Access to Information Manual

of The Hudd Trust t/a Kidbrooke Place

We respect your right of access to information. This manual will help you (the requester of information) to exercise that right and help you know how you may get access to our records. The Promotion of Access to Information Act 2 of 2000 as amended from time to time (known as PAIA[1]) requires us to draft and make this manual available to you and for you to:

- Know what types of information we have.
- Know how to request access to it.

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[1] To read PAIA, go to https://accesstoinformation.co.za/

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Date we compiled this manual: June 2026

Date we last revised it: June 2026

1. Introduction

We describe who we are and what we do on our website.

PAIA[2] requires the information officer of a private body to compile a manual that contains information on the records it holds. A 'private body' means a natural person, company or other type of juristic entity that carries on any trade, business or profession and includes a political party. We are a private body.

2. Our details

Our organisation's and information officer's details are as follows:

Organisation name	Hudd Trust t/a Kidbrooke Place
Website	www.kidbrookeplace.co.za
Registration number	IT 618/87
Postal address	PO Box 801, Hermanus, 7200
Physical address	Corner of R43 and Chanteclair Avenue, Onrusriver, Hermanus, 7201
Phone number	028 316 2361
Default information officer	Marlene Cronje
Deputy information officer	Sam Hodson
Information officer email	manager@kidbrooke.co.za
Information officer phone number	028 316 2361

3. Further guidance from the Information Regulator

For further guidance, contact the Information Regulator. They have compiled a PAIA guide[3] in each official language of South Africa on how to exercise your rights under PAIA.

Visit their website	www.inforegulator.org.za
Postal address	P.O Box 31533, Braamfontein, Johannesburg, 2017
Physical address	Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg, 2191
Phone number	069 003 6604

[2] Section 51(1) of PAIA
[3] https://inforegulator.org.za/paia-guidelines/

Ask a general enquiry by email	enquiries@inforegulator.org.za
Lodge a complaint by email	PAIAComplaints@inforegulator.org.za

4. Records which we make automatically available

We make some records automatically available[4] to you without you needing to request access to them.

Type of record	How you can access it
Banking details	Request by email
Brochures	Request by email
External newsletters and circulars	Subscribing or on our website
Information on our website	Visit our website

5. Records we hold to function

We may hold the following subjects and categories of records in electronic or physical format, which we do not make automatically available. You may request access to them.

Establishment records

Our records related to the establishment, registration, incorporation, or administration of our organisation.

- Policies and procedures
- Codes of conduct
- Statutory returns to the relevant authorities
- Minutes of board or trustee meetings
- Written resolutions
- Records relating to the appointment of trustee, auditor, secretary, public officer, or other officers
- Statutory registers
- Other statutory records

Business records

Documents that have economic value to the business.

- Annual repots
- Applicable statutory documents
- Compliance certification
- Fraud alerts and whistleblowing
- Legal compliance records

[4] Section 52

- Operational records
- Database records
- Published works
- Internal correspondence
- Product records

Financial records

Our records related to our finances.

- Business plan and budget
- Capital expenditure
- Debtors and creditors statement and invoices
- General ledger and sub-ledgers
- Management records
- Monthly expenses
- Paid cheques
- Payment terms
- Risk management and insurance
- Transaction records
- Treasury dealings
- General ledger reconciliations
- Incentives and bonuses
- Pension and retirement funding records
- Payment history
- Customer credit vetting
- Financial statements
- Tax return records
- Other records relating to tax
- Accounting records
- Auditor reports
- Banking records
- Bank statements
- Asset register
- Records of invoices
- Financial agreements

Insurance records

Our records related to our insurable assets.

- Insurance declarations
- Insurance policies
- Register of all immovable property owned by the company

Income tax records

Our records related to our income tax obligations.

- Employee tax records (such as PAYE)
- Corporate tax records

- Customs tax records
- Records of documents issued to employees for income tax purposes
- Records of payments made to SARS on behalf of employees
- VAT records
- Skills development levies
- UIF
- Workmen's Compensation

Personnel records

Our records about anyone who works for us, provides services to us, or provides services on our behalf and who we remunerate. This includes our employees, contractors, and other personnel.

- CV's and application records
- List of employees
- Employee personal information
- Employment records of employees, education and training records.
- Union membership and information.
- Employee benefit records
- Employee relations
- Records of disciplinary procedures, CCMA and court matters
- Records of retrenchment and legal processes about employment matters
- Time management records
- Study assistance scheme records
- Social responsibility records
- Skills development records
- SETA records
- Operating manuals
- Personal records provided by personnel
- Records of incentives and bonuses'
- IRP5 records
- Job profiles records
- Leave records
- Medical aid records
- Records of organisational structures
- Pension and retirement funding records
- Employment applications and appointment letters records
- Employment Equity Plan
- Health and safety records
- Medical aid records
- Pension and provident fund records
- Records of salaries or wages of employees
- Leave records
- Internal evaluations and performance records
- Disciplinary records
- Disciplinary codes
- Training records
- Records of operating manuals

- Personal records provided by personnel
- Other statutory records

Policies and directives

Both internal and external documents.

- Records of internal policies relating to employees and the organisation
- Records of external policies relating to customers and other third parties
- Information technology systems and documents records
- Financial policies and procedures
- Employment policies and procedures
- Records of grievance procedure
- ICT policies, standards, procedures and templates records
- Information, communication and technology policies records
- Procurement policies records

Agreements or contracts

Both the documents themselves and all related documents.

- Records of standard agreements
- Records of contracts concluded with customers
- Records of NDAs
- Letters of intent and MOUs records
- Records of third-party contracts (such as JV agreements, VAR agreements, etc.)
- Records of office management contracts
- Bond agreements records
- Rental agreements records
- Supplier or service contracts records
- Employee employment contracts records
- Contractual disputes with third parties records
- Licensing and maintenance agreements records
- Service level agreement records

Regulatory documents

Any documents we need to comply with any laws.

- Records of applications
- Records of exemptions
- Records of submissions
- Records of registrations
- Permits records
- Licences records
- Authorities records

Information technology and infrastructure

- Call desk agent schedule

- Device management
- Disaster recovery policy and plan
- Licence agreements
- Maintenance plans
- Network topologies or diagrams
- Email and voice mail
- Equipment specifications
- Facilities
- Faults, troubleshooting and reporting
- Hardware and software manuals
- Internal systems support and programming
- Operating systems
- Performance of the client call desk
- Performance of IT infrastructure
- Root cause analysis
- Security Access
- Software Licences
- Supplier agreements or vendor agreements
- Systems documentation and manuals

Published information

Any document that we prepare and produce.

- Records of internal newsletters and circulars
- Records of information on the company published by third parties

Customer information

Any information about anyone that we provide goods or services to, including our customers, leads, or prospects.

- Customer details records
- Records of contact details of individuals within customers
- Records of communications with customers
- Sales records
- Transactional information records
- Marketing records
- Customer surveys records

Logistics and procurement

- Dispatch records
- Inspection records
- Purchase orders records
- Standard terms and conditions of supply of services, products and software to the company records
- Statement of work records
- Inventory records
- Supplier and manufacturer records

Environmental

- Impact assessment records
- Records of the disposal of equipment records
- Maintenance records
- Environmental standards records

Intellectual property

- Licences records
- Patents records
- Trademark applications records
- Copyright agreements records

Corporate affairs and investor relations or communications

- Records of corporate social investments
- Records of media releases
- Newsletters and publications records
- Public corporate records

Legal

- Records of competition notices
- Records of stolen goods
- Subpoenas records
- Records pertaining to commercial disputes, litigation, arbitration or regulatory investigations
- Title deeds and leases records
- Health and safety records
- SAPS investigations and cases records

Sales, marketing and communication

- Records of actual sales numbers
- Commission records
- Records of customer orders and delivery notes
- Point of sale (POS) records
- Proposal and tender records

Reference materials

Any sources of information that we contribute to.

- Books
- Newsletters and journal articles
- Magazines
- Newspaper articles

6. Records we hold to comply with the law

We hold records that all organisations are required by law to hold. We also hold records that the law specifically requires organisations like ours to retain. Please ask our information officer for details.

7. How you can request access

We have appointed our information officer to deal with all matters relating to PAIA so we can comply with our PAIA obligations. To request access to a record, please complete Form 2[5].

Please submit the completed form (together with the relevant request fee we explain below) to our information officer's email address, our physical address, or by fax using the details we provide. Please ensure that the completed form:

- has enough information for the information officer to identify you, the requested records, and the form of access you require,
- specifies your email address, postal address, or fax number,
- describes the right that you seek to exercise or protect,
- explains why you need the requested record to exercise or protect that right,
- provides any other way you would like to be informed of our decision other than in writing, and
- provides proof of the capacity in which you are making the request if you are making it on behalf of someone else (we will decide whether this proof is satisfactory).

If you do not use the standard form, we may:

- reject the request due to lack of procedural compliance,
- refuse it if you do not provide sufficient information, or
- delay it.

8. How we will give you access

We will evaluate and consider all requests we receive. If we approve your request, we will decide how to provide access to you – unless you have asked for access in a specific form. Publication of this manual does not give rise to any rights to access information records, except in terms of PAIA.

9. How much it will cost you

Request fees

When submitting your request, you must pay us a request fee as the law prescribes. You must pay us the prescribed fees before we give you access. You will receive a notice from our information officer upon your request[6], setting out the application procedure.

[5] https://inforegulator.org.za/paia-forms/
[6] Section 54(1)

Access fees

If we grant the request, you will have to pay us a further access fee[7] the law prescribes that includes a fee for the time it takes us to handle your request, or if the time has exceeded the prescribed hours to search and prepare the record for disclosure. Our information officer will notify you if you need to pay a deposit for the access fee. The deposit may be up to one third of the prescribed access fee[8]. The access fee will provide for:

- the costs of making the record, or transcribing the record,
- a postal fee (if applicable), and
- the reasonable time we need to search for the record and prepare the record for you[9].

If you paid the deposit and we refused your request, we will refund you the deposit amount. Until you have paid the fees, we may withhold the record you requested.

10. Grounds for us to refuse access

We may have to refuse you access to certain records in terms of PAIA to protect:

- someone else's privacy[10],
- another company's commercial information[11],
- someone else's confidential information[12],
- research information[13],
- the safety of individuals and property[14], or
- records privileged from production in legal proceedings[15].

Some of these grounds are explained in further detail below.

Protection of someone else's privacy (a natural person)

We may refuse to give you access to a record if access would unreasonably disclose a natural person's personal information, including a deceased person.

We will not refuse access in certain circumstances.

- The person who the information pertains to, has given consent.
- The information is publicly available.
- The information belongs to a class of information, and the private body notified the individual upfront that the specific class of information might be made public.
- The record is physical or mental health information or information about someone's well-being who is:

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[9] Section 54(7)
[10] Section 63
[11] Section 64
[12] Section 65
[13] Section 68
[14] Section 66
[15] Section 67

    - under the requester's (your) care and below 18 years, or
    - incapable of understanding the nature of the request and giving access would be in the individual's best interests.
- The information is about a deceased person and:
    - you are the next of kin, or
    - the request is made with the written consent of the individual's next of kin.
- The information is about a person who is, or was an executive at your organisation, and the information relates to their position or functions, for example:
    - that the person was an official at our organisation,
    - the title, work address, work phone number and other similar details,
    - the classification, salary scale or remuneration and responsibilities of the position or services, and
    - the name of the person on a record prepared by them while employed.

Protection of another organisation's commercial information

We may refuse to give you access to a record if the record contains another organisation's:

- trade secrets,
- financial, commercial, scientific, or technical information and the disclosure could cause harm to the financial or commercial interests of that company,
- information and the disclosure could put that company at a disadvantage in negotiations or commercial competition, or
- information on a computer programme owned by us, protected by copyright.

Protection of the safety of individuals and property

We may refuse access if it could reasonably be expected to endanger someone's life or physical safety. We may refuse access to a record if disclosing it would be likely to prejudice or impair the security of:

- a building, structure, or system, including a computer or communication system,
- a means of transport,
- any other property,
- methods, systems, plans or procedures for the protection of someone in a witness protection scheme,
- the public, or a part of the public, or
- the property contemplated above.

Protection of research information

We may refuse you access to a record that contains research done by us or someone else, if disclosing it would disclose our identity, the researcher's or the subject matter of the research and would place the research at a serious disadvantage.

Our decision on giving you access

We will notify you in writing whether your request has been approved or denied within 30 calendar days after receiving your request. If we cannot find the record you asked for or it does not exist, we will notify you by way of affidavit that it is not possible to give access to that record.

11. Remedies available if we refuse to give you access

If we deny your request for access, you may:

- apply to a court[16] with appropriate jurisdiction, or
- complain[17] to the Information Regulator,

for the necessary relief within 180 calendar days of us notifying you of our decision.

12. How we process and protect personal information

Please refer to our website for our Privacy Policy.

13. Availability of this Manual

This manual is available in English in electronic format on our website and in physical format at the reception of our company offices.

14. Updates to this Manual

We will update this manual whenever we make material changes to it.

[16] Section 78
[17] PAIAComplaints@inforegulator.org.za