PROTECTION OF PERSONAL INFORMATION ACT (POPIA)

PROCEDURES MANUAL

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I hereby acknowledge and affirm that I have read through this manual and fully comprehend its contents.

Signed at .................................................. Date: ..................................................
1. **RATIONALE**

The Protection of Personal Information Act (POPIA) no. 4 of 2013 gives effect to the constitutional right to privacy in terms of Section 14 of the Bill of Rights of the Constitution of South Africa. Non-compliance with the Act can result in penalties and damage to Pact South Africa’s reputation and brand. Pact South Africa, by its nature of operations, collects and processes personal information of stakeholders such as employees, service providers, community members and other third parties during its normal day-to-day operations. As such, Pact South Africa is considered a “responsible party” in terms of POPIA and is required to comply with the conditions and requirements that govern the processing of personal information.

2. **SCOPE**

This procedures manual applies to all Pact South Africa’s employees, service providers, contractors, consultants and other stakeholders of Pact South Africa.

3. **PURPOSE**

3.1 The purpose of this procedure manual is to enable Pact South Africa to achieve operational compliance with POPIA by:

3.1.1 Defining privacy related procedures for the processing and handling of personal information; and

3.1.2 Integrating privacy with existing Pact South Africa’s policies and procedures related to or affecting the processing of personal information and interactions with Data Subjects.

4. **DEFINITIONS AND ABBREVIATIONS**

**Data Subjects**
The owners of personal information collected through various channels and processed by Pact South Africa in line with its operations.

**Privacy**
Protecting the rights of data subjects by ensuring that personal information is obtained, processed, retained and disposed of in a lawful manner and access to such personal information is limited to those who require access for legitimate purposes.

**POPIA**
Protection of Personal Information Act no. 4 of 2013.

**PAIA**
### Policy
A set of principles adopted by Pact South Africa to comply with regulatory requirements, support and achieve strategic goals, which are linked to a specific control, and drive behavior within the organization.

### Regulatory Requirements
Any legislation applicable to Pact South Africa, i.e. legislation as set out in the Pact South Africa’s Compliance Universe as amended from time to time.

### Information Officer
The individual within Pact South Africa responsible for the execution of privacy governance functions and ensuring compliance with the Act.

### Deputy Information Officer
The individual within Pact South Africa responsible for assisting the Information Officer with the execution of privacy governance functions and ensuring compliance with the Act.

### Legal Services
The function tasked with providing legal oversight in terms of the Protection of Personal Information Act within Pact South Africa.

### POPIA Deputy Information Officer
The individual tasked with operational privacy related responsibilities for a specific Data Subject within Pact South Africa.

### Channel
The medium through which personal information is collected from a data subject. This could be paper-based application forms, questionnaires, contracts, etc., or electronic channels such as online web pages, email, SMS, telephone, etc.

## 5. POPIA PROCEDURES

### 5.1. Further Processing of Personal Information Process

#### 5.1.1. Procedure Overview

This procedure outlines the steps to be followed to determine whether further processing of personal information is compatible or incompatible with the original purpose for which personal information was collected from data subjects for processing.
5.1.2 Procedure Description

(a) The Requester should submit the request for personal information to the POPIA Deputy Information Officer.

(b) On receipt of the request, the POPIA Deputy Information Officer should assess whether the purpose for which the personal information is requested is legitimate. The Deputy Information Officer declines the request which is found to be illegitimate and informs the Requester for reasons for decline.

(c) If the purpose is legitimate, the POPIA Deputy Information Officer checks the request against the privacy notice to confirm that it is compatible with the original purpose for which the personal information was collected.

(d) If the request is not compatible with the original purpose of collection, consent should be obtained from the Data Subject prior to processing the request. The processing can only be performed if the Data Subject grants the consent. If no consent is granted, the request should be declined and the Requester should be informed of the decline.

(e) For requests which are aligned with the original purpose or where consent is granted by the Data Subject, the Deputy Information Officer reviews purpose for the request to establish what fields should be provided considering the purpose of the request.

(f) The Deputy Information Officer then provides the Requester with the personal information requested with protection requirements communicated.

(g) The Requester receives the relevant personal information requested from the POPIA Deputy Information Officer and apply protection requirements.
Title: 5.1 Further Processing of Personal Information Process

1. Submit request for personal information
2. Receive request for personal information
3. Decline the request and inform Requestor of reasons
4. Receive declined request with reasons
5. Check request against Privacy Notice
6. Review purpose for the request to establish what fields to provide

7. Provide information requested with protection requirements communicated
8. Receive personal information requested and apply protection requirements

Decision Points:

- Is purpose for which personal information requested legitimate?
- Is the consent granted?
- Is the request compatible with original purpose of collection?
5.2. Obtaining Consent Process

5.2.1. Procedure Overview

This procedure outlines the steps to be followed in order to obtain consent from the Data Subject for further processing if the personal information request is found to be not compatible with the original purpose for which the personal information was collected.

5.2.2. Procedure Description

(a) The POPIA Deputy Information Officer contacts the affected Data Subject to request consent to release his or her personal information to the Requester of the information.

(b) On receipt of the request, the Data Subject decides whether to grant the consent or not.

(c) If the Data Subject objects to provide the consent, the Deputy Information Officer should decline the request for processing of personal information and inform the Requester about reasons for decline.

(d) If the Data Subject has granted the consent for further processing of the personal information, the Deputy Information Officer should record the consent details in the Consent Register and file the evidence of the consent granted for control and future reference purposes.

(e) The Deputy Information Officer assesses the nature of personal information request to establish if it qualifies to be part of private notice.

(f) If the request qualifies, the POPIA Deputy Information Officer updates the private notice accordingly and communicate the updated privacy notice to all affected Stakeholders for the purpose of updating all relevant data collection forms affected.
### Title: 5.2 Obtaining Consent Process

#### Phase

1. **Start**

2. Further Processing of Personal Information Process
   - **Process 5.1**

3. **A**
   - File received of consent received
   - **Process 5.1**

4. Does nature of request qualify to be part of Privacy Notice?
   - Yes
   - **B**
     - Communicate updated Privacy Notice to all affected stakeholders for updating all relevant Data Collection Forms
     - **Process 5.1**
   - No

5. **Update the Privacy Notice**

6. **End**

- **1** Contact affected Data Subject to request release of personal information
- **2** Receive request for personal information with purpose described
- **3** Record consent details in the Consent Register
- **4** Does the consent granted?
  - Yes
  - **5**
    - Update the Privacy Notice
    - Communicate updated Privacy Notice to all affected stakeholders for updating all relevant Data Collection Forms
    - **Process 5.1**
  - No
    - **B**
      - **Process 5.1**

---

**Data Subject**

- **Process 5.1**
5.3. Data Quality Process

5.3.1 Procedure Overview

This procedure outlines steps to be followed in order to notify Data Subjects that their personal information requires review and updating. The process includes steps to follow in order to update personal information in all instances where such updates are received.

5.3.2 Procedure Description

(a) The POPIA Deputy Information Officer issue notifications once a year to all Pact South Africa’s Data Subjects to request them to update their personal information.

(b) The Data Subjects receive the request for updating personal information and update their details directly into the system if they have access into Pact South Africa’s systems.

(c) If Data Subjects don’t have access to Pact South Africa’s systems, the Data Subjects forward the personal information details to be updated to the relevant POPIA Deputy Information Officer.

(d) The POPIA Deputy Information Officer receive the personal information details to be updated from the Data Subjects and coordinate with the relevant Business Units for the updating of the details.

(e) Once the personal information has been updated, the relevant POPIA Deputy Information Officer should retain evidence that all Data Subjects were requested by Pact South Africa to update their details.
Title: 5.3 Data Quality Process

1. Issue notification once a year to all organization’s Data Subjects to request them to update their personal information.

2. Receive request for updating of personal information.

3. Update the details directly on the system.

4. Retain evidence that all Data Subjects were requested by the organization to update their details.

5. Forward details to be updated to the POPIA Deuty Information Officer.

6. Receive details to be updated.

7. Coordinate with the relevant Business Unit to update Data Subjects’ details on the system.

End
5.4. Correction of Personal Information Process

5.4.1 Procedure Overview

This procedure outlines the steps to be followed in order to handle requests for the correction of a Data Subject's personal information.

5.4.2 Procedure Description

(a) The Business Unit receives a request for correction of personal information from the Data Subject through the completed relevant POPIA Form and verifies the Data Subject to confirm that the request is indeed done by the owner of the personal information.

(b) If the Data Subject has been verified, the Business Unit performs correction of personal information on the relevant system.

(c) If personal information also needs to be corrected at any third parties’ platform, the Business Unit notifies the POPIA Deputy Information Officer to liaise with the relevant external third party.

(d) The external third party corrects the relevant personal information as per the request and provides confirmation to Pact South Africa that the information has been corrected.

(e) On receipt of the confirmation, the POPIA Deputy Information Officer informs the Business Unit that the personal information has been corrected.
Title: 5.4 Correction of Personal Information Process

1. Receive request for correction of personal information
   - Is request for correction submitted via POPIA Form?
     - Yes
       - Perform correction of personal information on the system
         - Is POPIA Form correctly completed?
           - Yes
             - Inform POPIA Deputy Information Officer
           - No
             - Is correction of personal information also to be done at an external third party?
               - Yes
                 - Contact external third party and request correction of personal information
               - No
                 - Provide confirmation that personal information has been corrected
2. Notify Data Subject to resubmit the request through completion of POPIA Form
3. Notify Data Subject to correct POPIA Form resubmit

End
5.5. Privacy Complaints and Incidents Response Process

5.5.1 Procedure Overview:

This procedure outlines the process to be followed in order to handle privacy complaints and incidents.

5.5.2 Procedure Description:

(a) The Information Officer or Deputy Information Officer receives notification of privacy complaint or incident, records it in the Privacy Complaints Register and conduct an investigation.

(b) If the complaint or incident is found not to be legitimate, the Information Officer or Deputy Information Officer updates the Privacy Complaints Register with the outcome of the investigation and provide the feedback to the Reporter of the complaint or incident.

(c) If the complaint or incident is found to be legitimate, the Information Officer or Deputy Information Officer performs a Root Cause Analysis and determines remediation plan.

(d) The Information Officer or Deputy Information Officer assigns the responsibility for implementation of remediation plan to the relevant Business Unit.

(e) The relevant Business Unit receives the remediation plans requiring implementation from the Information Officer or Deputy Information Officer and coordinates implementation of remediation plans with the Business Unit.

(f) The relevant Business Unit reports to the Information Officer or Deputy Information Officer after the remedial actions have been implemented.

(g) The Information Officer or Deputy Information Officer receives a report from the relevant Business Unit that the remedial plans have been implemented and updates the Privacy Complains Register accordingly with the outcome of the investigation and remedial action implementation.

(h) The Information Officer or Deputy Information Officer advice the Information Regulator and Incident Reporter of the root causes and remediation plan implemented.
Title: 5.5 Privacy Complaints and Incidents response Process

1. Receive notification of privacy complaint or incident
2. Record the privacy incident or compliant in the Privacy Complaints Register
3. Conduct an investigation of the privacy incident or complaint
4. Update Privacy Complaints register with the outcome
5. Provide feedback on the outcome of the investigation to the Reporter

Is Complaint or incident legitimate?

No

Yes

6. Perform Root Cause Analysis and determine Remediation Plan
7. Assign responsibility for implementing Remediation Plans to the POPIA Debuty Information Officer
8. Receive a Remediation Plans requiring implementation
9. Coordinate implementation of Remediation Plans
10. Report to the Information Officer or Deputy Information Officer after the completion of implementation
11. Receive a report that Remedial Plans have been completed
12. Update the Privacy Complaints Register with outcome of the investigation and remedial action implementation
5.6. Data Classification and Handling Criteria Process

5.6.1 Procedure Overview

This procedure outlines the steps to be followed in order to handle data classifications and criteria process.

5.6.2 Procedure Description

(a) The relevant Business Unit collects personal information for processing purposes and classify the personal information according to the appropriate Data Classification Category, including classifying personal information and special personal information.

(b) Where practical the relevant Business Unit should segregate special personal information from the normal personal information and ensure that extra security measures are applied to the special personal Information for all processing activities performed and that only limited people have access to this type of information.

(c) The relevant Business Unit should ensure that personal information is processed and handled in line with the conditions for processing personal information.
5.7. Objections to the Processing of Personal Information Process

5.7.1 Procedure Overview

This procedure outlines the steps to be followed to address objections raised by Data Subjects to the processing of their personal information of Pact South Africa.

5.7.2 Procedure Description

(a) The Data Subject submits the objection to the processing of personal information to Pact South Africa to the relevant Business Unit using the completed relevant POPIA Form.

(b) On receipt of the objection, the Business Unit assesses the legitimacy of the objection and declines the request if it is found not to be legitimate.

(c) If the objection is legitimate, the Business Unit reports the objection to the POPIA Deputy Information Officer for review and approval.

(d) The POPIA Deputy Information Officer receives the request and assess the legitimacy of the objection.

(e) The POPIA Deputy Information Officer declines the request and inform the Business Unit of the reasons for rejection if the request is found not to be legitimate.

(f) If the objection is legitimate, the POPIA Deputy Information Officer records the objection in the Objections Register and coordinates the deletion of personal information internally and at the third parties, if applicable.

(g) The POPIA Deputy Information Officer notifies the Data Subject that the personal information has been deleted and provide evidence of the deletion of the information.
Title: 5.7 Objections to the Processing of Personal Information Process

1. Submit the objection to processing personal information to the organization
2. Notify Data Subject to complete POPIA Forms and resubmit objection
3. Receive objection for processing personal information from the Data Subject
4. Decline the objection
5. Inform Data Subject of reason for rejection
6. Receive a notification of the decline for the objection and reasons for rejection
7. Report the objection to the POPIA Deputy Information Officer
8. Receive the request for objection from the Business Unit
9. Assess the validity of objection
10. Decline the objection and inform Business Unit of reason for rejection
11. Receive a notification of the decline for the objection and reasons for rejection
12. Record the objection in the Objections Register
13. Coordinate deletion of personal information internally and at third parties
14. Notify Data Subject and provide evidence of deletion of personal information

End

1. Submit the objection to processing personal information to the organization
2. Notify Data Subject to complete POPIA Forms and resubmit objection
3. Receive objection for processing personal information from the Data Subject
4. Decline the objection
5. Inform Data Subject of reason for rejection
6. Receive a notification of the decline for the objection and reasons for rejection
7. Report the objection to the POPIA Deputy Information Officer
8. Receive the request for objection from the Business Unit
9. Assess the validity of objection
10. Decline the objection and inform Business Unit of reason for rejection
11. Receive a notification of the decline for the objection and reasons for rejection
12. Record the objection in the Objections Register
13. Coordinate deletion of personal information internally and at third parties
14. Notify Data Subject and provide evidence of deletion of personal information

End

1. Submit the objection to processing personal information to the organization
2. Notify Data Subject to complete POPIA Forms and resubmit objection
3. Receive objection for processing personal information from the Data Subject
4. Decline the objection
5. Inform Data Subject of reason for rejection
6. Receive a notification of the decline for the objection and reasons for rejection
7. Report the objection to the POPIA Deputy Information Officer
8. Receive the request for objection from the Business Unit
9. Assess the validity of objection
10. Decline the objection and inform Business Unit of reason for rejection
11. Receive a notification of the decline for the objection and reasons for rejection
12. Record the objection in the Objections Register
13. Coordinate deletion of personal information internally and at third parties
14. Notify Data Subject and provide evidence of deletion of personal information

End

1. Submit the objection to processing personal information to the organization
2. Notify Data Subject to complete POPIA Forms and resubmit objection
3. Receive objection for processing personal information from the Data Subject
4. Decline the objection
5. Inform Data Subject of reason for rejection
6. Receive a notification of the decline for the objection and reasons for rejection
7. Report the objection to the POPIA Deputy Information Officer
8. Receive the request for objection from the Business Unit
9. Assess the validity of objection
10. Decline the objection and inform Business Unit of reason for rejection
11. Receive a notification of the decline for the objection and reasons for rejection
12. Record the objection in the Objections Register
13. Coordinate deletion of personal information internally and at third parties
14. Notify Data Subject and provide evidence of deletion of personal information

End
5.8. Notification to the Data Subjects and Information Regulator Process

5.8.1 Procedure Overview

This procedure outlines the steps to be followed for notification to the Data Subjects and Information Regulator process about the leakage or unauthorised access by external third parties to the personal information occurred within Pact South Africa.

5.8.2 Procedure Description

(a) The Data Subject’s personal information leaks or is accessed by unauthorised third parties.

(b) The POPIA Deputy Information Officer prepares a formal notification to the Information Regulator and submit to the Information Officer or Deputy Information Officer for review and approval.

(c) The Information Officer or Deputy Information Officer reviews the notification and revise it where necessary and also state measures to be implemented by Pact South Africa to prevent the recurrence of such and approve the notification.

(d) The Information Officer or Deputy Information Officer send a formal notification to both the Information Regulator and the affected Data Subjects.

(e) The Information Regulator and affected Data Subjects receive a notification from Pact South Africa that the personal information has leaked or accessed by unauthorised third parties.

(f) On receipt of the notification from Pact South Africa, the Information Regulator advises Pact South Africa on what steps to be taken regarding the leaked information.

(g) The Information Officer or Deputy Information Officer should cooperate with the Information Regulator to facilitate the process of implementing the advises provided.
Title: 5.8 Notification to the Data Subject and Information Regulator Process

1. Data Subject’s personal information leaks or accessed by an unauthorised third party
2. Prepare a formal Notification to the Information Regulator
3. Receive the Formal Notification
4. Review the Notification and revise it where necessary and also stating measures to be implemented by the organization to prevent the recurrence of such and approve the Notification

Data Subject or Information Regulator?

Data Subject

Information Regulator

5. Send a Formal Notification to the Information Regulator

6. Receive a notification that personal information has leaked or accessed by unauthorised third parties
7. Advises the organization on what steps should be taken regarding the personal information leaked
8. Send a Formal Notification to Data Subject using the means of communication which could reach them
9. Receive notification that personal information has leaked or accessed by unauthorised third parties
10. Put precautionary measures regarding the type of personal information which leaked

End

End
5.9. Access Requests to Personal Information – Data Subjects Request Process

5.9.1. Procedure Overview

This procedure outlines the steps to be followed in order to assess requests of personal information by Pact South Africa’s Data Subjects, i.e. the process where Data Subjects are requesting their own personal information.

5.9.2. Procedure Description

(a) The POPIA Deputy Information Officer receives request for personal information from the Data Subject using the completed PAIA Form.

(b) The Deputy Information Officer verifies the Data Subject to confirm that the Requester of the personal information is indeed the owner of the information.

(c) If the Data Subject’s request is just to confirm if personal information is held about them, there is no processing fee charged as per PAIA.

(d) If the request is to get access to personal information, the POPIA Deputy Information Officer requests the processing fee as per PAIA from the Requester (Data Subject) of the personal information.

(e) After the payment has been received by Pact South Africa, the Deputy Information Officer assesses the request and submits the assessment outcome to the Information Officer for review and approval.

(f) The Information Officer reviews the request assessment outcome and either approves or declines the request for information.

(g) On receipt of the approval, the POPIA Deputy Information Officer coordinates the processing of the request with the relevant Business Unit and notifies the Requester accordingly of the outcome of the request.

(h) The Deputy Information Officer records the request for personal information in the Access Requests Register and file the PAIA Form for control and future reference purposes.
Title: 5.9 Access Requests to Personal Information – Data Subject Requests Process

Phase

Start

1. Personal information access request received from Data Subject

2. Notify Data Subject to complete PAIA Form and resubmit request
   - Is PAIA form completed correctly?
     - Yes: Go to 3
     - No: Set aside

3. Decline the request
   - Is data subject verified?
     - Yes: Go to 4
     - No: Go to 9

4. Update Access Request Log

End

9. Request processing fee as per PAIA
   - Is payment received?
     - Yes: Set aside
     - No: Request processing fee as per PAIA

10. Assess and process the request in terms of PAIA

11. Submit access request and assessment outcome to Information Officer or Deputy Information Officer

12. Receive access request and assessment outcome

13. Review the access request assessment

14. Refer back the access request and assessment outcome with suggested amendments to be made
   - Is the assessment ok?
     - Yes: Go to 15
     - No: Set aside

15. Approve the access request and assessment outcome

End
5.10. Access Requests to Personal Information – Third Parties Request Process

5.10.1. Procedure Overview

This procedure outlines the steps to be followed in order to assess requests of personal information of Pact South Africa’s Data Subjects by external third parties.

5.10.2 Procedure Description

(a) The POPIA Deputy Information Officer receives request for personal information of Pact South Africa’s Data Subjects from a third-party Requester using the completed PAIA Form.

(b) The POPIA Deputy Information Officer requests the processing fee as per PAIA from the Requester of the personal information.

(c) The Deputy Information Officer checks if the Requester is one of the law enforcement authority and if not, facilitate the process of obtaining consent from the affected Data Subject. The Deputy Information Officer declines the request if the consent is not granted and updates the Access Request Register accordingly.

(d) If the request is from the law enforcement authority or the Data Subject has granted the consent, the Deputy Information Officer assesses the request and submits the assessment outcome to the Information Officer for review and approval.

(e) The Information Officer reviews the request assessment outcome and either approves or declines the request for information.

(f) The POPIA Deputy Information Officer coordinates the processing of the request with the relevant Business Unit and notifies the Requester accordingly of the outcome of the request.

(g) The Deputy Information Officer records the request for personal information in the Access Requests Register and file the PAIA Form for control and future reference purposes.
Title: 5.10 Access Request to Personal Information – Third Party Requests Process

Phase

Start

1. Personal information access request received from a third party Requester
   - Is PAIA Form completed correctly?
     - Yes
       - Notify Requester to complete PAIA Form
     - No
       - No

2. Notify Requester to complete PAIA Form and resubmit request
   - Is PAIA Form completed correctly?
     - Yes
       - Update Access Request Log
     - No
       - No

3. Decline the request
   - No
     - Is the consent granted?
       - Yes
         - Obtaining Consent Process
       - No
         - No

4. Update Access Request Log
   - Is payment received?
     - Yes
       - Is the Request a law enforcement authority?
         - Yes
           - Submit access request and assessment outcome to Information Officer or Deputy Information Officer
         - No
           - No
     - No
       - No

5. Coordinate processing of request with the relevant Business Unit

6. Notify the Requester of outcome of the request

7. Update Access Request Log and file the PAIA Request Forms

8. End

9. Request processing fee as per PAIA
   - Yes
     - Is the Request a law enforcement authority?
       - Yes
         - Submit access request and assessment outcome to Information Officer or Deputy Information Officer
       - No
         - No
   - No
     - No

10. Assess and process the request in terms of PAIA

11. Submit access request and assessment outcome to Information Officer or Deputy Information Officer

12. Receive access request and assessment outcome
   - No
     - Is the assessment outcome to be made?
       - Yes
         - Refer back the access request and assessment outcome with suggested amendments to be made
       - No
         - No

13. Review the access request assessment
   - No
     - Is the assessment outcome ok?
       - Yes
         - Approve the access request and assessment outcome
       - No
         - No

14. Approve the access request and assessment outcome

15. Is the assessment outcome ok?

End