PAIA MANUAL

BRAS Consultants Group (Pty) Ltd

trading as The Apprentice Doctor Africa

Registration number 2022/212587/07

Prepared in terms of section 51 of the

Promotion of Access to Information Act 2 of 2000 (as amended)

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1. List of acronyms and abbreviations

"BRAS"	BRAS Consultants Group (Pty) Ltd, trading as The Apprentice Doctor Africa
"CPA"	Consumer Protection Act 68 of 2008
"DIO"	Deputy Information Officer
"IO"	Information Officer
"Minister"	Minister of Justice and Correctional Services
"PAIA"	Promotion of Access to Information Act 2 of 2000 (as amended)
"POPIA"	Protection of Personal Information Act 4 of 2013
"Regulator"	Information Regulator
"Republic"	Republic of South Africa

2. Purpose of this PAIA manual

This manual is useful for the public to:

2.1 check the categories of records held by BRAS 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 BRAS, by providing a description of the subjects on which BRAS holds records and the categories of records held on each subject;

2.3 know the description of the records of BRAS which are available in accordance with any other legislation;

2.4 access the contact details of the 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 whether BRAS processes personal information, the purpose of that processing, and the categories of data subjects and of the information relating to them;

2.7 know the recipients or categories of recipients to whom the personal information may be supplied;

2.8 know whether BRAS transfers or processes personal information outside the Republic, and the recipients or categories of recipients to whom it may be supplied; and

2.9 know whether BRAS has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information it processes.

3. Key contact details for access to information of BRAS

3.1 Information Officer

Name	Roeloff Breet
Contact	Through the contact page: https://theapprenticedoctor.com/get-in-touch/
Post	145 Bokmakierie Road, Pretoria, Gauteng, 0157
Fax	None

3.2 Deputy Information Officer

No Deputy Information Officer has been designated in terms of section 17(1) of PAIA. Every request goes to the Information Officer.

3.3 Access to information: general contact

Through the contact page, https://theapprenticedoctor.com/get-in-touch/, marked "PAIA request", or by post to the Information Officer at the address below.

3.4 Head office

Postal address	145 Bokmakierie Road, Pretoria, Gauteng, 0157
Physical address	145 Bokmakierie Road, Pretoria, Gauteng, 0157
Contact	https://theapprenticedoctor.com/get-in-touch/
Website	https://theapprenticedoctor.com

3.5 How to make a request

A request for access to a record is made on Form 2 of the PAIA Regulations, available from the Regulator's website, and sent to the Information Officer as set out above. The requester must give enough detail to identify the record, say which right the record is needed to exercise or protect (section 50 of PAIA), and pay the prescribed request fee and any access fee before the record is provided. The Information Officer will help a requester who needs assistance to complete the form.

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 Guide contains the description of:

- the objects of PAIA and POPIA;
- the postal and street address, phone and fax number and, if available, electronic mail address of the Information Officer of every public body, and of every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;
- the manner and form of a request for access to a record of a public body (section 11) and of a private body (section 50);
- the assistance available from the Information Officer of a public body, and from the Regulator, in terms of PAIA and POPIA;
- 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 an internal appeal, a complaint to the Regulator, and an application to a court against a decision by the information officer of a public body, a decision on internal appeal, a decision by the Regulator or a decision of the head of a private body;
- the provisions of sections 14 and 51 requiring a public body and a private body, respectively, to compile a manual, and how to obtain access to a manual;
- the provisions of sections 15 and 52 providing for the voluntary disclosure of categories of records by a public body and a private body, respectively;
- the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and
- the regulations made in terms of section 92.

4.4 Members of the public can inspect or make copies of the Guide from the offices of public and private bodies, including the office of the Regulator, during normal working hours.

4.5 The Guide can also be obtained upon request to the Information Officer, or from the website of the Regulator (https://inforegulator.org.za).

4.6 A copy of the Guide is also available in English and Afrikaans for public inspection at BRAS's head office during normal office hours, by appointment made through the contact page.

5. Categories of records of BRAS which are available without a person having to request access

Category of records	Types of the record	Available on website	Available upon request
Programme information	Programme pages: dates, places, fees, what the fee includes, eligibility requirements	X	X
Participant documents	The Participation Agreement, including the Risk Acknowledgement and the Privacy Notice, given to every applicant before payment	X	X
Policies	Terms, conditions and policies	X	X
PAIA manual	This manual	X	X

6. Description of the records of BRAS which are available in accordance with any other legislation

BRAS keeps the following records as the legislation below requires, where it applies to BRAS. They are available as that legislation provides, and otherwise by a request under PAIA.

Category of records	Applicable legislation
Memorandum of incorporation, register of directors, company records and filings	Companies Act 71 of 2008
Accounting and tax records	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011
Consumer agreements, invoices, cancellation and refund records	Consumer Protection Act 68 of 2008
Records of electronic transactions and acceptances	Electronic Communications and Transactions Act 25 of 2002
Records of personal information and consents	Protection of Personal Information Act 4 of 2013
Consents and records about participants under 18	Children's Act 38 of 2005

Employment records, where BRAS employs staff	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995; Unemployment Insurance Act 63 of 2001; Compensation for Occupational Injuries and Diseases Act 130 of 1993
Health and safety and incident records	Occupational Health and Safety Act 85 of 1993
PAIA manual	Promotion of Access to Information Act 2 of 2000

7. Description of the subjects on which BRAS holds records, and the categories of records held on each subject

Subjects on which BRAS holds records	Categories of records
Company and governance	Memorandum of incorporation, director records, resolutions, statutory filings
Finance and tax	Invoices, credit notes, payment and refund records, bank statements, accounting records, tax returns
Programmes and participants	Applications, signed agreements and acceptances, Medical and Emergency Forms, attendance and check-in records, incident records, certificates and the alumni register, photos and video, correspondence
Parents and guardians	Consents, contact details, collection arrangements, court orders provided
Marketing	Marketing consents and their withdrawals, published marketing material
Suppliers, venues and service providers	Contracts, quotations, invoices, insurance records, correspondence
Staff and facilitators	Contracts, contact details, qualifications, training records, payment records
Information technology	System access records, security records, backups

8. Processing of personal information

8.1 Purpose of processing personal information

BRAS processes personal information to:

- run its programmes: applications, places, payments, invoices, refunds, communication, attendance and certificates;
- keep participants safe: medical information, emergencies and incident records;
- take photos and video to teach, keep participants safe and record the programme;

- use photos and video in marketing, only with the participant's, or for a participant under 18 the parent's or guardian's, voluntary consent;
- verify certificates through its alumni register;
- contract with and pay its suppliers, venues, staff and facilitators; and
- keep the records the law requires.

The basis for each purpose is set out in the Privacy Notice (Part 6 of the Participation Agreement).

8.2 Description of the categories of data subjects and of the information relating to them

Categories of data subjects	Personal information that may be processed
Applicants and participants	Name, date of birth, contact details, school or studies, answers on the application form, health information from the Medical and Emergency Form, glove size, dietary requirements, payment records, signed acceptances, attendance and check-in records, incident records, certificates, photos and video, and the marketing Yes or No
Parents and guardians of participants under 18	Name, contact details, relationship to the participant, collection arrangements, any court order, consents, and payment records where they pay
People and organisations who pay for a participant	Name, contact details, billing details, payment records
Staff and facilitators	Name, contact details, identity number where employment or tax law requires it, qualifications, bank details for payment
Suppliers, venues and service providers	Names, registration numbers, contact persons, addresses, bank details
People who contact BRAS	Name, contact details and the message sent

Card and bank login details are handled by BRAS's payment provider, not by BRAS.

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
Names and dietary requirements	Venues and caterers, only what they need
Health and emergency information	Paramedics, hospitals and doctors, in an emergency
Payment records	BRAS's payment provider
Application, participant, parent and payment records	The service providers that host BRAS's booking, email and record systems

Marketing photos and video	The Apprentice Corporation and the Apprentice Doctor Online Academy, only where the answer was Yes and has not been withdrawn
Whether a certificate is genuine and the participant attended	A school, university, employer or other legitimate party that asks BRAS to verify a certificate
Records the law requires to be disclosed	The South African Revenue Service, the Regulator and other authorities, where the law requires it
Records needed for advice or a claim	BRAS's attorneys, accountants and insurers

BRAS never sells personal information.

8.4 Planned transborder flows of personal information

Yes. Some of the service providers that host BRAS's booking, email and record systems are outside the Republic, including in the United States of America. The information concerned is application, participant, parent, payment and correspondence records. Marketing photos and video are supplied to The Apprentice Corporation, which is in the United States of America, only with the consent described in 8.1. Every transfer is made as section 72 of POPIA requires: under agreements that protect the information, or with the data subject's consent.

8.5 General description of information security measures

BRAS protects personal information with reasonable technical and organisational measures, including:

- encrypted connections (HTTPS) for its website, booking and payment pages;
- password-protected staff accounts, two-step login for staff on its booking site, and access limited by role to the staff who need it;
- payments taken through its payment provider, so that BRAS never holds card or bank login details;
- health information limited to the staff who need it, and the Medical and Emergency Form kept apart from other records;
- signed paper forms kept securely, and scanned copies stored with restricted access;
- regular backups and security scanning of its systems; and
- notifying the data subject and the Regulator if personal information is compromised, as section 22 of POPIA requires.

9. Availability of this manual

9.1 A copy of this manual is available:

- on https://theapprenticedoctor.com/terms-conditions-and-policies/;
- at the head office of BRAS for public inspection during normal business hours, by appointment made through the contact page;

- to any person upon request and upon payment of a reasonable prescribed fee; and
- to the Regulator upon request.

9.2 A fee for a copy of this manual, as contemplated in Annexure B of the Regulations, is payable per A4-size photocopy made.

10. Updating of this manual

The head of BRAS will update this manual on a regular basis.

Issued by



Roeloff Breet
Director and Information Officer
BRAS Consultants Group (Pty) Ltd