SOLIDARITEIT

PAIA MANUAL

SOLIDARITY TRADE UNION

Manual in Terms of Section 51 of the Promotion of Access to Information Act, 2 of 2000 (as amended)

Prepared as a Private Body

Date of compilation/revision	Information officer
2025/09/30	Dawid Durie

Table of Contents

1. Acronyms

1.1. DIO means the Deputy Information Officer;

1.2. IO means the Information Officer;

1.3. Minister means the Minister of Justice and Correctional Services;

1.4. PAIA means the Promotion of Access to Information Act 2 of 2000(as Amended;

1.5. POPIA means the protection of Personal Information Act 4 of 2013;

1.6. Private body means the Solidarity Trade Union.

1.7. Regulator means the Information Regulator of South Africa; and

1.8. Republic means the Republic of South Africa.

2. Introduction to this Manual

2.1. This PAIA Manual is prepared in accordance with Section 51 of PAIA, as amended. It applies to Solidarity Trade Union, a registered trade union operating as a private body within the meaning of PAIA (hereinafter referred to as "**Solidarity**" or "**the private body**").

2.2. The purpose of this Manual is to facilitate requests for access to information held by Solidarity, in a manner that gives effect to the constitutional right of access to information, while balancing this right with Solidarity's obligation to protect personal and confidential information, preserve legitimate interests, and uphold the rights of third parties.

2.3. This Manual provides an outline of the information structure of Solidarity, the categories of records available without a request, the process to be followed when requesting access to records, the applicable forms and contact details, as well as information required in terms of POPIA.

2.4. Requesters are advised to read this Manual together with the PAIA Guide issued by the Information Regulator, and the provisions of PAIA and POPIA, before submitting any request for access to records.

3. Purpose of PAIA Manual

3.1. This PAIA Manual is useful for the public to-

3.1.1. check the categories of records held by a body which are available without a person having to submit a formal PAIA request;

3.1.2. 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;

3.1.3. know the description of the records of the body which are available in accordance with any other legislation;

3.1.4. 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;

3.1.5. know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

3.1.6. 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;

3.1.7. know the description of the categories of data subjects and of the information or categories of information relating thereto;

3.1.8. know the recipients or categories of recipients to whom the personal information may be supplied;

3.1.9. 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

3.1.10. know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

4. Contact details for access to information requests

4.1. This section outlines how a requester may contact the private body for the purposes of exercising rights or fulfilling obligations under PAIA and/or POPIA.

4.2. All such contacts must be made through the designated Information Officer (IO) or Deputy Information Officer (DIO), whose contact details are provided in this Manual.

4.3. All requests for access to information must be directed to the IO, and where so indicated, also the DIO.

4.4. **Chief Information Officer**

Name: Dawid Durie

Tel: 012 644 4300

Email: dawid@solidariteit.co.za

4.5. **Deputy Information Officer**

Name: [Name]

Tel: [Tel]

Email: [Email]

4.6. **Access to information general contacts:**

Email: paia@solidariteit.co.za & paia1@solidariteit.co.za

3.4 **National or Head Office:**

Postal Address: cnr DF Malan and Eendracht Street, Kloofsig, Centurion

Physical Address: DF Malan and Eendracht Street, Kloofsig, Centurion

Telephone: 0861 252 423

Email: paia@solidariteit.co.za

Website: www.solidariteit.co.za

5. Guide PAIA and how to obtain access to the Guide

5.1. 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.

5.2. The Guide is available from the Regulator in each of the official languages and in braille.

5.3. The aforesaid Guide contains the description of-

5.3.1. the objects of PAIA and POPIA;

5.3.2. the postal and street address, phone and, if available, electronic mail address of-

5.3.2.1. the Information Officer of every public body, and

5.3.2.2. 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];

5.3.3. the manner and form of a request for-

5.3.3.1. access to a record of a public body contemplated in section 11[3]; and

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

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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.

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

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

5.3.6. 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-

5.3.6.1. an internal appeal;

5.3.6.2. a complaint to the Regulator; and

5.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;

5.3.7. 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;

5.3.8. 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;

5.3.9. the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

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

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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] *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;

5.4. Copies of the Guide can be made available on request.

5.5. The Guide can also be obtained-

5.5.1. upon request to the Information Officer;

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

5.6. A copy of the Guide is also available in the following official languages on the website of the Regulator-

5.6.1. **Afrikaans;**

5.6.2. **isiZulu**

5.6.3. **Sepedi**

5.6.4. **Setswana**

5.6.5. **isiXhosa**

6. Requests for access to information held by a private body

6.1. A requester must follow the provisions of the PAIA, read together with the PAIA Regulations, the Guide issued by the Information Regulator, and this PAIA Manual before any access to records held by the private body will be considered.

6.2. Access to information is not automatic. The private body respects the constitutional right of access to information but will protect its own rights, including the right to confidentiality, commercial secrecy, legal privilege, and the protection of personal information in accordance with PAIA and the POPIA.

6.3. A request for access must be made on the prescribed **Form 2 (as per Regulation 7 of the PAIA Regulations),** which must be fully and properly completed and submitted to the Information Officer at the contact details listed in this Manual. Incomplete or non-compliant requests may be rejected or returned.

(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.

6.4. The requester must provide sufficient detail on the request form to enable the Information Officer to:

6.4.1. Identify the record(s) requested;

6.4.2. Identify the requester and the right the requester seeks to exercise or protect;

6.4.3. Provide an explanation of why the record is required to exercise or protect that right;

6.4.4. Indicate the preferred form of access;

6.4.5. Furnish the postal address, email address or other applicable contact details;

6.4.6. State whether they wish to be informed of the outcome in another manner and, if so, the relevant manner and particulars.

6.5. The private body will assess the request in accordance with the applicable provisions of PAIA and may refuse access on any ground permitted by law, including where the record is subject to legal privilege, contains personal or commercial information of a third party, or if disclosure would reasonably be expected to prejudice the legitimate interests of the private body.

6.6. A request fee and access fee may be payable. No processing will occur until the required fees are paid. The Information Officer will notify the requester of the applicable fee(s), if any.

6.7. The private body will respond to the request within 30 calendar days, unless extended in terms of PAIA. The Information Officer may refuse a request that does not comply with the law or the requirements set out herein.

6.8. Before granting access to any record that may contain information about a third party, including personal information, confidential information, trade secrets, or other commercially sensitive material, the private body will take steps to notify the affected third party as required by PAIA. The third party will be afforded an opportunity to make representations as to why the request should be refused. In such instances, the time period for responding to the request may be extended in accordance with PAIA. The requester will be informed of any such process and delay. Access to a record will be denied where it would constitute an unreasonable disclosure of personal or commercial

information about a third party, unless the third party has consented or the disclosure is otherwise permitted under PAIA.

6.9. In the event that a request is refused, the requester may lodge a complaint with the Information Regulator or approach a court for appropriate relief, subject to the procedures and timeframes prescribed in PAIA.

6.10. Kindly refer to the Guide and PAIA for more particulars.

7. Categories of records which are available without a person having to request access

Category	Description	Mode of access				
		I	R	W	C	F
PAIA	PAIA Manual	X	X	X	X	X
	Form 01 – Request for a Guide from the Regulator [Regulation 2]		X	X		X
	Form 02 – Request for Access to a Record [Regulation 7] **		X	X		X
POPIA	Form 1: Objection to the Processing of Personal Information	X	X	X	X	X
	Form 2: Request for Correction or Deletion of Personal Information or Destruction or Deletion of Record of Personal Information	X	X	X	X	X
Founding documents	Solidarity Union – Constitution		X		X	X
	Solidarity Union – Registration Certificate issued by the Registrar of Labour Relations		X		X	X

	at the Department of Employment and Labour					
Communications	Media Statements			X		X
Human Resources	Vacancies and positions advertisements			X		X

* I = Inspection, R = Request, W = Website, C = Copying, F = Free

8. Description of the subjects and categories of records held on each subject

Subjects held	Categories of records
Corporate records	Board minutes and resolutions
	Member registers
	Registration documents
Financial records	Annual financial statements
	Audit Records
	Tax records
	Accounting records
	Asset registers
Strategic documents, plans and proposals	Annual Reports
	Strategic plans
	Policy documents
	Business plans
	Projects, project plans and proposals
Human Resources	Employment contracts
	Staff files
	Leave records

	Payroll records
	Training materials
	Staff policy materials
Legal and compliance	Contracts and agreements
	Licences and permits
	Regulatory filings
	Litigation records
	Privileged member records
Administrative records	Standard operating procedures
	Internal memoranda
	Office management records
Information technology	IT policies
	System documentation
	Asset registers
	Access logs
	Member Data
	Databases and digital records
	Data backup records
Supplier records	Supplier agreements
	Procurement documents
	Purchase policies and records
Health and safety	Health and safety records
	Incident reports
	Audits

Intellectual Property	Trademarks
	Patents
	Copyright
	Technology and software
	Licensing agreements
	Proprietary systems
Donor and Support	Donor and supporter information
	Information on donations and support received

9. Processing of personal information

9.1. Purpose of Processing Personal Information

9.1.1. Solidarity Trade Union processes personal information to fulfil its functions and responsibilities as a trade union acting in the interests of its members, supporters, and the wider community. This includes managing membership records, facilitating communication, providing support and representation in labour matters, engaging in collective bargaining, and conducting litigation on behalf of members.

9.1.2. Solidarity Trade Union also processes personal information as part of its various initiatives, campaigns, and strategic projects aimed at promoting workers' rights, community development, and broader social justice objectives. These activities may involve collaboration with other entities within the Solidariteit Beweging, affiliated organisations, and strategic partners.

9.1.3. Personal information is further processed in connection with public awareness efforts, education and training programmes, research, surveys, advocacy work, and the operation of digital platforms.

9.1.4. Processing may be necessary for administrative, legal, operational, historical, or statistical purposes, in support of the Union’s mission and the broader aims of the Solidariteit Beweging and its associated structures.

9.2. 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
Union members	Full name, ID number, contact details, employment details, employer information, membership records, bank details, disciplinary records, grievance records
Donors / Supporters	Name, contact details, donation records, payment information, campaign involvement, preferences and communication history
Employees	Employment contracts, ID numbers, contact details, qualifications, performance records, payroll and tax information, disciplinary records
Volunteers	Name, contact information, availability, skills, background screening results
Solidariteit Beweging Members	Name, contact details, membership history, participation in projects, communication preferences
Strategic partners and affiliates	Organisation details, representative contact information, partnership agreements, project involvement
Beneficiaries of projects and campaigns	Name, contact details, demographic data, nature of support received, participation records
Project and event participants	Registration details, contact information, participation records, feedback and evaluation data
Service providers	Company information, contact persons, contract terms, payment details, tax compliance documents

Website and platform users	Login data, contact details, user preferences, usage data, IP address, location data
Advocacy and litigation	Name, contact information, statements, affidavits or submissions (where applicable in public interest matters)

9.3. The recipients or categories of recipients to whom the personal information may be supplied[12]:

Categories of Personal Information	Categories of potential recipients
Identity number, names, and contact details	Solidariteit Beweging members, union representatives, Bargaining Councils, Employers, Department of Employment and Labour, CCMA
Membership information, donor and supporter information and contact details	Solidariteit Beweging members, strategic partners and affiliates, vetted service providers
Financial and banking details	Banks, Payment processors, Auditors
Legal and disciplinary information	Legal representatives, CCMA, Labour Court, third parties relevant to matter, vetted service providers
Digital platform usage and interaction data	Solidariteit Beweging members, strategic partners and affiliates, vetted service providers, IT service providers, Platform analytics providers, Cybersecurity partners
Personal information of employees	SARS, UIF, Pension/Provident Fund Administrators, Medical Aid Providers, External payroll providers

[12] *Disclaimer - Personal information is processed and shared strictly in accordance with the Protection of Personal Information Act, 4 of 2013 ("POPIA"), and in line with the applicable legal bases, consents, and rights afforded to each data subject. This may include the sharing or transfer of personal information internally within the structures, departments, and affiliated entities of the private body, including but not limited to operational teams, administrative functions, project units, and affiliated organisations within the Solidariteit Beweging, where such transfer is necessary to achieve lawful and legitimate purposes. The listing of recipients or categories of recipients in this section is for transparency and does not imply that personal information will necessarily be shared with all such recipients, nor that all categories of personal information will be disclosed. Any sharing of information, whether internal or external, will take place only where appropriate, relevant, and legally justified, and subject to appropriate safeguards.*

Survey and research data	Solidariteit Beweging members, strategic partners and affiliates, vetted service providers, research institutions, policy bodies, advocacy partners

9.4. Planned transborder flows of personal information:

9.4.1. Solidarity Trade Union may transfer or store certain categories of personal information outside the borders of the Republic of South Africa where necessary for operational, administrative, or technological purposes. This includes the use of reputable third-party cloud service providers and platforms that may store or process data in jurisdictions outside South Africa.

9.4.2. Such transborder flows typically occur in the following circumstances:

Categories of Personal Information	Country or Region	Purpose of transfer / storage
Contact details, membership data, and communication records	Africa, European Union, Ireland, United States, United Kingdom	Cloud-based email and CRM services, communication platforms, and secure storage
Website and platform user data	Africa, European Union, Ireland United States, United Kingdom	Web hosting, analytics, and user management systems
Employee records and internal communications	Africa, European Union, Ireland, United States, United Kingdom	Human resource platforms, payroll processing, and internal cloud services
Donor and supporter information	Africa, European Union, Ireland, United States, United Kingdom	Donation processing platforms, campaign management tools

9.4.3. All transborder flows of personal information are managed in compliance with Section 72 of POPIA and only occur where the receiving country or service provider ensures an adequate level of protection or where appropriate

safeguards and contractual arrangements are in place. These include the use of standard contractual clauses, data processing agreements, and adherence to international data protection standards.

9.5. General description of Information Security Measures:

9.5.1. Solidarity Trade Union implements a range of technical and organisational safeguards to ensure the confidentiality, integrity, and availability of the personal information in its possession, as required by the Protection of Personal Information Act, 4 of 2013 (“POPIA”).

9.5.2. The following categories of information security measures are in place or under implementation:

9.5.2.1. Access Controls: Role-based and password-protected access to information systems to ensure that only authorised personnel have access to specific categories of personal information.

9.5.2.2. Data Encryption: Use of encryption technologies for data at rest and in transit to protect sensitive personal information from unauthorised access or interception.

9.5.2.3. Network and Infrastructure Security: Firewalls, intrusion detection systems, and secure VPNs to protect against external threats and unauthorised access.

9.5.2.4. Anti-virus and Anti-malware Solutions: Regularly updated software to detect and mitigate malicious threats across all devices and systems.

9.5.2.5. Secure Cloud Services: Use of reputable third-party cloud service providers that comply with international security standards and data protection laws.

9.5.2.6. Physical Security: Restricted physical access to offices and server rooms, alarm systems, and surveillance where appropriate.

9.5.2.7. Backup and Disaster Recovery: Regular data backups and tested disaster recovery plans to ensure data availability and business continuity.

9.5.2.8. Security Awareness and Training: Ongoing training and awareness programmes for employees and volunteers regarding data protection responsibilities and good security practices.

9.5.2.9. Audit and Monitoring Controls: Regular auditing, monitoring, and reviewing of systems and processes to identify vulnerabilities and ensure compliance.

9.5.3. These safeguards are designed to mitigate the risks of data breaches, unauthorised disclosures, and loss or damage to personal information.

10. Availability of the Manual

10.1. A copy of the Manual is available-

10.1.1. on https://solidariteit.co.za/en, if any;

10.1.2. head office for public inspection during normal business hours;

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

10.1.4. to the Information Regulator upon request.

10.2. 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.

11. Updating of the Manual

11.1. The board will on a regular basis update this manual.

Issued by

DAWID DURIE

Information Officer