GLEN COUNTRY CLUB

PAIA MANUAL

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

DATE OF COMPILATION: 21/09/2026

1. LIST OF ACRONYMS AND ABBREVIATIONS

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

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 GLEN COUNTRY CLUB

3.1. Chief Information Officer

Name:	LEONARD YANKELOWITZ
Tel:	083 672 4313
Email:	len@glenclub.co.za

3.2. Deputy Information Officer

Name:	GRANT ROBERT BEVAN RIGHTFORD
Tel:	021 4381512
Email:	grant@glenclub.co.za

3.3 Access to information general contacts

Email: len@glenclub.co.za

3.4 **National or Head Office**

Postal Address: 1 Victoria Road, Clifton, Cape Town, 8005

Physical Address: 1 Victoria Road, Clifton, Cape Town, 8005

Telephone: 021 4381512

Email: grant@glenclub.co.za

Website: www.glenclub.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 PAIA[1] and section 56 of POPIA[2];

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 11[3]; and

4.3.3.2. access to a record of a private body contemplated in section 50[4];

4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;

4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging-

4.3.6.1. an internal appeal;

4.3.6.2. a complaint to the Regulator; and

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

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[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.

decision by the Regulator or a decision of the head of a private body;

4.3.7. the provisions of sections 14[5] and 51[6] 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 15[7] and 52[8] 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 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

4.3.10. the regulations made in terms of section 92[11].

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;

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[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."

4.5.2. from the website of the Regulator (https://www.justice.gov.za/inforeg/).

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 and AFRIKAANS

5. CATEGORIES OF RECORDS OF GLEN COUNTRY CLUB WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	**Types of the Record**	Available on Website	Available upon request
Membership	Application details	X	X
Corporate Identity	Name, about	X	X
Operational Information	Physical address, contact details, facilities, events.	X	X

6. DESCRIPTION OF THE RECORDS OF GLEN COUNTRY CLUB WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	**Applicable Legislation**
Liquor Licence	Western Cape Liquor Act 4 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Health And Safety Records	National Health Act 61 of 2003
Smoking Regulations	Tobacco Products Control Act 83 of 1993
Employee Profiles And Remuneration	Basic Conditions of Employment Act 75 of 1997
Disciplinary And Dispute Records	Labour Relations Act 66 of 1995
Tax And UIF Contributions	Unemployment Insurance Act 63 of 2001
Workplace Safety Logs	Occupational Health and Safety Act 85 of 1993

Injury Compensation Claims	Compensation for Occupational Injuries and Diseases Act 130 of 1993 (COIDA)
Income Tax And PAYE Records	Income Tax Act 58 of 1962
VAT Invoices And Ledgers	Value Added Tax Act 89 of 1991
Personal Information And Consents	Protection of Personal Information Act 4 of 2013 (POPIA)
Electronic Communications	Electronic Communications and Transactions Act 25 of 2002

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

Subjects on which the body holds records	Categories of records
Strategic Documents	Annual Reports
Human Resources	HR policies and procedures, Advertised posts, Employees records, Employment contracts, personal detail forms, copies of identity documents, Salary and wage registers, payslips, IRP5 tax certificates, provident fund details, UIF declarations, COIDA returns, PAYE documentation, Performance reviews, training records, disciplinary warnings, and CCMA cases.
Constitutional Documents	Constitution, rules, regulations and bylaws
Management Records	Minutes of the Annual General Meetings (AGM), Special General Meetings (SGM), and executive committee meetings
Membership Records	Names, Contact Details, Identity Numbers, Membership Types, Annual Subscriptions, Joining Fees and Statements of Account
Operational And Licensing Records	Liquor Authority licenses, manager approval certificates, compliance inspection records, Certificates of Acceptability, kitchen cleaning logs,

Subjects on which the body holds records	Categories of records
	pest control contracts, CCTV footage, guest visitor logbooks, gate sign-in registers, Facility inspection notes, machinery service records and green/court treatment registers
Financial And Accounting Records	Annual Financial Statements, Balance Sheets, Trial Balances, Bank Statements, Deposit Slips, Electronic Fund Transfers (EFT) history, Invoices, Receipts, Supplier Statements, Credit Notes, Asset Registers, VAT Returns, Income Tax Returns and Regional Levy documents

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

The Glen Country Club processes personal information primarily to administer its sporting, recreational and hospitality operations, ensure statutory compliance, and maintain a safe environment for its community. Specifically, this data is used to manage the full membership lifecycle, which includes processing new applications, invoicing annual subscriptions and coordinating court or green bookings and tournament schedules. It is also required for human resources and payroll administration, enabling the club to recruit staff, pay salaries and fulfill employment obligations like PAYE, UIF and COIDA submissions. Furthermore, information is processed to facilitate operational security through visitor logs and CCTV monitoring, to handle member communication regarding newsletters, events, and AGM notices and to ensure strict compliance with legal mandates from SARS, the Department of Employment and Labour, local municipal health boards and the Western Cape Liquor Authority.

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

Categories of Data Subjects	Personal Information that may be processed
Customers	name, address, registration numbers or identity numbers, employment status and bank details
Service Providers	names, registration number, vat numbers, address, bank details
Employees	address, qualifications, gender and race, contact details
Members	address, qualifications, gender and race, contact details

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

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Qualifications, for qualification verifications	South African Qualifications Authority
Credit and payment history, for credit information	Credit Bureaus

8.4 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

The Glen Country Club implements reasonable technical and organizational safeguards to protect personal data from unauthorized access, loss, or destruction. Physical security is maintained through restricted back-office access, locked filing systems, on-site CCTV monitoring and secure cross-cut shredding of physical documents. Technical and cyber defences include role-based user access controls, strong password protocols, active anti-virus software and system firewalls to block digital threats. Finally, the club ensures data availability and strict governance by utilizing secure off-site cloud backups, providing privacy awareness training to staff and entering into formal data protection agreements with all third-party service providers.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.glenclub.co.za;

9.1.2 at the head office of The Glen Country Club for public inspection during normal business hours;

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

9.1.4 to the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The head of The Glen Country Club will on a regular basis update this manual when necessary.

Issued by

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LEONARD YANKELOWITZ
(Chief Information Officer)