



UNIVERSITY OF THE
WITWATERSRAND,
JOHANNESBURG

UNIVERSITY OF THE WITWATERSRAND, JOHANNESBURG

PROMOTION OF ACCESS TO INFORMATION MANUAL

**Prepared in terms of section 14 of the
Promotion of Access to Information Act
2 of 2000 (as amended)**

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1. LIST OF ACRONYMS AND ABBREVIATIONS

“VC”	Vice-Chancellor
“DVC”	Deputy Vice-Chancellor
“DIO”	Deputy Information Officer
“IO”	Information Officer
“ExCo”	Executive Committee of Convocation
“Minister”	Minister of Justice and Correctional Services
“PAIA”	Promotion of Access to Information Act No. 2 of 2000(as Amended)
“PFMA”	Public Finance Management Act No.1 of 1999 as Amended.
“POPIA”	Protection of Personal Information Act No.4 of 2013.
“Regulator”	Information Regulator
“HEA”	Higher Education Act No.101 of 1997 as amended
“WITS”	University of the Witwatersrand
“WA”	Wits Archives
“WAM”	Wits Art Museum
“Constitution”	Constitution of the Republic of South Africa, Act No.108 of 1996
“SAHRC”	South African Human Rights Commission
“SRC”	Student Representative Council
“UF”	University Forum

2. PURPOSE OF PAIA MANUAL

This PAIA Manual serves to inform the public about-

2.1 the nature of the records which may be publically available at the University of the Witwatersrand, Johannesburg (“the University”), without the need to submit a formal PAIA request;

2.2 how to make a request for access to a record of the University which is not available;

2.3 the relevant contact details of the persons who will assist members of the public with access to readily available records and/or to guide members of the public in respect of the process which ought to be followed to lodge a PAIA request in terms of this Manual;

- 2.4 all the remedies available in relation to a request for access to the University;
- 2.5 the purpose and description of the services available to members of the public by the University and how to gain access to those services. See Annexure 2 in this regard;
- 2.6 a guide on how to use the PAIA process, as updated by the Regulator;
- 2.7 the manner in which the University processes personal information as set out in Annexure 3;
- 2.8 the transfer or processing of personal information by the University outside of the The Republic of South Africa and the recipients or categories of recipients to whom personal information may be supplied to as per Annexure 3 attached hereto; and
- 2.9 the security measures which the University has in place to ensure the confidentiality, integrity and availability of personal information which is processed by the University as per Annexure 3 attached hereto.

3. ESTABLISHMENT OF THE UNIVERSITY OF THE WITWATERSRAND, JOHANNESBURG

3.1. Objectives/Mandate

The University of the Witwatersrand, Johannesburg (“Wits” or the “University”) provides higher education and research services to the general public in terms of its rules, regulations, policies, and procedures.

The University has five campuses situated in Braamfontein (2) and Parktown (3) in Johannesburg and five faculties consisting of the Commerce, Law and Management Faculty, the Engineering and the Built Environment Faculty, the Humanities Faculty, the Science Faculty, and the Faculty of Health Sciences. Wits is a high quality research-intensive higher education institution whose ethos is based on the promotion of the public good through the pursuit of intellectual excellence, international competitiveness, and local relevance.

The University is committed to providing high-quality, internationally competitive education, founded on high academic standards, cutting-edge research, public engagement, and productive partnerships with other leading institutions around the world.

The objective of the University is to make a positive impact on society through creating and advancing global knowledge and fostering graduates to be leaders with integrity. By driving innovation, and embracing the diversity of our people, disciplines, and ideas, Wits aims to be a place where our students and staff thrive.

The University strives to empower its graduates to be socially responsive and adaptive to an ever-changing world. Our people are at the centre of what makes Wits great. Members of the University community are required to be collegial, open-minded, respectful, accountable and to always act with integrity.

We at Wits, aim to foster a welcoming environment and embrace the diversity of our backgrounds. Innovation is what drives the University forward and it enables a space to create, collaborate, and engage in robust and informed debate, across disciplines and boundaries.

The University is committed to using its knowledge for the advancement of our community, city, country, continent, and the globe([Strategic Framework 2033 - Wits University](#)).

4. STRUCTURE AND FUNCTION OF THE UNIVERSITY OF THE WITWATERSRAND

The University of the Witwatersrand, Johannesburg (Wits University) is recognised as a higher education institution and operates in terms of the Higher Education Act, Act 101 of 1997, (“the HEA”) as amended. In line with the HEA, the University has established its own institutional statutes, policies, and rules.

The Higher Education Act (HEA) determines the following governance structures and functions within the University:

- **Council** –The Council governs the institution subject to the Higher Education Act and Institutional Statute.
- **Senate** –The Senate is accountable to the Council regarding the academic and research functions of the institution.
- **Joint Committees of Council and Senate** – These committees perform functions that are common to the Council and Senate.



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- **Institutional Forum (University Forum)** – The Forum advises the Council on all issues affecting the institution, including those listed in the Act.
- **Students' Representative Council (SRC)** – The SRC represents students in all aspects of student life.
- **Executive Committee (ExCo) of Convocation** – The Convocation represents the Alumni of the institution.

The Governance Structures of the University and the Vice-Chancellor's advisory bodies and their standing committees are set out in **Annexure 1**.

5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE UNIVERSITY OF THE WITWATERSRAND IN TERMS OF (SECTION 17(1) OF PAIA)

5.1. Information Officer

The Information Officer's contact details are as follows:

Name: Professor Zeblon Vilakazi

Designation: Vice-Chancellor and Principal

Tel: 011 717 1102

Email: zeblon.vilakazi@wits.ac.za

Fax number: 011 717 1107

5.2. Deputy Information Officer

Name: Carol Crosley

Designation: Registrar

Tel: 011 717 1201

Email: carol.crosley@wits.ac.za

Fax Number: 011 717 1217

5.3 Access to information general contacts

Email: carol.crosley@wits.ac.za



5.4 National / Head Office

Postal Address: Private Bag 3, Wits, 2050, South Africa
Physical Address: 1 Jan Smuts Avenue, Braamfontein, 2000
Telephone: 011 717 1201
Email: carol.crosley@wits.ac.za
Website: www.wits.ac.za

5.5 Availability of the PAIA Manual

A copy of this Manual is available to any person upon payment of a reasonable prescribed fee through the following channels –

- On request from the Registrar's Office: 10th Floor Senate House, Jorissen Street, Braamfontein, Johannesburg, South Africa, or by e-mail via the e-mail addresses reflected above;
- On our website under the link <https://www.wits.ac.za/paia/>; and
- At each University Faculty building as detailed in the table below.

Faculty of Health Science	Faculty Registrar's Office: Philip V Tobias Health Sciences Building I 29 Princess of Wales Terrace Parktown, 2193, Johannesburg
Faculty of Science	Faculty Registrar's Office: TW Kambule Building, Room 009, Mezzanine Floor, West Campus
Faculty of Humanities	Faculty Registrar's Office: Southwest Engineering Building, Braamfontein - East Campus Room A209, 2nd Floor, Administration Building Education Campus - Parktown
Faculty of Commerce, Law and Management	Faculty Registrar's Office: CLM Faculty Administration Building G, Ground Floor, CLM012, Braamfontein Campus West, Johannesburg. Faculty House (Block M), 1st Floor, Room 006, Management Campus, Parktown, Johannesburg
Faculty of Engineering and Built Environment	Faculty Registry, Ground Floor, ARM Building, West Campus, Johannesburg.

This Manual is also available in the following official languages-

- English
- Isizulu
- Setswana

6. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

6.1 The Regulator has, in terms of section 10(1) of PAIA, 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.

6.2. The Guide is available in each of the official languages.

6.3. The aforesaid Guide contains the description of-

6.3.1. the objects of PAIA and POPIA;

6.3.2. the postal and street address, phone, and fax number, and, if available, electronic mail address of-

6.3.2.1. the Information Officer of every public body, and

6.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA.

6.3.3. the manner and form of a request for

6.3.3.1. access to a record of a public body contemplated in section 11; and

6.3.3.2. access to a record of a private body contemplated in section 50;

6.3.4. the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;

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

6.3.6. 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-

6.3.6.1. an internal appeal;

6.3.6.2. a complaint to the Regulator;

6.3.6.3. 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;

6.3.7 the provisions of sections 14 and 51 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

6.3.8 the provisions of sections 15 and 52 provide for the voluntary disclosure of categories of records by a public body and private body, respectively;

6.3.9 the notices issued in terms of sections 22 and 54 regarding fees to be paid in relation to requests for access; and

6.3.10 the regulations made in terms of section 92.

6.4. Members of the public can inspect or make copies of the Guide from the offices of the public or private bodies, including the office of the Regulator, during normal working hours. The Guide can also be obtained-

6.4.1 upon request to the Information Officer; and

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

7. PROCEDURE FOR ACCESS TO RECORDS HELD BY UNIVERSITY OF THE WITWATERSRAND

7.1. Section 18 of PAIA prescribes the procedure to be followed when requesting access to information held by the University of the Witwatersrand. Section 32 (1) of POPIA also provides the procedure to access personal information. The manner of access to personal information should be in accordance with Section 18 of PAIA.

7.2. A requester or data subject can make use of the prescribed form, Form A which is accessible on the Wits website. The form can be downloaded under the link below: <https://www.wits.ac.za/paia/> or can be obtained from any of the contact listed in Section 5 above.

7.3. A requester is any person requesting access to a record at Wits. **PAIA** distinguishes between two types of requesters for access to information, i.e., Personal Requester, (data subject) and Other Requester.

7.3.1. A data subject is a requester who, having provided adequate proof of identity, is seeking access to a record containing personal information about the data subject. Subject to the provisions of **PAIA** and **POPIA**, Wits may provide the requested information, or give access to any record about the data subject's personal information within a reasonable time, (at a prescribed fee, if any) in a reasonable manner and format and a generally understandable form. The prescribed fee for the reproduction of the personal information requested will be charged by Wits.

7.3.2. A person falling in the category of Other Requester is entitled to request access to information pertaining to third parties. However, Wits is not obliged to grant access before the requester fulfills the requirements for access to information in terms of **PAIA** and **POPIA**.

7.4. When a record is requested by an Other Requestor (including Data Subjects themselves), the following will apply:

- Request Form A must be completed.
- On the Request Form all details must be completed, including the right the Requester wants to protect by requesting the information.
- If a Requester is acting on behalf of someone else (e.g., an attorney acting on behalf of a client), the signature of the other person (i.e., the client) must appear on the Form and the University shall have the right to verify that the person on whose behalf the request is being made did indeed authorise such request.
- A Requester must state in which form (inspection of copy, paper copy, electronic copy, transcript, etc) s/he wants to access the information.
- If the record is part of another record, the Requester may, subject to the provisions of POPI and PAIA only be granted access to that part of the record that pertains to the information s/he wants or is entitled to, and not the rest of the record.
- A Requester must indicate whether the requested record(s) is preferred in any particular language.

- A Requester should indicate the manner in which he/she wishes to be informed of the decision on the request and the necessary particulars to be informed accordingly.
- An oral request for access to a record(s) may be made if a Requester does not have a formal education or has a disability. The Information Officer or Deputy Information Officer will assist the Requester in completing the prescribed form on behalf of such a Requester and provide him/her with a copy of the completed form.
- The request for information will, in terms of Section 25 of PAIA, be processed by the Information Officer within 30 days after receipt of the request or as soon as is reasonably possible, whereafter the Information Officer will inform the Requester of his/her decision, either to grant or reject the request for access to records. The decision must, if it is reasonably possible, be communicated in the manner requested by the Requester.

7.5. Section 26 of **PAIA** prescribes the instances where the period of thirty (30) days referenced in Section 25 of **PAIA**, may be extended for a further 30 days. The period of 30 days may be extended once for a further period of not more than 30 days, if -

- the request is for many records or requires a search through many records and compliance with the original period would unreasonably interfere with the activities of Wits University.
- If the period has been extended, the Information Officer must as soon as possible and within 30 days of first receiving the request, inform the Requester of that extension.
- If a request for access to a record has been refused, delayed, or granted subject to unreasonable fees or is granted in an unacceptable form, the Requester may lodge an internal appeal as per Section 74 of **PAIA**.

7.6. All requests will be evaluated against the provisions of the Act (in conjunction with any other legislation, including the Protection of Personal Information Act of 2013). The Act allows the Information Officer to refuse access on grounds stipulated in the Act or terms of the Protection of Personal Information Act of 2013.

Some of the grounds include, but are not limited to:

- professional privilege;
- that it is necessary to protect the commercial information or the confidential information of a third party;
- that the record constitutes privileged information for the purposes of legal proceedings;
- that it is necessary to protect the commercial information of the University;
- that it is necessary to protect the safety of individuals or property; or
- that granting access would result in the unreasonable disclosure of personal information about a third party.

7.7. Fees

The Requester will be notified of the prescribed fee payable, if any, the method of payment, and the office to which he/she can make such payment or submit proof of payment before a request for information is processed further. Please note that the requester is exempted from paying an access fee to Wits if –

7.7.1. the Requester is a single person whose annual income, after permissible deductions, such as PAYE and UIF, is less than **R14 712** a year, or

7.7.2 the Requester is married and his/her joint income, after permissible deductions, such as PAYE and UIF is less than **R27 192** per year.

7.7.3. A Requester who seeks access to a record containing personal information about that the Requester is not required to pay the request fee.

7.7.4. Every other Requester, who is not requesting access to a record containing personal information about him/her or itself, must pay the request fee.

7.7.5. The Information Officer must by notice require the Requester (other than a personal requester) to pay the prescribed fee before further processing the request.

7.7.6. The fee that the Requester must pay to the University is R35,00. The requester may lodge an application to the Court against the tender or payment of the request.

7.7.7. If access to record/s is granted by the University, the Requester may be required to pay an access fee for the search for and preparation of the records and for reproduction of the record/s.

7.7.8. The access fees that apply are set out below and can be found in Part III of Annexure A of the Regulations to the Act. The University cannot issue a record/s until such an access fee has been paid.

The applicable fees are contained in the fee schedule, which can also be viewed using the link <https://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf>

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD BY THE UNIVERSITY OF THE WITWATERSRAND

Subjects on which the body holds records	Categories of records held on each subject
Council, Senate, and SET	Agendas, submission documents, minutes of the meetings, and members' attendance lists.
Strategic Documents, Plans, Proposals	Annual Performance Plan, Faculty Plans, Business Plans, Academic and Commercial Proposals, and University wide or specific Strategic Plans.
Records relating to the administration of the University:	Governance structures, personal data of governance office-bearers, internal rules, regulations and policies, minutes of meetings, submissions to governance structures, financial records, contracts, partnerships, scholarships, bursaries, grants and donations, tenders and service providers, employment equity data, BBBEE status, PAIA data, statutory and other licenses, marketing records. Records relating to academic and research activities of staff and students: Strategy statements, curricula, research, course and programme accreditations and changes, committee applications and decisions, teaching materials, research topics, research data, publications, student funding, research funding, exchange programs, research collaborations, transformation initiatives and data, census data.
Records relating to academic and research activities generally:	Strategy statements, contracts, partnerships, budgets, proposal documents, contracts, and financial records.



Records relating to students or prospective students:	Student personal data includes, but is not limited to academic records, academia related submissions, disciplinary records, merit records, scholarship and bursary records, financial records, and community service records.
Records relating to Employee matters	Staff personal data including, but not limited to CVs, service history, job descriptions, performance reviews, merit awards and mentions, disciplinary hearings and verdicts, marital status, credit history, criminal records, salary grades, progressions, payroll data, and general conditions of service.
Records relating to the University's commercial activities:	University-owned commercial companies, University consultancies, University staff, private consultancies, intellectual property commercialisation, budgets, and financial records.
Records relating to the University's intellectual property:	Registered IP, commercialization arrangements, publications, IP contracts, and IP policies.
Records relating to the University's public benefit programs:	Talent detection initiatives, clinics, rural development, government collaborations,- and international collaborations
Technical records	ICT infrastructure, physical infrastructure, construction blueprints.
Records relating to real property leased or owned by the University wholly or partly:	Property deeds, leases, uses, and third party rights.
Third party information	Funders, Donors, Collaborators and Clients.
Suppliers, vendors/ other business	Name and contact details, identity and student numbers, banking and financial information, information about products or services, other information required for the University's administrative and operational purposes.

Please note that the above list is not exhaustive of all of the categories of records held by the University. It serves only to provide a high-level description of the kinds of records held by the University.



9. CATEGORIES OF RECORDS OF THE UNIVERSITY OF THE WITWATERSRAND THAT ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category	Document Type	Available on Website	Available upon request
Strategic Documents (Plans and Report)	<ul style="list-style-type: none">- Organisational profile- (Overview, Objectives, Functions, Architecture)- Annual Reports.- Strategic Plan.	X	
Marketing	<ul style="list-style-type: none">- Any information published by the University in any books, magazines, brochures, or other material form that has been made available to the public by the University.	X	
	<ul style="list-style-type: none">- The mission and objectives of the University and all its various arms.- The statutes, rules, regulations, and policies of the University.- The organogram/structure of the University, including names and offices of office-bearers.- Programme and courses offered by the University.- Admission requirements, application forms, fees, and any other information necessary to facilitate public engagement with the University in the promotion of its objectives.- some research and academic initiatives that the University is involved in.	X	



<p>Personal information is available without recourse to the Act only if requested by the person that the information pertains to directly (i.e., the Requester is requesting access to his/her own personal information):</p>	<ul style="list-style-type: none"> - academic records. - records of merit awards or mentions. - records of extracurricular activities. - records of disciplinary hearings and/or verdicts. - graded papers submitted by the Requester during his/her academic pursuits at the University. - financial statements relating to the Requester's financial obligations to or rights against the University. 		X
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10. DESCRIPTION OF ALL REMEDIES AVAILABLE TO A REQUESTOR IN TERMS OF THE PAIA

10.1. Internal appeal

Should a Requester believe that a refusal by the University to grant information is unjustified, or should a Requester have grounds for complaint in terms of PAIA, an internal appeal may be lodged with Wits by completing Form B which is accessible under this link [Form B - Notice of Internal Appeal.pdf \(wits.ac.za\)](#)

10.2. Process for Complaining to the Information Regulator

A Requester can approach the Office of the Information Regulator after such Requester or third party has exhausted the internal appeal procedure referred to above, against a decision of the Information Officer of the University. The Requester or Third Party (hereinafter referred to as “the Complainant”) can make use of Form 5 to lodge a complaint with the Information Regulator. The form can be accessed from the Information regulator’s website referred to below:

<https://info regulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form05-Reg10-1.pdf>



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Once the form is completed, it can be sent to the following email address: PAIAComplaints@infoRegulator.org.za or an online complaint form can be completed at <https://www.justice.gov.za/infoereg/>

A complaint by the Requester or third party must be lodged within 180 days of receipt of the decision from the University.

10.3. Process for approaching the Court

Should a Requester or third party not be satisfied by an internal appeal and provided the internal appeal procedures have been exhausted; a requester may approach a relevant Court for appropriate relief.

11. PUBLIC INVOLVEMENT IN THE FORMULATION OF POLICY OR THE EXERCISE OF POWERS OR PERFORMANCE OF DUTIES BY THE UNIVERSITY OF THE WITWATERSRAND

11.1. As confirmed by the courts and legislature, the University has autonomy in determining its policies, rules, and procedures. As such, it is not required to invite members of the general public to make representations or to participate in the development of its policies, rules, and procedures. However, it does invite its stakeholders to make representations or to participate in or influence the development of its Regulations, Codes of Conduct, and Guidelines through the relevant University structures.

11.2. Members of the public may, where appropriate, make representations to the Regulator regarding the conduct of any person that falls within the jurisdiction of any of the Regulator's mandate.

11.3. The Regulator disseminates information to the public via electronic and print media, government gazette as well as social media.



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12. UPDATING OF THE MANUAL

The University of the Witwatersrand will through the Registrar's office update and publish this Manual annually.

Issued by

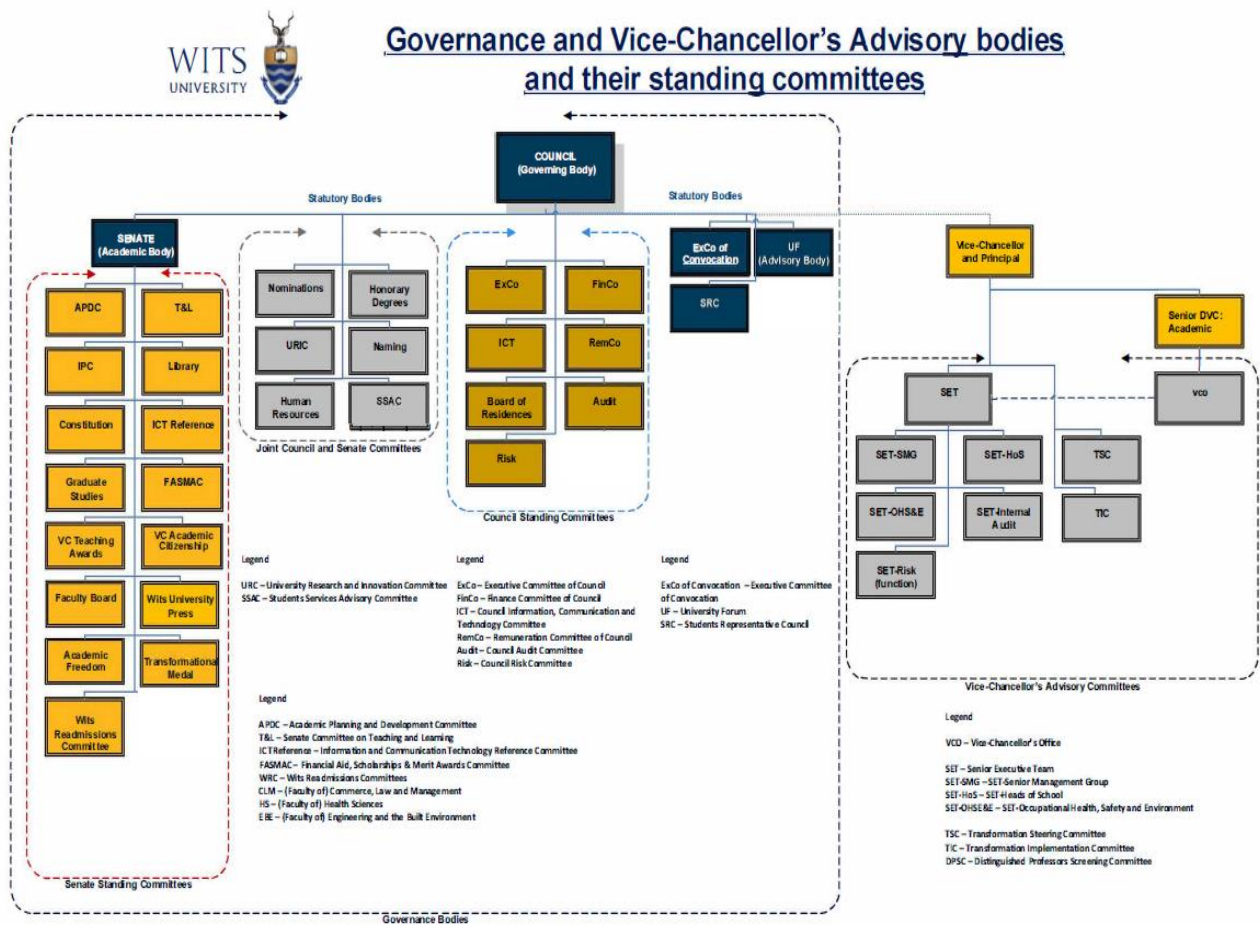
Professor Zeblon Vilakazi

Vice-Chancellor



ANNEXURES

ANNEXURE 1: GOVERNANCE COMMITTEES ORGANOGRAM



ANNEXURE 2: SERVICES AVAILABLE TO MEMBERS OF THE PUBLIC FROM THE UNIVERSITY AND HOW TO GAIN ACCESS TO THOSE SERVICES

Below is a list of services that the University offers to the public including the contact details:

- **Wits Law Clinic:** assist members of the public, staff, and students with legal advice on matters related to family law, Gender, Labour, Property, Criminal Law & Delict and Refugee Law. More information can be accessed at this link <https://www.wits.ac.za/lawclinic/>
- **Emthonjeni Centre:** is it a multi-disciplinary Centre that offers psychological, social work, speech pathology, and audiology services to the public, more information on how to access the services can be accessed on the link below: <https://www.wits.ac.za/shcd/emthonjeni-centre/>
- **Centre for Deaf Studies:** train teachers of the Deaf and equip parents of Deaf children and the greater Deaf community with the knowledge and skills to foster equal opportunities for the South African Deaf Community. More information on how to access the services can be accessed at this link <https://www.wits.ac.za/centre-for-deaf-studies/>
- **Wits Donald Gordon Medical Centre:** is the first and only teaching hospital in South Africa, more information on the services can be accessed at this link <http://www.dgmc.co.za/>
- **Wits Libraries:** Wits is home to 11 Libraries that allow staff, students, and researchers to access to book volumes, journal titles, and electronic resources, including beautiful paintings, maps, early printed books, and rare manuscripts. More information on the services can be accessed at this link <https://www.wits.ac.za/library/>
- **Historical Papers Research Archive:** is a platform for research and community engagement and one of the most comprehensive public archives in Southern Africa with over 3400 collections. More information on the services can be accessed at this link <https://www.wits.ac.za/historicalpapers/>
- **History Workshop:** promotes research into the lives, experiences, and social worlds of people and communities in South Africa that have been neglected by scholarly investigation to address the erasures of colonialism and apartheid. More information on the services can be accessed at this link, <https://www.wits.ac.za/history-workshop/>
- **Wits Art Museum (WAM):** WAM's holdings have enormous research value for academics, artists, and educators, as well as those working in the arts, culture, and heritage fields. More

information on the services can be accessed at this link <https://www.wits.ac.za/wam/collections/>

- **Wits Archives (WA):** manages university governance records, private papers& manuscripts, printed publications, and newspaper cuttings. The function of WA is to collect and make available the University memory using processes that can account for and protect this heritage's integrity against alteration, theft, damage, and destruction. Wits Archives can be accessed by researchers who wish to use the collection stored within our repository, researchers are required to fill in a researcher registration form using this link <https://www.wits.ac.za/about-wits/facts-and-figures/central-records-and-archives/>
- **Academic Teaching and Learning Services:** Wits is committed to providing high-quality, internationally competitive education, founded on high academic standards, cutting-edge research, public engagement, and productive partnerships. Services can be accessed at this link <https://www.wits.ac.za/teaching-and-learning/>
- **Research Services:** Wits is a research-intensive university that aspires to increase this intensity in such a manner that it is increasingly internationally competitive and locally relevant. The current strategic plan for research and postgraduate affairs strives to increase the production of 'research with impact'. Impactful research is quality research that is defined carefully to include:
 - Discovery research that propels a discipline forward.
 - Translational research that influences policy and practice.
 - Innovative research that stimulates economic development.
 - Achievement of this lofty goal will depend on growing new generations of research capability. In the South African context, this research development imperative is closely linked to demographic transformation. Services can be accessed at this link <https://www.wits.ac.za/research/researcher-support/>

ANNEXURE 3: PROCESSING OF PERSONAL INFORMATION

- **Purpose of Processing**

The University processes personal information to, amongst other things:

- perform duties in terms of its engagements and terms and conditions with students.
- performing administrative and operational functions.
- comply with the University's regulatory and other obligations.
- perform recruitment and employment functions including pension, payroll, medical aid, training, disciplinary action, and income tax related functions.

- **Description of the categories of Data Subjects and the information or categories of information relating thereto**

Categories of Data Subjects	Personal Information that may be Processed
Students / Prospective Students or Applicants, International Students	Full names, identity numbers, students numbers, gender, race / BBEE information, age, language, education, financial information (such as creditworthiness and banking details), employment history, credit information, criminal information, references, physical and postal address, contact details (cell phone and e-mail address), pregnancy, marital status, physical or mental health, medical records, wellbeing, disability, religion, culture, language, birth, location, online identifiers, biometric and facial recognition information, photographs, breathalyser test results, vehicle registration, driver's license, birth, and death certificates. If a person in this category is under the age of 18 years and therefore falls to be a child in terms of legal requirements, the necessary consent from the parent or guardian must be obtained.
Employment, candidates, employees, academic staff	B-BBEE/employment equity information, age, language, education, financial information (such as creditworthiness and banking details), employment history, credit information, criminal information, references, physical and postal address, contact



	details (cellphone and e-mail address), pregnancy, marital status, physical or mental health, medical records, well-being, disability, religion, culture, language, birth, location, online identifiers, biometric and facial recognition information, trade union membership, photographs, breathalyser test results, vehicle registration, driver's license, birth and death certificates, all Personal Information required for the administration of compensation and benefits (including payroll, promotions, salary increases, salary decreases, salary adjustments, bonuses, death benefit pay-outs, COIDA, disability), employee files (including performance records, disciplinary, CCMA records, employee grievances, formal written warnings, SHEQ), legal judgements, garnishee and other court orders.
Research participants, post-doctoral fellows, alumni, authors	Full names, identity number, students numbers, gender, race / BBBEE/employment equity information, age, language, education financial information (such as creditworthiness and banking details), employment history, credit information, criminal information, references, physical and postal address, contact details (cellphone and e-mail address), pregnancy, marital status, physical or mental health, medical records, well-being, disability, religion, culture, language, birth, location, online identifiers, biometric and facial recognition information, photographs, breathalyser test results, vehicle registration, driver's license, birth and death certificates.
Governance and/or appointed officer bearers, external members of committees, council members	B-BBEE/employment equity information, age, language, education, financial information (such as creditworthiness and banking details), employment history, credit information, criminal information, references, physical and postal address, contact details (cellphone and e-mail address), pregnancy, marital status, physical or mental health, medical records, well-being, disability, religion, culture, language, birth, location, online identifiers, biometric and facial recognition information, trade union membership, photographs, breathalyser test results, vehicle registration, driver's license, birth and death certificates, all Personal Information required for the administration of compensation and benefits (including payroll, promotions, salary



	increases, salary decreases, salary adjustments, bonuses, death benefit pay-outs, COIDA, disability), employee files (including performance records, disciplinary, CCMA records, employee grievances, formal written warnings, SHEQ), legal judgements, garnishee and other court orders.
Partner organisations, subsidiaries, donors, and funders,	Name of legal entity or person, registration number or identity number, names of contact persons/directors/members and identifying documents such as identity document or passport of contact persons/directors/members, physical and postal address, and contact details (email, cellphone), creditworthiness or other financial information, founding documents from the CIPC or other forms of proof of registration/incorporation such as trust deeds, partnership agreements or CC incorporation documents, tax related information, authorised signatories, resolutions for authority or business transactions, shareholding information, B-BBEE information, confidential correspondence, beneficiaries, ultimate beneficial owners, shareholding information, and any other Personal Information required for vetting purposes in terms of financial legislation such as FICA.
Particular third parties: Different universities, and government departments.	Name of a legal entity, registration number, names of contact persons/directors/members, physical and postal address, contact details (email, cellphone), financial and tax related information (tax clearance, tax pin, VAT number), founding documents (CIPC), authorised signatories, directors information for vetting purposes (criminal, credit and CIPC disqualification or deregistration), shareholding information, BBBEE information, and any other Personal Information required for vetting purposes in terms of financial legislation such as FICA.
Contractors / Suppliers / Service Providers: Juristic Persons	Name of legal entity, registration number, names of contact persons / directors / members, physical and postal address, contact details (email, cellphone), financial and tax related information (tax clearance, tax pin, VAT number), founding documents (CIPC), authorised signatories, directors information for vetting purposes (criminal, credit and CIPC disqualification or deregistration), shareholding information, B-BBEE information,



	and any other Personal Information required for vetting purposes in terms of financial legislation such as FICA.
Contractor / Suppliers / Service Providers: Natural persons	Full names, identity number, gender, race / B-BBEE information, age, credit information, criminal information, references, physical and postal address, contact details (email, cellphone), financial and tax related information (tax clearance, tax pin, VAT number), and any other Personal Information required for vetting purposes in terms of financial legislation such as FICA.
Beneficiaries in terms of Social Investment initiatives and community development	Name of legal entity, registration number, names of contact persons / directors / members and identifying documents such as identity document or passport of contact persons / directors / members, physical and postal address and contact details (email, cellphone), creditworthiness or other financial information, founding documents from the CIPC or other forms of proof of registration/incorporation such as trust deeds, partnership agreements or CC incorporation documents, tax related information, authorised signatories, resolutions for authority or business transactions, shareholding information, B-BBEE information, confidential correspondence, beneficiaries, ultimate beneficial owners, shareholding information, and any other Personal Information required for vetting purposes in terms of financial legislation such as FICA.
Visitors, members of the public	Full names, identity numbers, physical and postal address, contact details (cellphone and e-mail address), vehicle registration, driver's license, biometric and facial recognition information.

Please note that the above list is not exhaustive of all of the categories of personal information held by the University. It serves only to provide a high-level description of the kinds of personal information held by the University.

ANNEXURE 4: THE RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE PERSONAL INFORMATION MAY BE SUPPLIED.

Category of personal information	Recipients or Categories of Recipients
Identity number and names of staff members and students, for criminal checks	South African Police Services through a subpoena in terms of Section 205 of the Criminal Procedure Act
Qualifications and academic transcripts for qualification verifications	South African Qualifications Authority, Department of Higher Education, Third Party Employers

• **Planned transborder flows of personal information.**

Given the nature of the University's activities and business, there will be regular planned transborder transfer of personal information. For example, the details of exchange staff and students must be shared between institutions, co-supervised and joint degrees require an exchange of information between the institutions, and research results and data are shared across borders. In all instances, the University ensures that the recipients of the personal information are subject to laws binding them to protect the personal information in line with POPIA, at a minimum. Ethics and/or legal compliance is also required for any research that entails transborder transfer of personal information. Personal Information will only be transferred out of the Republic of South Africa if the third party who is the recipient of the information is subject to a law, binding corporate rules, or binding agreement that provides an adequate level of protection that:

- effectively upholds principles for reasonable processing of the information that are substantially similar to the conditions for the lawful processing of personal information relating to a data subject who is a natural person and, where applicable, a juristic person; and
- includes provisions that are substantially similar to the Protection of Personal Information Act ("POPIA") relating to the further transfer of personal information from the recipient to third parties who are in a foreign country.
- the data subject consents to the transfer.
- the transfer is necessary for the performance of a contract between the data subject and the University, or the implementation of pre-contractual measures taken in response to the data subject's request;
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the University and a third party; or

- the transfer is for the benefit of the data subject and –
- it is not reasonably practicable to obtain the consent of the data subject to that transfer; and
- it were reasonably practicable to obtain such consent, the data subject would be likely to give it.
- **General Description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information.**

The University shall take all reasonable, appropriate, technical, and organisational measures to protect Personal Information from loss, damage, unauthorised access, processing, destruction, or manipulation. The University will implement the following security measures, amongst others:

- The University has a structured plan and framework in place to regularly train the managers responsible for implementing this Policy.
- The University's third-party service providers are required to sign a service level agreement affirming their commitment to their legal obligation to protect personal information.
- All current suppliers of the University will where appropriate be required to sign an addendum to their contracts with the University containing relevant consent clauses for the use and storage of the University's data subject's information, or any other action so required, in terms of POPIA.
- All electronic files or data are backed up by the University department that is responsible for system security which protects third party access and physical threats.
- The University has conducted a risk assessment identifying reasonably foreseeable internal and external risks to personal information, establishing and maintaining appropriate safeguards against the risks identified, regularly verifying that the safeguards are effectively implemented, and ensuring that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.
- Affected data subjects will be informed should their personal information be accessed or processed by any unauthorised person.



- The University has implemented layered IT and cyber security, which includes multiple mitigating security controls to protect against internal and external threats to the data subject's information as well as the University's systems.
- In addition, the University has established relevant information security policies to govern controls that have been implemented. Including, however not limited to, the Acceptable Use Policy, Information Security Policy, Cyber Security Policy, Backup and Recovery Policy, Anti-Malware Policy, Availability Management Policy, Cybersecurity Incident Management Policy, Secure Development Policy, Information Classification and Handling Policy, and the Information Security Training and Awareness Policy.
- Information security is built into systems and applications that are used by the University community, and access to information is managed by roles and responsibilities. The relevant encryption mechanisms have been applied to data where necessary.
- Endpoint security has been applied to University-owned user workstations and devices to protect users against malware and viruses.
- The required network and perimeter security and monitoring controls are in place.
- In addition, incident management processes have been established to ensure incidents are reported or detected and handled within a reasonable timeframe to reduce the impact on the data subject and the University.
- End users are trained to safeguard the unauthorized collection, processing, or disposal of information through a cyber security awareness and training program.