RECORDS AVAILABLE WITHOUT HAVING TO REQUEST ACCESS [SECTION 51(1)(c)]

These records shall be reviewed at least monthly or when there are changes required. The following Records are automatically available without a person having to request access in terms of the Act:

- a. The web page www.hpp-sa.org is accessible to anyone who has access to the Internet. The Company's website hosts the following categories of information:
 - Who we are
 - i. History
 - ii. The Federation Humana People to People
 - iii. Partnership in Development
 - iv. What we do

- v. About how we create development
- vi. Health
- vii. Education
- viii. Community Development
- ix. Food Security News
- x. Publications
- xi. Blog
- xii. Donate
- xiii. Vacancies
- xiv. Privacy policy
- xv. Contact us details
- xvi. Much more.

6. RECORDS AVAILABLE IN TERMS OF LEGISLATION [SECTION 51(1)(d)]

Records are kept in accordance with the following legislation (which is not an exhaustive list):

- a. Basic Conditions of Employment Act, 1997
- b. Broad Based Black Economic Empowerment Act, 2003
- c. Companies Act, 2008
- d. Consumer Protection Act, 2008
- e. Compensation for Occupational Injuries and Diseases Act, 1993 :. Employment Equity Act, 1998
- f. Immigration Act, 2002
- g. Income Tax Act, 1962
- h. Labour Relations Act, 1995
- i. Medical Schemes Act, 1956
- j. Occupational Health and Safety Act, 1993
- k. Skills Development Act, 1998
- l. Unemployment Insurance Act, 2001
- m. Value Added Tax Act, 1991

7. CATEGORIES OF RECORDS HELD AND SUBJECT TO REQUEST

7.1 Statutory and Legal

- statutory registers
- annual reports
- statutory Records & returns, including incorporation documents, memorandum of incorporation and share register
- minutes of meetings
- board minutes
- Meetings of members
- List or register of registers of the Company
- Share register of the company
- Shareholders
- Power of attorney agreements and a list of persons authorised to bind the Company
- Attendance registers
- management committees
- Minutes of staff meetings
- contractual and legal agreements
- intellectual property: trademark certificates
- licences

- Statutory records
- copyrights & designs
- health and safety records

7.2 Human Resources

- HR policies & procedures
- Employment Contracts
- employment equity plan and report
- skills development plan and report
- employee records
- List of employees
- Employee benefits
- Industrial Relations (IR) disciplinary and grievance procedures and hearings, including CCMA Records
- incentive scheme rules Remuneration records and policies
- Arbitration orders and agreements
- General Correspondence
- Training records
- Tax records (Company &Employee)

7.3 Administration, Finance & Accounting:

- accounting records
- Annual Financial Statements
- tax returns
- VAT returns
- policies & procedures
- Budgets
- Banking records
- Financial transactions
- Internal audits
- Production records

7.4 Insurance

- policies, including coverage, limits and insurers
- claim records
- Insurance information

7.5. Information technology

- Hardware
- software packages
- licences
- IT policies and procedures
- operating systems

7.6 Sales and Marketing

- Customer records
- Credit application forms
- Service level Agreements
- Statements of account

- Terms & conditions
- Contracts
- Marketing material and media releases: brochures, newsletters and advertising materials

7.7 Assets

- Leases
- Land and builder register
- Fixed assets register
- Title deeds
- Tenants information and correspondence
- Asset register
- Other agreements for the purchase, ordinary sale, conditional sale, or hire of assets
- Credit facilities and letters of credit

7.8 Operational information

This information can be defined as information needed in the day-to-day running of the organization. (Examples of such information are: internal telephone lists, address lists, company policies, company procedures, employee staff handbook, Finance manual, industry related statistical data, data subject databases, management information reports and lease agreements, title deeds, property development information, construction drawings and architectural drawings.)

8. DATA SUBJECT REQUEST ACCESS

Enhanced Request Processing (2025 Amendments)

HPPSA respects the rights of data subjects to exercise control over their personal information as provided for in POPIA. Following the 2025 regulation amendments, we now accept requests through multiple channels to improve accessibility and convenience.

Multi-Channel Request Submission

Data subjects can now submit requests through any of the following methods:

Digital Channels (Available 24/7)

- Email: zimondik@hpp-sa.org
- WhatsApp: 076 409 8855
- SMS/Text Message: 076 409 8855
- Online Form: Available at www.hpp-sa.org

Voice Channels (Business Hours)

- Telephone: 031 701 9280
 - Note: All telephonic requests must be recorded and recordings will be made available upon request
- In-Person: Any HPPSA office during business hours

Traditional Channels

- Fax: 031 701 9280

- **Post:** 5/11 Richmond Road, Pinetown, 3610
- **Hand Delivery:** Any HPPSA office during business hours

Request Types and Forms

1. **Form 1: Objection to Processing** (Section 11(3) of POPIA)
 - Right to object to processing on reasonable grounds
 - Available in all 11 official languages
 - Can be submitted through any channel listed above
2. **Form 2: Request for Correction or Deletion** (Section 24(1) of POPIA)
 - Right to correct inaccurate information
 - Right to delete unlawfully obtained information
 - Available in all 11 official languages

Accessibility Features

Language Support:

- Forms available in all 11 official South African languages
- Translation assistance provided upon request
- Staff trained to assist in multiple languages

Disability Accommodations:

- Large print formats available
- Screen reader compatible electronic forms
- Sign language interpreters available with advance notice
- Alternative formats (Braille, audio) upon request

Assistance:

- HPPSA staff trained to assist with form completion
- Telephonic assistance available during business hours
- In-person assistance at all HPPSA locations

Processing Standards

Response Times:

- **Standard Response:** 30 days from receipt
- **Complex Requests:** May require extension (not exceeding additional 30 days)
- **Acknowledgment:** Within 3 business days of receipt

No Fees for Personal Information:

- All data subject rights requests are processed **FREE OF CHARGE**
- No fees for forms, processing, or responses related to personal information

Quality Assurance:

- All requests logged with unique reference numbers
- Regular training for staff on request handling

- Monthly review of processing times and quality

9. SECURITY COMPROMISE NOTIFICATIONS

In accordance with Section 22 of POPIA, HPPSA has established comprehensive procedures for responding to security compromises involving personal information:

1. Breach Identification and Containment:

- Immediate steps to contain the breach and mitigate potential harm
- Preliminary assessment of the breach scope and impact
- Implementation of short-term remedial actions

2. Notification Requirements:

- The Information Regulator will be notified as soon as reasonably possible after the discovery of a compromise
- Affected data subjects will be notified by email, post, or prominent publication on our website, depending on what is reasonably feasible
- Notifications will include information as required by Section 22(4)(b) of POPIA:
 - Description of the possible consequences of the compromise
 - Measures taken to address the compromise
 - Recommendations for affected data subjects to mitigate potential adverse effects
 - The identity of the unauthorized person who may have accessed the information (if known)

3. Internal Reporting Structure:

- All suspected or confirmed breaches must be reported immediately to the Information Officer
- The Information Officer will coordinate the breach response process in consultation with senior management
- Regular updates on breach management progress will be provided to the executive team

4. Documentation and Review:

- All breaches and response actions will be documented
- Post-breach reviews will be conducted to identify lessons learned and improve processes
- Breach response drills will be conducted twice yearly to test and improve response capabilities

10. CONSENT MANAGEMENT & SPECIAL PERSONAL INFORMATION (2025 amendments)

Enhanced Consent Framework (2025 Amendments)

HPPSA has strengthened its consent management processes to align with the enhanced requirements introduced in the 2025 POPIA regulation amendments.

Direct Marketing Consent (Updated)

Mandatory Use of Form 4:

- All direct marketing consent must use prescribed Form 4
- Explicit consent required (opt-out not sufficient)
- Detailed recording of consent method and timing

- Regular review and reconfirmation of consent

Multi-Channel Consent Collection:

- **Digital Consent:** Email, SMS, WhatsApp acceptance
- **Telephonic Consent:** Must be recorded with express permission
- **Written Consent:** Traditional forms and letters
- **Online Consent:** Secure web-based consent mechanisms

Enhanced Consent Records:

Required Documentation:

- Data subject identity verification
- Date and time of consent
- Method of consent (channel used)
- Specific purposes consented to
- Communication preferences selected
- Withdrawal procedures explained
- Consent validity period
- Staff member processing consent

Automated Marketing Systems

Compliance Requirements:

- Pre-programmed opt-out mechanisms in all communications
- Automated consent verification systems
- Real-time consent status checking
- Immediate processing of withdrawal requests

Technical Safeguards:

- Consent database integration with marketing systems
- Automated suppression list management
- Regular consent database audits
- Breach detection and response systems

Special Personal Information Processing

Enhanced Categories Processed:

- **Health Information:** Employee wellness, occupational health
- **Religious Beliefs:** Accommodation of religious practices
- **Race/Ethnicity:** B-BBEE compliance, equity monitoring
- **Biometric Data:** Access control, security systems

Strengthened Legal Basis Documentation:

- Explicit consent with enhanced safeguards

- Legal obligation compliance (employment equity)
- Legitimate interests with balancing test
- Vital interests protection in emergency situations

Additional Security Measures:

- Encryption of all special personal information
- Role-based access controls with logging
- Regular security assessments and penetration testing
- Staff clearance requirements for access

11. THIRD-PARTY PROCESSING

In compliance with Section 21 of POPIA, HPPSA ensures that all third parties (operators) processing personal information on our behalf provide sufficient guarantees of privacy protection:

- 1. Data Processing Agreements (DPAs):**
 - Written agreements are in place with all operators processing personal information on behalf of HPPSA
 - DPAs include provisions covering:
 - Confidentiality obligations
 - Security measures in line with industry standards
 - Processing limitations and purpose restrictions
 - Sub-processor management and restrictions
 - Data breach notification requirements and timelines
 - Cooperation with data subject requests
 - Data return or deletion upon termination
 - Right to audit compliance
- 2. Operator Management:**
 - HPPSA maintains an inventory of all operators with access to personal information
 - Operators are categorized based on the sensitivity and volume of data they process
 - Regular risk assessments are conducted for all operator relationships
 - High-risk operators are subject to enhanced due diligence and oversight
- 3. Operator Due Diligence:**
 - Prior to engagement, all potential operators undergo a privacy and security assessment
 - Existing operators are reassessed annually or when there are significant changes to processing activities
 - Operators failing to meet required standards must implement remediation measures or may be terminated
- 4. Audit Rights:**
 - HPPSA reserves the right to audit operators' compliance with data protection requirements
 - Audits may be conducted on-site or through documented self-assessments
 - Operators must address any non-compliance identified during audits
- 5. International Transfers:**
 - Where operators process personal information outside South Africa, additional safeguards are implemented
 - International operators must provide guarantees of protection equivalent to POPIA requirements

12. ACCESS: PROCEDURE, AVAILABILITY AND FEES

PAIA ACCESS PROCEDURES

How to Request a Record (Section 53)

A request for access to a record as contemplated in Section 53(1) of the Act, must be made on a form that corresponds substantially with Form C, of Annexure 1, to the Information Officer. Failure to make use of the prescribed form could result in your request being refused or delayed.

A request for access to a record must be accompanied by payment of an initial non-refundable request fee of R57.00 (inclusive of VAT). This fee is not applicable to personal requests, i.e. individual seeking access to records pertaining to him/herself.

The requestor must provide sufficient detail on the request form to enable the Information Officer to clearly identify the record as well as the requestor's identity, which is to be accompanied by positive proof of identification.

The requestor must indicate which form of access is required and if he/she wishes to be informed on the decision on the request in any other manner, to state the necessary particulars to be so informed.

Access is not automatic. The requestor must therefore identify the right he/she is seeking to exercise or protect and provide an explanation as to why the requested record is required for the exercise or protection of that right.

If a request is made on behalf of a person, the requestor must then submit proof, to the satisfaction of the Information Officer, of his/her authority to make the request. Failure to do so will result in the request being rejected.

Decision on Request (Section 56)

The requestor will be notified, within 30 days, in the manner indicated by him/her of the outcome of his/her request, alternatively whether an extension not exceeding 30 days is required to deal with the request.

If the request for access is granted a further access fee must be paid for the reproduction as well as the search and preparation of the records and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure. Access will be withheld until the requestor has made payment of the applicable fee(s).

In the event that the request for access is refused, reasons for the refusal will be provided and the requestor will be advised he/she may lodge an application with a court against the refusal of the request, as well as the procedure for lodging the application.

The requestor may lodge an internal appeal or an application to court against the tender or payment of the request fee.

MANUAL PUBLICATION AND ACCESSIBILITY

Publication Requirements

In accordance with Section 51(3) of PAIA and Regulation 4(1)(c) of the POPIA Regulations, HPPSA ensures the accessibility and availability of this manual as follows:

Official Languages

This manual is available in all 11 official languages of South Africa:

- Afrikaans
- English
- isiNdebele
- isiXhosa
- isiZulu
- Sepedi

- Sesotho
- Setswana
- siSwati
- Tshivenda
- Xitsonga

Availability Locations

Electronic Access:

- Available on HPPSA's website: www.hpp-sa.org
- Downloadable in multiple formats (PDF, accessible formats)

Physical Access: Hard copies are available for public inspection during normal business hours at:

- **National Headquarters:** 5/11 Richmond Road, Pinetown 3610
- **Partnership Office:** 22 Ontdekkers Road, Witpoortjie, Roodeport, Johannesburg
- All HPPSA project sites and field offices

Information Regulator Compliance

- A copy of this manual has been submitted to the Information Regulator
- Updated versions are submitted within 10 days of any substantial changes
- Registration details are maintained and updated as required

Accessibility Features

For Persons with Disabilities:

- Electronic versions are provided in accessible formats compatible with common screen readers
- Large print versions are available upon request
- Staff at all locations are trained to assist persons with disabilities to access the manual
- Alternative formats (audio, Braille) available upon reasonable request

Language Support:

- Staff at major locations can provide assistance in multiple South African languages
- Translation services can be arranged for complex requests
- Simplified summaries available in plain language

Regular Updates and Maintenance

Review Schedule:

- The Information Officer reviews this manual annually to ensure accuracy and compliance
- Interim updates are made as required by regulatory changes or operational needs
- The date of the most recent update is clearly indicated on the cover page

Version Control:

- Previous versions are archived and available upon request
- Change logs are maintained to track modifications
- Stakeholders are notified of significant updates

Public Notification:

- Updates are announced on the HPPSA website
- Major revisions are communicated to regular requestors
- Notice of updates is posted at all physical locations

FEES**Manual Access Fees**

Copy of Manual: The fee for a copy of the manual is R1.10 for every photocopy of an A4-size page or part thereof.

Reproduction Fees

The fees for preparation of records referred to in regulation 11(1) are as follows:

Service	Fee (Rand)
For every photocopy of an A4-size page or part thereof	1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0.75
For a copy in a computer-readable form on:	
- Electronic media, i.e. diskette	7.50
- Compact disc	70.00
For a transcription of visual images, for an A4-size page or part thereof	40.00
For a copy of visual images	60.00
For a transcription of an audio record, for an A4-size page or part thereof	20.00

Request Fee

The request fee payable by a requestor, other than a personal requestor, referred to in Regulation 11(2) is R50.00.

Access Fees

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

Service	Fee (Rand)
For every photocopy of an A4-size page or part thereof	1.10
For every printed copy of an A4-size page or part thereof held on a computer or in electronic or machine-readable form	0.75
For a copy in a computer-readable form on:	
- Electronic media, i.e. diskette	7.50
- Compact disc	70.00
For a transcription of visual images, for an A4-size page or part thereof	40.00
For a copy of visual images	60.00
For a transcription of an audio record, for an A4-size page or part thereof	20.00

Service	Fee (Rand)
To search for and prepare the record for disclosure for each hour or part of an hour reasonably required for such search and preparation	30.00

Additional Fee Information

Deposit Requirements:

- For purposes of section 22(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 requestor

Postage:

- The actual postage is payable when a copy of a record must be posted to a requestor

Fee Exemptions:

- No fees are charged for requests relating to personal information about the requestor
- Fee exemptions may apply in cases of public interest or where the requestor cannot afford the fees
- Applications for fee exemptions must be motivated in writing

Payment Methods

Accepted Payment Methods:

- Cash (at physical locations)
- Electronic fund transfer (EFT)
- Cheque (made payable to "Humana People to People South Africa")
- Credit card (where facilities are available)

Payment Terms:

- Fees must be paid before processing begins
- Deposits are required for extensive searches as outlined above
- Receipts are provided for all payments
- Refunds may apply if requests are refused or cannot be fulfilled

13: MULTI-CHANNEL REQUEST PROCESSING

Implementation of 2025 Regulatory Requirements

HPPSA has implemented enhanced multi-channel processing capabilities to comply with the 2025 POPIA regulation amendments, ensuring equal access to data protection rights across all communication methods.

Channel-Specific Procedures

WhatsApp and SMS Requests

- Verification:** Identity verification required before processing
- Confirmation:** Written confirmation sent via preferred method

- **Documentation:** All messages saved as part of the request record
- **Response:** Initial acknowledgment within 2 hours during business hours

Telephonic Requests

- **Recording Requirement:** All calls recorded with caller consent
- **Recording Access:** Recordings available to requestors upon request
- **Verification:** Enhanced identity verification procedures
- **Follow-up:** Written confirmation sent within 24 hours

Online Form Submissions

- **Secure Portal:** SSL-encrypted submission process
- **Automatic Confirmation:** Immediate acknowledgment with reference number
- **Status Tracking:** Real-time status updates available online
- **Integration:** Automatic integration with case management system

Digital Accessibility Standards

Technical Requirements:

- WCAG 2.1 AA compliance for online forms
- Mobile-responsive design for all digital channels
- Offline capability for form downloads
- Multi-format support (PDF, Word, HTML)

Security Measures:

- End-to-end encryption for digital submissions
- Secure document upload capabilities
- Automated data retention and deletion
- Audit trails for all digital interactions

14: COMPLAINT HANDLING PROCEDURES

Comprehensive Complaint Management System

HPPSA has established a comprehensive complaint handling system in accordance with the 2025 POPIA regulation amendments, enabling multiple pathways for raising data protection concerns.

Internal Complaint Process

Step 1: Initial Complaint Submission

- Use Form 5 (Complaint Form) - Annexure 7
- Submit through any available channel
- No fees for complaint submission
- Acknowledgment within 3 business days

Step 2: Investigation Process

- Preliminary assessment within 5 business days
- Formal investigation initiated if required
- Regular updates provided to complainant
- Documentation of all investigation steps

Step 3: Resolution and Response

- Written response within 30 days
- Clear explanation of findings and actions taken
- Right to internal review if unsatisfied
- Right to escalate to Information Regulator

External Complaint Pathways

Direct to Information Regulator:

- Complainants may submit directly to the Information Regulator
- Form 5 available online and at HPPSA offices
- HPPSA will cooperate fully with regulator investigations
- 14-day response time to regulator inquiries

Public Interest Complaints:

- Third parties may file complaints in public interest
- Enhanced documentation required for public interest cases
- HPPSA commitment to transparent resolution process

Complaint Categories and Response Procedures

Privacy Breach Complaints

- **Immediate Response:** Containment measures activated
- **Investigation:** Forensic investigation if required
- **Notification:** Regulatory reporting within required timeframes
- **Remediation:** Comprehensive remediation plan implemented

Access Request Complaints

- **Review Process:** Independent review of original decision
- **Documentation:** Complete file review and assessment
- **Resolution:** Revised decision or explanation provided
- **Appeal Rights:** Clear information on further appeal options

Data Quality Complaints

- **Verification:** Immediate verification of data accuracy
- **Correction:** Prompt correction of inaccurate information
- **Systems Update:** Updates to prevent recurrence
- **Confirmation:** Written confirmation of corrections made

15: CODE OF CONDUCT APPLICATIONS

Industry Standards and Best Practice Implementation

HPPSA recognizes the importance of industry-specific codes of conduct in enhancing data protection standards within the non-profit sector.

Participation in Industry Codes

Current Participation:

- NPO sector data protection guidelines
- International Humana People to People federation standards
- South African fundraising code of conduct
- Community development sector privacy standards

Ongoing Commitments:

- Regular review of applicable industry codes
- Active participation in code development processes
- Staff training on industry-specific requirements
- Continuous improvement of internal standards

Application for Code Development

Process for Industry Code Development:

- Use Form 3 (Application for Code of Conduct) - Annexure 5
- Consultation with sector stakeholders
- Submission to Information Regulator for approval
- Implementation and monitoring framework

HPPSA Leadership Role:

- Advocacy for sector-specific data protection standards
- Collaboration with peer organizations
- Best practice sharing and development
- Mentorship of smaller NPOs in compliance

16. Compliance Monitoring and Review

Continuous Improvement Framework

Regular Review Schedule:

- **Monthly:** Consent management system review
- **Quarterly:** Multi-channel request processing assessment
- **Bi-annually:** Staff training and competency evaluation
- **Annually:** Comprehensive manual and procedure review

Key Performance Indicators:

- Response time compliance (target: 95% within 30 days)
- Multi-channel utilization rates
- Complaint resolution satisfaction scores
- Staff compliance training completion rates

Regulatory Alignment:

- Monitoring of Information Regulator updates
- Industry best practice benchmarking
- Peer organization collaboration and learning
- Proactive compliance enhancement initiatives

Technology and Innovation

Digital Transformation:

- AI-powered request categorization and routing
- Automated compliance monitoring dashboards
- Predictive analytics for consent management
- Blockchain technology for audit trail integrity

Future Readiness:

- Emerging technology impact assessments
- Regulatory horizon scanning and preparation
- Staff capability development planning
- Infrastructure scaling and enhancement

Document Control:

- **Version:** 2.0 (Updated for 2025 POPIA Amendments)
- **Effective Date:** 22 May 2025
- **Next Review:** 22 May 2026
- **Approved By:** Mr Kilford Zimondi (Information Officer)
- **Document Owner:** HPPSA Information Officer