

PROMOTION OF ACCESS TO INFORMATION MANUAL

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Approved by:

Human Capital Manager: Madelein Ludeke

Managing Director: Simon Dabbs

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POLICY APPROVAL			
NAME SURNAME	AND DESIGNATION	SIGNATURE	DATE
Simon Dabbs	Director		17 June 2025
Karin van Heerden	Information Officer		17/06/2025

1. DEFINITIONS AND ABBREVIATIONS

Term	Description/Definition
Company	Focal Points Lab (Pty) Ltd
Employee	Any person, excluding an independent contractor, who is employed by the company and who receives, or is entitled to receive any remuneration from the company.
PAIA	Promotion of Access to Information Act, 2000 (Act 2 of 2000)
Information Officer (IO)	The Information Officer is the person authorised to handle PAIA requests.
Deputy Information Officer (DIO)	The persona designated by the Information Officer of a public body to assist the requester with their PAIA request.
PAIA Request	The name given to the document(s) submitted to a public or private body requesting access to information in terms of PAIA.
PAIA Request reference number	The reference number you allocate for an individual PAIA request, e.g 0/0/0/PAIA/date. It is advisable to use this reference number throughout all correspondence with the requester, as well as asking them to do the same.

2. PURPOSE

- 2.1 The purpose of the PAIA Manual is to provide information on how to obtain access to records held by Focal Points Lab (Pty) Ltd to identify the structure and services, in order to facilitate the implementation of the Promotion of Access to Information Act, 2000 (Act No 2 of 2000).

3. SERVICES OF FOCAL POINTS

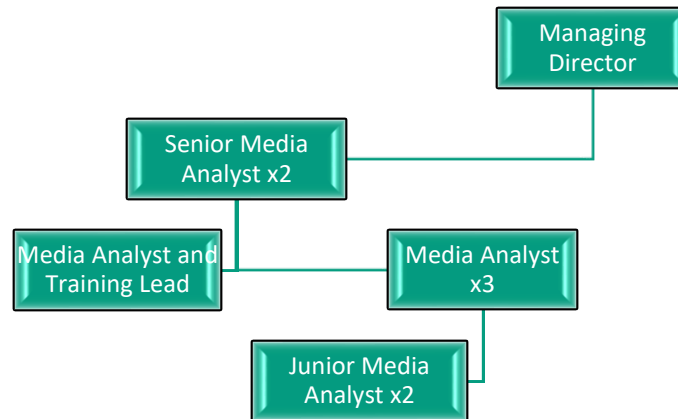
- 3.1 Focal Points' objective is to analyse and quantify the media coverage received for clients across social (Twitter, YouTube, Facebook Media, and Instagram) and editorial media (print, broadcast, and online). The Focal Points reporting solutions provide insights into the manner in which the client is portrayed in the media, which aids in identifying its brand image and reputation. This is done through sentiment analysis which classifies the client's media coverage according to the way (positive, negative, mixed, or neutral) in which it is portrayed in the media. Through brand benchmarking, a comparative analysis of the client's competitors is conducted to assess its media share of voice.

Further information regarding the services of Focal Points is available on the website <https://www.focalpoints.co.za/>

4. ORGANISATIONAL STRUCTURE

- 4.1 Focal Points Lab (Pty) Ltd is a private owned company that was established in 2010 and is a Level 4 B-BBEE contributor. Focal Points is recognised by The International Association for Measurement and Evaluation of Communication Awards (AMEC). The board of Directors consist of a Managing Director and Director. Management is appointed in the various departments with the relevant expertise. Offices are based in Roodepoort.

High Level Organogram



4.2 Description of categories of records held:

Company documentation:

- Compliance with Corporate Governance
- Shareholders Agreements
- Share Certificates
- Delegations of Authority
- General Correspondence

Department: Accounts:

- Annual Reports
- VAT Returns
- Income tax returns and assessments
- Asset records
- Invoices
- Credit Notes
- Journals, Ledgers & Balance sheets
- Income Statements
- Trial Balance statements
- Cash Flow statements
- Tax Invoices
- Insurance Policies
- Lease Agreements
- Contractual records and information relating to suppliers, service providers, contractors and professional advisors
- Building plans
- General Correspondence

Department: Human Capital:

- Employee Records
- Job Descriptions
- Payroll Data
- Medical Aid Records
- UIF Records
- PAYE Records
- Employment Equity Reports
- Skills Development Reports
- Leave Records
- Salary Information
- Disciplinary Records
- Job Competency Profile
- Employee Performance Records
- Training Records
- Internal Policies and Procedures
- Regulatory Submissions
- General Correspondence

Department: Sales:

- Contracts / Agreements
- Customer Liaison
- Customer Records
- General Correspondence

Department: IT:

- Development of New Products
- Databases
- Information Technology
- Product-related Records
- Internal Policies and Procedures
- General Correspondence

It is recorded that access to the documents listed above may be protected by privacy or the grounds of refusal set out in the Act. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act and other applicable legislation.

4.3 Automatically available records:

The records listed below are automatically available without having to submit a formal request to access the information in terms of PAIA.

4.3.1 Public Product Information

4.3.2 Public Corporate Records

4.3.3 B-BBEE Certificate

Records of the company which are not automatically available must be requested in terms of the procedure set out in this manual may be subject to the restrictions and right of refusal to access as provided for in the Act.

5. CONTACT DETAILS OF THE INFORMATION OFFICER

5.1 The Managing Director of Focal Points has appointed the following individuals as the Information Officer of which will be responsible for dealing with requests for records and information:

Information Officer	Karin van Heerden
Telephone number	010 020 5257
Fax number	010 020 5257
Email address	popi@news.newsclip.co.za / info@newsclip.co.za
Postal address	Postnet Suite 213 Private Bag X1 Florida Hills 1716

6. INFORMATION / DOCUMENTS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

6.1 Focal Points keeps information / documents in accordance with the following legislation (please note that this is not an exhaustive list):

Companies Act, No. 71 of 2008
Income Tax Act, No. 58 of 1962
Value-Added Tax Act, No. 89 of 1991
National Credit Act, No. 34 of 2005
Unemployment Insurance Act, No. 63 of 2001
Unemployment Insurance Contributions Act, No. 4 of 2002
Basic Conditions of Employment Act, No. 75 of 1997
Broad Based Black Economic Empowerment Act, No. 53 of 2003
Employment Equity Act, No. 55 of 1998
Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
Insolvency Act, No. 24 of 1936
Occupational Health and Safety Act, No. 85 of 1993
Copyright Act, No. 98 of 1978
Labour Relations Act, No. 66 of 1995
Skills Development Act, No. 97 of 1998
Skills Development Levies Act, No. 9 of 1999
Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
Arbitration Act, No. 42 of 1995
Medical Schemes Act, No. 131 of 1998
Electronic Communication and Transactions Act, No. 25 of 2002
Electronic Communications Act, No. 13 of 2000
Protection of Personal Information Act, No. 4 of 2013

7. RECORDS AUTOMATICALLY AVAILABLE

7.1 The information is classified and grouped according to records relating to the following subjects and categories:

7.1.1 Personnel records:

7.1.1.1 Personal records provided by personnel;

7.1.1.2 Records provided by a third party relating to personnel;

7.1.1.3 Conditions of employment and other personnel-related contractual and legal records;

7.1.1.4 Internal evaluation records and other internal records;

7.1.1.5 Correspondence relating to personnel;

7.1.1.6 Training schedules and material.

“Personnel” refers to any person who works for The Company and receives or is entitled to remuneration.

7.1.2 Customer related records:

7.1.2.1 Records provided by a customer to The Company;

7.1.2.2 Records generated by or withing The Company for financial purposes.

“Customer” refers to any natural person or company which receives services from The Company.

7.2 Certain other information relating to the company is also made available on said website from time to time

8. RECORDS NOT AUTOMATICALLY AVAILABLE

8.1 Records of the company which are not automatically available must be requested in terms of the procedure set out in section 9 of this PAIA manual and which may be subject to the restrictions and right of refusal to access as provided for in the Act.

9. REQUEST PROCEDURE

9.1 The requester of information must comply with all the procedural requirements laid down in the Act when requesting access to a record.

9.2 The information officer shall not be obliged to furnish any information until all requirements laid down in the Act and set out herein have been fulfilled.

9.3 The prescribed form annexed hereto as Appendix 1 must be completed and submitted to the Information Officer at the postal or physical or email address stated in paragraph 5 above, together with payment of the prescribed fees, if applicable (see paragraph 10 below for an explanation of the fees that are payable).

9.4 The prescribed form must be completed with sufficient detail to enable the Information Officer to identify the record(s) in question.

- 9.5 If there is insufficient space on a printed form to answer a question, additional information may be provided on an additional folio.
- 9.6 If a request is made on behalf of another person, the requester must submit proof of such capacity to the reasonable satisfaction of the Information Officer.
- 9.7 If the requester cannot complete the prescribed form due to illiteracy or disability, the requester may make the request orally and in person.
- 9.8 The Information Officer will process the request within 30 days unless the request contains considerations that are of such a nature that an extension of the 30-day time limit is required.
- 9.9 Where an extension of the 30-day time limit is required, the requester shall be notified together with reasons explaining why the extension was required.
- 9.10 Once the request is processed, the requester will be informed whether access will be granted or refused together with reasons for any refusal.

10. FEES

10.1 The fees for reproduction of a record as referred to in section 52(3) are as follows –

10.1.1 for every photocopy of an A4 size page or part thereof	R1,10
10.1.2 for every printed copy of an A4-size page or part thereof	R0,75
10.1.3 for a copy of a compact disc	R70,00
10.1.4 for a transcript of visual images for an A4 size page or part thereof	R40,00
10.1.5 for a copy of visual images	R60,00
10.1.6 for a transcript of an audio record, for an A4-size page or part thereof	R20,00
10.1.7 for a copy of an audio record	R30,00

10.2 The request fee payable by a requester, other than a personal requester is R50, 00.

10.3 If the Information Officer is of the opinion that six hours will be exceeded to search, reproduce and/or prepare the information requested, a deposit is payable equal to one-third of an amount of R30 for each hour or part thereof, exceeding the six hours.

11. GROUNDS FOR REFUSAL TO GRANT ACCESS

The main grounds upon which a request for information may be declined are:

- 11.1 Protecting personal information of a third party (who is a natural person) from unreasonable disclosure.
- 11.2 Protecting commercial information of a third party (for example trade secrets; financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party).
- 11.3 Disclosure would result in the breach of a duty of confidence owed to a third party.

- 11.4 Disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third party.
- 11.5 Mandatory protection of records which would be regarded as privileged in legal proceedings unless such privilege has been waived.
- 11.6 Refusing access to a record containing trade secrets, financial or sensitive information of Focal Points or any information that would put the Company at a disadvantage in negotiations or prejudice it in commercial competition.
- 11.7 The request is frivolous or vexatious or involves an unreasonable diversion of resources.
- 11.8 The record contains information about research being carried out, or about to be carried out, on behalf of a third party or on behalf of Focal Points.

12. GENERAL

- 12.1 The company reserves the right to amend this policy from time to time.

APPENDIX 1

FORM C – REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

Section 53 (1) of the Promotion of Access to Information Act 2 of 2000

A. PARTICULARS OF PRIVATE BODY

Name of Private Body: Focal Points Lab (Pty) Ltd

Registration No: 2010/007389/07

Head of Organisation: Simon Dabbs

Physical Address: Newsclip House, Unit 5
Cnr JG Strydom & Springhaas Road
Constantia Kloof
Roodepoort
1709

Postal Address: Postnet Suite 213
Private Bag X1
Florida Hills
1716

Telephone: 011 020 5257

Email: popi@news.newsclip.co.za / info@newsclip.co.za

B. PARTICULARS OF PERSON REQUESTING ACCESS TO THE RECORD

- (a) The full particulars of the person who requests access to the record must be given below.
- (b) The address and/or fax number in the Republic to which the information is to be sent must be given.
- (c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname: _____

Identity Number: _____

Postal Address: _____

Fax Number: _____ Telephone Number: _____

E-Mail address: _____

Capacity in which request is made, when _____

made on behalf of another person: _____

C. PARTICULARS OF PERSON ON WHOSE BEHALF REQUEST IS MADE

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname: _____

Identity Number: _____

D. PARTICULARS OF RECORD

(a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.

(b) If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all the additional folios.

Description of record or relevant part of the record:

Reference number, if available: _____

Any further particulars of record: _____

E. FEES

(a) A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.

(b) You will be notified of the amount required to be paid as the request fee.

(c) The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.

(d) If you qualify for exemption of the payment of any fee, please state the reason for exemption

Reason for exemption from payment of fees:

F. FORM OF ACCESS TO RECORD

If you are prevented by an impediment or disability to read, view or listen to the record in the form of access provided for in 1 to 4 hereunder, state your disability and indicate in which form the record is required.

Disability		Form in which record is required	

Mark the appropriate box with an "X":

NOTES:

- (a) Compliance with your request in the specified form may depend on the form in which the record is available.
(b) Access in the form requested may be refused in certain circumstances. In such case you will be informed if access will be granted in another form.
(c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

1. If the record is in written or printed form:					
	Copy of record		Inspection of record		
2. If the record consists of visual images					
	View images		Copy of images		Transcription of the images
3. If record consists of recorded words or information which can be reproduced in sound:					
	Listen to the soundtrack		Transcription of soundtrack		
4. If record is held on computer or in an electronic or machine-readable form:					
	Printed copy of record		Printed copy of information derived from the record		Copy in computer readable form (flash drive or cd)

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable	Yes	No
Note that if the record is not available in the language you prefer, access will be granted in the language in which the record is available		
In which language do you prefer the record?		

G. NOTICE OF DECISION REGARDING REQUEST FOR ACCESS

You will be notified in writing whether your request has been approved/denied. If you wish to be informed thereof in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.

How would you prefer to be informed of the decision regarding your request for access to the record?

Signed at _____ this _____ day of _____ 20 _____

Signature of Requester / Person on whose
Behalf request is made