



PAIA MANUAL

PAIA MANUAL OF BAMBOO BRIDGE (PTY) LTD TRADING AS CLUB ENGAGE

**Prepared in accordance with Section 51 of the
Promotion of Access to Information Act,
No. 2 of 2000 ("the Act")**

DATE OF COMPILATION: 26/05/2024

DATE OF REVISION: 08/06/2025

A. INTRODUCTION TO CLUB ENGAGE

Club Engage is a private company operating throughout South Africa, providing innovative and engaging aftercare and holiday programmes to schools and parents. Our vision is to unlock children's potential through professionally designed programmes that nurture core capabilities, foster confidence, and instil a lifelong love for learning. Visit www.clubengage.co.za for more information.

This PAIA Manual provides a guide for requesters on how to access information held by Club Engage, as required by the Promotion of Access to Information Act.

B. COMPANY CONTACT DETAILS (Section 51(1)(a))

Information Officer: Genevieve Allen

Designation: Managing Director

Postal Address: Plot 40, Fourth Road, Northwold, 2155

Street Address: Plot 40, Fourth Road, Northwold, 2155

Telephone Number: 082 853 6479

Email: md@clubengage.co.za

Website: www.clubengage.co.za

Company Registration No: 2013/174014/07

C. AVAILABILITY OF THE MANUAL (Section 51(3))

This manual is available:

- On our website: www.clubengage.co.za
- By request via email to the Information Officer
- At our head office during normal business hours

D. THE ACT AND THE SAHRC GUIDE (Section 51(1)(b))

A guide to the Promotion of Access to Information Act is available from the South African Human Rights Commission (SAHRC):

SAHRC PAIA Unit

Private Bag X2700, Houghton, 2041

Tel: 011 877 3600

Email: paia@sahrc.org.za

Website: www.sahrc.org.za

E. VOLUNTARY DISCLOSURES (Section 51(1)(c))

The following information is automatically available and does not require a request:

- Website
- Marketing Brochures
- Newsletters and Management Reports
- Aftercare and Holiday Club programme schedules
- Company profile
- School Prospectus
- Franchise Prospectus
- Policies and procedures available on the website
- Information regarding membership to professional associations

F. RECORDS HELD BY CLUB ENGAGE (Section 51(1)(d))

1. Personnel Records

- Employee contracts and conditions of employment
- Internal evaluation and disciplinary records
- Correspondence relating to personnel
- Employee ID documents
- Employee Police Clearance Records
- Employee First Aid Certificates

2. Client Records

- Child application and enrolment forms
- Parent and Guardian information
- Authorised pick-up information
- Child health and medical information
- Communication and agreements with clients
- Financial and Account Information
- Feedback and survey responses

3. Financial Records

- Annual financial statements
- Invoices
- Receipts
- Proof of payments
- Tax records

4. Operational Records

- Service Level Agreements (SLAs) with schools
- Service Level Agreements (SLAs) with other service providers
- Training materials

- Attendance Records
- Programme plans and weekly schedules
- REACH Curriculum (Theme Library – Intellectual Property)
- Enrolment Forms
- Onsite operational file
- Internal Correspondence
- Product records

5. Other Party Records

- Contracts and correspondence with suppliers and partners
- Franchisee agreements
- Records provided by third parties

G. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION (Section 51(1)(d))

Club Engage holds records as required in terms of:

- Companies Act No. 71 of 2008
- Basic Conditions of Employment Act No. 75 of 1997
- Labour Relations Act No. 66 of 1995
- Employment Equity Act No. 55 of 1998
- Income Tax Act No. 58 of 1962
- Value Added Tax Act No. 89 of 1991
- Protection of Personal Information Act No. 4 of 2013 (POPIA)

H. REQUEST PROCEDURES (Section 51(1)(e))

To request access to a record:

1. Complete the prescribed **Form C** (included at the end of this Manual)
2. Submit it to the Information Officer via email, post, or in person
3. Pay the prescribed request fee of R50 (if applicable)
4. Access fees may apply if the request is granted

Requests must include:

- Sufficient detail to identify the record
- The form of access required
- The requester's contact details
- Proof of capacity if requesting on behalf of someone else

I. GROUNDS FOR REFUSAL OF ACCESS

Club Engage may refuse a request for access if it involves:

- Unreasonable disclosure of personal information
- Commercial information of a third party

- Confidential information protected by law or contract
- Endangerment of individual safety
- Records privileged from legal proceedings

J. REMEDIES AVAILABLE WHEN REQUEST IS REFUSED

If access is denied:

- The requester may approach a court within 30 days to appeal the decision
- No internal appeal procedure exists

K. FEES

- Request fee: R50.00 (payable before request is processed)
- Reproduction fees: R3.90/page (photocopy), R4.80/page (printout), R56.00 (CD copy)
- If the request requires more than 6 hours, a deposit of one-third of the estimated access fee will be charged
- Actual postage cost will apply if applicable

L. UPDATING OF THE MANUAL

This manual will be reviewed annually and updated as necessary. Latest version will be available on our website and from our Information Officer.

M. FORM C: REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY (see Annexure p7)

N. PURPOSE OF PROCESSING PERSONAL INFORMATION

Club Engage processes personal information to:

- Fulfil contractual obligations to clients and franchisees
- Deliver aftercare and holiday care services
- Manage employment and HR responsibilities
- Comply with legal requirements (e.g. tax, labour, child protection)
- Monitor service quality and provide training
- Conduct marketing and stakeholder communication
- Maintain operational and administrative records

O. CATEGORIES OF DATA SUBJECTS AND INFORMATION PROCESSED

Categories of Data Subjects	Personal Information That May Be Processed
Customers / Clients	Name, address, registration/ID numbers, employment status, bank details
Service Providers	Name, registration number, VAT number, address, trade secrets, bank details
Employees	Employees Address, qualifications, gender, race

P. CATEGORIES OF RECIPIENTS OF PERSONAL INFORMATION

Category of Personal Information	Recipients or Categories of Recipients
Identity number and names	South African Police Services (for criminal checks)
Qualifications	South African Qualifications Authority (for verification)
Credit and payment history	Credit Bureaus (for credit assessments)

Q. UPDATING OF THE MANUAL

This manual will be updated annually.

Issued by:

G Allen

Managing Director

ANNEXURE: FORM C — REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) [Regulation 10]

1. Particulars of Private Body

Name of Private Body: Club Engage (Pty) Ltd

Information Officer: Genevieve Allen

Postal Address: Plot 40, Fourth Road, Northwold, 2155

Physical Address: Plot 40, Fourth Road, Northwold, 2155

Telephone: 082 853 6479

Email: md@clubengage.co.za

2. Particulars of Person Requesting Access to the Record

The particulars of the person who requests access to the record must be given below.

Full Name and Surname:

ID Number:

Postal Address:

Telephone Number:

Fax Number:

Email Address:

Capacity in which request is made (when made on behalf of another person):

3. Particulars of Person on Whose Behalf Request is Made (if applicable)

This section must be completed only if a request for information is made on behalf of another person. Attach proof of authority to act on behalf of the other person.

Full Name and Surname:

ID Number:

4. Particulars of Record Requested

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

Description of Record:

Reference Number (if applicable):

Any Further Particulars of Record:

5. Fees

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

- **Do you qualify for exemption from the payment of the fee?** (Mark with X)
Yes ☐ No ☐
- **If yes, please state reason for exemption:**

6. Form of Access to Record

Indicate the form in which access is required. Mark the appropriate box with an X.

1. **If record is in written or printed form:**
☐ Copy of record ☐ Inspection of record
 2. **If record consists of visual images (including photographs, slides, video recordings, etc.):**
☐ View the images ☐ Copy of the images ☐ Transcription of images
 3. **If record consists of recorded words or information which can be reproduced in sound:**
☐ Listen to soundtrack ☐ Transcription of soundtrack
 4. **If record is held on computer or in an electronic or machine-readable form:**
☐ Printed copy of record
☐ Printed copy of information derived from the record
☐ Copy in computer readable form (e.g. flash drive or compact disc)
- **If you requested a copy or transcription of a record, do you wish the copy to be posted to you?**
Yes ☐ No ☐
Note: Postal fees are payable.

7. Particulars of Right to be Exercised or Protected

Indicate which right is to be exercised or protected:

Explain why the record requested is required for the exercise or protection of the aforementioned right:

8. Notice of Decision Regarding Request

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

☐ Written letter ☐ Email ☐ Telephone ☐ Other: _____

Signed at: _____

On this day: ____ / ____ / 20____

Signature of Requester / Authorised Person: _____