



THE CLICK FOUNDATION TRUST

(Click Learning)

PROMOTION OF ACCESS TO INFORMATION MANUAL

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

Date	Version
2020	1
September 2024	2
June 2025	3
April 2026	4

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1. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to -

- 1.1. check the categories of records held by Click Learning which are available without a person having to submit a formal PAIA request;
- 1.2. have a sufficient understanding of how to make a request for access to a record of Click Learning;
- 1.3. understand the description of the records of Click Learning which are available in accordance with any other law;
- 1.4. access all the relevant contact details of the Information Officer who will assist the public with the records they intend to access;
- 1.5. understand the description of the guide on how to use PAIA, as updated by the Information Regulator and how to obtain access to it;
- 1.6. understand if the Click Learning 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;
- 1.7. understand the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.8. understand the recipients or categories of recipients to whom the personal information may be supplied;
- 1.9. understand if Click Learning 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
- 1.10. understand whether Click Learning has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

2. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF Click Learning

Information Officer: Nicola Harris

Address: Office 293, 2nd Floor, Dunkeld West Centre, Cnr Jan Smuts Avenue & Bompas Road
Dunkeld, Johannesburg, 2195

E-mail: compliance@clicklearning.org

Deputy Information Officer: Brad Games

Address: Office 293, 2nd Floor, Dunkeld West Centre, Cnr Jan Smuts Avenue & Bompas Road
Dunkeld, Johannesburg, 2195

E-mail: compliance@clicklearning.org

National or Head Office

Postal Address: Postnet Suite 1099, Private Bag X99, Benmore 2010

Physical Address: Office 293, 2nd Floor, Dunkeld West Centre, Cnr Jan Smuts Avenue &
Bompas Road Dunkeld, Johannesburg, 2195

Email: compliance@clicklearning.org

Website: <https://clicklearning.org>

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

- 2.1. The Information 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 Promotion of Access to Information Act Act 2 of 2000 (PAIA) and the Protection of Personal Information Act 4 of 2013 (POPIA).
- 2.2. 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 Information Regulator, during normal working hours.
- 2.3. The Guide can also be obtained-
 - upon request to the Information Officer; and
 - from the website of the Information Regulator (<https://inforegulator.org.za/paia-guidelines/>).

4. RECORDS AVAILABLE WITHOUT A REQUEST TO ACCESS IN TERMS OF PAIA

- 4.1. Records of a public nature, typically those disclosed on the Click Learning's website (<https://clicklearning.org/>) and in its various reports, may be accessed without the need to submit a formal application.
- 4.2. Other non-confidential records, such as statutory records maintained at the Master's Office, may be accessed without the need to submit a formal application, however, an appointment to view such records will still have to be made with the Deputy Information Officer.

5. DESCRIPTION OF THE RECORDS OF THE BODY WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Where applicable to its operations, Click Learning also retains records and documents in terms of the legislation below.

Category of Records	Applicable Legislation
Trust formation and Trustee records	Trust Property Control Act 1957 of 1988
Register, record or reproduction of the earnings, time worked, payment for piece work and overtime and other prescribed particulars of all the employees	Compensation for Occupational and Diseases Act 130 of 1993
Written particulars of an employee after termination of employment	Basic Conditions of Employment Act 75 of 1997
Employee's name and occupation	Basic Conditions of Employment Act 75 of 1997
Time worked by each employee	Basic Conditions of Employment Act 75 of 1997
Remuneration paid to each employee Records of disciplinary transgressions, the actions taken by Click Learning and the reasons for the actions Employee records – names, identifications numbers and monthly remuneration and address at which employee is employed Employee race and gender information	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995 Unemployment Insurance Act 63 of 2002 Employment Equity Act 55 of 1998 Broad-Based Black Economic Empowerment Act 53 of 2003

<p>Records of workplace incidents including incidents which resulted in employees having to receive medical treatment Records of recommendations made to Click Learning in terms of issues affecting the health of employees</p> <p>Employee remuneration, and tax records</p>	<p>Occupational Health and Safety Act, 84 of 1993 and Compensation for Occupational and Diseases Act 130 of 1993</p> <p>Occupational Health and Safety Act, 84 of 1993 and Compensation for Occupational and Diseases Act 130 of 1993</p> <p>Tax Administration Act 28 of 2011, Income Tax Act 58 of 1962</p>
<p>Tax records</p>	<p>Tax Administration Act 28 of 2011, Income Tax Act 58 of 1962 and Value Added Tax Act 89 of 1991, Skills Development Levies Act 9 of 1999</p>
<p>Click Learning tax and financial records</p>	<p>Trust Property Control Act 57 of 1988, Tax Administration Act 28 of 2011, Income Tax Act 58 of and Skills Development Levies Act 9 of 1999</p>
<p>Electronic communications and transactions records</p>	<p>Electronic Communications & Transactions Act 25 of 2002</p>

6. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY Click Learning

Subjects on which Click Learning holds records	Categories of records
Trust records	Trust Deed Statutory records Trustee and Beneficiary records
Human Resources	HR policies and procedures Advertised posts Employee records Job Applicant records Training records
Finance	Tax records (Click Learning and employees) Annual financial statements Bank statements Purchase Orders/Invoices Asset Register Insurance information
Operational	Request for Proposals Operational reviews Vendor records Donor/Funder records External Facilitator and Volunteer records School, District and Government records Guidelines, policies and procedure Contracts Internal and external correspondence Records provided by a third party Information technology Strategic Plans Marketing materials Visitor Records Contact Records

7. PROCESSING OF PERSONAL INFORMATION

7.1. Purpose of Processing Personal Information

Click Learning processes personal information in the ordinary course of its operations, including, but not limited to, the following:

- to assess and/or verify your suitability for participation in the Education Programme;
- to facilitate your enrolment in the Education Programme and give you access to the education software;
- to assist you in completing certain modules of the Education Programme;
- to track training provided for SACE accredited training;
- to obtain and maintain funding;
- for analysis, evaluation and research regarding the Education Programme;
- your employment or our internal processes and our organisation;
- to carry out Click Learning's obligations or enforce your obligations arising from any contracts entered into between you and Click Learning;
- to communicate with you and/or to provide you with the information and services that you request from Click Learning and for Click Learning to request information it may require from you;
- to measure compliance with laws including, but not limited to, the Broad Based Black Economic Empowerment Act 53 of 2003 (as amended) and labour laws;
- to provide you with sim card and/or RICA you in so far as we are a RICA agent;
 - to assess / verify your suitability for a job you apply for;
- to perform and manage the employment relationship we have with our employees; and/or
 - to inform you about Click Learning events or initiatives.

For more information regarding the purposes we process personal information, please see our Privacy Notice on our website; for job applicants and their referees, please see our Privacy Notice on our recruitment website; or for Click Learning personnel please contact the Deputy Information Officer.

7.2. Description of the categories of Data Subjects, the information or categories of information relating thereto and categories of recipients

Most commonly, Click Learning processes the following personal information of the following categories of data subjects:

Categories of Data Subjects	Personal Information that may be processed	Categories of third party recipients
Students	Full Name	Personal information may be shared with: <ul style="list-style-type: none">● Schools● Suppliers● Professional service providers● Partners
	Contact Details	
	Race	

	Gender	<ul style="list-style-type: none"> • Donors • External facilitators • Regulatory authorities, government departments and the courts
	Age	
	Identification / Passport Number	
	Lurits number	
	Education	
	Nationality	
	Language	
	Disability	
	Username and Password	

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School Staff and External Facilitators	Full Name	Personal information may be shared with: <ul style="list-style-type: none"> • Schools • Suppliers • Professional service providers • Partners • Donors • External facilitators • Third Party verification, credit bureau and background check agencies • Regulatory authorities, government departments and the courts
	Contact Details	
	Address	
	Identification Number / Passport number	

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Parents / Legal Guardians of Students	Names	Personal information may be shared with: <ul style="list-style-type: none"> • Schools • Suppliers • Professional service providers • Partners • Donors • External facilitators • Regulatory authorities, government departments and the courts
	Contact Details	

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Schools and Government Departments	Names	Personal information may be shared with: <ul style="list-style-type: none"> • Schools • Suppliers • Professional service providers • Partners • Donors • External facilitators • Regulatory authorities, government
	Contact Details	
	Addresses	
	Bank Details (Schools)	

		departments and the courts
Donors	Names	Personal information may be shared with: <ul style="list-style-type: none"> • Schools • Suppliers • Professional service providers • Partners • Donors • Regulatory authorities, government departments and the courts
	Contact Details	
	Financial Information	
	Registration Information	
	Additional Information you choose to tell us	
Suppliers	Name and contact details	Personal information may be shared with: <ul style="list-style-type: none"> • Schools / Students / Parents • Suppliers • Professional service providers • Partners • Donors • External Facilitators / Volunteers • Regulatory authorities, government departments and the courts
	Company registration details and incorporation documents	
	Physical and/or postal address	
	Key employee names, contact details	
	Financial, BEE and tax information	
	Teleconference and video conference call recordings	
	Additional information you choose to tell us	

Employees	Name and Contact Details	Personal information may be shared with: <ul style="list-style-type: none"> • Schools / Students / Parents • Suppliers • Professional service providers • Partners • Donors • External facilitators • Third Party verification, credit bureau and background check agencies • Regulatory authorities, government departments and the courts
	Medical information	
	Identity number and date of birth / ID and/or passport copies	
	Gender	
	Disability information	
	Education and Employment history	
	Criminal records and credit history	
	Pension, Retirement Fun and	

	Insurance Information	
	Employment contracts	
	Performance records	
	Details of dependants, marital status and emergency contacts	
	Payroll, financial and tax records	
	Electronic access and communication records	
	Physical access records	
	Surveillance records Health and safety records Training records	
	Leave records	
	Time and attendance records Device usage data including IP address, and online activity Details of payments to third parties	
	Teleconference and video conference call recordings	
	Additional information you choose to tell us	
Job Applicants	Full Name	Job applicant information may be shared with: <ul style="list-style-type: none"> • Suppliers • Professional service providers • Third Party verification, credit bureau, psychometric test providers and background check agencies • Regulatory authorities, government departments and the courts
	Contact Details	
	Race	
	Gender	
	Nationality	
	Language	
	Drivers Licence	
	Identification/visa/passport information	
	Video recordings	
	Criminal record and any pending criminal proceedings	
	Credit History	
	Educational background Psychometric testing results	

	Additional information you choose to tell us	

Persons who visit / work at our premises	Full Names and contact details	Personal Information may be shared with: <ul style="list-style-type: none"> ● Suppliers ● Professional service providers ● Regulatory authorities, government departments and the courts
	CCTV Footage	
Persons who contact us / subscribe to our newsletters / engage with us and visitors to our website	Full Name and contact details	Personal information may be shared with: <ul style="list-style-type: none"> ● Schools / Students / Parents ● Suppliers ● Professional service providers ● Partners ● Donors ● External Facilitators ● Regulatory authorities, government departments and the courts
	Browser information (e.g., IP address, browser type and version, operating system, language), date and time of access, device information, traffic source, content your browse and your navigation around our applications	
	Additional Information you choose to tell us	

For more information regarding the personal information we process and who we share it with, please see our Privacy Notice on our website; for job applicants and their referees, please see our Privacy Notice on our recruitment website; or for Click Learning personnel, please contact the Deputy Information Officer.

7.3. Planned transborder flows of personal information

While we generally store all of the personal information that we collect about you in the Republic of South Africa, it is possible that your personal information will be transmitted and hosted outside your region.

We ensure that countries to which your information is being shared either have adequate laws in place or that we entered into contractual arrangements to ensure the protection of your personal information.

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

We apply physical, technical and administrative measures to protect your personal information that is under our control from unauthorised access, collection, use, disclosure, copying,

modification or disposal. All information you provide to us is stored on secure servers. We do not transfer your personal information outside of the country of your residence, unless we are satisfied that there are sufficient safeguards in place to protect your personal information.

We employ up to date technology to ensure the confidentiality, integrity and availability of the personal information under our care. Measures include, but are not limited to:

- Virus protection software and update protocols.
- Secure Identity and electronic access management and physical access control.
- Secure setup of hardware and software making up the IT infrastructure.
- Outsourced service providers who process personal information on behalf of us are contracted to implement security controls.
- Policies and procedures are implemented to ensure the security of your information. Data Encryption and Secure Storage.
- Network Security and Monitoring.
- Employee Security Awareness Training.
- Incident Response and Breach Management.

8. FORM OF REQUEST

A requester must comply with all the procedural requirements contained in PAIA relating to the request for access to a record.

A request for access to records held by Click Learning in terms of section 50 of PAIA must be made on the form contained in the Regulations regarding the Promotion of Access to Information ([Form 2](#)). The request must be made to Click Learning at the address or email address, specified in section 2 above.

A requester must provide sufficient detail on the prescribed form to allow Click Learning to identify the record or records which have been requested and the identity of the requester. If a request is made on behalf of another person or entity, the requester must submit details and proof of the capacity in which the requester is making the request, which must be reasonably satisfactory to Click Learning. The requester is also required to indicate the form of access to the relevant records that is required, and to provide his, her or its contact details in the Republic of South Africa.

A requester will receive a response to their request on the [Form 3](#).

9. AVAILABILITY OF THE MANUAL

8.1. A copy of the manual is available:

- on Click Learning website;
- head office of Click Learning for public inspection during normal business hours;
- to any person upon request and upon the payment of a reasonable prescribed fee; and
- to the Information Regulator upon request.

8.2. A fee for a copy of the Manual shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The Information Officer of Click Learning will on a regular basis update this manual

