



THE HELEN SUZMAN FOUNDATION TRUST

PAIA MANUAL

**Prepared in terms of section 51 of the Promotion of
Access to Information Act 2 of 2000 (as amended)**

DATE OF COMPIRATION: 25/11/2025



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1. LIST OF ACRONYMS AND ABBREVIATIONS

| | | |
|-----|--------------------|--|
| 1.1 | “ED” | Executive Director |
| 1.2 | “DIO” | Deputy Information Officer; |
| 1.3 | “HSF” | Helen Suzman Foundation |
| 1.4 | “IO” | Information Officer; |
| 1.5 | “Minister” | Minister of Justice and Correctional Services; |
| 1.6 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000(as Amended; |
| 1.7 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.8 | “Regulator” | Information Regulator; and |
| 1.9 | “Republic” | Republic of South Africa |

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the body which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;

- 2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 2.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE HSF

3.1. Chief Information Officer

Name: Ms Naseema Fakir
Tel: 011 4822872
Email: info@hsf.org.za
Fax number: n/a

3.2. Deputy Information Officer

Name: Ms Chanel van der Linde
Tel: 011 4822872
Email: info@hsf.org.za
Fax Number: n/a

3.3 Access to information general contacts

Email: info@hsf.org.za

3.4 National or Head Office

Postal Address: The Helen Suzman Foundation
Postnet Suite 130
Private Bag X2600
Houghton, 2041

Physical Address: North Block
La Val Office Park
45 Jan Smuts Avenue
Westcliff, 2193

Telephone: 011 4822872



Email: paiarequests@hsf.org.za
Website: <https://hsf.org.za/about/about-hsf>

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

- 4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA (“Guide”), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.
- 4.2. The Guide is available in each of the official languages and in braille.
- 4.3. The aforesaid Guide contains the description of-
 - 4.3.1. the objects of PAIA and POPIA;
 - 4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-
 - 4.3.2.1. the Information Officer of every public body, and
 - 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
 - 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 11³; and
 - 4.3.3.2. access to a record of a private body contemplated in section 50⁴;

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA relating to a request for access to that record; and*
- c) *access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. 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, including the manner of lodging:
 - 4.3.6.1. an internal appeal;
 - 4.3.6.2. a complaint to the Regulator; and
 - 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 4.3.7. the provisions of sections 14⁵ and 51⁶ requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 15⁷ and 52⁸ providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 22⁹ and 54¹⁰ regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92¹¹.

⁵ Section 14(1) of PAIA- *The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.*

⁶ Section 51(1) of PAIA- *The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.*

⁷ Section 15(1) of PAIA- *The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access*

⁸ Section 52(1) of PAIA- *The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access*

⁹ Section 22(1) of PAIA- *The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

¹⁰ Section 54(1) of PAIA- *The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.*

¹¹ Section 92(1) of PAIA provides that-“The Minister may, by notice in the Gazette, make regulations regarding-

4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

- 4.5.1. upon request to the Information Officer;
- 4.5.2. from the website of the Regulator (<https://www.justice.gov.za/inforeg/>).

4.6. A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

- 4.6.1. English and Zulu.

5. CATEGORIES OF RECORDS OF THE HSF WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

| Category of records | Types of the Record | Available on Website | Available upon request |
|----------------------|---|--|------------------------|
| HSF Briefs | Legal articles | X https://hsf.org.za/publications/hsf-briefs | |
| Focus | Magazine | X https://hsf.org.za/publications/focus | |
| Special Publications | Research articles / publications | X https://hsf.org.za/publications/special-publications | |
| Submissions | Submissions in writing to Parliament or Government institutions | X https://hsf.org.za/publications/submissions | |
| Articles | Research documents | X https://hsf.org.za/publications/articles | |

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act."

| | | | |
|------------------------|--|--|--|
| Letters | Letters written to various organisations | X https://hsf.org.za/publications/letters | |
| Annual Reports | Available as of 2023 financial year | X https://hsf.org.za/publications/annual-reports | |
| Court papers | Founding affidavits and judgments of matters involving HSF | X https://hsf.org.za/litigation | |
| Lectures | Youtube videos of Memorial Lectures | X https://hsf.org.za/events/lectures | |
| Roundtable discussions | Youtube videos | X https://hsf.org.za/events/roundtable-series | |
| Speeches | Copies of speeches delivered | X https://hsf.org.za/events/speeches | |

6. DESCRIPTION OF THE RECORDS OF HSF WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

| Category of Records | Applicable Legislation |
|---------------------|--|
| Privacy Policy | POPIA |
| PAIA Manual | Promotion of Access to Information Act 2 of 2000 |
| Registration as NPO | Nonprofit Organisations Act 71 of 1997 |
| Tax records | Income Tax Act 58 of 1962 |

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE HSF

| Subjects on which the body holds records | Categories of records |
|--|---|
| Strategic Documents, Plans, Proposals | Annual Reports Strategic Plan |
| Human Resources | - Human Resources Policy Manual - Advertised posts - Employees' records |
| Finance | - Procurement of goods and services as per HR Policy Manual - Donations Policy |

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

As per HSF Privacy Policy (available here <https://hsf.org.za/privacy-policy>):

Website Visitors

Like most website operators, Helen Suzman Foundation collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Helen Suzman Foundation's purpose in collecting non-personally identifying information is to better understand how Helen Suzman Foundation's visitors use its website. From time to time, Helen Suzman Foundation may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its website.

Helen Suzman Foundation also collects potentially personally-identifying information like Internet Protocol (IP) addresses for logged in users and for users leaving comments on <https://hsf.org.za> blog posts. Helen Suzman Foundation only discloses logged in user and commenter IP addresses under the same circumstances that it uses and discloses personally-identifying information as described below.

Gathering of Personally-Identifying Information

Certain visitors to Helen Suzman Foundation's websites choose to interact with Helen Suzman Foundation in ways that require Helen Suzman Foundation to gather personally-identifying information. The amount and type of information that Helen Suzman Foundation gathers depends on the nature of the interaction. For example, we ask visitors who sign up for a blog at <https://hsf.org.za> to provide a username and email address.

Protection of Certain Personally-Identifying Information

Helen Suzman Foundation discloses potentially personally-identifying and personally-identifying information only to those of its employees, contractors and affiliated organizations that (i) need to know that information in order to process it on Helen Suzman Foundation's behalf or to provide services available at Helen Suzman Foundation's website, and (ii) that have agreed not to disclose it to others. Some of those employees, contractors and affiliated organizations may be located outside of your home country; by using Helen Suzman Foundation's website, you consent to the transfer of such information to them. Helen Suzman Foundation will not rent or sell potentially personally-identifying and personally-identifying information to anyone. Other than to its employees, contractors and affiliated organizations, as described above, Helen Suzman Foundation discloses potentially personally-identifying and personally-identifying information only in response to a subpoena, court order or other governmental request, or when Helen Suzman Foundation believes in good faith that disclosure is reasonably necessary to protect the property or rights of Helen Suzman Foundation, third parties or the public at large.

If you are a registered user of <https://hsf.org.za> and have supplied your email address, Helen Suzman Foundation may occasionally send you an email to tell you about new features, solicit your feedback, or just keep you up to date with what's going on with Helen Suzman Foundation and our products. We primarily use our blog to communicate this type of information, so we expect to keep this type of email to a minimum. If you send us a request (for example via a support email or via one of our feedback mechanisms), we reserve the right to publish it in order to help us clarify or respond to your request or to help us support other users. Helen Suzman Foundation takes all measures reasonably necessary to protect against unauthorized access, use, alteration or destruction of potentially personally-identifying and personally-identifying information.

Operations of HSF

In order to function as a Foundation, personal information is used to administer our HR needs of our employees, to process donations from our funders, to manage our relationship with our Trustees and to provide professional services to our clients.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Also refer to our website Privacy Policy available here <https://hsf.org.za/privacy-policy>

| Categories of Data Subjects | Personal Information that may be processed |
|------------------------------|--|
| Donors | name, address, registration numbers or identity numbers and bank details |
| Service Providers | names, registration number, vat numbers, address and bank details |
| Employees | address, qualifications, gender and race, bank details |
| Newsletter subscribers | Name and email address |
| Clients (seeking assistance) | Name, email address, address |
| Trustees | Name, email, address and bank details |

8.3 The recipients or categories of recipients to whom the personal information may be supplied

| Category of personal information | Recipients or Categories of Recipients to whom the personal information may be supplied |
|--|---|
| Identity number and names, for criminal checks | South African Police Services |
| Qualifications, for qualification verifications | South African Qualifications Authority |
| Credit and payment history, for credit information | Credit Bureaus |

8.4 Planned transborder flows of personal information

8.4.1 HSF uses Microsoft SharePoint and OneDrive for cloud storage. Data is replicated across multiple servers worldwide. It is stored securely on multiple servers globally providing continues availability.

8.4.2 HSF has not planned Transborder flows of personal information. However, should it become necessary if donors or trustees are abroad, to transfer personal information to another country for any lawful purposes, HSF will ensure that anyone to whom it pass personal information is subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection and the third party agrees to treat that personal information with the same level of protection as HSF is obliged under POPIA.

8.4.3 Any transfer of personal information cross border shall be with data subject's consent, however should it not be reasonably practicable to obtain data subject's consent, HSF shall transfer the personal information if –

- a) it will be for the data subject's benefit; and
- b) the data subject would have given consent should it have been reasonably practicable to obtain such consent.

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

8.5.1 HSF deploys Bitdefender antivirus programme on all computers for local protection, with licences renewed annually. Additionally, HSF benefits from Microsoft's built-in security protocols for OneDrive and SharePoint, ensuring high levels of protection for cloud-stored data.

8.5.2 HSF continuously establishes and maintains appropriate, reasonable technical and organisational measures by taking appropriate, reasonable technical and organisational measures to prevent –

- a) loss of, damage to or unauthorised destruction of personal information; and
- b) unlawful access to or processing of personal information.

8.5.3 Measures taken by HSF includes, amongst others –

- a) Access control;
- b) Data backups;
- c) Anti-virus and anti-malware solutions (see par 8.5.1);
- d) Awareness and vigilance; and
- e) Hard copies of employee and financial files locked up with restricted access.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on <https://hsf.org.za>;

9.1.2 head office of the HSF for public inspection during normal business hours;

9.1.3 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made. (Annexure B, fee schedule, may be accessed here: <https://www.justice.gov.za/legislation/notices/2021/20210827-gg45057gon757-PAIRegulations.pdf>)

10. UPDATING OF THE MANUAL

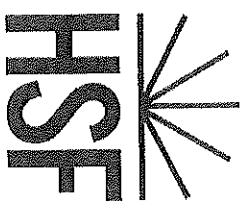
The ED of HSF will on a regular basis update this manual.



Issued by

A handwritten signature in black ink, appearing to read 'Naseema Fakir', is positioned above a horizontal line.

Ms Naseema Fakir
Executive Director
Helen Suzman Foundation



THE HELEN SUZMAN FOUNDATION TRUST
NOTICE

AUTOMATIC AVAILABILITY OF CERTAIN RECORDS

In terms of

Section 52 of the Promotion of Access to Information Act 2 of 2000

And

**[Regulation 4 of the Regulations relating to the
Promotion of Access to Information, 2021]**

Date: 25/11/25

DESCRIPTION OF THE CATEGORIES OF RECORDS OF THE INFORMATION REGULATOR THAT ARE AUTOMATICALLY AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000

| Category of records | Types of the Record | Available on Website | Available upon request |
|------------------------|---|--|------------------------|
| HSF Briefs | Legal articles | X https://hsf.org.za/publications/nsf-briefs | |
| Focus | Magazine | X https://hsf.org.za/publications/focus | |
| Special Publications | Research articles / publications | X https://hsf.org.za/publications/special-publications | |
| Submissions | Submissions in writing to Parliament or Government institutions | X https://hsf.org.za/publications/submissions | |
| Articles | Research documents | X https://hsf.org.za/publications/articles | |
| Letters | Letters written to various organisations | X https://hsf.org.za/publications/letters | |
| Annual Reports | Available as of 2023 financial year | X https://hsf.org.za/publications/annual-reports | |
| Court papers | Founding affidavits and judgments of matters involving HSF | X https://hsf.org.za/litigation | |
| Lectures | Youtube videos of Memorial Lectures | X https://hsf.org.za/events/lectures | |
| Roundtable discussions | Youtube videos | X https://hsf.org.za/events/roundtable-series | |

| | | |
|----------|---|---|
| Speeches | Copies of speeches delivered https://hsf.org.za/events/speeches | X |
|----------|---|---|



Ms Naseema Fakir

INFORMATION OFFICER

Date: 6 - 1 - 26



**DESIGNATION AND DELEGATION OF AUTHORITY TO THE DEPUTY
INFORMATION OFFICER**

*(In terms of section 56 of the Protection of Personal Information Act, 2013 (POPIA) and
Section 17(1) of the Promotion of Access to Information Act, 2000 (PAIA))*

I, the undersigned,

Naseema Fakir

(Name of the Information Officer)

hereby designate **Chanel Van Der Linde** as a Deputy Information Officer of the **Helen Suzman Foundation**.

Your designation as Deputy information is necessary to ensure that the public body is reasonably accessible to the members of the public who may require access to the records of the body.

As deputy information officer, you will be performing your function under my direction and control, and you have no power to take any decision.

Information Officer

By my signature herein below, I hereby accept the delegation and designation as the Deputy Information Officer and undertakes to ensure that the public body is reasonably accessible possible for the members of the public who may require access to the records of the body.

Chanel Van der Linde

Date : 06/01/2025