

PAIA MANUAL

Prepared in terms of Section 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000), as amended

Read together with the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)

Date of compilation: 12 October 2026

Version: 1.0

1. INTRODUCTION

The Swiss Hotel School (Pty) Ltd ("SHS" or "the School") is a private educational institution specialising in hospitality management, culinary arts and professional hospitality training.

This manual has been prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2000 ("PAIA"), as amended, and the Protection of Personal Information Act, 2013 ("POPIA").

The purpose of this manual is to explain the records held by the School, how members of the public may request access to those records, and how the School processes and protects personal information.

Access to records is subject to the requirements of PAIA and any applicable grounds for refusing access.

2. PARTICULARS OF THE PRIVATE BODY

Registered name: The Swiss Hotel School (Pty) Ltd

Physical address:

33 Bond Street
Ferndale
Randburg
Gauteng
South Africa

Telephone:

+27 11 789 9934

Website:

<https://www.swisshotelschool.co.za>

General email:

info@swisshotelschool.co.za

Information Officer:

Stephen Hickmore, Director

Information Officer email:

hickmore@swisshotelschool.co.za

The Information Officer is responsible for overseeing the School's compliance with PAIA and POPIA, including handling requests for access to records and protecting personal information.

3. PURPOSE OF THIS MANUAL

This manual is intended to assist members of the public to:

- Understand their rights under PAIA and POPIA.
- Identify the categories of records held by the School.
- Understand which records may be available without a formal PAIA request.
- Learn how to submit a request for access to a record.
- Identify the relevant contact person for information requests.
- Understand how the School processes and protects personal information.
- Understand the circumstances in which access to information may be refused in accordance with the law.

4. LEGISLATION APPLICABLE TO THE SCHOOL

The School maintains records in accordance with applicable legislation and regulatory requirements, which may include:

- Promotion of Access to Information Act, 2000.
- Protection of Personal Information Act, 2013.
- Companies Act, 2008.
- Basic Conditions of Employment Act, 1997.
- Labour Relations Act, 1995.
- Employment Equity Act, 1998.
- Occupational Health and Safety Act, 1993.
- Skills Development Act, 1998.
- National Qualifications Framework Act, 2008.
- Relevant education, quality assurance and accreditation legislation and requirements.
- Tax, financial and other applicable statutory requirements.

Access to records maintained under these laws remains subject to the relevant legislation and any lawful restrictions.

5. GUIDE ON HOW TO USE PAIA

The Information Regulator provides guidance on how to exercise rights under PAIA and POPIA.

Members of the public may obtain information and guidance from:

Information Regulator of South Africa

Website: <https://infoeregulator.org.za/>

PAIA Manual Portal: <https://eservices.infoeregulator.org.za/paiamanuals/>

Telephone: 010 023 5200

Email: enquiries@infoeregulator.org.za

The Information Regulator's website provides guidance and access to the applicable forms and procedures for requesting records and lodging complaints.

6. CATEGORIES OF RECORDS HELD BY THE SCHOOL

The School holds records relating to its educational, administrative, financial and operational activities. The categories below describe the types of records that may be held. The existence of a category does not guarantee that a particular record exists or that access will be granted.

6.1 Company and governance records

These may include:

- Company registration and statutory records.
- Governance policies and procedures.
- Delegations of authority and internal policies.
- Meeting minutes and resolutions.
- Contracts and agreements.
- Risk management and compliance documentation.

6.2 Academic and student records

These may include:

- Applications and admission documentation.
- Student registration records.
- Academic results, assessments and examination records.
- Attendance and academic progress records.
- Student support and disciplinary records.
- Qualification and certification records.
- Records relating to workplace learning and internships.
- Student accommodation administration records.
- Student communications and correspondence.

Access to student records is subject to applicable privacy rights, confidentiality obligations and the rights of other individuals.

6.3 Education, accreditation and quality assurance records

These may include:

- Accreditation and registration documentation.
- Records relating to the Council on Higher Education and relevant quality assurance bodies.
- Quality assurance policies and reports.
- Records relating to the Quality Council for Trades and Occupations (QCTO).
- Occupational qualification, assessment and trade test documentation.
- Recognition of Prior Learning (RPL) and Assessment of Prior Learning (ARPL) records.
- Records relating to City & Guilds and other applicable awarding bodies.
- Academic policies, programme documentation and curriculum records.
- Audit and compliance reports.

Access to confidential assessment materials, restricted examination documents and third-party records may be limited by law or contractual obligations.

6.4 Human resources records

These may include:

- Employee contracts and personnel files.
- Recruitment and selection records.
- Payroll and remuneration records.
- Leave and attendance records.
- Training and performance documentation.
- Disciplinary and grievance records.
- Occupational health and safety records.

Employee information is treated as confidential and is subject to applicable employment and privacy legislation.

6.5 Financial and accounting records

These may include:

- Financial statements and accounting records.
- Budgets and financial reports.
- Student fee and payment records.
- Supplier invoices and payment records.
- Procurement and purchasing documentation.
- Tax and statutory financial records.
- Bursary, scholarship and sponsorship administration records.

6.6 Commercial and contractual records

These may include:

- Supplier and service provider agreements.
- Agreements with hospitality industry partners.
- Internship and workplace learning agreements.
- Sponsorship and bursary agreements.
- Client and business correspondence.
- Insurance and service contracts.

Commercially sensitive and confidential information may be withheld where permitted by PAIA.

6.7 Operational and facilities records

These may include:

- Campus and facilities management documentation.
- Health, safety and security records.
- Maintenance and equipment records.
- Food safety and kitchen operational documentation.
- Accommodation and access control records.
- CCTV records, where applicable.

Access to security-sensitive information and records involving other individuals may be restricted.

6.8 Information technology and communications records

These may include:

- IT policies and procedures.
- Website and administrative records.
- Learning management system records.
- User access and system administration records.
- Business correspondence and electronic communications.
- Records relating to data protection and information security.

6.9 Records relating to other legislation

The School may hold records required by legislation governing education, qualifications, employment, taxation, company administration, occupational safety and financial management.

The availability of such records depends on the applicable legislation and any lawful restrictions on disclosure.

7. RECORDS AVAILABLE WITHOUT A FORMAL PAIA REQUEST

Certain information may be made available through the School's website, prospectuses, programme information, published policies, marketing materials and general communications.

Examples may include:

- General information about the School.
- Programme descriptions and admission requirements.
- Published fee information.
- General contact details.
- Public announcements and events.
- Published policies and other documents approved for public distribution.

The School has not published a notice under section 52 of PAIA.

Personal information, confidential student records, employee records and commercially sensitive documents are not automatically available to the public.

8. PROCESSING OF PERSONAL INFORMATION UNDER POPIA

The School processes personal information for legitimate educational, administrative, contractual and legal purposes.

8.1 Categories of data subjects

Depending on the circumstances, the School may process personal information relating to:

- Prospective students and applicants.
- Registered students and graduates.
- Parents, guardians and sponsors.
- Employees and prospective employees.
- Lecturers, facilitators and assessors.
- Suppliers, contractors and service providers.
- Hospitality industry partners and internship hosts.
- Other individuals who communicate or interact with the School.

8.2 Categories of personal information

The School may process the following categories of information, where relevant:

- Identification and contact information.
- Application and admission information.
- Academic records, assessment results and qualifications.
- Employment and professional information.
- Financial and payment information.
- Parent, guardian or sponsor information.
- Information required for bursaries and scholarships.
- Information required for workplace learning, internships and qualifications.
- Correspondence and administrative records.
- Photographs, CCTV footage and other relevant security records, where applicable.
- Special personal information only where necessary and permitted by law.

8.3 Purposes of processing

Personal information may be processed for the purposes of:

- Managing student applications, admissions and registration.
- Delivering educational programmes and assessing academic performance.
- Administering qualifications, examinations and certification.
- Meeting accreditation, audit and regulatory requirements.
- Managing student accounts, payments, bursaries and scholarships.
- Communicating with students, parents, guardians and sponsors where appropriate.
- Managing employment, recruitment and payroll.
- Administering workplace learning and internships.
- Managing campus security, accommodation and facilities.
- Maintaining financial, accounting and statutory records.
- Responding to enquiries and providing student support.
- Marketing and communicating about the School, where permitted.
- Meeting contractual and legal obligations.

8.4 Recipients of personal information

Where lawful and necessary, personal information may be disclosed to or processed by:

- Relevant education and quality assurance authorities.
- The Department of Higher Education and Training, where applicable.
- The Council on Higher Education, QCTO, SAQA and relevant awarding bodies, as applicable.
- Examination, assessment and certification bodies.
- Employers, internship hosts and workplace learning partners, where appropriate.
- Parents, guardians or sponsors, where legally permitted or otherwise authorised.
- Banks, payment providers, auditors and professional advisers.
- IT service providers and learning management system providers.
- Relevant government departments and regulatory authorities.
- Other authorised service providers or recipients where permitted by law.

The School seeks to limit disclosure to information reasonably necessary for the relevant purpose and lawful basis.

8.5 International transfers of personal information

Where student placements, internships, international study arrangements or other School activities require personal information to be shared with recipients outside South Africa, such information may be transferred subject to applicable legal requirements.

Any such transfer must comply with section 72 of POPIA and the applicable safeguards governing international transfers of personal information.

Such transfers may include sharing a student's details with an internship or workplace host abroad, and the storage of information by service providers outside South Africa that support our website and communications, such as our email platform (Kit, in the United States), Google and Meta.

8.6 Information security

The School seeks to implement reasonable technical and organisational safeguards to protect personal information against loss, unauthorised access, misuse, disclosure, alteration or destruction.

Safeguards may include:

- Access controls and authorised user permissions.
- Password protection and system security measures.
- Physical security measures at the campus.
- Confidentiality obligations for staff and service providers.
- Secure storage and handling of records.
- Appropriate backup, retention and disposal procedures.
- Procedures for responding to suspected information security incidents.

The measures implemented are subject to ongoing review and improvement.

9. HOW TO REQUEST ACCESS TO A RECORD

A request for access to a record held by the School must be submitted to the Information Officer using the applicable prescribed PAIA form and procedure.

Requests should be sufficiently clear to enable the School to identify the requested record and determine whether access may lawfully be granted.

9.1 Information to include

A requester should provide:

- Full name and contact details.
- Sufficient information to identify the record requested.
- The form of access required, where applicable.
- The right the requester seeks to exercise or protect, where required under PAIA.
- An explanation of why the record is required for the exercise or protection of that right, where applicable.
- Proof of authority, where a person acts on behalf of another.
- Any other information required by the prescribed form.

Where applicable, a requester must provide sufficient proof of identity. Requests made on behalf of another person may require evidence of legal authority or authorisation.

9.2 Submission of requests

Requests should be addressed to:

The Information Officer

The Swiss Hotel School (Pty) Ltd
33 Bond Street
Ferndale, Randburg
Gauteng, South Africa

Email: hickmore@swisshotelschool.co.za Telephone: +27 11 789 9934

Requests must be made on Form 2 (Request for Access to Record) prescribed under the PAIA Regulations, 2021, available from the Information Regulator's website. Send the completed form to the Information Officer by email, or deliver it to the address above during office hours

9.3 Processing of requests

Upon receipt of a valid request, the School will consider the request in accordance with PAIA and applicable regulations.

The School may contact the requester for clarification or additional information where necessary.

The Information Officer will assess whether the requested record exists, whether it is held by the School, whether the procedural requirements have been met, and whether any grounds for refusal apply.

The requester will be informed of the outcome in accordance with the applicable legal requirements and time limits.

10. FEES

Fees may be payable for requests for access to records in accordance with PAIA and the applicable regulations.

Depending on the request, applicable fees may include permitted request, access, reproduction, search or preparation charges.

Any applicable fee will be communicated in accordance with the relevant legal requirements. Fees will not be imposed contrary to applicable law.

A copy of this manual supplied electronically may be made available free of charge. A reasonable charge may apply for a printed copy where permitted by law.

11. GROUNDS FOR REFUSAL OF ACCESS

The School may refuse access to a record where a lawful ground for refusal under PAIA applies.

Such grounds may include, where applicable:

- Protection of another person's personal information.
- Protection of commercial information or confidential third-party information.
- Protection of confidential information supplied in confidence.
- Protection of the School's commercial interests.
- Protection of privileged legal communications.
- Protection of research information where applicable.
- Other grounds recognised by PAIA.

Where the law requires or permits access to part of a record, the School will consider whether the remainder may be disclosed with protected information appropriately withheld.

A refusal will be dealt with in accordance with the applicable requirements of PAIA.

12. REMEDIES AVAILABLE TO A REQUESTER

A requester who is dissatisfied with a decision concerning access to a record may pursue the remedies available under applicable law.

These may include lodging a complaint with the Information Regulator or seeking appropriate relief through a competent court, subject to the applicable procedures and time limits.

The Information Regulator's contact details and guidance are available at:

<https://inforegulator.org.za/>

13. AVAILABILITY OF THIS MANUAL

This manual will be made available:

- On the School's website.
- At the School's principal place of business for inspection during normal business hours.
- To a person upon request, subject to any lawful charge.
- To the Information Regulator upon request.

The School will review this manual periodically and update it when necessary, including when its contact details, record categories, information processing activities or applicable legal requirements materially change.

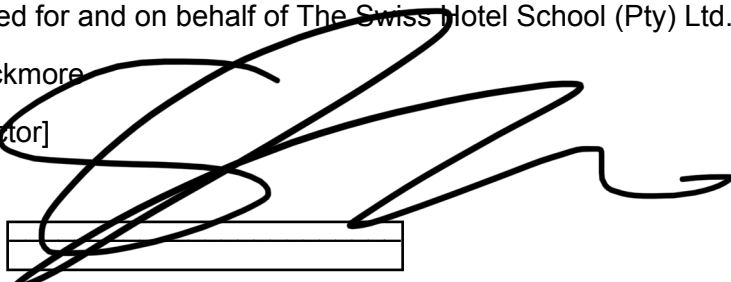
14. APPROVAL

This manual is issued for and on behalf of The Swiss Hotel School (Pty) Ltd.

Name: Stephen Hickmore

Designation: [Director]

Signature:




Date of approval: 14/10/26

END OF MANUAL

