

Quality Management System	Title:	PAIA Manual: Section 51 Act 2 of 2000		
	Type:	Policy	Number:	QMS-P-36
	Owner:	R. R. Robertson	Revision:	1
	Author:	M. le Roux	Active Date:	28-06-2021
	Approved by:	R.R. Robertson	Review Date:	AUGUST 2026
			Page Number:	Page 1 of 13

COMBINED PRIVATE INVESTIGATIONS PTY LTD “CPI”



PAIA MANUAL

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

Quality Management System	Title:	PAIA Manual: Section 51 Act 2 of 2000		
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			Page Number:	Page 2 of 13

1. LIST OF ACRONYMS AND ABBREVIATIONS

- 1.1 **“IO“** Information Officer;
- 1.2 **“Minister”** Minister of Justice and Correctional Services;
- 1.3 **“PAIA”** Promotion of Access to Information Act No. 2 of 2000(as Amended;
- 1.4 **“POPIA”** Protection of Personal Information Act No.4 of 2013;
- 1.5 **“Regulator”** Information Regulator; and
- 1.6 **“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

Quality Management System	Title:	PAIA Manual: Section 51 Act 2 of 2000		
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	Approved by:	R.R. Robertson	Review Date:	AUGUST 2026
			Page Number:	Page 3 of 13

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 OFFICE OF CPI

3.1. Chief Information Officer

Name: Raymond Roy Robertson
 Tel: 011 265 3601
 Email: popi@combinedpi.co.za
 Address: 33 New Road, Halfway House, Midrand, Gauteng, 1685

3.2. Access to information general contacts

Email: info@combinedpi.co.za

3.3 National or Head Office

Postal Address: P.O. Box 50172
 Midrand
 1685

Physical Address: 33 New Road
 Halfway House
 Midrand
 1685

Telephone: 011 265 3601

Email: info@combinedpi.co.za

Website: www.combinedpi.co.za

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

	Title:	PAIA Manual: Section 51 Act 2 of 2000		
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	Approved by:	R.R. Robertson	Review Date:	AUGUST 2026
			Page Number:	Page 4 of 13

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;

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

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-

- that record is required for the exercise or protection of any rights;
- that person complies with 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.

 Combined Private Investigations Corporate Investigations	Quality Management System	Title:	PAIA Manual: Section 51 Act 2 of 2000	
		Type:	Policy	Number: QMS-P-36
		Owner:	R. R. Robertson	Revision: 1
		Author:	M. le Roux	Active Date: 28-06-2021
		Approved by:	R.R. Robertson	Review Date: AUGUST 2026 Page Number: Page 5 of 13

- 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.
- 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/>).

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-

- (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.”

Quality Management System	Title:	PAIA Manual: Section 51 Act 2 of 2000		
	Type:	Policy	Number:	QMS-P-36
	Owner:	R. R. Robertson	Revision:	1
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	Approved by:	R.R. Robertson	Review Date:	AUGUST 2026
			Page Number:	Page 6 of 13

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 Afrikaans & English

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

Category of records	Types of the Record	Available on Website	Available upon request
General			X

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

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Copy of the Occupational Health and Safety Act 85 of 1993	Occupational Health and Safety Act 85 of 1993
All records required by the Act.	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Summary of the Employment Equity Act 55 of 1998	Employment Equity Act 55 of 1998
All records required by the Act	Income Tax Act 58 of 1962
Records of disciplinary hearings	Labour Relations Act 66 of 1995
Records detailing contributions by contributors employed by the employer.	Unemployment Insurance Act 30 of 1966
All records required by the Act.	Value added Tax 58 of 1962
All records required by the Act.	Protection of Personal Information Act 4 of 2013

Quality Management System	Title:	PAIA Manual: Section 51 Act 2 of 2000		
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	Owner:	R. R. Robertson	Revision:	1
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	Approved by:	R.R. Robertson	Review Date:	AUGUST 2026
			Page Number:	Page 7 of 13

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

Subjects on which the body holds records	Categories of records
Administration	• Registration documents • Licences and policies • PSIRA documentation • Statutory registers and returns • Minutes of meetings
Human Resources	• Employment contracts • Employment Equity Plan and records • Medical Aid records • Pension Fund records • Disciplinary records • Salary records • SETA records • Disciplinary code • Leave records • Training records • Training Manuals • Benefits records • Union, Bargaining Council and other membership records • Employee records • BBBEE records • Performance records
Financial	• Financial Statements • Budgets • Contracts • Financial transactions • Insurance • Purchase & Order

Quality Management System	Title:	PAIA Manual: Section 51 Act 2 of 2000		
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	Owner:	R. R. Robertson	Revision:	1
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			Page Number:	Page 8 of 13

Subjects on which the body holds records	Categories of records
	• Tax returns • Accounting records • Banking records • Bank statements • Asset register • Rental/lease agreements • Invoices • PAYE records • Records relating to income tax of employees • Statutory compliance and payments
Operational	• Correspondence • Reports • Licences and permits • Agreements • Fleet documentation • Technological documentation

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Description of category of data subject	Purpose of the processing
Customers / Clients	Contract management Service deliverables Reporting
Service Providers/ Suppliers	Procurement management Performance duties Account management Administrative duties Compliance
Employees	HR management

Quality Management System	Title:	PAIA Manual: Section 51 Act 2 of 2000		
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	Approved by:	R.R. Robertson	Review Date:	AUGUST 2026
			Page Number:	Page 9 of 13

Description of category of data subject	Purpose of the processing
	Recruitment verification General matters, such as pension, medical aid, payroll, disciplinary record, training Legal obligation Any other reasonable purpose relating to employment or the employee.

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
Customers / Clients	Name Address and contact details Registration number VAT number Bank details
Service Providers/Suppliers	Name Registration number VAT number Address and contact details Bank details
Employees	Names and identifying information Address Qualifications and occupation Gender and race Salary/benefit information Disciplinary Proceedings Banking details UIF

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	Approved by:	R.R. Robertson	Review Date:	AUGUST 2026
			Page Number:	Page 10 of 13

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
Customer/Client	Staff members
Service Providers/ suppliers	Staff members
Employees	South African Revenue Service CPI Time and Attendance Application Statutory bodies and relevant public bodies Professional associations Medical Scheme Pension Fund Vetting agencies Banks

8.4 Planned transborder flows of personal information

8.4.1. Whenever we transfer your Personal Information out of the country, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- (a) We will only transfer your Personal Information to countries that have appropriate data protection and privacy legislation to protect your Personal Information.
- (b) Where we use certain service providers, we conclude an agreement with them to confirm that your Personal Information is confidential, they can only process on our instructions and that they should establish and maintain appropriate technological and organisational measures to protect your Personal Information.
- (c) Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide protection to Personal Information similar to the principles under the GDPR, which we believe are good principles to ensure compliance.

Quality Management System	Title:	PAIA Manual: Section 51 Act 2 of 2000		
	Type:	Policy	Number:	QMS-P-36
	Owner:	R. R. Robertson	Revision:	1
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	Approved by:	R.R. Robertson	Review Date:	AUGUST 2026
			Page Number:	Page 11 of 13

8.4.2. By submitting your Personal Information to us you consent to the transfer of your Personal Information outside the borders of the Republic of South Africa.

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. **CPI** undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. **CPI** may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

1. Access Control of Persons:

CPI shall implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data are processed.

2. Data Media Control:

CPI undertakes to implement suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by **CPI** and containing personal information of data subjects.

3. Data Memory Control:

CPI undertakes to implement suitable measures to prevent unauthorized input into data memory and the unauthorised reading, alteration, or deletion of stored data.

4. User Control:

CPI shall implement suitable measures to prevent its data processing systems from being used by unauthorised persons by means of data transmission equipment.

5. Access Control to Data:

CPI represents that the persons entitled to use **CPI** data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).

6. Transmission Control:

	Quality Management System	Title:	PAIA Manual: Section 51 Act 2 of 2000	
		Type:	Policy	Number: QMS-P-36
		Owner:	R. R. Robertson	Revision: 1
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		Approved by:	R.R. Robertson	Review Date: AUGUST 2026 Page Number: Page 12 of 13

CPI shall be obliged to enable the verification and tracing of the locations / destinations to which the personal information is transferred by utilization of **CPI** data communication equipment / devices.

7. Transport Control:

CPI shall implement suitable measures to prevent Personal Information from being read, copied, altered, or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

8. Organisation Control:

CPI shall maintain its internal organisation in a manner that meets the requirements of this Manual.

9.5.2. **CPI** is doing this by implementing the following security measures:

- a) Staff awareness program
- b) Policies
- c) Procedure Guidelines
- d) Technical Security Measures
- e) Organisational Security Measures

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

- 9.1.1 on www.combinedpi.co.za, if any;
- 9.1.2 head office of the CPI 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.

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	Owner:	R. R. Robertson	Revision:	1
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	Approved by:	R.R. Robertson	Review Date:	AUGUST 2026
			Page Number:	Page 13 of 13

10. UPDATING OF THE MANUAL

The manual will be updated on a regular basis.

Issued by

Raymond Roy Robertson
Information Officer