



**MANUAL IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION
ACT 2 OF 2000 AND THE PROTECTION OF PERSONAL INFORMATION
ACT 4 OF 2013**

of

TRINITY PRESBYTERIAN CHURCH, LYNNWOOD, PRETORIA ("TRINITY")

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INFORMATION OFFICER	DEPUTY INFORMATION OFFICER
Prof Peter Havenga E-mail: peterhavenga@outlook.com	Mr LA Hardouin E-mail: lincon.atherton@gmail.com

A handwritten signature in black ink, appearing to be "LA Hardouin", written in a cursive style.

1 INTRODUCTION

The Promotion of Access to Information Act 2 of 2000 ("PAIA") facilitates access to information. The purpose of PAIA is to actively promote a society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect all of their rights. The Promotion to Access of Information Act 4 of 2013 ("POPI Act") seeks to protect the personal information of all citizens. In its regulation of how personal information is processed, the POPI Act attempts to balance the right to privacy and the need for the free flow of, and access to, information.

The POPI Act applies to any public or private body that keeps any type of records relating to information of a personal nature. A church is an example of a private body to which the Act applies. From 30 June 2021 all public and private bodies have to comply with the POPI act.

This manual has been compiled in compliance with section 115 of the POPI Act amending section 51 of PAIA which requires a private body to compile a manual and to update it on a regular basis. For the purposes of PAIA, this Manual details the procedure to be followed by a requester and the how a request for Access will be facilitated. For the purposes of POPI the detail prescribed in the amended section 51 of PAIA is provided and certain measures taken by Trinity to protect information are explained.

TRINITY is a church affiliated to the Uniting Presbyterian Church in Southern Africa (UPCSA). Our mission is to be a congregation pointing people to God.

The LYNNWOOD CHURCH TRUST was established to manage Erf 419 Lynnwood on which the church was erected to serve Trinity and the Trinity Anglican Church Pretoria after an inter vivos donation. The LYNNWOOD CHURCH TRUST Is responsible for maintaining records relating to the Trust, including the Title Deed of the property on which the church is built and the Presbyterian manse.

2 INFORMATION OFFICER

Session has appointed the chairperson of its Executive (stewardship) committee as Information Officer and the pastoral assistant as Deputy Information Officer as required by the POPI Act. The Information Officer acts with the authority of Session in respect of the matters contemplated in the Manual, and the obligations imposed by POPI and PAIA. These officers are:

INFORMATION OFFICER	DEPUTY INFORMATION OFFICER
Prof Peter Havenga E-mail: exco@trinity.org.za	Mr LA Hardouin E-mail: pastor@trinity.org.za

3 THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION (“SAHRC”) GUIDE

The SAHRC has compiled a guide, as contemplated in section 10 of PAIA, containing information to assist any person who wishes to exercise any right as contemplated in the Act. This guide is available from the SAHRC at Private Bag 2700, Houghton 2041; website www.sahrc.org.za; tel 011 877 3600; fax 011 403 0684 6

4 DATA COLLECTION AND RECORDKEEPING

4.1 Trinity keeps records of the names, identity numbers, residential and email addresses and telephone numbers of all its members and their minor children as well as of non-member “friends of Trinity” who wish to remain in contact with the congregation. The information is kept on an electronic database and is provided voluntarily, as described below. It is used for lawful purposes relating to the functioning and activities of Trinity for example, for purposes of pastoral care and communication and, in the case of members, to compile a Roll of Members as required in the *UPCSA Manual of Faith and Order* so that reports can be submitted to Presbytery as and when required, for example in the annual report on the number of members in each congregation. No personal detail is disclosed in such reporting, and Trinity will not make this information available to any outside party without prior written consent of such members or friends of Trinity. Consent on behalf of minor children will be obtained from a parent or legal guardian of the child.

Members’ information is collected by means of a *Member Information Form* on which consent is provided for retention of the information contained in the form of adults and their minor children. Members are informed for what purposes the information is gathered. The information collected by means of this form is available from the office administrator upon e-mail request to admin@trinity.org.za and will be provided within reasonable time (not exceeding one week) of receipt of the request. Members’ names, email addresses and telephone numbers are kept on an electronic database provided by an outside provider. This information enables the use of bulk emails, bulk SMS’s and broadcast Whatsapp groups to enhance communication and pastoral care. Data Subject information is not available to other data subjects. Email distribution lists do not disclose the details of the data subject or the email address of data subjects.

Records of personal information are not retained any longer than is necessary to achieve the purpose for which the information was collected, which included keeping records for statistical purposes. Only authorised members of management are able to access the personal information.

4.2 Trinity also retains records which are required in terms of legislation other than PAIA in respect of its employees and suppliers. These may include taxpayer

numbers and bank account details. Trinity further retains records of information of certain suppliers, for example their bank account details. Such information will be used only for the purposes provided and will not be used or disclosed for any other purposes.

4.3 Trinity will comply with legislation that provides that private bodies shall allow some persons access to specified records upon request.

4.4 Records are kept electronically and stored in the Cloud. In some instances hard copies are also retained.

4.5 **Categories of records kept:**

Trinity maintains a website <https://www.trinity.org.za> containing inter alia:

- Homepage
- About
- Sermons
- Devotionals
- Ministries
- Calendar
- Fellowship groups
- Newsletters
- Prayer

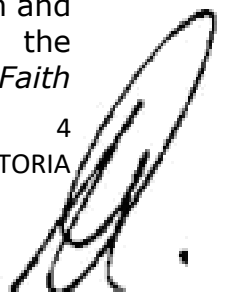
Announcements and pre-recorded sermons are also posted on the Trinity Facebook page: <https://www.facebook.com/TrinityPresbyterianChurchLynnwood/>.

The pre-recorded sermons are also made available via YouTube: <https://www.youtube.com/channel/UCf3TeEf3FR1IbxcnV98HfzA>

Financial and business records kept by Trinity include monthly and annual financial statements and reports; bank statements; suppliers statements and invoices; deposit slips; the petty cash book; asset records; tax returns and assessments; annual budgets; asset and liability and income and expenditure records; insurance record; reports to Presbytery; annual congregation reports; PBO records; and systems records.

A register is maintained of employees' personal information, their remuneration, employment contracts; leave records; IRP 5 and IT 3 certificates; salary slips; UIF PAYE, and Workmen's Compensation documents. Information technology records include those pertaining to agreements; the members' database; hardware; licences; operating systems; software packages and telephone lines. Records of insurance policies and claims and details of coverage, limits and insurers are maintained. Contracts with suppliers, contractors and service suppliers and lease agreements are on record.

The annual returns submitted to the Tshwane Presbytery; minutes of Session and the Executive (Stewardship) Committee; the Register of Baptisms and the Membership Roll are on record as prescribed by the UPCSA. The *Manual of Faith*



and Order is kept electronically as well as in hard copy. Confirmations and marriages are also recorded.

4.6 **Availability of records:**

Access to the Trinity Facebook page and website, and youTube links provided by Trinity are available without request.

Other records must, in terms of section 53 of the POPI Act, be requested by using the prescribed Form 2 under the *Regulations relating to the Promotion of Access to Information, Government Gazette* of 27 August 2021, R757. The request must be made to the Information Officer and directed at the electronic mail address of the body concerned (exco@trinity.org.za or admin@trinity.org.za).

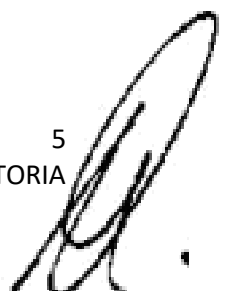
The requester must provide sufficient detail on the request form to enable the Information Officer to identify the record and the requester, and should also indicate which form of access is required. The requester should also indicate if he or she wishes to be informed in any other manner and state the necessary particulars to be so informed.

The requester must identify the right that he or she is seeking to exercise or protect and provide an explanation of why the requested record is required for the exercise or protection of that right. If a request is made on behalf of a person, the requester must submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

The fee for private bodies is R50. The requester may lodge an internal appeal or an application to the court against the tender or payment of the request fee. Trinity must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request. If the request is granted a further access fee must be paid for the reproduction and the search and preparation, and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure. The Information Officer will then make a decision on the request and notify the requester in the required form. There is not internal appeal procedure and the decision of the Information Officer is therefore final and a requestor who is not satisfied with the response of the Information Officer may make use of the external remedies prescribed

4.7 **Safeguarding of records**

The Trinity Office is kept locked when the office administrator is not there and is situated on fenced church property that is protected by a security company. Very few people have access to the alarm and security gate codes. Additional security gates lead to the parking areas. Hard copy data is filed and stored in the office filing system in locked cupboards, or in the office safe. There are only two keys to the safe, neither of which is stored on the church premises.



Mobile devices are retained in the possession of the individual or locked in a cupboard in the church office and are individually secured with a password/ code. Office laptops are also retained in the possession of individual staff members, are password protected and are generally not left in the office overnight. When they are, they are locked away.

Electronic records and information are stored on various software applications (e.g. One Drive, Microsoft Outlook, Excel, Word) and on third party cloud storage solutions that are password protected. Data is regularly backed up to external storage devices.

Information is processed in Pretoria, Gauteng, South Africa and is disseminated only for the purpose and at the level required.

Trinity will implement appropriate and reasonable technical and organisational measures to protect the confidentiality and integrity of personal information obtained from a data subject, and will inform the Regulator and the data subject should there be reasonable grounds to believe that the personal information of a data subject has been unlawfully acquired by an unauthorised person, as prescribed in the POPI Act. Security risks like theft of physical devices and stored data have been mitigated by the measures described above. Minister, Elders, Staff and Activity co-ordinators have been briefed on security and privacy requirements for the protection of information to mitigate the risk of accidental disclosure. Hacking of databases is mitigated by password protection, firewalls, antivirus and regular software updates.

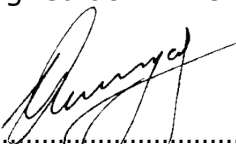
5 AVAILABILITY OF MANUAL

This manual is available for inspection, on reasonable prior notice, free of charge, at the registered address stated above. A copy is also available on the website of the TRINITY Presbyterian Church, Lynnwood <https://www.trinity.org.za>

Further copies are available from the South African Human Rights Commission as provided in the POPI Act.

Signed at PRETORIA on

2022:07:31



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INFORMATION OFFICER