



Starfish[®]
GREATHEARTS FOUNDATION
LIFE, HOPE AND OPPORTUNITY

Corner William Nicol Drive & Leslie Avenue Design Quarter, Fourways, South Africa |
Private Bag X9951, Sandton, 2146 |
starfish-greatheart.org | info@starfish.org.za

PAIA MANUAL

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



DATE OF REVISION: 01/09/2026

Starfish Greathearts Foundation NPC. 2003/002865/08 | NPO. 039-447-NPO | PBO 930008639
Directors: T.L Killops, N. Von Klemperer, J. Price, V. Hammond, D.J van der Merwe, A. Hilgart





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1. LIST OF ACRONYMS AND ABBREVIATIONS

- | | | |
|-----|-----------------------------|--|
| 1.1 | “CEO” | Chief Executive Officer |
| 1.2 | “DIO” | Deputy Information Officer; |
| 1.3 | “IO” | Information Officer; |
| 1.4 | “Minister” | Minister of Justice and Correctional Services; |
| 1.5 | “PAIA” | Promotion of Access to Information Act No. 2 of 2000 (as Amended; |
| 1.6 | “POPIA” | Protection of Personal Information Act No.4 of 2013; |
| 1.7 | Personal information | As described in POPIA Means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPIA , which has more specific examples if you need them, can be found at the following link: https://www.gov.za/documents/protection-personal-information-act ; |
| 1.8 | “Regulator” | Information Regulator; and |
| 1.9 | “Republic” | Republic of South Africa |





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2. PURPOSE OF PAIA MANUAL

The purpose of this PAIA manual is to:

- 2.1 To assist potential requesters of information as to the procedure to be followed when requesting access to information and/or documents from **Starfish Greathearts Foundation** as contemplated in the act.
- 2.2 check the categories of records held by **Starfish Greathearts Foundation** which are available without a person having to submit a formal PAIA request; and
- 2.3 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;

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF **STARFISH GREATHEARTS FOUNDATION**

3.1. Chief Information Officer

Name: Xelda Rohrbeck
Tel: 010 035 3789
Email: operations@starfish.org.za

- 3.2. Deputy Information Officer *(NB: if more than one Deputy Information Officer is designated, please provide the details of every Deputy Information Officer of the body designated in terms of section 17 (1) of PAIA.*

Name: Sian Dhewnanan
Tel: 010 035 3789
Email: admin@starfish.org.za





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3.3 Access to information general contacts

Email: info@starfish.org.za

3.4 National or Head Office

Postal Address: Private Bag X9951
Sandton
2146

Physical Address: Corner William Nicol and Leslie Ave
Design Quarter
DQ Suite 3
Fourways
2199

Telephone: 010 035 3789

Email: info@starfish.org.za

Website: [Home Page](#)

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.





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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;





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- 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;

-
- 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.

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.





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- 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.
- 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/infoereg/>).

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-
(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.”





4.6 A copy of the Guide is also available for public inspection during normal office hours.

5. CATEGORIES OF RECORDS OF STARFISH GREATHEARTS FOUNDATION

Category of records	Types of the Record	Available on Website	Available upon request
<u>Promotional material and brochures</u>	Printed and electronic	X	X
<u>Legislation</u> (such as Companies Act, BCoE, Constitution of South Africa, etc)	Electronic	X (government website)	X
<u>Incorporation documentation</u> (MOI, Board, resolutions, Board minutes, general correspondence)	Printed and electronic		X
<u>Financial documents and records</u> (VAT, Tax, PAYE, UIF, quotations, bank accounts, AFS, petty cash, accounting records, budgets etc).	Printed and electronic	X (AFS)	X





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<u>Operational Documentation and records</u> (minutes, annual report, insurance, contracts, marketing and event records, policies & procedures, SOPs, correspondence, community-based organisation partners, etc)	Printed and electronic	X (Annual Report)	X
<u>Human Resource Documentation</u> (structure, personnel files and contracts, remuneration records, training, medical history, provident fund etc).	Printed and electronic		X
<u>Information Technology Records</u> (software licences, email communication, general correspondence etc).	Printed and electronic		X





8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

To process personal information of the Community based organisations, beneficiaries, service providers, donors and employees of Starfish Greathearts foundation in order to achieve the strategic and operational objectives in the day-to-day operation and daily management of Starfish Greathearts Foundation.

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

Categories of Data Subjects	Personal Information that may be processed
Community Based Organisations and beneficiaries	name, address, registration numbers or identity numbers, employment status and bank details, demographics of beneficiaries
Service Providers	names, registration number, vat numbers, address, trade secrets and bank details
Employees	address, qualifications, gender and race, bank details
Donors / funders (local and international)	name, address, registration numbers or identity numbers, tax number

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





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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
Employee information	Service providers (payroll)
Beneficiary information	Donors and Starfish Chapters

8.4 Planned transborder flows of personal information

Some personal information may be stored in the cloud outside the Republic.

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

The company has implemented a range of technical and organisational security safeguards to protect the confidentiality, integrity, and availability of personal information under its care.





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The company operates within a Microsoft 365 / Microsoft Azure cloud environment, with access to systems and data controlled through Microsoft 365 security and identity management features.

Multi-Factor Authentication (MFA) is enabled for user accounts to provide an additional layer of protection against unauthorised access.

Endpoints are centrally monitored and protected using Absolute endpoint management and antivirus/anti-malware solutions. Endpoint monitoring allows the IT support team to monitor the health and security status of devices and identify potential security issues requiring attention.

Access to company data, including SharePoint resources, is controlled through security groups and user permissions. Access is granted based on the user's requirements and authorised access levels, helping to prevent unauthorised access to personal and company information.

Additional security safeguards are provided through a well-structured user offboarding process. This process ensures that users who leave the company no longer have access to company resources by disabling their accounts and removing their permissions and access rights.

The IT environment is also monitored through centralised monitoring software to assist with identifying system, security and availability issues. Security updates, endpoint protection and access controls are maintained as part of the company's ongoing IT management and security processes.





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These safeguards are implemented to reduce the risk of unauthorised access, disclosure, alteration, loss or destruction of personal information and to maintain the confidentiality and integrity of information held by the company.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on [Home Page](#);

9.1.2 head office of the Starfish Greathearts Foundation 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.

10. UPDATING OF THE MANUAL

The head of **Starfish Greathearts Foundation** will on a regular basis update this manual.





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Issued by

11 September 2026

Xelda Rohrbeck
Executive Director

Date





REPUBLIC OF SOUTH AFRICA

A. Particulars of private body

The Head:

[illegible]

B. Particulars of person requesting access to the record

- (a) The particulars of the person who requests access to the record must be given below.
- (b) The address and/or fax number in the Republic to which the information is to be sent must be given.
- (c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname:

Identity number:

Postal address:

Telephone number: (.....) Fax number: (.....)

E-mail address:

Capacity in which request is made, when made on behalf of another person:

C. Particulars of person on whose behalf request is made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname:

[illegible]

D. Particulars of record

- (a) 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.
- (b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Description of record or relevant part of the record:

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.....

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.....

2. Reference number, if available:

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.....

3. Any further particulars of record:

.....

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.....

E. Fees

- (a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- (b) You will be notified of the amount required to be paid as the request fee.
- (c) 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.
- (d) If you qualify for exemption of the payment of any fee, please state the reason for exemption.

Reason for exemption from payment of fees:

.....

.....

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.....

.....

F. Form of access to record

If you are prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state your disability and indicate in which form the record is required.

Disability:	Form in which record is required:
Mark the appropriate box with an X .	
NOTES:	
(a) Compliance with your request for access in the specified form may depend on the form in which the record is available.	
(b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.	
(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.	

1. If the record is in written or printed form:					
	copy of record*		inspection of record		
2. If record consists of visual images - (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):					
	view the images		copy of the images*		transcription of the images*
3. If record consists of recorded words or information which can be reproduced in sound:					
	listen to the soundtrack (audio cassette)		transcription of soundtrack* (written or printed document)		
4. If record is held on computer or in an electronic or machine-readable form:					
	printed copy of record*		printed copy of information derived from the record*		copy in computer readable form* (stiffy or compact disc)
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.				YES	NO

G. Particulars of right to be exercised or protected

If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

1. Indicate which right is to be exercised or protected:

.....

.....

.....

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

.....

.....

.....

H. Notice of decision regarding request for access

You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

.....

Signed at this day..... ofyear

.....
SIGNATURE OF REQUESTER /
PERSON ON WHOSE BEHALF REQUEST IS MADE