

Library Special Projects (Pty) Ltd.
t/a/ LSP



PAIA MANUAL

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

**DATE OF COMPILATION: 01/10/2021
DATE OF REVISION: 01/10/2023**

1. LIST OF ACRONYMS AND ABBREVIATIONS

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|-----|--------------------|--|
| 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 | “Regulator” | Information Regulator; and |
| 1.8 | “Republic” | Republic of South Africa |
| 1.9 | “LSP” | Library Special Projects (Pty) Ltd. |

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 Library Special Projects (Pty) Ltd. t/a LSP

3.1. Managing Director

| | |
|--------|---------------------|
| Name: | Stewart Barstow |
| Tel: | +27 (0) 10 203 9456 |
| Email: | stewart@lib.co.za |

Cell number: +27 (0) 829238028

3.2. Deputy Information Officer

Name: Frances Barstow
Tel: +27 (0) 10 203 9456
Email: frances@lib.co.za
Cell Number: +27 (0) 82 923 8013

3.3 Access to information general contacts

Email: info@lib.co.za

3.4 **National or Head Office**

Postal Address: 6 Cardiff Road, Randburg, Johannesburg, South Africa, 2193

Physical Address: Office 201, Parktown Quarter, 7th Ave, Parktown North,
Johannesburg, South Africa, 2193

Telephone: +27 (0) 10 203 9456

Email: info@lib.co.za

Website: www.lib.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 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;

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.*

- 4.3.6. 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-

- (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.”

4.4. 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/>).

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 & Zulu

5. CATEGORIES OF RECORDS OF THE Library Special Projects (Pty) Ltd. t/a LSP WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

| Category of records | Types of the Record | Available on Website | Available upon request |
|---------------------|--|----------------------|------------------------|
| Pdf Report | LSP's Company Profile and portfolio of work | | X |
| Website | Some of LSP's projects – photos, project location, date, client name (no additional client or project information) LSP's office generic contact details provided. | X | |

6. DESCRIPTION OF THE RECORDS OF Library Special Projects (Pty) Ltd. t/a LSP WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

LSP maintains records in accordance with various legislation, including but not limited to:

| Category of Records | Applicable Legislation |
|-----------------------------|--|
| Memorandum of incorporation | Companies Act 71 of 2008 |
| PAIA Manual | Promotion of Access to Information Act 2 of 2000 |

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE Library Special Projects (Pty) Ltd. t/a LSP

| Subjects on which the body holds records | Categories of records |
|---|--|
| LSP Internal records The records listed pertain to LSP's own affairs | <ul style="list-style-type: none"> - Strategic Documents, Plans, Proposals - Financial records - Operational records - Intellectual property - Marketing records - Internal correspondence - Statutory records - Internal policies and procedures - Minutes of meetings |
| Human Resources | <ul style="list-style-type: none"> - HR policies and procedures - Advertised posts - Employees records |
| Client-related records | <ul style="list-style-type: none"> - Contracts with the client |

| Subjects on which the body holds records | Categories of records |
|--|---|
| Other third party records | - LSP payroll for employees records which are held by another party (LSP's appointed accountants) as well as LSP. |

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Library Special Projects (Pty) Ltd. t/a LSP processes personal information for various purposes, all of which are aligned with our business objectives and legal obligations. The primary purposes for processing personal information include, but are not limited to:

- providing and maintaining our design for arts and heritage services to clients;
- managing client relationships and communicating with clients regarding projects, updates, and relevant information;
- processing payments and invoices related to our design services;
- complying with legal and regulatory requirements, such as tax laws and industry regulations;
- ensuring the security and integrity of our business operations and client data;
- recruiting and managing employees, contractors, and suppliers.

LSP process personal information in accordance with the provisions of the Protection of Personal Information Act (POPIA) and other relevant laws, ensuring that the processing is lawful, fair, and transparent.

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

The personal information LSP processes may include, but is not limited to, names, contact details, identification numbers, financial information, employment information, and any other information necessary for our business operations and as permitted by law.

LSP processes personal information relating to the following categories of data subjects:

| Categories of Data Subjects | Personal Information that may be processed |
|-----------------------------|---|
| Clients | name, address and contact details only (no banking details, no financial details, no ID or employee details); project requirements, and correspondence related to our design services |
| Service Providers | names, registration number, vat numbers, address, and bank details |
| Employees | address, qualifications, ID number and banking account details for salary payments only. |

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

LSP disseminates very little personal information. The only personal information that LSP disseminates is that which is related to payroll for employees, and even that is limited to basic personal information and does not include banking details. See detail below:

| Category of personal information | Recipients or Categories of Recipients to whom the personal information may be supplied |
|--|---|
| Employee details with specific reference to payroll calculations, banking details and Identity number and name in order to produce payslips. | LSP's appointed Accountants / Auditors: ML Accountants (Pty) Ltd. |

8.4 Planned transborder flows of personal information

LSP does not enter into any transborder flows of information.

If this changes at any time, LSP will update the manual accordingly.

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

LSP is committed to ensuring the confidentiality, integrity, and availability of personal information processed by our organisation. We have implemented a comprehensive Information Security Management System (ISMS) that includes a range of technical, administrative, and physical security measures to safeguard personal information against unauthorised access, use, disclosure, alteration, or destruction.

These measures include, but are not limited to:

Access Control: We employ strict access control mechanisms, such as unique user identifiers, strong passwords, and role-based access permissions, to ensure that only authorised individuals can access personal information on a need-to-know basis.

Encryption: We use industry-standard encryption technologies to protect personal information during transmission and storage, safeguarding against unauthorised access or interception.

Secure Network Infrastructure: Our network infrastructure is protected by firewalls, intrusion detection and prevention systems, and LSP does regular vulnerability assessments to identify and address potential security risks.

Data Backup and Recovery: We maintain regular and automated backups of personal information to ensure data availability and integrity in the event of a disaster or system failure.

Employee Training and Awareness: All employees receive mandatory training on information security best practices, data protection policies, and their responsibilities in safeguarding personal information.

Third-Party Risk Management: We conduct due diligence on third-party service providers to ensure they maintain appropriate security measures and comply with relevant data protection laws and regulations.

In addition, LSP and ML Accountants (LSP's only Third-Party organisation which processes some personal information for LSP's employees) have a specific PAIA manual which guides our joint interactions.

We regularly review and update our information security measures to ensure they remain effective and in line with industry best practices and evolving security threats. By implementing these measures, we strive to maintain the confidentiality, integrity, and availability of the personal information entrusted to us.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 head office of the Library Special Projects (Pty) Ltd. t/a LSP for public inspection during normal business hours;

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

9.1.3 to the Information Regulator upon request.

9.1.4 Note: LSP's website is currently under development and the Manual will be available via the website in the future.

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 Library Special Projects (Pty) Ltd. t/a LSP will on a regular basis update this manual.

Issued by

Frances Barstow – Information Officer

Stewart Barstow – Managing Director