



## Sasria SOC Ltd

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**(Registration number:  
1979/000287/30)**

Published in terms of

Section 51 of the Promotion of Access to Information  
Act No. 2 of 2022 (“PAIA”) and Section 14 of the  
Information Manual

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## DOCUMENT MANAGEMENT

Date	Version	Description	Author
1 March 2021	1.0	First Draft	Wayne Beelders of RAIN Chartered Accountants
11 March 2021	1.1	2 <sup>nd</sup> Draft	Wayne Beelders of RAIN Chartered Accountants
4 April 2023	1.2	3 <sup>rd</sup> Draft	Sasria SOC Ltd
31 May 2023	1.3	4 <sup>th</sup> Draft	WWISE
05 July 2023	2.0	Final	WWISE

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## 1. ABBREVIATIONS

The following abbreviations are found and are commonly used in this Manual:

<b>DIO:</b>	Deputy Information Officer
<b>IO:</b>	Information Officer
<b>PAIA:</b>	Promotion of Access to Information Act No. 2 of 2000
<b>POPI:</b>	Protection of Personal Information Act No. 4 of 2013
<b>IR:</b>	Information Regulator
<b>SASRIA:</b>	The South African Special Risks Insurance Association

## 2. INTRODUCTION

The Promotion of Access to Information Act No. 2 of 2000 (hereinafter referred to as “PAIA”) gives effect to the right of access to information as provided for in Section 32 of the Constitution, subject to justifiable limitations, including, but not limited to, limitations aimed at the reasonable protection of privacy, commercial confidentiality, and effective, efficient, and good governance.

Section 9 of PAIA recognises that the right of access to information is subject to certain justifiable limitations aimed at, amongst others:

- the reasonable protection of privacy;
- commercial confidentiality;
- effective, efficient, and good governance.

Section 14(1) of PAIA stipulates that the Information Officer of the public body must compile a manual in at least three official languages containing information on the public body for public consumption. Should this manual be translated into any other language and there is a conflict or inconsistency between the English version and the other languages, the English language text of the manual shall prevail.

The purpose of the PAIA is to foster a culture of transparency and accountability in both the public and private sectors by affording any person the right of access to information to enable them to exercise and protect all their rights to the full extent required.

The purpose of the Protection of Personal Information Act No. 4 of 2013 (hereinafter referred to as “POPI”) is to give effect to Section 14 of the Constitution, being the Constitutional right to privacy by protecting personal information and regulating the free flow and processing of personal information.

POPI gives data subjects the right to, in the prescribed manner, a request for a responsible party to correct or delete personal information about the data subject in its possession or under its control, that is inaccurate, irrelevant, excessive, out of date incomplete, misleading, or obtained unlawfully; or destroy or delete a record of personal information about the data subject that the responsible part is no longer authorized to retain access and/or request the correction or deletion of any personal information held about them that may be inaccurate, misleading, or outdated.

### 3. PURPOSE OF THE MANUAL

This Manual has been compiled in accordance with the PAIA which prescribes that a public body must provide details of the records held by such a public body so that requests for information may be accommodated. This Manual serves as a guide on how a requester of information is accommodated.

This Manual serves as a guide on how a requestor of information may request access to that information (record) held by The South African Special Risks Insurance Association (hereinafter referred to as “Sasria”).

The purpose of this Manual is to set out procedures to be followed and criteria that must be met for anyone (“the requester”) to request access to records in the possession or under the control of Sasria. For this purpose, contact details of persons responsible for managing such requests are provided.

Sasria supports the Constitutional right of access to information, and we are committed to provide you access to our records in accordance with the provisions of the Act, the confidentiality we owe third parties and the principles of South African law.

For the purposes of POPI, this Manual details the purpose for which personal information may be processed; a description of the categories of data subjects for whom the company processes personal information as well as the categories of personal information relating to such data subjects; and the recipients to whom personal information may be supplied.

### 4. USEFUL TERMS AND DEFINITIONS

**Access fee:** This is the fee paid by the requester to the public or private body from which you are seeking the information to cover the costs of finding and copying the records.

**Act:** The Promotion of Access to Information Act No. 2 of 2000. Referred to in this Manual as “PAIA”.

**Client:** Any natural or juristic person that received or receives services from Sasria.

**Data Subject:** The person to whom personal information relates.

**Form A:** Found at the end of the PAIA on the IR’s website and the websites of various public institutions. This form is used to request access to information held by a public body.

**Form C:** Found at the end of the PAIA on the IR’s website and the websites of various private companies. This form is used to request access to information held by a private body.

**Guide:** Refers to this Guide on PAIA which has been compiled and published by the IR to assist persons in using and understanding PAIA, as provided for in Section 10 of PAIA.

**Information Officer and Deputy Information Officer** The Information Officer (sometimes referred to as “IO”) is the person authorised to handle PAIA requests. For a public body, this is the person who is or is acting as the head of the body. The Deputy Information Officer (sometimes referred to as “DIO”) is the person designated by the Information Officer of a

- Juristic person:** A company or body which is recognised by law as an entity or ‘person’ having rights and duties.
- Minister:** References to the Minister are in relation to the Minister of Justice and Correctional Services.
- Natural person:** A real person, as opposed to a legal or juristic person such as a corporation.
- Official languages of South Africa:** English, Afrikaans, isiNdebele, isiXhosa, isiZulu, Sepedi, Sesotho, Setswana, isiSwati, Tshivenda and Xitsonga.
- Personal Information:** Information about an identifiable individual, including, but not limited to, information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the individual as defined in PAIA section 1.
- Personnel:** Any person who works for or provides services to or on behalf of Sasria and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of Sasria, which includes, without limitation, directors (executive and non-executive), all permanent, temporary, and part-time staff as well as contract workers.
- Private Body:** This is a natural or juristic person or partnership who is involved or has been involved in any trade, business, or profession in that capacity.
- Processing:** Any operation or activity or any set of operations, whether by automatic means, concerning personal information, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, or linking, as well as restriction, degradation, erasure, or destruction of information.
- Protected Records:** Records that contain sensitive information and cannot be made accessible to the public as per the provisions of PAIA Sections 33 to 45.
- Public Body:** Any department of state or administration in the national or provincial sphere of government, any municipality in the local sphere of government or any institution performing a public function in terms of any legislation as defined in PAIA Section 1.
- Record:** Any recorded information regardless of the form, including, for example, written documents, video materials etc. A record requested from a public or private body refers to a record that is in that body’s possession regardless of whether that body created the record.
- Records automatically available:** Records that can be accessed without a person having to request access in terms of the Act as stipulated in Section 15(1)(a) of PAIA.



**Records available on request:** Records that can be accessed through following PAIA processes as stipulated in PAIA Sections 11 and 18; access to these records may be refused on the basis of Sections 33 to 45 of the Act.

**Request Fee:** The cost to be paid for making a request for access to information. For an information request to a public body there is a standard fee of R 35.00; for an information request to a private body there is a standard fee of R 50.00.

**Request for access:** A request for access to a record of the organisation in terms of Section 50 of PAIA.

**Requester:** The natural or juristic person requesting access to information. A requester also refers to the person making a request on behalf of somebody else.

**Third Party:** Any natural or juristic person who is not the requester of the information, nor the body to whom the information request is made.

**Working days:** Any days other than Saturdays, Sundays, or public holidays.

## 5. THE REGULATOR'S GUIDE IN TERMS OF SECTION 10 OF THE ACT

In addition to this Manual, requesters are advised that the Information Regulator (IR) has published a guide, in terms of Section 10 of the PAIA, which explains how to make a request for access to a record.

Any person who wishes to exercise any right contemplated in The Act may obtain a copy of the information guide issued by the Information Regulator. This Guide is available in all official languages. Copies of the Guide can be found at the head office of the IR and all its provincial offices. In addition, an electronic copy is available on the Information Regulator's website (<https://inforegulator.org.za/>).

The Information Regulator's contact details are as follows:

**Telephone number:** 010 023 5200

**Email Address:** [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)

**Physical Address:** JD House, 27 Stiemens Street, Braamfontein,  
Johannesburg, 2001

**Postal Address:** P. O Box 31533, Braamfontein, Johannesburg, 2017

**Website Address:** <https://inforegulator.org.za/>

**Email Address:** [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)

The POPI amends PAIA in a number of ways. One of the keyways in which POPI changes PAIA relates to the role of the IR. Under POPIA the IR's functions in terms of PAIA will be transferred to the Information Regulator, a new independent body which will be set up to monitor both POPI and PAIA, and to handle



complaints relating to access to information and the protection of personal information.

However, the IR will still retain its Constitutional obligation to promote, protect and monitor the right of access to information as a right enshrined in the Bill of Rights.

## 6. CONTACT PARTICULARS OF SASRIA

In terms of the PAIA, the Chief Executive Officer of a public body is automatically designated as Chief Information Officer. Sasria's Chief Executive Officer's details are as follows:

### **Information Officer:**

**Name and Surname:** Mpumelelo Tyikwe

**Capacity:** Chief Executive Officer

**Email address:** [mpumit@sasria.co.za](mailto:mpumit@sasria.co.za)

The Deputy Information Officer has been duly designated by the Information Officer, in terms of Section 17 of PAIA, to deal with requests for access to information in terms of the PAIA. Requesters are therefore required to address all requests to the relevant Deputy Information Officer at the contact details below.

### **Deputy Information Officer:**

**Name and Surname:** Mziwoxolo Success Mavuso

**Capacity:** Company Secretary

**Email address:** [Contactus@sasria.co.za](mailto:Contactus@sasria.co.za)

**Postal Address:** P.O. Box 653367 Benmore 2010

**Physical Address:** 34 & 36 Fricker Road Illovo 2196

**Telephone Number:** 011 214 0800

**Website Address:** [www.sasria.co.za](http://www.sasria.co.za)

## 7. FACILITATION OF A REQUEST FOR ACCESS TO INFORMATION

Information which is not readily available as indicated in this manual, may be requested in accordance with the procedure prescribed in terms of The Act. Copies of the prescribed forms to be completed for submitting a request are available from Sasria SOC Ltd Website.

Records held by Sasria may be accessed on request only once the requirements for access have been met. A requester is any person making a request for access to a record of Sasria and in this regard, the Act distinguishes between two types of requesters:

- **Personal Requester** - A personal requester is a requester who is seeking access to a record containing personal information about the requester. Subject to the provisions of the Act and applicable law, Sasria will provide the requested information, or give access to any record with regard to the requester's personal information. The prescribed fee for reproduction of the information requested will be charged by Sasria.
- **Other Requester** - This requester (other than a personal requester) is entitled to request access to information pertaining to third parties. However, Sasria is not obliged to grant access prior to the requester fulfilling the requirements for access in terms of the Act. The prescribed fee for reproduction of the information requested will be charged by Sasria.

## 8. ABOUT SASRIA

The South African Special Risks Insurance Association was formed in 1979. Sasria SOC Ltd is a state-owned entity initially incorporated in terms of the Companies Act No. 61 of 1973 as a section 21 company with the state being the sole shareholder. Sasria was then converted from a section 21 company to a public company in terms of the Conversion Sasria Act, No. 134 of 1998 with the state remaining the only shareholder in the company.

Sasria is a Non-life Short-term Insurance Company that provides cover for damage caused by special risks such as politically motivated malicious acts, riots, strikes, terrorism, and public disorders. Sasria is the only non-life short-term insurance company with authority to underwrite the above perils in terms of the Reinsurance of Damages and Losses Act, No. 56 of 1989.

As a state-owned entity, we report to the Minister of Finance via the National Treasury. We serve two fundamental strategic directives; the first being a legislative one that calls for a focus on research and investigation of any risks that can be considered to be of national interest. The second mandate involves driving a positive contribution to transform the financial services industry in line with the National Development Plan. This creates a sustainable economic and social environment for South Africans.

Sasria is an authorised FSP registered under **license number: 39117**.

## 9. OUR PURPOSE

Vision:

- Special risk covered.

Mission:

- To provide special risk solutions for the stability of South Africa.

Values:

- Fairness
- Ethics
- Service Excellence
- Collaboration
- Innovation

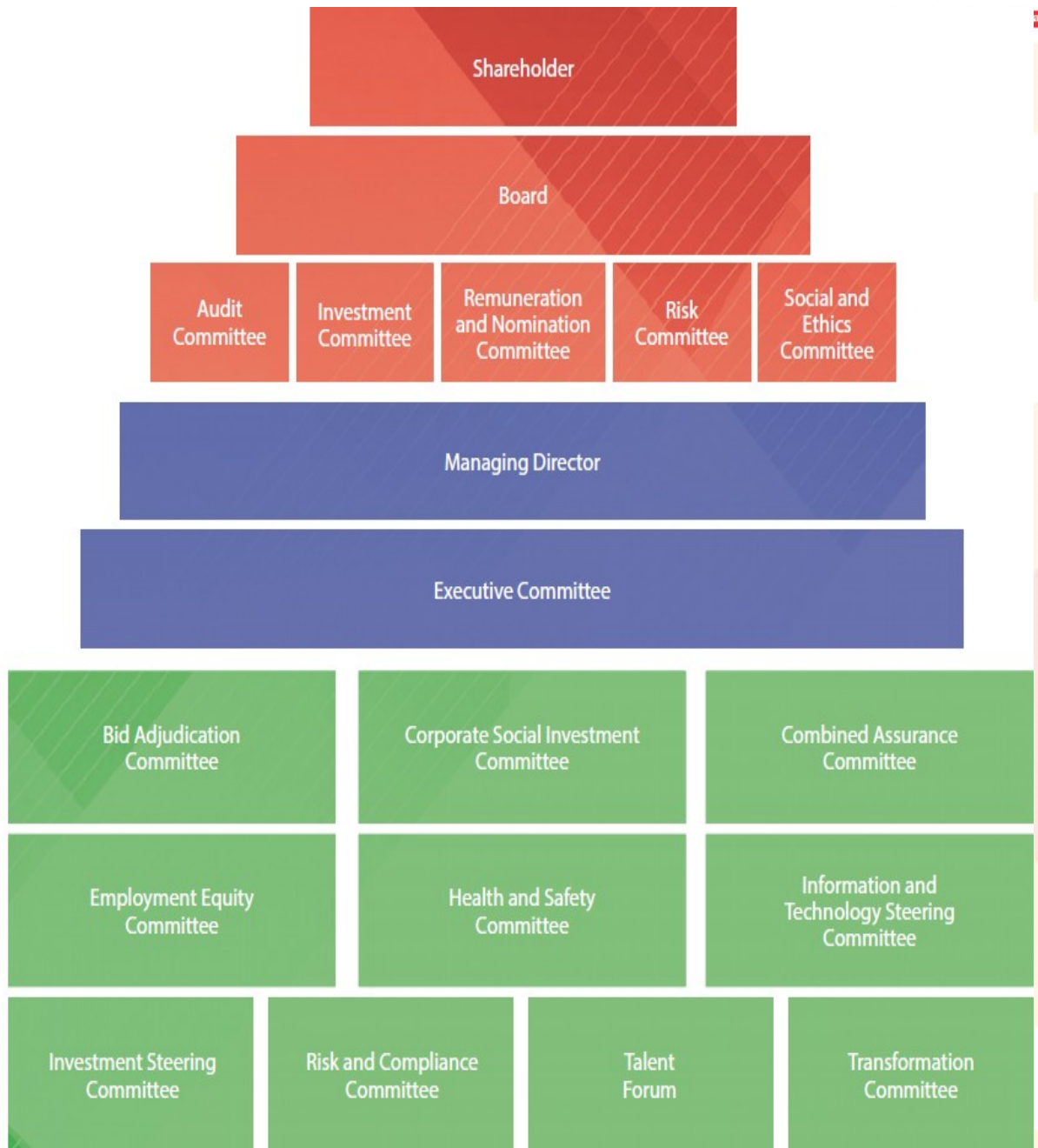
## 10. OUR BUSINESS

Business process	Explanation	Stakeholders
Provide special risk cover	We do not sell our products directly to our end-customers. Instead, we enter into agreements with other short-term insurance companies and intermediaries in South Africa who then, as agents, represent and sell the special risks cover to our end-customers, be they individuals, businesses, government or corporate entities. The agents and brokers (intermediaries) engage with our end-customers on policy administration and collect premiums on our behalf.	<ul style="list-style-type: none"> <li>• Customers</li> </ul>
Pay fees	We pay the agents binder fees for performing administration on our behalf. We also pay intermediaries commission for selling our products to current and new customers.	<ul style="list-style-type: none"> <li>• Agents and brokers</li> </ul>
Pay claims	The only contact that we have with end-customers is on the settlement of claims. Customers submit claims to the intermediaries or insurance companies, who confirm their validity prior to submission to Sasria. We receive and verify all claims before payment directly to the customer.	<ul style="list-style-type: none"> <li>• Customers</li> </ul>
Reinsure risks	We buy reinsurance cover to protect and strengthen our balance sheet and pay reinsurance premiums to reinsurers. We receive recoveries from reinsurers when the reinsurance treaties are triggered.	<ul style="list-style-type: none"> <li>• Reinsurers</li> </ul>
Pay salaries and other expenses	We incur costs in managing the business, including paying our directors, employees and service providers, as well as suppliers, for goods and services, and benefactors of our corporate social investment activities.	<ul style="list-style-type: none"> <li>• Employees</li> <li>• Suppliers</li> <li>• Community</li> </ul>
Pay taxes and fees	We pay all the relevant taxes and statutory fees to the authorities.	<ul style="list-style-type: none"> <li>• Authorities</li> <li>• Regulatory bodies</li> <li>• Associations</li> </ul>
Invest	Our premium, after payment of claims and expenses, is invested, whilst ensuring and maintaining the adequate liquidity levels for claims payment. Our investments earn good returns in the form of interest, dividends and capital growth.	<ul style="list-style-type: none"> <li>• Investments</li> </ul>
Pay dividends	We pay our shareholder a dividend from our distributable reserves.	<ul style="list-style-type: none"> <li>• Shareholder</li> </ul>

## 11. ORGANISATIONAL STRUCTURE

The Board of Sasria, as the accounting authority, is committed to the principles of openness, transparency, integrity, and accountability as advocated in King IV.

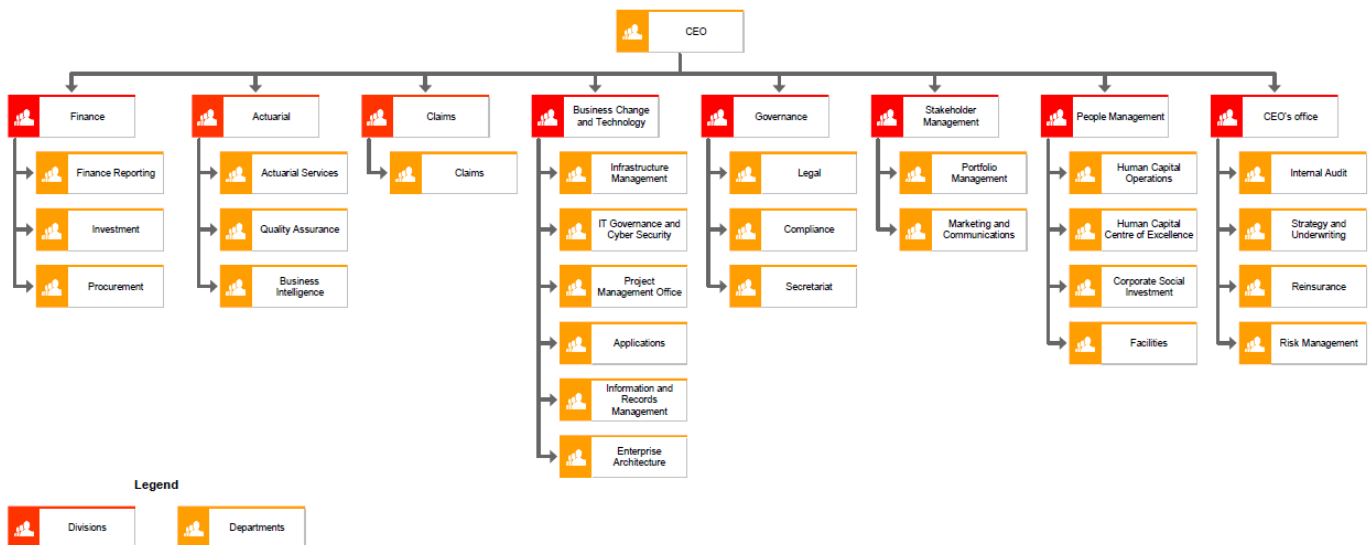
The organisational structure of Sasria is as follows:





## 12. OPERATIONAL STRUCTURE

The operational structure of Sasria is as follows:



## 13. POLICY WITH REGARD TO CONFIDENTIALITY AND ACCESS TO INFORMATION

Sasria will protect the confidentiality of information provided to it by third parties, subject to its obligations to disclose information in terms of any applicable law or regulation or a court order requiring disclosure of information. If access is requested to a record that contains information about a third party, Sasria is obliged to attempt to contact such third party to inform him/her/it of the request.

Sasria will give the third party an opportunity of responding by either consenting to the access or by providing reasons why the access should be denied. In the event that the third party furnishes reasons for the support or denial of access, the Deputy Information Officer will consider these reasons in determining whether access should be granted to the requester or not.

Sasria does not process the personal information of children.

In terms of Section 12(2)(b) of POPI, it is not necessary to collect personal information directly from the data subject if the data subject or a competent person where the data subject is a child has consented to the collection of the information from another source.



## 14. RECIPIENTS OF PERSONAL INFORMATION

Recipients of personal information include, but are not limited to:

1. Agents
2. Employees
3. Third parties
4. Regulatory and governmental authorities.

## 15. COMMUNICATION OF INFORMATION TO OUR STAKEHOLDERS

Sasria does not do direct business with its end customers, it functions through a network of underlying insurance companies (often referred to as Sasria Agents) who enter into a contract with Sasria in order to manage the day-to-day administration of Sasria.

Insurance companies (Sasria Agents) have underlying insurance contracts with the clients, Sasria cover is added to those insurance contracts and the Agents collect premiums from clients on behalf of Sasria.

Due to the nature of our business model, clients submit claims through Agent companies and not directly with Sasria.

To ensure that Sasria and the Agent Companies are aligned at all times, Sasria provides product training to Agent companies and brokers.

Training Sessions are held at least 3 days a month for various agent companies where necessary and Agent companies and brokers are required to attend at least one session a year.

Our Training content covers the following sections:

1. Sasria Perils (insured events)
2. Sasria Regulations
3. Sasria Claims process

## 16. DISSEMINATION OF REGULATORY INFORMATION

Sasria Dissemination of Regulatory Information to Various Regulatory and Governmental Institutions as required by regulatory bodies.

## 17. INFORMATION AUTOMATICALLY AVAILABLE

The following categories of records are automatically available from Sasria, the requester having to request access in terms of the PAIA:

- Employees can make a request for his or her personal employee record through the Information Officer if the Employee is unable to access such record through the Human Resources Department.
- Sasria's Calendar of Events.
- Information uploaded to Sasria's website ([www.sasria.co.za](http://www.sasria.co.za)):
  - Information about Sasria

- Offerings and Products
- Media Releases (News & Social Media)
- Training Manual
- Circulars
- Board and Board Committees
- Ethics Management Policy
- Fraud Prevention and Whistle Blowing Policy
- Gift and Hospitality Policy
- Complaints Management Policy
- Conflict of Interest Management Policy
- Information and Records Management Policy
- Supply Chain Management (Policies; Procedure Manuals; Guidelines; Application Forms)
- Vacancies
- Information booklets.
- Pamphlets.
- Posters.
- Newsletters.
- Claim Forms.
- Marketing Brochures and informative materials relating to the functions and services of Sasria.
- Court Pleadings (after litigation) - available on an individual basis.
- Court Orders - available on an individual basis.
- Judgments - available on an individual basis.
- Statutory Records.
- Strategic Plans.
- Annual Reports.
- Statutory Quarterly report, FSCA return, Annual Report (Finance: Reporting) Banking details and bank accounts (Finance: Treasury).
- Public Finance Management Act and Treasury Regulations.
- Tenders/Quotations.

Most of the information is provided free of charge. The conditions for the use of the information can be found on the website.

## 18. INFORMATION AVAILABLE IN TERMS OF OTHER LEGISLATION

Sasria retains records relating to several statutes, which includes, inter alia, the following information is available in terms of certain provisions of the following legislation:

- Arbitration Act No. 42 of 1965
- Assessment of Damages Act No. 9 of 1969
- Basic Conditions of Employment Act No. 75 of 1997
- Broad Based Black Economic Empowerment Act No. 53 of 2003
- Companies Act No. 61 of 1973 (Chapter XIV Only)
- Companies Act No. 71 of 2008
- Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
- Consumer Protection Act No. 68 of 2008
- Constitution of the Republic of South Africa Act No. 108 of 1996
- Debt Collection Act No. 114 of 1998
- Electronic Communications Act No. 36 of 2005
- Electronic Communications and Transactions Act No. 25 of 2002
- Employment Equity Act No. 55 of 1998
- Employment Tax Incentive Act No. 26 of 2013
- Financial Intelligence Centre Act No. 38 of 2001
- Financial Sector Regulation Act No. 9 of 2017
- Financial Services Ombud Schemes Act No. 37 of 2004
- Income Tax Act No. 58 of 1962
- Insurance Act No. 18 of 2017
- Intergovernmental Relations Framework Act No. 13 of 2005
- Labour Relations Act No. 66 of 1995
- National Credit Act No. 34 of 2005
- National Minimum Wage Act No. 9 of 2018
- National Payment System Act No. 78 of 1998
- Occupational Health and Safety Act No. 85 of 1993
- Preferential Procurement Policy Framework Act No. 5 of 2000

- Prevention and Combating of Corrupt Activities Act No. 12 of 2004
- Prevention of Organised Crime Act No. 121 of 1998
- Protection of Constitutional Democracy Against Terrorist and Related Activities Act No. 33 of 2004
- Protection of Information Act No. 84 of 1982
- Protected Disclosures Act No. 26 of 2000
- Promotion of Access to Information Act No. 2 of 2000
- Promotion of Equality and Prevention of Unfair Discrimination Act No. 4 of 2000
- Protection of Business Act No. 99 of 1978
- Public Finance Management Act No. 1 of 1999
- Reinsurance of Damage and Losses Act No. 56 of 1989
- Rental Housing Act No. 50 of 1999
- Sectional Titles Act No. 95 of 1986
- Sectional Titles Schemes Management Act No. 8 of 2011
- Share Blocks Control Act No. 59 of 1980
- Short-Term Insurance Act No. 53 of 1998
- Skills Development Levies Act No. 9 of 1999
- Skills Development Act No. 97 of 1998
- Tax Administration Act No. 28 of 2011
- Unemployment Contributions Act No. 4 of 2002
- Unemployment Insurance Act No. 63 of 2001
- Value Added Tax Act No. 89 of 1991

Sasria has used its best endeavors to supply a list of applicable legislation. However, it is possible that the above list may be incomplete. Wherever it comes to our attention that existing or new legislation allows a requester access on a basis other than that set out in PAIA, we shall update the list accordingly.

## **19. RECORDS HELD BY SASRIA**

The subjects on which Sasria holds records and the categories on each subject are as listed below. Please note that a requester is not automatically allowed access to these records and that access to them may or must be refused in accordance with Section 62 to 69 of the Act.

Statutory and Regulatory Framework
(All functions relating to the drafting and amendment of Acts, Regulations, Bills, Green papers, White papers, Codes and practice, etc.)
<ul style="list-style-type: none"> <li>• Legislation</li> <li>• Other Regulations</li> </ul>
<ul style="list-style-type: none"> <li>• Own Act</li> </ul>
<ul style="list-style-type: none"> <li>• Other Acts</li> </ul>
<ul style="list-style-type: none"> <li>• Policy Files</li> </ul>
<ul style="list-style-type: none"> <li>• Own Regulations</li> </ul>
Organisation and Control
(All functions relating to the determination of organizational goals, objectives, and organizational management.)
<ul style="list-style-type: none"> <li>• Corporate Restructuring</li> </ul>
<ul style="list-style-type: none"> <li>• Delegation of Authority by Managing Director</li> </ul>
<ul style="list-style-type: none"> <li>• Business Process Management</li> </ul>
<ul style="list-style-type: none"> <li>• Actuarial</li> </ul>
<ul style="list-style-type: none"> <li>• Capital Modelling</li> </ul>
<ul style="list-style-type: none"> <li>• Technical Pricing</li> </ul>
<ul style="list-style-type: none"> <li>• Data Analysis</li> </ul>
<ul style="list-style-type: none"> <li>• Ad-hoc</li> </ul>
<ul style="list-style-type: none"> <li>• ORSA</li> </ul>
<ul style="list-style-type: none"> <li>• Statutory Reporting</li> </ul>
<ul style="list-style-type: none"> <li>• Reinsurance Renewal</li> </ul>
<ul style="list-style-type: none"> <li>• Establishment of New Departments</li> </ul>
<ul style="list-style-type: none"> <li>• Organisational Structure</li> </ul>
<ul style="list-style-type: none"> <li>• Corporate Planning</li> </ul>
<ul style="list-style-type: none"> <li>• Strategic Plans</li> </ul>
<ul style="list-style-type: none"> <li>• Business Plans</li> </ul>
<ul style="list-style-type: none"> <li>• Quality Assurance (QA)</li> </ul>
<ul style="list-style-type: none"> <li>• Internal Audit Control</li> </ul>
<ul style="list-style-type: none"> <li>• External Auditors</li> </ul>
<ul style="list-style-type: none"> <li>• Risk Management</li> </ul>
<ul style="list-style-type: none"> <li>• Risk Strategy</li> </ul>
<ul style="list-style-type: none"> <li>• Risk Appetite</li> </ul>

• Risk Escalation
• Risk Identification
• Risk Assessment
• Risk Measurement
• Risk Mitigation
• Risk Monitoring
• Own Risk Solvency Assessment
• Stress Testing
• Reinsurance Risk Management
• Underwriting Risk Management
• Market Risk Management
• Credit Risk Management
• Operational Risk Management
• Enterprise Risk Management
• Strategic Risk Management
• Technical Provisions
• Model Governance
• Internal Insurance
• Secretariat Services
• Board of Directors (Corporate Governance)
• Directors Advisor Provision
• Director Induction and Development
• Exco and Sub Committees
• Investment Steering Committee
• IT Steering Committee
• Employment Equity Committee
• Risk and Compliance Committee
• Bid Adjudication Committee
• Bid Evaluation Committee
• Bid Specification Committee
• Corporate Social Investment
• Exco Touchbase
• Business Development
• Business Transformation



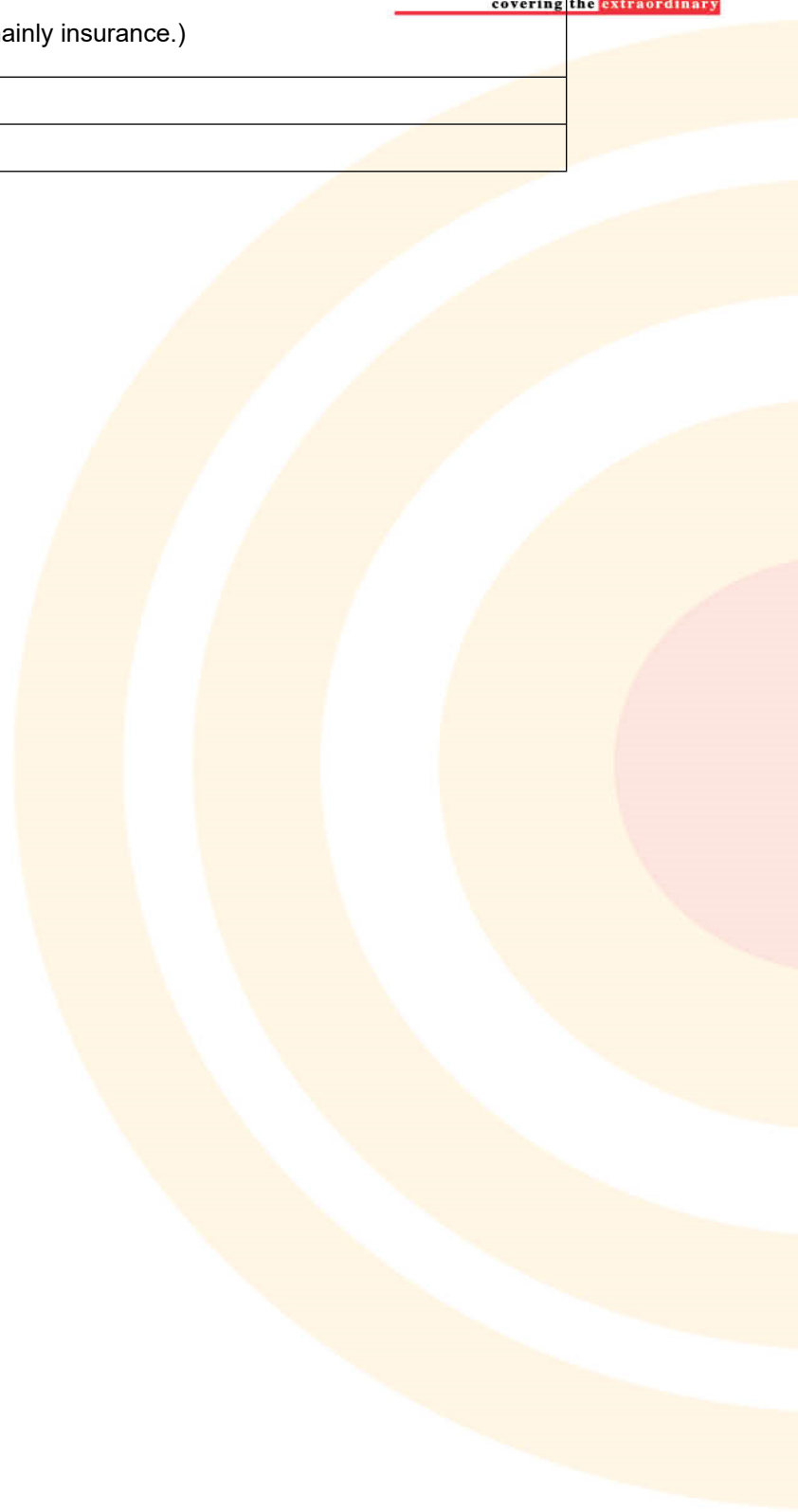
• Operations Committee
• Licencing Conversion Committee
• Moderation Committee
• Talent Forum
• Recognition Committee
• Policy Development and Review
• Integrated Report Steering Committee
• Culture Steering
• Board of Directors Committee
• Audit Committee
• Remuneration and Nominations Committee
• Social and Ethics

<ul style="list-style-type: none"> <li>• Risk Committee</li> </ul>
<ul style="list-style-type: none"> <li>• Board of Directors Meeting</li> </ul>
<ul style="list-style-type: none"> <li>• Correspondence with Stakeholders</li> </ul>
<p>Human Resources Management (All functions relating to the management of the organisation's employees)</p>
<ul style="list-style-type: none"> <li>• Recruitment and Selection</li> </ul>
<ul style="list-style-type: none"> <li>• On Boarding</li> </ul>
<ul style="list-style-type: none"> <li>• Performance Management</li> </ul>
<ul style="list-style-type: none"> <li>• Employee Relations</li> </ul>
<ul style="list-style-type: none"> <li>• Termination</li> </ul>
<ul style="list-style-type: none"> <li>• Payroll Administration</li> </ul>
<ul style="list-style-type: none"> <li>• Learning and Development</li> </ul>
<ul style="list-style-type: none"> <li>• Submissions to Authorities</li> </ul>
<ul style="list-style-type: none"> <li>• Corporate Social Investment</li> </ul>
<ul style="list-style-type: none"> <li>• Change Management</li> </ul>
<ul style="list-style-type: none"> <li>• Activity Plans</li> </ul>
<p>Financial Management (All functions relating to raising, allocating, using, and accounting for the financial resources of an organisation.)</p>
<ul style="list-style-type: none"> <li>• Financial Accounting</li> </ul>
<ul style="list-style-type: none"> <li>• Financial Statement Closing</li> </ul>
<ul style="list-style-type: none"> <li>• Performance Information</li> </ul>
<ul style="list-style-type: none"> <li>• Integrated Reporting</li> </ul>
<ul style="list-style-type: none"> <li>• Accruals</li> </ul>
<ul style="list-style-type: none"> <li>• Property, Plant and Equipment</li> </ul>
<ul style="list-style-type: none"> <li>• Intangible Assets</li> </ul>
<ul style="list-style-type: none"> <li>• Premiums</li> </ul>
<ul style="list-style-type: none"> <li>• Investments</li> </ul>
<ul style="list-style-type: none"> <li>• Budgets</li> </ul>
<ul style="list-style-type: none"> <li>• Taxes</li> </ul>
<ul style="list-style-type: none"> <li>• Dividends</li> </ul>
<ul style="list-style-type: none"> <li>• Expenditure Management</li> </ul>
<ul style="list-style-type: none"> <li>• Enterprise and Supplier Development</li> </ul>

<ul style="list-style-type: none"> <li>• Fruitless, Wasteful and Irregular Expenditure</li> </ul>
Supply Chain Management
(All functions relating to the acquisition, maintenance, and management of consumable assets.)
<ul style="list-style-type: none"> <li>• Procurement</li> </ul>
<ul style="list-style-type: none"> <li>• Appointment of Consultants</li> </ul>
<ul style="list-style-type: none"> <li>• Contracts</li> </ul>
Facilities Management
(All functions relating to planning, designing, and managing buildings, their mechanical and electrical installation and air-conditioning plants, etc., equipment and furniture grounds, as well as postal and telecommunication services.)
<ul style="list-style-type: none"> <li>• Facilities Functions</li> </ul>
<ul style="list-style-type: none"> <li>• Business Continuity Management</li> </ul>
Travel and Transport Arrangements
(All functions relating to the administration of travel arrangements and the provision of transport to deliver services.)
<ul style="list-style-type: none"> <li>• Travel</li> </ul>
Information Services
(All functions relating to the provision and management of information resources of the organisation.)
<ul style="list-style-type: none"> <li>• Applications</li> </ul>
<ul style="list-style-type: none"> <li>• Infrastructure Management</li> </ul>
<ul style="list-style-type: none"> <li>• Service Management</li> </ul>
<ul style="list-style-type: none"> <li>• Governance Risk and Cyber Security</li> </ul>
<ul style="list-style-type: none"> <li>• Project Management</li> </ul>
<ul style="list-style-type: none"> <li>• Records Management</li> </ul>
<ul style="list-style-type: none"> <li>• Knowledge Management</li> </ul>
<ul style="list-style-type: none"> <li>• Access to information in terms of Promotion of Access to Information Act</li> </ul>
<ul style="list-style-type: none"> <li>• Access to Information in terms of Protection of Personal Information Act</li> </ul>
<ul style="list-style-type: none"> <li>• Data Quality</li> </ul>
<ul style="list-style-type: none"> <li>• Enterprise Architecture</li> </ul>
<ul style="list-style-type: none"> <li>• The Architecture Metamodel</li> </ul>
<ul style="list-style-type: none"> <li>• Architecture Landscape</li> </ul>

<ul style="list-style-type: none"> <li>• Governance Log</li> </ul>
•
<ul style="list-style-type: none"> <li>• The Enterprise Repository</li> </ul>
<ul style="list-style-type: none"> <li>• Standards Information Base</li> </ul>
<ul style="list-style-type: none"> <li>• Reference Library</li> </ul>
<p>Communications</p> <p>(All functions relating to the systematic planning, implementing, monitoring and revision of publication and marketing strategies as well as the dissemination of information.)</p>
<ul style="list-style-type: none"> <li>• Marketing and Advertising</li> </ul>
<ul style="list-style-type: none"> <li>• Strategy</li> </ul>
<ul style="list-style-type: none"> <li>• Marketing Strategy</li> </ul>
<ul style="list-style-type: none"> <li>• Internal Marketing</li> </ul>
<ul style="list-style-type: none"> <li>• Advertising</li> </ul>
<ul style="list-style-type: none"> <li>• Digital Marketing</li> </ul>
<ul style="list-style-type: none"> <li>• Social Media</li> </ul>
<ul style="list-style-type: none"> <li>• Website</li> </ul>
<ul style="list-style-type: none"> <li>• Marketing Resources</li> </ul>
<ul style="list-style-type: none"> <li>• Communications</li> </ul>
<ul style="list-style-type: none"> <li>• Public Relations</li> </ul>
<ul style="list-style-type: none"> <li>• Multimedia</li> </ul>
<ul style="list-style-type: none"> <li>• Sponsorships</li> </ul>
<ul style="list-style-type: none"> <li>• Miscellaneous</li> </ul>
<p>Legal Services</p> <p>(All functions relating to the provision of legal advice, litigation, and contract management.)</p>
<ul style="list-style-type: none"> <li>• Legal</li> </ul>
<ul style="list-style-type: none"> <li>• Compliance</li> </ul>
<ul style="list-style-type: none"> <li>• Ethics Management</li> </ul>
<ul style="list-style-type: none"> <li>• Complaints Management</li> </ul>
<ul style="list-style-type: none"> <li>• Conflict of Interest Management</li> </ul>
<ul style="list-style-type: none"> <li>• Fit and Proper Requirements</li> </ul>
<ul style="list-style-type: none"> <li>• Fraud Prevention and Whistleblowing</li> </ul>
<ul style="list-style-type: none"> <li>• Outsourcing</li> </ul>
<p>Attendance and Hosting Gatherings</p>
<ul style="list-style-type: none"> <li>• Conferences</li> </ul>

Insurance (The core functions of the organisation; mainly insurance.)
<ul style="list-style-type: none"> <li>• Claims</li> </ul>
<ul style="list-style-type: none"> <li>• Pursue Recovery</li> </ul>



• Underwriting
• Customer Relations
• Environmental Analysis
• Business Development Management
• Market Development
• Market Intelligence
• Operational Activities
• Product Development and Enhancement



## 20. PROTECTION OF PERSONAL INFORMATION THAT IS PROCESSED BY SASRIA

Chapter 3 of POPI provides for the minimum conditions for lawful processing of personal information by a responsible party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPI. Sasria needs personal information relating to both individual and juristic persons in order to carry out its business and organisational functions. The manner in which this information is processed and the purpose for which it is processed is determined by Sasria. Accordingly, Sasria is a responsible party for the purposes of POPI and will ensure that the personal information of a data subject is processed according to the conditions set out in POPI. Below is a description of the conditions for lawful processing as contained in POPI:

- **Accountability** - the Responsible Party has an obligation to ensure that there is compliance with POPI in respect of the Processing of Personal Information.
- **Processing limitation** - Personal Information must be collected directly from a Data Subject to the extent applicable; must only be processed with the consent of the Data Subject and must only be used for the purposes for which it was obtained.
- **Purpose specification** - Personal Information must only be processed for the specific purpose for which it was obtained and must not be retained for any longer than it is needed to achieve such purpose.
- **Further processing limitation** - Further processing of Personal Information must be compatible with the initial purpose for which the information was collected.
- **Information quality** - The Responsible Party must ensure that Personal Information held is accurate and updated regularly and that the integrity of the information is maintained by appropriate security measures.
- **Openness** - There must be transparency between the Data Subject and the Responsible Party.
- **Security safeguards** - A Responsible Party must take reasonable steps to ensure that adequate safeguards are in place to ensure that Personal Information is being processed responsibly and is not unlawfully accessed.
- **Data Subject participation** - The Data Subject must be made aware that their information is being processed and must have provided their informed consent to such processing.

Personal information may only be processed for a specific purpose. The purposes for which Sasria processes or will process personal information is the following:

- Rendering service(s) to clients and service providers
- Staff administration
- Keeping of accounts and records

- Complying with tax laws

Categories of Data Subjects (clients and service providers) and their personal information

- Names
- Contact details
- Physical and postal addresses
- Date of birth

ID number, ID document, passport or work permit

- Drivers' license
- Tax related information
- Nationality
- Race
- Gender
- Marital status
- Education information
- Employment history
- Financial information
- Criminal behaviour

Sasria may supply the Personal Information to service providers who render the following services:

- Capturing and organising of data
- Storing of data
- Sending of emails and other correspondence to clients
- Conducting due diligence checks

Sasria employs up to date technology to ensure the confidentiality, integrity, and availability of the personal information under its care. Measures include:

- Firewalls
- Virus protection software and update protocols
- Logical 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 the Company are contracted to implement security controls

Section 72 of POPI provides that Personal Information may only be transferred out of the Republic of South Africa under certain conditions. Sasria has no planned transborder flows of personal information.

In terms of Section 11(3), a Data Subject may, at any time, object to the processing of his/her/its personal information in the prescribed form subject to exceptions contained in POPI.

A Data Subject may request for their personal information to be corrected/deleted in the prescribed form.

## 21. REQUESTING PROCEDURES

The Deputy Information Officer is available to assist with the completion of the PAIA forms.

A requester must be given access to a record of a public body if a requester complies with the following:

- The requester complies with all the procedural requirements in the Act relating to the request for access to that record.
- Access to that record is not refused on ground of refusal mentioned in the Act.
- Written correspondence will be addressed to the requester in response to the request whether the request is granted or not.
- Should the information not be found, a written affidavit will be signed and communicated to the requester.
- The request will be processed within thirty (30) days of the request, or it may be extended by the information officer by a further thirty (30) days.
- Notwithstanding the time period listed above, the deputy information officer must acquire the authorisation of the Executive Committee or Managing Director before the information is released to the requester.

Nature of the request:

- A requester must use the form that has been printed in the Government Gazette 25099 [Government Notice R887-20 June 2003 Form A]. Annexure A illustrates the form to be completed when requesting information. The form can also be accessed on <https://info regulator.org.za/>.
- Form A must be addressed to the Deputy Information Officer at the address stated or email [contactus@sasria.co.za](mailto:contactus@sasria.co.za).
- The requester must also indicate whether the request is for a copy of the record or whether the requester wants to inspect the record at the offices of the public body. Alternatively, if the record is not a document it can be viewed in the requested form, where possible [Section 29(2)].
- If the requester requires access in a particular form, the requester should be given access in the manner that has been asked for. That is, unless doing so would interfere unreasonably with the running of the public body concerned, or damages the record, or infringes a copyright. If for practical reasons, access cannot be given in the required form but in an alternate manner, the fee must be calculated according to the form of access first indicated by the requester [Section 29(3) and (4)].

- If, in addition to a written reply to the request of the record, the requester requires to be advised about the decision in any other way, e.g. telephone, this must be indicated [Section 18(2)(e)].
- If a requester is asking for information on behalf of somebody else, the capacity in which the request is being made should be indicated [Section (2)(f)] If a requester is unable to read or write or has a disability, the request of the record may be made orally. The information Officer must reduce the oral request to writing in the prescribed form and provide a copy thereof to the requester [Section 18(3)].

There are two types of fees required to be paid in terms of the Act, being the Request fee and Access fee [Section 22]

A requester that seeks access to a record containing personal information about that requester is not required to pay the Request fee. Every other requester, who is not a personal requester, must pay the required Request fee. The information officer must notify the requester (other than a personal requester) by notice, requiring a requester to pay the prescribed fee (if any) before processing the request.

- The request fee payable to public bodies is R 35.00. The requester may lodge an internal appeal, where appropriate, or an application to the court against the tender or payment of the request fee.
- After the information officer has decided on the request, the requester must be notified of such decision in the manner which the requester requires to be notified.
- On granting a request, an access fee is payable for the search, preparation, reproduction and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure.

A person who wants access to the records must complete the necessary request form, that is available at the offices of **Sasria SOC Ltd**, or can be accessed on the Information Regulators Website being, <https://infoeregulator.org.za/>. The form is also available on Sasria's Website and can be accessed on <https://www.sasria.co.za/> The completed request form must be sent to the address provided in this manual and marked for the attention of the Information Officer.

## 22. INTERNAL PAIA REQUEST PROCESS

- Sasria has a list of records that are automatically available FFwhich is available on the Sasria's website. Automatically available records are those that a body will provide to you without the need for you to submit a PAIA request (in other words, you can just request it without completing a PAIA request form).
- PAIA requires that if you want to make a request, you have to submit the request on the required form (these forms are prescribed by Regulations). PAIA Request Forms are available on the Sasria's Website.
- Any requests for information under PAIA may be submitted by post or email or may be hand-delivered to Sasria's reception.

**Postal Address:** P. O Box 653367 Benmore 2010

**Physical Address:** 34 & 36 Fricker Road Illovo 2196

**Email:** Contactus@sasria.co.za

- The PAIA requests will be received by the Information Officer, Deputy Information Officers or Information and Records department at Sasria.
- The request will be registered in the Sasria Request for Information Register.
- In certain circumstances you may be required to pay a fee to Sasria before your request is considered or the records that you have requested are made available to you. Please refer to Fees form structure on the Sasria Website.
- Upon receipt of your request, it will be acknowledged by the Compliance department, Information and Records Management department; Information Officer or Deputy Information Officers within 14 working days.
- The Information Officer, Deputy Information Officers; Compliance department or Information and Records department will Coordinate the processing of the request within the Sasria.
- The Information Officer or Deputy Information Officers will review the request.
- The Information Officer or Deputy Information Officers will make a decision as to whether to grant access to the records being requested.
- The Information Officer, Deputy Information Officers, Compliance department, Information and Records department will liaise with the requester (e.g. may ask the requester for more details, may need to request an extension of time to deal with the request, etc).
- The Information Officer, Deputy Information Officers, Compliance department or Information and Records department will advise the requester of the outcome of their PAIA request or request for an extension if required within 30 days after receiving the request.
- The Information Officer, Deputy Information Officers, Compliance department or Information and Records department will inform relevant third parties should it be required.
- If the records are granted Sasria will provide the requester with a copy of the record.
- Should the request be unsuccessful The Information Officer, Deputy Information Officers, Compliance department or Information and Records department will provide the requester with reasons for the decision made.
- If the requester is not satisfied with the outcome, they may lodge an internal appeal (**Form B: Notice of Internal Appeal**).

## 23. INTERNAL APPEAL PROCESS

- a. An internal appeal must be lodged within 60 days after the decision was taken.
- b. If you are not satisfied with the outcome, you may submit an internal appeal. Submit the completed **Form B** to the Information Officer or Deputy Information Officer who dealt with your original request.
- c. All internal appeal received by Information Officer or Deputy Information Officers, including phone calls and e-mails, will be acknowledged within 14 working days.
- d. This will then be forwarded to the designated officials within Sasria dealing with internal appeals within 30 days of receipt of the notice of appeal.



- e. Resolve all internal appeal within 30 working days, should this timeframe not be achievable, the internal appeal will be informed, and a new ~~timeframe~~ <sup>covering the extraordinary</sup> suggested and agreed.
- f. If all internal appeal processes have been depleted and you are still not satisfied with the outcome, the matter can then be taken to court.
- g. The submission of the appeal to the relevant authority must be done within 10 working days after receipt of the appeal.

## 24. REQUEST FROM PUBLIC BODIES

A requestor in respect of a public body is defined in PAIA to mean any person, or someone acting on their behalf, except certain organs of state or functionaries or institutions exercising powers or performing a duty in terms of the Constitution or a provincial constitution.

Sasria is obliged to provide access to any reasonable records and information requested by a public body but will follow the same process of approval as indicated above in Section 19.

Public bodies may include but is not limited to SARS, CIPC, etc.

## 25. INFORMATION OR RECORDS NOT FOUND

If Sasria cannot find the records that the Requester is looking for despite a reasonable and diligent search and it believes either that the records are lost or that the records are in its possession but unattainable, the Requester will receive a notice in this regard from the Information Officer in the form of an affidavit setting out the measures taken to locate the document and accordingly the inability to locate the document.

## 26. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

The Act provides for grounds on which access to records may be refused and the grounds on which Sasria could, inter alia, refuse access to records are as follows:

- Mandatory protection of information in terms of the FAIS Act [Section 3 of the General Code of Conduct] where it relates to an insured under any insurance policy and where such party has not explicitly provided the requester with a written mandate to obtain specified information of such insured.
- Mandatory protection of information of returns, reports, submissions, statistics, etc. that relates to the commercial relationship between Sasria and any insurer or administrator.
- Mandatory protection of information relating to submissions, reports, returns, correspondence, etc. between Sasria and any regulator [including, but not limited to, the Financial Sector Conduct Authority, the Prudential Authority and the Financial Intelligence Centre] Mandatory protection of privacy of a third party who is a natural person which would involve the unreasonable disclosure of personal information of that natural person.
- Mandatory protection of the commercial information of a third party where the requested record or records contain:
  - trade secrets of that third party
  - financial, scientific or technical information (the disclosure of which could likely cause harm to the financial or commercial interests of that party)



- information disclosed in confidence by a third party to Sasria, if the disclosure of such information could put that third party at a disadvantage in negotiations or commercial competition
- Mandatory protection of confidential information of third parties if it is protected in terms of any agreement
- Mandatory protection of the safety of individuals and the protection of property
- Mandatory protection of records privileged from production in legal proceedings
- Sasria's commercial information which may include, without limitation:
  - trade secrets
  - financial, commercial, scientific or technical information (the disclosure of which could likely harm the financial or commercial interests of Sasria)
  - information which, if disclosed, could put Sasria at a disadvantage in negotiations or commercial competition
  - computer programs and related information technology software which is owned by Sasria and which is protected by copyright
- Mandatory protection of research information compiled by Sasria or a third party if its disclosure would place the research at a serious disadvantage
- Access to all information that has been requested of Sasria which relates to personal information as defined in the Protection of Personal Information Act will be refused in terms of this clause unless it can be shown, by the requester at their own expense, that provision of this information to the requesting party will not contravene the Act
- The definition of personal information in the Act is information relating to an identifiable, living, natural person and where it is applicable, an identifiable, existing juristic person including, but not limited to:
  - information related to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person
  - Information relating to the education or the medical, financial, criminal or employment history of the person
  - any identifying number (including account number), symbol, e-mail address, physical address, telephone number or other particular assignment to the person
  - the blood type or any other biometric information of the person
  - the personal opinions, views or preferences of the person
  - correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence
  - the views or opinions of another individual about the person

- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person

It is important to note that PAIA cannot be used to obtain records for use during civil or criminal legal proceedings after the commencement of such proceedings if the production or access to records for this same purpose are provided for in by law.

## 27. AVAILABILITY OF THE MANUAL

This manual will be available/published online on Sasria's website ([www.sasria.co.za](http://www.sasria.co.za)).

Copies of this manual are available for inspection, free of charge, at the offices of Sasria SOC Ltd. Under the POPI, this manual will not have to be submitted to the Information Regulator.

## 28. REMEDIES AVAILABLE IF THE PROVISIONS OF THE ACT ARE NOT COMPLIED WITH

The Act does not require and Sasria does not have any internal appeal procedures that may be followed if a request for access to information has been refused. As such, the decision made by the information officer pertaining to a request is final.

A requester (or third party where applicable) may seek relief from any court with appropriate jurisdiction in respect of the following decisions of the Information Officer:

- Refusal or partial refusal of the request for access
- The amount of fees required to be paid
- The extension of the period which the information will be furnished
- Provides access to a record in a form different from the one originally

requested All legal processes must be served on the Information Officer who dealt with the request.

## 29. UPDATING OF MANUAL

The PAIA Manual is a working document that must be reviewed periodically. The manual will be updated at least annually.

## 30. PERSONNEL ACKNOWLEDGEMENT OF POLICY

All relevant personnel must acknowledge that they have read and understand the contents of this document by signing the personnel acknowledgement sheet.

The personnel acknowledgement sheet will need to be re-signed by relevant staff upon each review of the PAIA manual.

## 31. SIGNATORY

All relevant personnel acknowledge that they have read and understand the contents of this manual.

We confirm, to the best of our knowledge and belief, the accuracy and completeness of the information provided.

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Information Officer  
Officer

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Signature of Information