



COMMON CHANGE

PROMOTION OF ACCESS TO INFORMATION ACT (“PAIA”) MANUAL

Prepared in terms of section 51 of the Promotion of Access to Information Act, 2000 (Act 2 of 2000, “PAIA”) as amended, and incorporating required information in terms of the Protection of Personal Information Act, 2013 (Act 4 of 2013, “POPIA”).

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25 Ferdinand Street • Kirstenhof • Cape Town • 7925 • South Africa

COMMON CHANGE NPC

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1. Introduction and purpose of this manual

This manual is published by Common Change NPC (“Common Change”), a nonprofit organisation with Nonprofit Organisation number 177-802 NPO and company incorporated in South Africa with Company Registration number 2016/004288/08.

This manual has been published with the purpose of complying with PAIA, which gives effect to the constitutional right of access to records held by public and private bodies where such access is required for the exercise or protection of rights, subject to justifiable limitations. This manual explains how to request access to Common Change’s records and describes the categories of records held, the process to follow, the applicable grounds on which a request may be refused, and the remedies available if access is refused.

In compliance with section 51 of PAIA, read with section 110 of POPIA, this manual also provides a high-level description of Common Change’s processing of personal information.

Common Change’s core purpose is the elimination of personal economic isolation through facilitating access to, or provision of, resources sourced from a community of groups practicing financial, intellectual, and creative generosity. Common Change’s objects include enabling poor and needy persons to access welfare and humanitarian initiatives, health care, education, and development, including community-based self-help, empowerment, capacity building, skills development, anti-poverty projects, training and support to such projects, disaster relief, poverty relief, and educational enrichment programmes.

2. Contact details of the Information Officer

- Common Change’s Information Officer: Jessica Margrit Rice
- Physical address: 25 Ferdinand Street, Kirstenhof, Cape Town, 7945
- Postal address: 25 Ferdinand Street, Kirstenhof, Cape Town, 7945
- Email: support@commonchange.co.za
- Website: www.commonchange.co.za



3. Guide on how to use PAIA

A Guide on how to use PAIA and POPIA is available from the Information Regulator in all official languages. The Guide explains how to exercise rights under PAIA and POPIA, how to make requests, and available remedies

3. Information Regulator contact details:

- Physical: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191 Postal: P.O. Box 31533, Braamfontein, Johannesburg, 2017
- Email: PAIAComplaints@inforegulator.org.za / enquiries@inforegulator.org.za / inforeg@justice.gov.za
- Telephone: 08000 17 160 / 010 023 5200
- Website: <https://inforegulator.org.za/>
- The Guide is also available on the Regulator's website, and a link thereto has been added to Common Change's website. For assistance or queries in this regard, contact support@commonchange.co.za.

This Guide can, upon request to the abovementioned email address, be made available for inspection at Common Change's registered address as well.

4. Records that are automatically available

Common Change may, from time to time, make certain categories of records automatically available without a requester having to submit a formal PAIA request. These records may be made available on Common Change's website or for inspection at Common Change's office, and may include:

- Public statements, media releases, brochures, newsletters, and general information about Common Change's programmes and initiatives,
- Annual reports and impact summaries made public by Common Change, and
- Policies or notices expressly marked as publicly available on Common Change's website.



If hard copies of records are requested, a requester may be charged the prescribed reproduction fee for copies as provided for in the PAIA Regulations. Common Change will update any description of automatically available records as necessary.

5. Description of Common Change's subjects and categories of records

This section provides detail to facilitate requests for access as required by PAIA.

5.1 Corporate governance and statutory records

Including incorporation documents, Memorandum of Incorporation, CIPC filings, NPO registration records, governance policies, board and committee charters, minutes and resolutions, delegations of authority, and conflict of interest disclosures.

5.2 Strategy, programmes, and operations

Including programme design documents, project proposals, grant criteria, due diligence frameworks, monitoring and evaluation records, impact assessments, training materials, outreach materials, event records, disaster relief deployment plans, and post-implementation reviews.

5.3 Donor and funding records

Including donor registers, donation agreements, donation receipts, donor due diligence and screening documentation, acknowledgments, restrictions and conditions on funding, co-donor facilitation records, and donor communication records.

5.4 Beneficiary/recipient records

Including applications, eligibility assessments, verification records, grant or assistance agreements, disbursement schedules, reports, impact metrics, and communications with recipients and implementing partners.



5.5 Financial and tax records

Including audited financial statements, management accounts, reconciliations, general ledger extracts, banking confirmations, payment records, procurement records, supplier contracts, SARS correspondence, tax exemption documentation, and other tax filings.

5.6 Human resources and volunteer records

Including employee and volunteer files, employment/volunteer agreements, vetting and background checks (where lawful), training records, performance records, payroll and benefits administration records, leave records, discipline and grievance records.

5.7 Information technology and security records

Including information security policies and standards, access control logs, asset registers, vendor/service-level agreements, system architecture and hosting arrangements, business continuity and incident response records, and data protection impact assessments.

5.8 Legal, compliance, and risk management records

Including contracts and MOUs, compliance registers, regulatory filings, insurance policies, risk assessments, legal opinions, and dispute resolution records.

5.9 Communications and marketing records

Including publications, website content, newsletters, social media records, brand assets and guidelines, and stakeholder engagement correspondence.

5.10 Environmental, health, and safety records

Including health and safety policies, incident logs, training records, and related compliance records.



5.11 Records held under other legislation

Including records held or made available in accordance with other applicable legislation will be made available in accordance with that legislation, where applicable.

Note: Some records listed above may be subject to refusal or partial disclosure on the statutory grounds set out in section 9 of this manual.

6. Personal information processed by Common Change (POPIA section 51 content)

6.1 Purpose of processing

Common Change processes personal information to fulfil its objectives and legal obligations, which include:

- Funding, designing, implementing, monitoring, and evaluating projects and programmes in welfare, humanitarian initiatives, health care, education, disaster relief, poverty relief, and development.
- Identifying, screening, onboarding, and supporting donors, co-donors, beneficiaries/recipients, suppliers, and partners.
- Facilitating co-donor introductions and pooling initiatives. .
- Administering donations, grants, payments, reporting, and tax receipts.
- Managing HR and volunteer engagements and operations.
- Complying with applicable laws (including NPO, company, tax, anti-money laundering, and data protection requirements), responding to lawful requests, preventing fraud, maintaining security, and managing risks.
- Maintaining stakeholder communications and relationship management.



6.2 Categories of data subjects and information

- Donors and co-donors:
 - Names, identification/registration numbers, tax reference numbers, contact details, bank details (where necessary), KYC/AML screening information, donation history, and communication preferences.
- Beneficiaries/recipients and implementing partners:
 - Names, identification/registration numbers, eligibility and needs assessments, contact details, bank details (where necessary), programme documentation and reporting, and compliance records.
- Employees and volunteers:
 - Identifiers, contact details, qualifications, employment/volunteer history, background screening results (where lawful), payroll and benefits data, performance records, and security credentials.
- Suppliers and service providers:
 - Identifiers, contact details, banking details, contracts, performance and compliance records.
- Website users and correspondents:
 - Identifiers, contact details, technical identifiers (e.g., IP addresses where applicable), and communications.



6.3 Recipients or categories of recipients of personal information

- Common Change's employees and authorised contractors on a need-to-know basis.
- Co-donors and philanthropic partners, for lawful co-funding facilitation, where sharing is necessary, permitted, and proportionate.
- Banks and payment intermediaries for processing payments and receipts.
- Professional advisers, auditors, insurers, and compliance service providers.
- Regulators and law enforcement, where legally required or permitted.
- IT and cloud service providers under appropriate contractual safeguards.

6.4 Planned transborder flows

Personal information may be transferred or hosted outside South Africa in connection with cloud hosting, collaboration platforms, cross-border payments, or international partner engagements. Common Change will ensure compliance with POPIA in relation to any cross-border transfers of personal information. For example, Common Change will ensure that the third party who is the recipient of the information is subject to a law or binding agreement which provides for an adequate level of protection similar to POPIA.

6.5 Information security measures

Common Change implements appropriate, reasonable technical and organisational measures to ensure the confidentiality, integrity, and availability of personal information, including user access controls, encryption in transit and at rest where appropriate, security awareness, vendor due diligence, incident response procedures, and physical and logical safeguards proportionate to risk.



7. How to request access to a record

7.1 Who may request and on what basis

A requester must demonstrate that the record requested is required for the exercise or protection of a right, comply with the procedural requirements of PAIA, and that no ground of refusal applies.

Requests for personal information by the data subject may rely on applicable POPIA rights.

7.2 Prescribed form and submission

Complete the prescribed “Request for Access to Record” (Form 2 in Annexure A to the PAIA Regulations).

Provide sufficient particulars to identify the record, the requester, and the right to be exercised or protected, and explain why the record is required to exercise or protect that right.

Specify the form of access and a South African postal address, email address, or fax number to which the record can be sent.

If requesting on behalf of another person, provide proof of authority.

Submit the completed form to Common Change’s Information Officer at the contact details noted in section 2.

Pay the prescribed request fee, if applicable, as stipulated in the PAIA Regulations.

7.3 Assistance for requesters

If a requester is unable to complete the prescribed form due to illiteracy or disability, the Information Officer will, on request, assist and reduce the oral request to writing in the prescribed form.



7.4 Request and access fees

A request fee may be payable before a request is processed.

If search and preparation time exceeds the prescribed threshold, a deposit of up to one-third of the access fee may be required.

If access is granted, an access fee for reproduction, search, and preparation and postage may be payable.

Fees are prescribed in Annexure B to the PAIA Regulations. Common Change will not charge fees other than those prescribed.

7.5 Time periods and notices

Common Change will consider the request and notify the requester in writing, within 30 days of receiving a request (or of receiving required particulars), whether access is granted or refused.

Common Change may extend the 30-day period once (for not more than 30 days) in the circumstances permitted by PAIA. Common Change will notify the requester of any extension, the reasons, and the requester's rights.

If third-party notification is required, Common Change will follow the statutory procedures and time periods.

7.6 Forms of access and language

If access is granted and applicable fees are paid, Common Change will provide access in the form reasonably required by the requester, unless doing so would unreasonably interfere with operations, prejudice the preservation of the record, or infringe copyright.

Language of access is subject to availability of the record in that language.



7.7 Deferral of access

Common Change may defer access for a reasonable period (in limited circumstances provided by PAIA), with notice to the requester.

8. Third-party notification and intervention

Where a request may involve records containing third-party personal, commercial, or confidential information, Common Change will take all reasonable steps to notify the third party and invite representations within the statutory period.

Common Change will decide with due regard to any representations and notify both the requester and third party as required by PAIA. Access, if granted, may be deferred pending expiry of the applicable period for complaints/applications.

9. Grounds for refusal of access

PAIA prescribes mandatory and discretionary grounds upon which access must or may be refused. Without limitation, access may be refused to protect:

- The privacy of a natural person (unreasonable disclosure of personal information).
- Third-party commercial information (trade secrets; financial, commercial, scientific, or technical information where disclosure is likely to cause harm; or information supplied in confidence).
- Contractual or equitable confidentiality where disclosure would constitute a breach of a duty of confidence.
- The safety of individuals and the protection of property.
- Privileged records (legal professional privilege).
- Common Change's own commercial information (trade secrets or information where disclosure would likely cause commercial harm or place Common Change at a disadvantage in negotiations or competition).



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- Research information (where disclosure would be likely to expose Common Change, a third party, or the subject matter of the research to serious disadvantage).
- Manifestly frivolous or vexatious requests, or requests that would substantially and unreasonably divert Common Change's resources.

Where only a part of a record is subject to refusal, Common Change will endeavour to grant access to the remainder that can reasonably be severed.

10. Availability of records in terms of other legislation

Common Change holds records that may be available or must be made available under other applicable laws. Access to such records will be provided in accordance with those laws where applicable.

11. Records That Cannot Be Found or Do Not Exist

If all reasonable steps have been taken to find a record requested and there are reasonable grounds for believing that the record is in Common Change's possession but cannot be found or does not exist, the Information Officer will, by way of affidavit or affirmation, notify the requester that it is not possible to give access to that record.

12. Remedies: internal and external

12.1 Internal appeal

There is no internal appeal procedure applicable to private bodies under PAIA. A requester or third party aggrieved by Common Change's decision may pursue the external remedies below.

12.2 Complaints to the Information Regulator

- A requester or third party may lodge a written complaint with the Information Regulator using the prescribed form and within the prescribed period (generally within 180 days of the decision).



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- The Regulator may investigate, attempt to mediate/conciliate or settle, issue an Enforcement Notice, or decide to take no action for reasons permitted by PAIA.
- Contact details and forms are available on the Regulator's website and as referenced in section 3 of this manual.

12.3 Applications to court

- After exhausting the complaints procedure (or internal appeal where applicable to public bodies), a requester or third party may apply to a court for appropriate relief within 180 days of the decision (or as otherwise provided by law).
- The court may examine the record(s) and grant any just and equitable order, including confirming, amending, or setting aside the decision, requiring action, granting interim or specific relief, or making costs orders.

13. Access to, correction or deletion of personal information (POPIA)

In addition to PAIA rights, data subjects may exercise POPIA rights, including to request access to their personal information, request correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully, or to object to processing in the prescribed manner, where applicable.

- Requests should be directed to the Information Officer using the prescribed POPIA forms (available from the Information Regulator) and Common Change's published channels.
- Common Change will respond in accordance with POPIA and applicable regulations, which may require prescribed forms and fees.



14. Availability of this manual

This manual is available:

- On Common Change's website: www.commonchange.co.za
- For inspection at Common Change's registered address, upon request
- From the Information Regulator, upon request

Reasonable reproduction fees (if any) may be payable as prescribed.

15. Updates to this manual

Common Change will review and update this manual on a regular basis and at least as required by law. The latest version will be made available as stated in section 14.

16. Request submission checklist

Before submitting a request, please ensure:

- The prescribed Form 2 is fully completed and signed.
- The right to be exercised or protected is identified and the necessity of the record is explained.
- Sufficient particulars are provided to enable identification of the record.
- A South African postal address, email address, or fax number is provided.
- Proof of identity and proof of authority (if acting on behalf of another) are attached.
- The prescribed request fee, if applicable, is paid.
- Any preference for form of access and language is indicated.



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17. Approval

This manual is approved by:

- Jessica Margrit Rice (Information Officer, Common Change)
- Ntokozo Lusanda Funeka (Director, Common Change)

Date: 19 March 2026

Place: Johannesburg, South Africa