



PROMOTION OF ACCESS TO INFORMATION MANUAL

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# MANUAL IN TERMS OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000 (Act No. 2 of 2000) AND THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (Act.4 No of 2013)

## 1. INTRODUCTION

- 1.1. This Manual is published in pursuance of section 10 of Promotion of Access to Information Act No.2 of 2000 (PAIA) as amended which seeks to assist a person who wishes to exercise any right contemplated in PAIA and the Protection of Personal Information Act, 2013 (POPIA).
- 1.2. The right to access to information is subject to certain justifiable limitations, including, but not limited to limitations relating to the reasonable protection of privacy, commercial confidentiality as well as effective, efficient and good governance, as contemplated in Section 9 (b) (i).
- 1.3. Where a request is made in terms of PAIA as amended by POPIA, the body to which the request is made is obliged to release the information, except where PAIA and POPIA expressly provides that the information may not be released. PAIA sets out the required procedure to make such a request.
- 1.4. However, PAIA also recognizes that such right to access to information cannot be without justifiable limitations as follows:
  - a) the reasonable protection of privacy;
  - b) commercial confidentiality; and
  - c) effective, efficient and good governance.
- 1.5. The purpose of the PAIA is to foster a culture of transparency and accountability in both the public and private sectors by affording any person the right of access to information to enables them to exercise and protect all of their rights to the full extent required.
- 1.6. Section 14 of PAIA as amended by POPIA requires public bodies to compile a Manual that would assist a person or organization to obtain access to information held by the public body and stipulates minimum requirements which a Manual must comply with.

The purpose of this Manual is to outline the procedures to be followed in accessing information held by Air Traffic and Navigation Services Company (ATNS) in accordance with PAIA and POPIA.

## **2. PURPOSE OF THE MANUAL**

- 2.1. The purpose of this Manual is to set out the procedures to be followed and criteria that have to be met for anyone (the "requester") to request access to records in the possession or under the control of ATNS.

## **3. DEFINITIONS**

- 3.1. "Data subject" refers to the person or entity to whom personal information relates.
- 3.2. "Employee" refers to any person who works for or provides services to or on behalf of the organisation and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of the organisation, and who has a written contract of employment with ATNS.
- 3.3. "Form 2" refers to a form that can only be used if you want to request access to the records of a public or private body.
- 3.4. "Form 4" refers to a form can only be used if you want to submit an internal appeal against the decisions of the Information Officers or that of the Deputy Information Officers of a National, Provincial or Local Sphere of Government to which an internal appeal is applicable.
- 3.5. "Information Officer" refers to a person or persons acting on behalf of ATNS who is responsible for discharging duties and responsibilities assigned to the Chief Executive Officer or equivalent officer, as prescribed in terms of PAIA may include the Deputy Information Officer.
- 3.6. "Information Regulator" refers to the Office of the Information Regulator that has been established, in terms of section 39 of POPIA, to monitor and enforce compliance with both POPIA and PAIA. In this Manual the Office of the Information Regulator or the information Regulator is referred to as the Regulator.

- 3.7. “Manual” refers to this Promotion of Access to Information Act Manual as amended by POPIA.
- 3.8. “Organisation” refers to Air Traffic and Navigation Services SOC Limited (ATNS)
- 3.9. “Other Requester” refers to any requester other than a personal requester.
- 3.10. “Personal Requester” refers to a requester who is seeking to access a record containing personal information about the requester.
- 3.11. “Requester” refers to any person making a request for access to a record that is under the control of ATNS.
- 3.12. “Third Party” ~~means~~ refers to any natural or juristic person other than the requester or such party acting on behalf of the requester.

#### **4. AVAILABILITY OF THE MANUAL**

- 4.1. This Manual can be accessed on our website at <http://www.atns.com/> or by requesting a copy by email from the relevant Deputy Information Officer as provided for in paragraph 6 below. The Manual may also be obtained from the Information Regulator.

#### **5. FUNCTION AND STRUCTURE OF ATNS**

- 5.1. The South African Government through the Department of Transport (DoT) is the sole Shareholder of ATNS and thus ATNS was established in terms of Section 2 of the Air Traffic and Navigation Services Company Act, 45 of 1993. It is a schedule 2 Public Entity in terms of the Public Finance Management Act, 1 of 1999.
- 5.2. The objective of ATNS is acquisition, establishment, development, provision, maintenance, management, control or operation of air navigation infrastructure, air traffic services or air navigation services.
- 5.3. ATNS is a sole provider of air traffic management, communication, surveillance, navigation, training and associated service within South Africa. ATNS manages ten percent of the world’s airspace. ATNS strives to continuously provide safe air space, orderly, expeditious and efficient management of Air Traffic Management services. The

company operates at 21 aerodromes within the country, including OR Tambo, Cape Town and Durban International Airports.

- 5.4. In the rest of the African Continent, ATNS provides inter alia, Aeronautical Satellite, Communication networks known as VSAT Networks, WGS 84 surveys, documentation, airspace design, AIP documentation Billing Services and Consultancy services.
- 5.5. The services provided extend from Cape Town to Cairo interconnecting more than 33 states in Africa and Middle East. ATNS academy provides training to students from South Africa and other African Countries on Aeronautical information services (AIS).
- 5.6. ATNS has a Board which manages the affairs of ATNS, and exercises control over the performance of its functions, the exercise of its powers and the execution of its duties. The Board has assigned certain powers to the Chief Executive Officer who is responsible for the general management of ATNS.
- 5.7. ATNS is made up of the following Departments:
  - 5.7.1. Engineering and Technical Services
  - 5.7.2. Operations
  - 5.7.3. Air Traffic Management
  - 5.7.4. Commercial Services
  - 5.7.5. Risk
  - 5.7.6. Legal and Compliance
  - 5.7.7. Human Capital
  - 5.7.8. Finance

**6. INFORMATION OFFICER AND DEPUTY INFORMATION OFFICERS**

- 6.1. In terms of the Act, the Chief Executive Officer of a public body is automatically designated as the Information Officer.
- 6.2. The Information Officer has designated:

6.2.1. Deputy Information Officers:

Designation	E-mail
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Chief Governance Risk and Compliance Officer	<a href="mailto:generallegalrequests@atns.co.za">generallegalrequests@atns.co.za</a>
Company Secretary	<a href="mailto:cosec@atns.co.za">cosec@atns.co.za</a>
Chief Human Capital Officer	<a href="mailto:humanresourceconsultants@atns.co.za">humanresourceconsultants@atns.co.za</a>
Chief Technology and Information Officer	<a href="mailto:Ti management sec @atns.co.za">T i management sec @atns.co.za</a>

6.2.2. However, to ensure proper processing of requests, all requests for information must be addressed to the Chief Governance Risk and Compliance Officer.

## 7. CONTACT DETAILS

7.1. ATNS office is situated in Eastgate Office Park, in Bruma, Johannesburg. Head Office is responsible for handling all request for access to information pertaining to all offices and branches of ATNS.

7.2. Physical address: Eastgate Office Park  
Block C  
South Boulevard Road  
Bruma  
2198  
Gauteng  
South Africa

7.3. Postal address: Private Bag X15  
Kempton Park  
1620

7.4. Business Telephone: +27 11 607 1000

7.5. Fax: +27 11 607 1000

7.6. Website address: [www.atns.co.za](http://www.atns.co.za)

## 8. ~~MANUAL ON~~ HOW TO USE PAIA MANUAL

8.1. The Information Regulator is an independent body established in terms of section 39 of the Protection of Personal Information Act 4 of 2013. It is subject only to the law and the constitution and it is accountable to the national assembly

- 8.2. The information regulator is, among others, empowered to monitor and enforce compliance by Public and private bodies with the provisions of the promotion of access to information act, 2000 (act 2 of 2000), and the Protection of Personal Information Act, 2013 (act 4 of 2013).
- 8.3. Members of the public can inspect or make copies of the Manual during normal working hours, from the offices of the ATNS. The Manual is available in English and two of the official languages and is available on the ATNS website on <https://www.atns.com>. Additionally, a copy of the Manual may be request from the ATNS through completing Form 1 and paying a prescribed fee.
- 8.4. Should your PAIA request be denied or there is no response from ATNS for access to records you may lodge a complaint using the Information Regulator's contact details which are as follows:

General PAIA enquiries:

[enquiries@infoeregulator.org.za](mailto:enquiries@infoeregulator.org.za)

Information Officer  
Chief Executive Officer:

Mr. Mosalanyane Mosala

Contact Person:

Ms. Pfano Nenweli

Email:

[PNenweli@justice.gov.za](mailto:PNenweli@justice.gov.za)

Deputy Information Officer:

Ms. Varsha Sewlal

Email:

[VarSewlal@justice.gov.za](mailto:VarSewlal@justice.gov.za)

Physical Address:

Postal Address:

JD House, 27 Stiemens Street

P.O. Box 31533

Braamfontein

Braamfontein

Johannesburg 2001

Johannesburg 2017

Telephone:

010 023 5200

## 9. MANNER OF REQUEST

- 9.1. ATNS can be regarded as both the Public Body and a Private Body depending on the record to be accessed.



- 9.2. ATNS will be regarded as a public body where the records relate or are relevant to the exercise of a power or the performance of a function in terms of legislation or the founding Act. All regulated services will fall under this category.
- 9.3. ATNS will be regarded as a Private Body if the record requested, relates to the exercise of a power or the performance of a function of a Private Body. Employee related matters will fall under this category.
- 9.4. All requests for access to information relating to ATNS as a Public Body will be dealt with in terms of Section 11 of the Act. Any other unregulated Services will be dealt with in terms of Section 50 of the Act as this relates to record of ATNS in a capacity as Private Body.

## **10. PUBLIC INVOLVEMENT IN THE FORMULATION OF POLICY AND THE EXERCISE OF POWERS OR PERFORMANCE OF DUTIES BY ATNS**

- 10.1. In the exercise of its powers or performance of its duties in terms of PAIA and POPIA, the public may from time to time be invited to make representations or to participate or influence the development of Regulations, Codes of Conduct and Manual lines.
- 10.2. Members of the public can, at any time, make representations to the ATNS regarding the conduct of any person that falls within the jurisdiction of any of the ATNS's mandate.
- 10.3. Members of the public are also encouraged to submit proposals for the development of a Code of Conduct or any legislative reform or representations on any matter affecting the personal information of a data subject. The public are also encouraged to participate in public consultation and stakeholder's engagement arranged by the ATNS.
- 10.4. The platform utilised for public participation may either be through public hearings (physical or virtually), email or written submissions.
- 10.5. The inputs and submissions of members of the public are considered intensively during the formulation of the Regulations, Manual lines and Codes of Conduct.

## **11. PROCEDURE FOR REQUESTING ACCESS TO INFORMATION**

- 11.1. The requester must fill in a prescribed Form 2 and forward a request to the Information Officer or Deputy Information Officer/s. The requester must indicate whether the request is for a copy of the record or inspection of the relevant record.
- 11.2. If the requester requests access in a particular form, access will be granted in such a manner in which the request was made, unless doing so will interfere unreasonably with the running of ATNS, if it will infringe on copyright not owned by ATNS or if it will cause damage to the record.
- 11.3. If, in addition to a written reply to the request for the record, the requester wants to be informed telephonically, this must be indicated on the application form.
- 11.4. If the requester is requesting access on behalf of another person, the capacity in which the requester is making the request must be indicated.
- 11.5. If the requester is unable to read or write, or has a disability, then a request can be made orally. The Information Officer will assist such requester to fill in a form on behalf of a requester and give him a copy.

## **12. CONSIDERING THE REQUEST**

- 12.1. Subject to the provisions of the PAIA, access to records requested from ATNS will only be given if the following conditions are met:
  - 12.1.1. All the procedural requirements set out in PAIA relating to a request are met; and;
  - 12.1.2. Access to the requested record/s is not refused in terms of any ground for refusal set out PAIA.
- 12.2. The grounds of refusal are and includes mandatory protection of:
  - 12.2.1. commercial and confidential information of a third party;
  - 12.2.2. personal information of a third party;
  - 12.2.3. certain confidential information;
  - 12.2.4. safety of individuals, and protection of property;
  - 12.2.5. records privileged from production in legal proceedings;

12.2.6. economic interests and financial welfare of the Republic and commercial activities of public bodies;

12.2.7. research information of a third party, and protection of research information of a public body; or

12.2.8. certain information regarding the operations of public bodies.

12.3. ATNS may also refuse requests that are manifestly frivolous or vexatious or that will lead to a substantial and unreasonable diversion of resources.

12.4. Records requested for the purpose of criminal or civil proceedings are excluded from the ambit of PAIA if they are requested after the commencement of those proceedings and the production of, or access to, the record is provided for in any other law. Any record obtained in contravention of the exclusion is not admissible as evidence in the proceeding unless the court is of the opinion that the exclusion of the record would be detrimental to the interests of justice.

12.5. In terms of the International Civil Aviation Organisation (“ICAO”) Annex 13, paragraph 8.3 of Annex 13, certain records cannot be disclosed and ATNS will take that into account when a request is made. ICAO Annex 13, Paragraph 8.3, states as follows:

12.5.1. the State conducting the investigation of an accident or incident shall not make the following records available for purposes other than accident or incident investigation, unless the appropriate authority for the administration of justice in that State determines that their disclosure outweighs the adverse domestic and international impact such action may have on that or any future investigations;

12.5.2. all statements taken from persons by the investigation authorities in the course of their investigation;

12.5.3. all communications between persons having been involved in the operation of the aircraft;

12.5.4. cockpit voice recordings and transcripts from such recordings;

12.5.5. recordings and transcriptions of recordings from air traffic control units; and

12.5.6. opinions expressed in the analysis of information, including flight recorder information.

### **13. FEES PAYABLE**

- 13.1. PAIA makes provision for two types of fees, namely a prescribed fee and an access fee, which must be paid to ATNS for the access of record.
- 13.2. A personal requester is not required to pay a request fee.
- 13.3. A required prescribed fee is payable for any request if the requester is not requesting a record containing his personal information. The Deputy Information Officer, or duly authorised person, will notify the requester before processing the request to pay the prescribed fee.
- 13.4. The request fee payable to public bodies is as set out in clause 20 below, payable on submission of each application. This amount is not refundable.
- 13.5. After the Deputy Information Officer has made a decision on the request, the requester will be notified of such request and a further access fee must be paid for the search, preparation, reproduction and for any time that has exceeded the prescribed hours to search and prepare the record.

### **14. TRANSFER OF A REQUEST**

- 14.1. When ATNS receives a request that should have been made to another public body, ATNS can to either:
  - 14.1.1. assist the requester to make the request to the appropriate body; or
  - 14.1.2. transfer the request to the correct body - whichever will result in the request being dealt with earlier.
- 14.2. Despite the election to either transfer the request or assist the requester to make the request to the appropriate body, a mandatory obligation to transfer a request is placed on the Information Officer of ATNS to transfer the request as soon as reasonably possible, but within 14 (fourteen) days of the request being received, where:
  - 14.2.1. the record requested is in the possession of another public body;
  - 14.2.2. The subject matter of the requested record is more closely connected with the functions of another public body; or

14.2.3. the record contains commercial information in which another public body has a greater commercial interest.

14.3. An information officer is also obliged to transfer a request where it does not hold the record requested and where it is unsure which public body does hold the record or where the subject matter of the record is not closely connected with the functions of the public body, and it is not sure which public body the subject matter is more closely connected with.

14.3. In those circumstances the information officer must transfer the request to the public body for which the record was originally created or received by. Such a transfer must also occur as soon as reasonably possible but within 14 (fourteen) days of the request being received.

14.4. When transferring the request, ATNS must notify the requester of the transfer, the reasons for the transfer and the period in which the request must be dealt with immediately upon transferring the request.

## 15. RECORDS HELD BY ATNS

15.1. Records available from ATNS without a person having to request access in terms of PAIA (Voluntary disclosure and automatic available record).

15.2. The Annual Report of ATNS (The annual report can be downloaded from the Website at ([www.atns.co.za](http://www.atns.co.za)), Integrated report, tenders, general information, service information and ATNS's brochure are available on ATNS's website.

15.3. Description of subjects and categories of records held by the ATNS

15.3.1. The following records are available, but disclosure thereof is not automatic and is subject to Chapter 3 of PAIA. Each request will be evaluated on a case-by-case basis in accordance with the provisions of the Ac:

Subjects	Categories of records	Request for access	Download from the Website
Financial records	Financial Accounting, Financial Reporting, Contracts and Tender Administration, Asset Management / Register, Management Accounting, Estimates, Statements, Budgets, Reports, Audit Records, Revenue Statements, Reports and Returns.		
Operations records	Air Traffic and Management records Air Traffic Service Management/Administration records Occurrence Logs/Aircraft Movements records Safety records <u>Airspace Management records</u> Flight Plans Aeronautical Information Publications		
Engineering records	Navigation and surveillance records Airspace Efficiency records		
Internal Correspondences	Business cases Submission memos Reports		
Internal policies, directives and procedures	Policies Procedure Manuals Standard Operating Procedures (SOP) Directives Manuallines		
Statutory records	Acts Regulations Directives		
Human Resource records	- HR policies and procedures; - Advertised posts; - Employees records; - Learning and Development e.g.: Skills Development and Training Plans		

	- Employment Equity Plan and Statistics		
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan Research papers		
Corporate Governance	- Organisational and Business Plans; - Memorandum of Understanding; - ATNS Policies and Procedures; - Occupational Health and Safety Plan; - Loss Control Register;		
Information Technology and Data Management	- Incidents and Service Requests; - Asset Issuing and Custodian Information; - System Event Logs; - System Performance Logs; - Systems Maintenance Check lists; - Monthly Operations Reports; - Service Level Agreements; - ICT Policies and Procedure Manuals; - Network maintenance; - System Development Lifecycle documents.		
ATNS Publications	Booklets, Books, Periodicals, Journals, Reports, Newsletters, Bulletins, Magazines, Pamphlets, E- Publications.		
Media	Press releases, Radio and TV Interviews, Statements, Participation details, Official Speeches and Messages, Gifts & Awards, Website content and corporate identity and info graphs.		
Travel documents	Events, Functions, Seminars and Conferences Presentations, Discussions,		
Meetings	Agenda Minutes Action registers		

Supply Chain Management documents	BID Documents, Contracts, Purchase Orders, Quotations, Tenders, Terms of Reference and Leases, List of applicants for Tenders, List of Tenders Awarded.		
Audio-Visual Recordings	Presentation Slides, Photographs for events, Films, Videos.		
IKM records	File Plan Destruction list Disposal Authority Procedures and policies KM records Library databases		
Facilities and security records	Building maintenance records Contracts Vehicle logs Physical security records Investigation records Personnel security records Inspection records Incidents records		

15.4. Services and information available to the public at a fee:

15.4.1. Upper Airspace Management;

15.4.2. VSAT/NAFISAT;

15.4.3. WGS- 84 Survey;

15.4.4. Aeronautical Information Services Documentation;

15.4.5. Central Aeronautical Database (CAD);

15.4.6. Billing Services;

15.4.7. Flight Procedure Design;

15.4.8. Airspace Design;

15.4.9. Engineering Services; and

15.4.10. Training

## 16. PROCESSING OF PERSONAL INFORMATION



## 16.1. PURPOSE OF PROCESSING

16.1.1. ATNS processes personal information for purposes of:

- 16.1.1.1. Employment administration;
- 16.1.1.2. Procurement and supply;
- 16.1.1.3. Processing payments;
- 16.1.1.4. Complying with ATNS' obligations;
- 16.1.1.5. Contractual obligations;
- 16.1.1.6. Conducting due diligence processes;
- 16.1.1.7. Accounts retention and records;
- 16.1.1.8. Providing the ATNS bursary programme;
- 16.1.1.9. Complying with the ATNS' investment and/or procurement strategies;
- 16.1.1.10. Adherence to the Financial, Environmental, Social and Governance obligations;
- 16.1.1.11. Complying with any other administrative purposes in terms of relevant laws, codes of good practice and standards.

## 16.2. CATEGORIES OF DATA SUBJECTS AND PERSONAL INFORMATION

16.2.1. ATNS may possess or possesses records relating to clients, airlines, students, employees, board members, service providers and members of the public.

Data Subject Category	Personal Information Processed
Natural Persons	Names; surname; contact details; physical and postal addresses; date of birth; identification number; passport number; tax number; tax related information; nationality; gender; age; disability; marital and pregnancy status; race; bank account details; biometric information; health information; confidential correspondence; Information relating to children; education and employment history.
Juristic Persons / Entities	Names of contact persons; name of legal entity; Physical address; postal address; contact details; financial information; registration number; founding documents; tax related information.

Service Providers	Names of contact persons; name of legal entity; Physical; postal address; contact details; financial information; registration number; founding documents; tax related information.
Employees / Board Members	Names; surname; contact details; physical and postal addresses; date of birth; identification number; passport number; tax number; tax related information; nationality; gender; age; disability; marital and pregnancy status; race; bank account details; biometric information; health information; confidential correspondence; Information relating to children; well-being; education and employment history.

### **16.3. CATEGORIES OF RECIPIENTS FOR PROCESSING THE PERSONAL INFORMATION**

16.3.1. ATNS may supply the Personal Information to service providers who render the following services:

16.3.1.1. Capturing and organising of data;

16.3.2. Storing of data;

16.3.3. Conducting due diligence checks.

### **16.4. TO WHOM MAY ATNS SHARE INFORMATION WITH**

16.4.1. ATNS may share Personal Information to a requestor if a court order requires.

16.4.2. ATNS may, where required to do so, disclose certain Personal Information to Third Parties and will enter into written agreements with such Third Parties to ensure that they Process any Personal Information in accordance with the provisions of the Privacy policy and POPIA.

16.4.3. ATNS notes that such Third Parties may assist ATNS with the purposes listed in paragraph 13.2 of the Privacy policy (obtainable on <https://atns.com/>) – for example, Third Parties may be used, inter alia, to:

16.4.3.1. assist ATNS with legal, technical and financial due diligence processes;

16.4.3.2. assist ATNS with auditing processes (including external audits);

- 16.4.3.3. advise ATNS on certain investment or procurement transactions;
- 16.4.3.4. provide outsourced services to the ATNS including in respect of its IT and data storage requirements;
- 16.4.3.5. assist ATNS with regulatory compliance processes; and
- 16.4.3.6. notify the Data Subjects of any pertinent information concerning ATNS.

16.4.4. ATNS may also send Personal Information to a foreign jurisdiction outside of the Republic of South Africa, including for Processing and storage by Third Parties.

16.4.5. When Personal Information is transferred to a jurisdiction outside of the Republic of South Africa, ATNS will comply with the requirements under POPIA for the lawful transfer of such Personal Information to any foreign jurisdiction.

16.4.6. The Data Subject should also take note that the Processing of Personal Information in a foreign jurisdiction may be subject to the laws of the country in which the Personal Information is held, and may be subject to disclosure to the governments, courts of law, enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

## **16.5. TRANS-BORDER FLOWS OF PERSONAL INFORMATION**

16.5.1. ATNS may share personal information with international organisations from time to time as stated in clause 16.4.4. ATNS will take reasonable steps to ensure that it continues to protect personal information regardless of its location.

## **16.6. GENERAL DESCRIPTION OF INFORMATION SECURITY MEASURES**

16.6.1. ATNS has information technology infrastructure to ensure the confidentiality, integrity and availability of the Personal Information under its care.

16.6.2. Measures include but are not limited to the following:

- 16.6.2.1. Firewalls;
- 16.6.2.2. Virus protection software and update protocols;
- 16.6.2.3. Secure access control;
- 16.6.2.4. Secure setup of hardware and software making up the IT infrastructure;
- 16.6.2.5. Non-Disclosure Agreements.

## **17. APPEAL PROCEDURE**

- 17.1. In terms of PAIA and the Constitution of the Republic of South, everyone has a right to access information held by a Public Body provided such record does not fall within the category of records prohibited in terms of Chapter 3.
- 17.2. Should the requester feel that the refusal to grant access to the record is unjustifiable, he or she can lodge an Appeal with the Information Officer. An internal appeal must be lodged in the prescribed form, within 60 (days) of the decision. The Appeal must contain information on the decision being appealed against, the reasons for the appeal and any other information that is known by the requester relating to the appeal. The prescribed form referred to as Notice of Internal Appeal Form 4 which may be requested from the Deputy Information Officer.
- 17.3. After exhausting the internal appeal remedies, an application may be lodged with a court of law.

## **18. UPDATING OF MANUAL in terms of Section 14(3) of PAIA**

- 18.1. The Manual will be updated on an annual basis and as soon as the updated version is available, it will be made available to the public in the manner indicated below.

## **19. AVAILABILITY OF MANUAL**

- 19.1. The Manual will be made available in the following manner:
  - 19.1.1. From each Legal Deposit as defined in section 6 of the Legal Deposits Act 1997;
  - 19.1.2. The English version will be published in the Government Gazette;
  - 19.1.3. The Manual can also be accessed on ATNS website (<http://www.atns.com/>);
  - 19.1.4. Information Regulator.

## **20. PAYMENT OF FEES**

- 20.1. Payments details can be obtained from the Deputy Information Officer as indicated above and can be made either via a direct deposit. Proof of payment must be supplied. The access fee must be paid prior to access being given to the requested record. If the request for access is successful an additional access fee may be required for the search,

reproduction and/or preparation of the record(s) and will be calculated based on the fees as outlined below and amended from time to time.

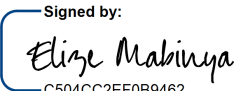
Item	Description	Amount
1.	The 'request fee' payable by every requester	R57.00 (incl. VAT)

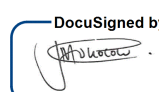
**20.2. The access fee referred to in section 22(6) of the Act (unless the requester is exempted under section 22(8)) are as follows –**

Item	Description	Amount
1.	Photocopy of A4-size page	R2.00 per page or part thereof
2.	Printed copy of A4-size page	R2.00 per page or part thereof
3.	For a copy in a computer-readable form on: (i) Flash drive (to be provided by requester) (ii) Compact disc <ul style="list-style-type: none"> <li>If provided by requester</li> <li>If provided to the requester</li> </ul>	R40.00 R40.00 R60.00
4.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service Provider
5.	Copy of visual images	
6.	Transcription of an audio record, per A4-size	R24.00
7.	For a copy of an audio record on: (i) Flash drive (to be provided by requester) (ii) Compact disc <ul style="list-style-type: none"> <li>If provided by requester</li> <li>If provided to the requester</li> </ul>	R40.00 R40.00 R60.00
8.	To search for and prepare the record for disclosure for each hour or part of an hour, excluding the first hour, reasonably required for such search and preparation.	R100.00
	To not exceed a total cost of:	R300.00
9.	Deposit: If search exceeds 6 hours	1/3 of amount per request, calculated in terms of items 1 to 7
10.	Postage, email or any other electronic transfer	Actual cost, if any

21. CONCLUSION

21.1. The Manual’s purpose is to promote transparency and accountability and to enable the members of the public to exercise their Constitutional Right to access to information. ATNS will submit an annual report to the Information Regulator on the implementation of PAIA.

Acting Chief Governance Risk & Compliance Officer	<div>Signed by:  C504CC2EF0B9462... Elize Mabinya</div>	26 May 2025
	SIGNATURE	DATE

Acting Chief Executive Officer	<div>DocuSigned by:  2ABCB80A68894B3... Matome Moholola</div>	30 May 2025
AUTHORITY/CAPACITY	SIGNATURE	DATE

Attachments

DOCUMENT	TYPE	VERSION
Form 2	Request of access form	01

**FORM 2****REQUEST FOR ACCESS TO RECORD OF PUBLIC BODY**

Section 18(1)

(Promotion of Access to Information Act, 2000(Act No. 2 of 2000))

[Regulation 6]

**FOR DEPARTMENTAL USE**

Reference number:.....

Request received by Information Officer on..... (date)

Request fee (if any): R .....

Deposit (if any): R .....

Access fee: R .....

.....  
Signature of Information Officer/Designate**A. Particulars of public body**

Deputy Information Officers:

Submit to:

Designation	E-mail
Chief Governance Risk and Compliance Officer	<a href="mailto:generallegalrequests@atns.co.za">generallegalrequests@atns.co.za</a>
Company Secretary	<a href="mailto:cosec@atns.co.za">cosec@atns.co.za</a>
Chief Human Capital Officer	<a href="mailto:humanresourceconsultants@atns.co.za">humanresourceconsultants@atns.co.za</a>
Chief Technology and Information Officer	<a href="mailto:Ti_management_sec_@atns.co.za">T i management sec _@atns.co.za</a>

**B. Particulars of person requesting access to the record**

- (a) *The particulars of the person who requests access to the record must be given below.*
- (b) *The address and/or fax number in the Republic to which the information is to be sent, must be given.*
- (c) *Proof of the capacity in which the request is made, if applicable, must be attached.*

Full names and surname:.....

Identity number:..... (\*attach copy of ID)

Postal address:.....  
.....

Fax number:.....

Telephone number:..... Cell-phone number: .....

E-mail address:.....

Capacity in which request is made, when made on behalf of another person:  
(\*attorney/parent/next-of-kin/relative).....

\*Attach proof of capacity.

C. Particulars of person on whose behalf request is made (if applicable)

*This section must be completed ONLY if a request for information is made on behalf of another person.*

Full names and surname:.....

Identity number:..... (\*attach copy of ID)

Fax number:.....

Telephone number:..... Cell-phone number: .....

E-mail address:.....

D. Particulars of record

- (a) 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.

(b) If the provided space is inadequate, please continue on a separate folio and attach it to This form. **The requester must sign all the additional folios.**

1. Description of record or relevant part of the record:

.....

.....

.....



and/or **Annexure:**

Yes		No	
-----	--	----	--

2. Reference number, if available:.....

3. Any further particulars of record:

.....

.....

**E. Fees**

(a)	<i>A request for access to a record, other than a record containing personal information about yourself, will be processed only after a <b>request fee</b> has been paid.</i>
(b)	<i>You will be notified of the amount required to be paid as the request fee.</i>
(c)	<i>The <b>fee payable for access</b> 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 (Section 28(2) of the Promotion of Access to Information Act, 2002 (Act No 2 of 2000)).</i>

\*Reason for exemption from payment of fees (if exempt):.....

.....

**F. Form of access to record**

<i>If requester prevented by a disability to read, view or listen to the record in the form of access provided for in 1 to 4 below, state disability and indicate in which form the record is required</i>
--

Disability:  .....	Form in which record is required:  .....
--------------------------	--

Mark the appropriate box with an **X**.

**NOTES:**

- (a) Compliance with your request for access in the specified form may depend on the form in which the record is available.
- (b) Access in the form requested may be refused in certain circumstances. In such a case you will be informed if access will be granted in another form.
- (c) The fee payable for access to the record, if any, will be determined partly by the form in which access is requested.

**1. If the record is in written or printed form:**

<input type="checkbox"/>	copy of record*	<input type="checkbox"/>	inspection of record
--------------------------	-----------------	--------------------------	----------------------

**2. If record consists of visual images -**

(this includes photographs, slides, video recordings, computer-generated images, sketches, etc.):

<input type="checkbox"/>	view the images	<input type="checkbox"/>	copy of the images*	<input type="checkbox"/>	transcription of the images*
--------------------------	-----------------	--------------------------	---------------------	--------------------------	------------------------------

**3. If record consists of recorded words or information which can be reproduced in sound:**

<input type="checkbox"/>	listen to the soundtrack (audio cassette)	<input type="checkbox"/>	transcription of soundtrack* (written or printed document)
--------------------------	---	--------------------------	---

**4. If record is held on computer or in an electronic or machine-readable form:**

<input type="checkbox"/>	printed copy of record*	<input type="checkbox"/>	printed copy of information derived from the record*	<input type="checkbox"/>	copy in computer readable form* (stiffy or compact disc)
--------------------------	-------------------------	--------------------------	--	--------------------------	---

\*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?

**Postage is payable.**

YES	NO
<input type="checkbox"/>	<input type="checkbox"/>

**G. Notice of decision regarding request for access**

*You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request.*

How would you prefer to be informed of the decision regarding your request?:

(\*post/fax/e-mail/inspection/collect)

1. .... and/or 2. ....

Signed at ..... this ..... day of ..... 20.....

.....  
Signature of Requester  
or person on whose behalf request is made