

# PROMOTION OF ACCESS TO INFORMATION MANUAL

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**Approved by:**

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POLICY APPROVAL			
NAME SURNAME	AND DESIGNATION	SIGNATURE	DATE
Simon Dabbs	Director		
Karin van Heerden	Information Officer		

## 1. DEFINITIONS AND ABBREVIATIONS

Term	Description/Definition
Company	Focal Points Lab (Pty) Ltd
Employee	Any person, excluding an independent contractor, who is employed by the company and who receives, or is entitled to receive any remuneration from the company.
PAIA	Promotion of Access to Information Act, 2000 (Act 2 of 2000)
Information Officer (IO)	The Information Officer is the person authorised to handle PAIA requests.
Deputy Information Officer (DIO)	The persona designated by the Information Officer of a public body to assist the requester with their PAIA request.
PAIA Request	The name given to the document(s) submitted to a public or private body requesting access to information in terms of PAIA.
PAIA Request reference number	The reference number you allocate for an individual PAIA request, e.g 0/0/0/PAIA/date. It is advisable to use this reference number throughout all correspondence with the requester, as well as asking them to do the same.

## 2. PURPOSE

- 2.1 The purpose of the PAIA Manual is to provide information on how to obtain access to records held by Focal Points Lab (Pty) Ltd to identify the structure and services, in order to facilitate the implementation of the Promotion of Access to Information Act, 2000 (Act No 2 of 2000).

## 3. SERVICES OF FOCAL POINTS

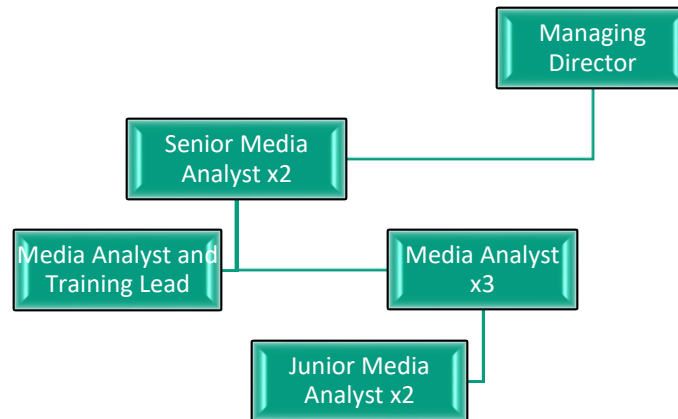
- 3.1 Focal Points' objective is to analyse and quantify the media coverage received for clients across social (Twitter, YouTube, Facebook Media, and Instagram) and editorial media (print, broadcast, and online). The Focal Points reporting solutions provide insights into the manner in which the client is portrayed in the media, which aids in identifying its brand image and reputation. This is done through sentiment analysis which classifies the client's media coverage according to the way (positive, negative, mixed, or neutral) in which it is portrayed in the media. Through brand benchmarking, a comparative analysis of the client's competitors is conducted to assess its media share of voice.

Further information regarding the services of Focal Points is available on the website <https://www.focalpoints.co.za/>

## 4. ORGANISATIONAL STRUCTURE

- 4.1 Focal Points Lab (Pty) Ltd is a private owned company that was established in 2010 and is a Level 4 B-BBEE contributor. Focal Points is recognised by The International Association for Measurement and Evaluation of Communication Awards (AMEC). The board of Directors consist of a Managing Director and Director. Management is appointed in the various departments with the relevant expertise. Offices are based in Roodepoort.

## High Level Organogram



### 4.2 Description of categories of records held:

#### Company documentation:

- Compliance with Corporate Governance
- Shareholders Agreements
- Share Certificates
- Delegations of Authority
- General Correspondence

#### Department: Accounts:

- Annual Reports
- VAT Returns
- Income tax returns and assessments
- Asset records
- Invoices
- Credit Notes
- Journals, Ledgers & Balance sheets
- Income Statements
- Trial Balance statements
- Cash Flow statements
- Tax Invoices
- Insurance Policies
- Lease Agreements
- Contractual records and information relating to suppliers, service providers, contractors and professional advisors
- Building plans
- General Correspondence

#### Department: Human Capital:

- Employee Records
- Job Descriptions
- Payroll Data
- Medical Aid Records
- UIF Records
- PAYE Records
- Employment Equity Reports
- Skills Development Reports
- Leave Records
- Salary Information
- Disciplinary Records
- Job Competency Profile
- Employee Performance Records
- Training Records
- Internal Policies and Procedures
- Regulatory Submissions
- General Correspondence

Department: Sales:

- Contracts / Agreements
- Customer Liaison
- Customer Records
- General Correspondence

Department: IT:

- Development of New Products
- Databases
- Information Technology
- Product-related Records
- Internal Policies and Procedures
- General Correspondence

It is recorded that access to the documents listed above may be protected by privacy or the grounds of refusal set out in the Act. All requests for access will be evaluated on a case-by-case basis in accordance with the provisions of the Act and other applicable legislation.

#### 4.3 Automatically available records:

The records listed below are automatically available without having to submit a formal request to access the information in terms of PAIA.

##### 4.3.1 Public Product Information

##### 4.3.2 Public Corporate Records

##### 4.3.3 B-BBEE Certificate

Records of the company which are not automatically available must be requested in terms of the procedure set out in this manual may be subject to the restrictions and right of refusal to access as provided for in the Act.

## 5. CONTACT DETAILS OF THE INFORMATION OFFICER

5.1 The Managing Director of Focal Points has appointed the following individuals as the Information Officer of which will be responsible for dealing with requests for records and information:

Information Officer	Karin van Heerden
Telephone number	010 020 5257
Fax number	010 020 5257
Email address	<a href="mailto:popi@news.newsclip.co.za">popi@news.newsclip.co.za</a> / <a href="mailto:info@newsclip.co.za">info@newsclip.co.za</a>
Postal address	Postnet Suite 213 Private Bag X1 Florida Hills 1716

## 6. INFORMATION / DOCUMENTS AVAILABLE IN ACCORDANCE WITH OTHER LEGISLATION

6.1 Focal Points keeps information / documents in accordance with the following legislation (please note that this is not an exhaustive list):

Companies Act, No. 71 of 2008  
Income Tax Act, No. 58 of 1962  
Value-Added Tax Act, No. 89 of 1991  
National Credit Act, No. 34 of 2005  
Unemployment Insurance Act, No. 63 of 2001  
Unemployment Insurance Contributions Act, No. 4 of 2002  
Basic Conditions of Employment Act, No. 75 of 1997  
Broad Based Black Economic Empowerment Act, No. 53 of 2003  
Employment Equity Act, No. 55 of 1998  
Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993  
Insolvency Act, No. 24 of 1936  
Occupational Health and Safety Act, No. 85 of 1993  
Copyright Act, No. 98 of 1978  
Labour Relations Act, No. 66 of 1995  
Skills Development Act, No. 97 of 1998  
Skills Development Levies Act, No. 9 of 1999  
Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993  
Arbitration Act, No. 42 of 1995  
Medical Schemes Act, No. 131 of 1998  
Electronic Communication and Transactions Act, No. 25 of 2002  
Electronic Communications Act, No. 13 of 2000  
Protection of Personal Information Act, No. 4 of 2013

## **7. RECORDS AUTOMATICALLY AVAILABLE**

7.1 The information is classified and grouped according to records relating to the following subjects and categories:

7.1.1 Personnel records:

7.1.1.1 Personal records provided by personnel;

7.1.1.2 Records provided by a third party relating to personnel;

7.1.1.3 Conditions of employment and other personnel-related contractual and legal records;

7.1.1.4 Internal evaluation records and other internal records;

7.1.1.5 Correspondence relating to personnel;

7.1.1.6 Training schedules and material.

“Personnel” refers to any person who works for The Company and receives or is entitled to remuneration.

7.1.2 Customer related records:

7.1.2.1 Records provided by a customer to The Company;

7.1.2.2 Records generated by or withing The Company for financial purposes.

“Customer” refers to any natural person or company which receives services from The Company.

7.2 Certain other information relating to the company is also made available on said website from time to time

## **8. RECORDS NOT AUTOMATICALLY AVAILABLE**

8.1 Records of the company which are not automatically available must be requested in terms of the procedure set out in section 9 of this PAIA manual and which may be subject to the restrictions and right of refusal to access as provided for in the Act.

## **9. REQUEST PROCEDURE**

9.1 The requester of information must comply with all the procedural requirements laid down in the Act when requesting access to a record.

9.2 The information officer shall not be obliged to furnish any information until all requirements laid down in the Act and set out herein have been fulfilled.

9.3 The prescribed form annexed hereto as Appendix 1 must be completed and submitted to the Information Officer at the postal or physical or email address stated in paragraph 5 above, together with payment of the prescribed fees, if applicable (see paragraph 10 below for an explanation of the fees that are payable).

9.4 The prescribed form must be completed with sufficient detail to enable the Information Officer to identify the record(s) in question.

- 9.5 If there is insufficient space on a printed form to answer a question, additional information may be provided on an additional folio.
- 9.6 If a request is made on behalf of another person, the requester must submit proof of such capacity to the reasonable satisfaction of the Information Officer.
- 9.7 If the requester cannot complete the prescribed form due to illiteracy or disability, the requester may make the request orally and in person.
- 9.8 The Information Officer will process the request within 30 days unless the request contains considerations that are of such a nature that an extension of the 30-day time limit is required.
- 9.9 Where an extension of the 30-day time limit is required, the requester shall be notified together with reasons explaining why the extension was required.
- 9.10 Once the request is processed, the requester will be informed whether access will be granted or refused together with reasons for any refusal.

## 10. FEES

10.1 The fees for reproduction of a record as referred to in section 52(3) are as follows –

10.1.1 for every photocopy of an A4 size page or part thereof	R1,10
10.1.2 for every printed copy of an A4-size page or part thereof	R0,75
10.1.3 for a copy of a compact disc	R70,00
10.1.4 for a transcript of visual images for an A4 size page or part thereof	R40,00
10.1.5 for a copy of visual images	R60,00
10.1.6 for a transcript of an audio record, for an A4-size page or part thereof	R20,00
10.1.7 for a copy of an audio record	R30,00

10.2 The request fee payable by a requester, other than a personal requester is R50, 00.

10.3 If the Information Officer is of the opinion that six hours will be exceeded to search, reproduce and/or prepare the information requested, a deposit is payable equal to one-third of an amount of R30 for each hour or part thereof, exceeding the six hours.

## 11. GROUNDS FOR REFUSAL TO GRANT ACCESS

The main grounds upon which a request for information may be declined are:

- 11.1 Protecting personal information of a third party (who is a natural person) from unreasonable disclosure.
- 11.2 Protecting commercial information of a third party (for example trade secrets; financial, commercial, scientific or technical information that may harm the commercial or financial interests of a third party).
- 11.3 Disclosure would result in the breach of a duty of confidence owed to a third party.



- 11.4 Disclosure would jeopardise the safety of an individual or prejudice or impair certain property rights of a third party.
- 11.5 Mandatory protection of records which would be regarded as privileged in legal proceedings unless such privilege has been waived.
- 11.6 Refusing access to a record containing trade secrets, financial or sensitive information of Focal Points or any information that would put the Company at a disadvantage in negotiations or prejudice it in commercial competition.
- 11.7 The request is frivolous or vexatious or involves an unreasonable diversion of resources.
- 11.8 The record contains information about research being carried out, or about to be carried out, on behalf of a third party or on behalf of Focal Points.

## **12. GENERAL**

- 12.1 The company reserves the right to amend this policy from time to time.

## APPENDIX 1

### FORM 2 – REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

*Section 53 (1) of the Promotion of Access to Information Act 2 of 2000 Regulation 7*

#### A. PARTICULARS OF PRIVATE BODY

Name of Private Body:	Focal Points Lab (Pty) Ltd
Registration No:	2010/007389/07
Head of Organisation:	Simon Dabbs
Physical Address:	Newsclip House, Unit 5 Cnr JG Strydom & Springhaas Road Constantia Kloof Roodepoort 1709
Postal Address:	Postnet Suite 213 Private Bag X1 Florida Hills 1716
Telephone:	011 020 5257
Email:	<a href="mailto:popi@news.newsclip.co.za">popi@news.newsclip.co.za</a> / <a href="mailto:info@newsclip.co.za">info@newsclip.co.za</a>

# FORM 2

## REQUEST FOR ACCESS TO RECORD

[Regulation 7]

**NOTE:**

1. *Proof of identity must be attached by the requester.*
2. *If requests made on behalf of another person, proof of such authorisation, must be attached to this form.*

**TO:** The Information Officer


(Address)

E-mail address: 

--

Fax number: 

--

Mark with an "X"

☐

Request is made in my own name

☐

Request is made on behalf of another person.

PERSONAL INFORMATION				
Full Names				
Identity Number				
Capacity in which request is made (when made on behalf of another person)				
Postal Address				
Street Address				
E-mail Address				
Contact Numbers	Tel. (B):		Facsimile: <table border="1"><tr><td></td></tr></table>	
Cellular:				
Full names of person on whose behalf request is made (if applicable):				
Identity Number				
Postal Address				

Street Address			
E-mail Address			
Contact Numbers	Tel. (B)		Facsimile
	Cellular		
<p align="center"><b>PARTICULARS OF RECORD REQUESTED</b></p> <p><i>Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.)</i></p>			
Description of record or relevant part of the record:			
Reference number, if available			
Any further particulars of record			
<p align="center"><b>TYPE OF RECORD</b></p> <p align="center"><i>(Mark the applicable box with an "X")</i></p>			
Record is in written or printed form			
Record comprises virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>			
Record consists of recorded words or information which can be reproduced in sound			
Record is held on a computer or in an electronic, or machine-readable form			

<b>FORM OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Printed copy of record <i>(including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</i>	
Written or printed transcription of virtual images <i>(this includes photographs, slides, video recordings, computer-generated images, sketches, etc)</i>	
Transcription of soundtrack <i>(written or printed document)</i>	
Copy of record on flash drive <i>(including virtual images and soundtracks)</i>	
Copy of record on compact disc drive <i>(including virtual images and soundtracks)</i>	
Copy of record saved on cloud storage server	

<b>MANNER OF ACCESS</b> <i>(Mark the applicable box with an "X")</i>	
Personal inspection of record at registered address of public/private body <i>(including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</i>	
Postal services to postal address	
Postal services to street address	
Courier service to street address	
Facsimile of information in written or printed format <i>(including transcriptions)</i>	
E-mail of information <i>(including soundtracks if possible)</i>	
Cloud share/file transfer	
Preferred language <i>(Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)</i>	

<b>PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b> <i>If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.</i>	
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:	

FEES	
a)	<i>A request fee must be paid before the request will be considered.</i>
b)	<i>You will be notified of the amount of the access fee to be paid.</i>
c)	<i>The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record.</i>
d)	<i>If you qualify for exemption of the payment of any fee, please state the reason for exemption</i>
Reason	

You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any. Please indicate your preferred manner of correspondence:

Postal address	Facsimile	Electronic communication (Please specify)

Signed at \_\_\_\_\_ this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

\_\_\_\_\_  
**Signature of Requester / person on whose behalf request is made**

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**FOR OFFICIAL USE**

Reference number:	
Request received by: (State Rank, Name And Surname of Information Officer)	
Date received:	
Access fees:	
Deposit (if any):	

\_\_\_\_\_  
**Signature of Information Officer**