PAIA Manual

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000 (as amended)

Higher Ed Partners-South Africa LLC Incorporated in Texas

Trading as Higher Ed Partners Africa

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Based on the Information Regulator's PAIA Manual template for private bodies

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1. List of acronyms and abbreviations

Term	Meaning
"CEO"	Chief Executive Officer
"CIPC"	Companies and Intellectual Property Commission
"HEPSA" or "the Company"	Higher Ed Partners-South Africa LLC Incorporated in Texas, an external company registered with the CIPC, trading as Higher Ed Partners Africa
"IO"	Information Officer
"Minister"	Minister of Justice and Constitutional Development
"OPM"	Online programme management
"PAIA"	Promotion of Access to Information Act 2 of 2000, as amended
"Partner institution"	A university or higher education institution for which HEPSA provides online programme services
"POPIA"	Protection of Personal Information Act 4 of 2013
"Regulator"	Information Regulator (South Africa)
"Republic"	Republic of South Africa

2. Purpose of this PAIA Manual

This Manual is published in terms of section 51 of PAIA. It helps members of the public to:

2.1 check the categories of records held by HEPSA which are available without a formal PAIA request;

2.2 understand how to request access to a record of HEPSA, by describing the subjects on which HEPSA holds records and the categories of records held on each subject;

2.3 know which records of HEPSA are available in accordance with other legislation;

2.4 find the contact details of the Information Officer who will assist with requests;

2.5 know where to obtain the Guide on how to use PAIA, as updated by the Regulator;

2.6 know whether HEPSA processes personal information, the purposes of processing and the categories of data subjects and information concerned;

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

2.8 know whether HEPSA transfers or processes personal information outside the Republic and to whom; and

2.9 know whether HEPSA has appropriate security measures to protect the confidentiality, integrity and availability of personal information.

3. About HEPSA and how it holds records

Higher Ed Partners-South Africa LLC Incorporated in Texas is a limited liability company incorporated in Texas, United States of America, and registered with the CIPC as an external company since 28 March 2017 under

registration number 2017/142724/10. It is registered with the Regulator under registration number 2025-059728. It trades in South Africa as Higher Ed Partners Africa.

HEPSA is an online programme management partner to South African and other African universities. Under written agreements with each partner institution, it designs and supports online programmes, markets them, handles enquiries and helps applicants and students on the partner institution's behalf. Much of this work is carried out under the partner institution's own name and brand.

Records held for partner institutions. Where HEPSA processes the personal information of prospective students, applicants and students for a partner institution, the partner institution is the responsible party and HEPSA acts as its operator. Requests for access to those records should normally be made to the partner institution under its own PAIA manual. If HEPSA receives such a request, it will tell the requester which institution holds the record and, where the partner institution agrees, assist with the request.

4. Key contact details for access to information of HEPSA

4.1 Information Officer

Detail	Contact
Name	Keamo Segwagwe
Position	Head of Technology
Appointed	20 June 2025, registered with the Regulator
Telephone	+27 11 589 5831
Email	dataprotection@higheredpartners.co.za
Fax	Not available

4.2 Access to information general contact

Detail	Contact
Email	dataprotection@higheredpartners.co.za

4.3 Head office

Detail	Contact
Physical and postal address	The Workspace, Unit 1, Pendoring Office Park, 299 Pendoring Road, Blackheath, Johannesburg, 2195
Registered address (CIPC)	Wanderers Office Park, 52 Corlett Drive, Illovo, Gauteng, 2196
Telephone	+27 11 589 5831
Email	info@higheredpartners.co.za
Website	https://higheredpartners.co.za

5. Guide on how to use 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 in each of the official languages and in braille.

5.3 The Guide contains the description of:

5.3.1 the objects of PAIA and POPIA;

5.3.2 the postal and street address, phone and fax number and, if available, email address of the Information Officer of every public body and every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA and section 56 of POPIA;

5.3.3 the manner and form of a request for access to a record of a public body contemplated in section 11 of PAIA, and of a private body contemplated in section 50 of PAIA;

5.3.4 the assistance available from the Information Officer 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 an internal appeal, a complaint to the Regulator, and an application to court against a decision of the information officer of a public body, a decision on internal appeal, a decision of the Regulator or a decision of the head of a private body;

5.3.7 the provisions of sections 14 and 51 of PAIA 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 and 52 of PAIA 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 and 54 of PAIA regarding fees to be paid in relation to requests for access; and

5.3.10 the regulations made in terms of section 92 of PAIA.

5.4 Members of the public can inspect or make copies of the Guide at the offices of public and private bodies, including the office of the Regulator, during normal working hours.

5.5 The Guide can also be obtained on request to the Information Officer, or from the Regulator's website at https://inforegulator.org.za.

5.6 A copy of the Guide is available at HEPSA's head office in English and Afrikaans for public inspection during normal office hours.

6. Categories of records available without a request for access

The following records are available without a formal PAIA request. Records on the website can be downloaded; the others can be requested from the Information Officer by email.

Category of records	Types of record	On website	On request
Company information	Company profile, services, partner institutions, contact details	X	X
Legal and compliance notices	This PAIA Manual, website privacy notice, website terms of use	X	X
Programme information published for partner institutions	Programme pages, fees and intake information, brochures (on each partner's online programme website)	X	X
Media and marketing	Media releases, articles and blog posts	X	X
Careers	Advertised vacancies	X	X

7. Records available in accordance with other legislation

HEPSA keeps records in terms of the following legislation, as amended. Some of these records are available only to the persons or authorities the relevant law names.

Category of records	Applicable legislation
External company registration, registers and statutory records	Companies Act 71 of 2008
PAIA Manual and access requests	Promotion of Access to Information Act 2 of 2000
Personal information records, consent records, operator agreements	Protection of Personal Information Act 4 of 2013
Tax records, returns and supporting documents	Income Tax Act 58 of 1962; Value-Added Tax Act 89 of 1991; Tax Administration Act 28 of 2011
Employment contracts, time and remuneration records	Basic Conditions of Employment Act 75 of 1997
Disciplinary and collective records	Labour Relations Act 66 of 1995
Employment equity plans and reports	Employment Equity Act 55 of 1998
Skills development levies and workplace skills plans	Skills Development Levies Act 9 of 1999; Skills Development Act 97 of 1998
Unemployment insurance records	Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002
Workplace injury records	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Health and safety records	Occupational Health and Safety Act 85 of 1993
B-BBEE certificates and records	Broad-Based Black Economic Empowerment Act 53 of 2003
Electronic communications and transaction records	Electronic Communications and Transactions Act 25 of 2002

Category of records	Applicable legislation
Consumer and direct marketing records	Consumer Protection Act 68 of 2008

8. Subjects on which HEPSA holds records and categories of records

Subject	Categories of records
Corporate governance	Registration documents, resolutions, minutes, statutory registers, group structure documents, policies
Finance and tax	Financial statements, management accounts, budgets, invoices, banking records, tax records, audit reports
Human resources	HR policies and procedures, advertised posts, recruitment records, employee records, payroll, performance and training records, disciplinary records
Partner institutions	Partnership and service agreements, operator agreements, programme plans, performance and enrolment reports, correspondence
Marketing and recruitment	Campaign plans and results, enquiry and lead records, eligibility checker results, consent and opt-out records, website analytics
Applicant and student support (held for partner institutions)	Enquiries, applications and supporting documents, call recordings, chat, WhatsApp and email correspondence, student support records
Information technology and security	System documentation, access logs, security and incident records, AI usage policy, data processing records
Suppliers and procurement	Supplier agreements, operator and sub-operator agreements, purchase orders, supplier due diligence
Legal	Contracts, legal opinions, litigation and dispute records, regulatory correspondence

9. Processing of personal information

9.1 Purpose of processing

HEPSA processes personal information to:

- provide online programme management services to partner institutions under written agreements, including marketing programmes, answering enquiries, assessing indicative eligibility, supporting applications and supporting students;
- communicate with prospective students, applicants and students by email, SMS, telephone, WhatsApp, web chat and AI assistants, in line with their consent and the partner institution's instructions;
- recruit, employ and manage staff and contractors;
- manage relationships with partner institutions, suppliers and service providers;
- administer finance, tax, payroll and statutory reporting;
- protect its systems, information and people, and keep records needed for quality, training and dispute resolution; and
- meet its legal and regulatory obligations.

9.2 Categories of data subjects and personal information

Categories of data subjects	Personal information that may be processed
Prospective students and enquirers	Name, contact details, ID or passport number, date of birth, qualifications and results, eligibility answers, employment details, funding intentions, communication preferences and consent records, conversation records, website usage data
Applicants and students of partner institutions	As above, plus application documents, academic records, module registration and progress, fees status, support requests and, where volunteered with consent, disability or health information
Employees, candidates and contractors	Name, contact details, ID number, address, qualifications, employment history, remuneration, bank details, tax number, race and gender for employment equity reporting, health information where required by law, performance and disciplinary records
Partner institution staff	Name, title, work contact details, correspondence
Suppliers and service providers	Company and contact person names, registration and VAT numbers, addresses, bank details, B-BBEE information, contract records
Website visitors	IP address, device and browser data, pages visited, cookie identifiers

9.3 Recipients of personal information

Category of personal information	Recipients or categories of recipients
Enquiry, eligibility and application information	The partner institution concerned, for admission, registration and student support
Qualification details, for verification	South African Qualifications Authority, previous institutions and funders, with the data subject's knowledge
Contact, enquiry and conversation records	Service providers acting as sub-operators: CRM and marketing platforms, contact centre and telephony providers, WhatsApp and AI assistant platforms and the AI model providers they use, email and document platforms
Employee and payroll information	Payroll and benefits providers, SARS, the Department of Employment and Labour, pension and medical aid funds
Financial and governance information	Auditors, legal and professional advisers, banks, group companies within the Higher Ed Partners group
Any personal information, where required by law	Courts, the Regulator, law enforcement and other authorities with a lawful right to it

9.4 Planned transborder flows of personal information

Some of HEPSA's service providers and group companies store or process personal information outside the Republic. HEPSA transfers personal information only where section 72 of POPIA allows it, normally under binding agreements that give protection at least equal to POPIA.

Country or region	Categories of personal information	Reason
European Union	Prospective student, applicant and website data	CRM, marketing and website platform hosting

Country or region	Categories of personal information	Reason
United States of America	Prospective student, applicant and conversation data; limited employee and financial data	CRM, messaging and AI model providers; group reporting to the parent company
United Kingdom	Limited employee, financial and operational data	Group company operations

9.5 Information security measures

HEPSA protects the confidentiality, integrity and availability of personal information with technical and organisational measures that include:

- role-based access to systems, with multi-factor authentication and regular access reviews;
- encryption of data in transit, and at rest where the platform supports it;
- written operator and sub-operator agreements that require confidentiality, security safeguards and breach notification;
- anti-malware protection, patching and secure configuration of devices and systems;
- an AI usage policy governing how AI tools may be used with personal information, and contractual commitments from AI providers not to train their models on HEPSA data;
- staff confidentiality undertakings and data protection training;
- backups and business continuity arrangements; and
- an incident response process, including notification to the Regulator and affected data subjects under section 22 of POPIA.

10. How to request access to a record

10.1 Records that are not available under section 6 may be requested under section 53 of PAIA, using Form 2 (Request for Access to Record) prescribed under Regulation 7 of the PAIA Regulations. The form is available from the Information Officer or at https://inforegulator.org.za/paia-forms/. A copy of the Guide may be requested on Form 1. Requesters should use the latest version of each form published by the Regulator.

10.2 The completed form must be sent to the Information Officer at dataprotection@higheredpartners.co.za or delivered to HEPSA's head office, marked for the attention of the Information Officer.

10.3 The request must give enough detail to enable HEPSA to identify:

10.3.1 the record or records requested;

10.3.2 the requester and, where a person makes the request on behalf of someone else, proof of the capacity in which they act;

10.3.3 the form of access required;

10.3.4 a postal address, fax number or email address of the requester in the Republic;

10.3.5 whether the requester wishes to be told of the decision in any other manner, and the details for doing so; and

10.3.6 the right the requester seeks to exercise or protect, with an explanation of why the record is needed for that purpose.

10.4 A request fee and, where access is granted, an access fee are payable at the rates prescribed in the PAIA Regulations. HEPSA will tell the requester of any fee payable on Form 3 before processing the request further.

10.5 HEPSA will decide on a request within 30 days of receiving it. It may extend this once, by up to 30 days, in the circumstances section 57 of PAIA allows, and will tell the requester of any extension and the reasons for it.

10.6 A record being listed in this Manual does not mean that access will be granted. HEPSA may refuse access on any ground in Chapter 4 of Part 3 of PAIA, including to protect the privacy of third parties, the commercial or confidential information of third parties or of HEPSA, legally privileged records and the safety of individuals or property. Each request is considered on its own merits.

10.7 Requests for records that HEPSA holds as operator for a partner institution are dealt with as set out in section 3.

11. Remedies

11.1 HEPSA has no internal appeal procedure. The decision of the Information Officer on a request is final within HEPSA.

11.2 A requester who is not satisfied with a decision, or a third party affected by a decision to grant access, may lodge a complaint with the Regulator within 180 days of the decision, or apply to a court of competent jurisdiction within the period PAIA allows.

11.3 The Information Regulator can be contacted at Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191; P.O. Box 31533, Braamfontein, Johannesburg, 2017; telephone 010 023 5200 or toll free 0800 017 160; general enquiries enquiries@inforegulator.org.za; PAIA complaints PAIAComplaints@inforegulator.org.za; website https://inforegulator.org.za.

12. Availability of this Manual

12.1 A copy of this Manual is available:

12.1.1 on https://higheredpartners.co.za;

12.1.2 at HEPSA's head office for public inspection during normal business hours;

12.1.3 to any person on request and on payment of a reasonable prescribed fee; and

12.1.4 to the Regulator on request.

12.2 A fee for a copy of this Manual, as contemplated in Annexure B of the Regulations, is payable for each A4-size photocopy made.

13. Updating of this Manual

The head of HEPSA will review and update this Manual regularly, and at least once a year.

Issued by



Nick Kendall
Chief Executive Officer (head of the private body)

Higher Ed Partners-South Africa LLC Incorporated in Texas

Date: 17 November 2026