

**JOHANNESBURG SOCIAL HOUSING COMPANY,
("JOSHCO")
PAIA & POPIA MANUAL**

**THIS MANUAL IS PUBLISHED IN TERMS OF SECTION 14 OF THE PROMOTION OF ACCESS
TO INFORMATION ACT 2 OF 2000 ("PAIA") READ TOGETHER WITH THE REQUIREMENTS OF
THE PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013 ("POPIA")**

Document Configuration Management

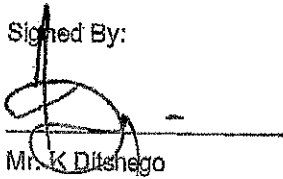
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Signed By:



Mr. K Ditshego
 Acting CEO



Mr. T Dhlamini
 Chairperson of the Board

Date:

13 March 2026

Date:

23/03/2026

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1. INTRODUCTION

- 1.1 JOSHCO was established by the City of Johannesburg ("CoJ") in 2004 and mandated to provide and manage social and affordable rental housing for the lower income market as part of CoJ's strategy to address its housing backlog.
 - 1.2 To give effect to its mandate, JOSHCO is required to collect, record, disseminate and retain certain records (information and documents), including personal information.
 - 1.3 In doing so, JOSHCO must comply with the provisions of PAIA and POPIA insofar as protecting and providing access to the information held by it.
 - 1.4 PAIA was promulgated to give effect to Section 32 of the Constitution which provides for the right of access to any information held by public or private bodies in instances where such information is required by any person for the exercise and/or protection of any right.
 - 1.5 The principal objectives of PAIA are to foster a culture of transparency, accountability and effective governance by enabling persons who require access to certain information held by public or private bodies the means by which they can do so.
 - 1.6 POPIA, on the other hand, promotes the protection of personal information processed by public and private bodies and puts in place conditions so as to establish minimum requirements for the processing of personal information.
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2. PURPOSE AND AVAILABILITY OF THIS MANUAL

- 2.1 This Manual is published in terms of Section 14 of PAIA read together with the requirements of POPIA.
- 2.2 The purpose of the manual is to set out the nature of records held by JOSHCO, the procedure, as well as the criteria that must be complied with by any person who requires access to records held by JOSHCO.
- 2.3 This Manual can be accessed on the JOSHCO website at www.joshco.co.za or by requesting a copy via email from the relevant Deputy Information Officer as set out in paragraph 8 below.
- 2.4 This Manual is also available for inspection at JOSHCO's head office, free of charge.

3. GUIDE ON HOW TO USE PAIA

- 3.1 In accordance with section 10 of PAIA, the SAHRC has published a guide on how to utilise PAIA ("the guide").
- 3.2 This guide is available at the offices of the Information Regulator:

Physical Address: The South African Human Rights Commission,

PAIA Unit – The Research and Development Department,

Braampark Forum 3,

33 Hoof Street,

Braamfontein

Private Bag x 2700, Houghton 2041

Tel: +27 11 877 3803

Fax+ 27 11 403 0625

Email: paia@sahrc.org.za

Website: www.sahrc.org.za

4. DEFINITIONS

**Johannesburg Social Housing Company (JOSHCO)
POPIA AND PAIA Policy**

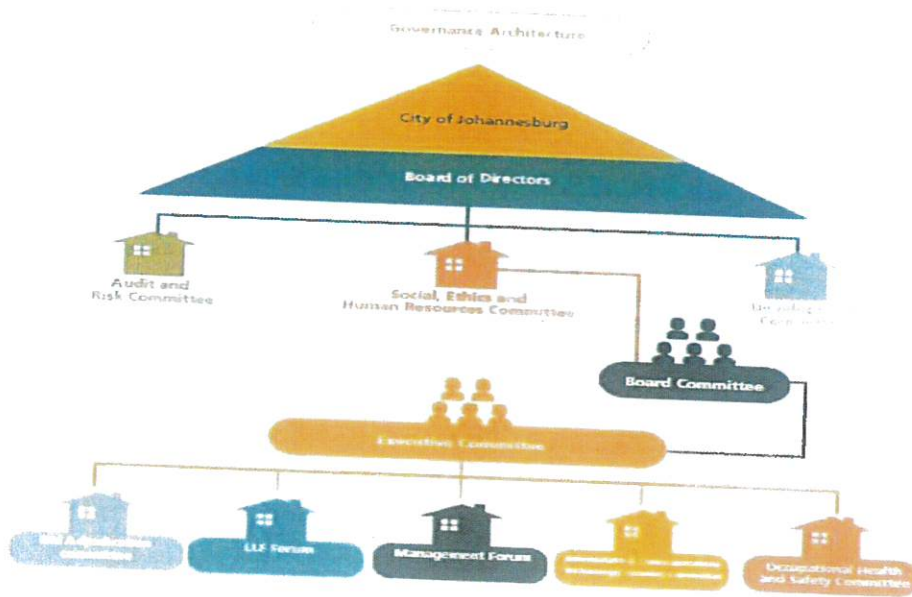
The following words or expressions will bear the following meanings In this Manual:

- 4.1 **"JOSHCO"** means the Johannesburg Social Housing Company SOC Limited, a Municipal Entity of the City of Johannesburg established in terms of the Municipal Systems Act 32 of 2000 and the Companies Act 71 of 2008.
- 4.2 **"Manual"** means this manual, together with all its annexures;
- 4.3 **"PAIA"** means the Promotion of Access to Information Act No. 2 of 2000;
- 4.4 **"POPIA"** means the Protection of Personal Information Act No 4 of 2013;
- 4.5 **"SHI"** means a Social Housing Institution accredited under the Social Housing Act 2008; and
- 4.6 **"SHRA"** means the Social Housing Regulatory Authority established in terms of the Social Housing Act 16 of 2008.

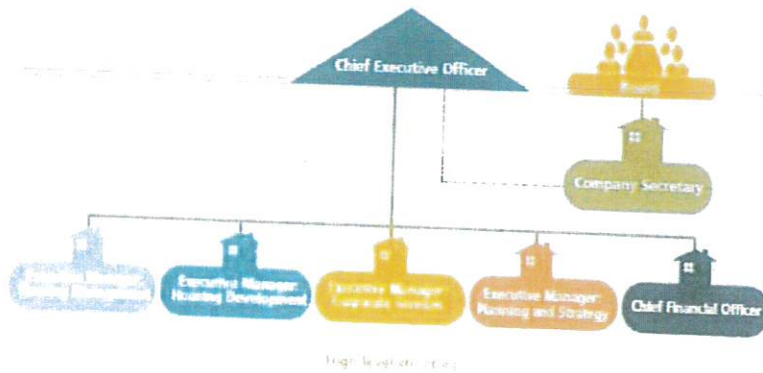
5. FUNCTIONS AND STRUCTURE OF JOSHCO

- 5.1 JOSHCO's vision is to become the best provider of quality affordable housing designed to world class standards that contributes to the CoJ.
- 5.2 JOSHCO achieves its vision by designing and building quality, resource efficient, ~~economically sustainable and affordable housing projects which are close to transport nodes and address the needs the CoJ.~~
- 5.3 JOSHCO's core business includes, but is not limited to, the development of social rental housing, refurbishments, upgrading, and management of council-owned rental housing stock as well as the refurbishment, upgrading and management of hostels.
- 5.4 The organogram below outlines the governance structure under which JOSHCO operates:

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5.5 JOSHCO's Board of Directors ("BOD"), serves as the focal point and custodian for corporate governance. The BOD is comprised of executive and non-executive directors as outlines in the organogram below:



6. INFORMATION OFFICER AND DEPUTY INFORMATION OFFICER CONTACT DETAILS

6.1 PAIA designates the Chief Executive Officer, or equivalent officer, of a public body as the Information Officer.

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6.2 The Information Officer's role is to ensure and encourage overall compliance with PAIA and POPIA and evaluate and approve requests for access to information received.

6.3 The details of JOSHCO's Information Officer are detailed below:

DETAILS OF THE INFORMATION OFFICER					
Title	Name and Surname	Contact Number	Email address	Physical Address	Postal Address
TBA	TBA	011 408 7300	TBA	61 Juta Street Braamfontein 2094	61 Juta Street Braamfontein 2094

6.4 JOSHCO's Information Officer has, in terms of section 17(3) of PAIA, designated the powers conferred on him in terms of the PAIA to the persons tabled below, who shall perform the functions of Deputy Information Officer.

DETAILS OF THE DEPUTY INFORMATION OFFICERS						
Title	Name Surname	Designation	Contact Details	Email Address	Physical Address	Postal Address
ABV	Mpendulo Magutshwa	Deputy Information Officer	011 408 7300	mpendulo@joshco.co.za	61 Juta Street Braamfontein 2094	61 Juta Street Braamfontein 2094

7. CONSIDERATIONS TO BE MADE BEFORE REQUESTING ACCESS TO JOSHCO'S RECORDS

7.1 Before submitting a request for access to a record, a requestor must ensure that the record which he/she seeks to access is not a record requested:

7.1.1 for purposes of criminal or civil proceedings; and

7.1.2 after the commencement of such criminal or civil proceedings, as the case may be.

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- 7.2 Furthermore, a requestor must, prior to submitting a request for access, ensure that the production of the record is not provided for in any other law.
- 7.3 The documents listed above fall outside the ambit of PAIA. Should you seek to access any of the above records, you are required to use the rules and procedures for discovery of information set out in the relevant forum.
- 7.4 In order to ensure that you are provided with the correct record expeditiously, JOSHCO requests that you:
- 7.4.1 provide sufficient detail on the request form to enable us to identify the record sought;
 - 7.4.2 indicate the preferred format of the requested record, i.e., whether a hardcopy printout or electronic format is sought;
 - 7.4.3 list the right/s that you seek to exercise and/or protect and provide an explanation as to why the requested record is required for the exercise or protection of that right; and
 - 7.4.4 submit proof of the capacity in which you make the request, in the event that the request has been made on behalf of another entity and/or party.

8. HOW TO REQUEST INFORMATION FROM JOSHCO

- 8.1 JOSHCO is a public body and, as a result, requests for access to information held by it may only be made on the form as prescribed in PAIA.
- 8.2 Any person ("a requestor") who seeks to access a record and/or information held by JOSHCO must follow the following procedures set out in this Manual:
- 8.2.1 print the formal request form, attached hereto as "Annexure 1", this form is also available on JOSHCO's website www.joshco.co.za, as well as at the offices of JOSHCO at the address mentioned in paragraph 6.3 above;
 - 8.2.2 fill in all fields in the request form and pay the prescribed fee as set out in "Annexure 2"; and
 - 8.2.3 deliver the request form and applicable payment to the address of the Deputy Information Officer mentioned in paragraph 6.4 above.

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- 8.3 If you are unable to read or write, or have a disability, your request may be made orally. The Information Officer will complete the form on your behalf and provide you with a copy and/or copies.
 - 8.4 JOSHCO's Information Officer, will, as soon as reasonably possible and within thirty (30) days after the request has been received, decide whether to grant your request or not and notify you, in writing, of such decision.
 - 8.5 The thirty (30) day period may be extended, by notice to the requestor, to sixty (60) days of receipt thereof, if the request involves a large number of records or the search for the records is to be conducted at premises not situated in the same town or city as the head office of JOSCHO.
 - 8.6 Should our Information Officer fail to give you a response within thirty (30) days after receipt of the request or pursuant to the requested period of extension, the request is deemed to have been refused.
 - 8.7 Where your request has been declined, our Information Officer will provide you with written reason for his/her decision.
 - 8.8 All requests received by the Information Officer will be evaluated and considered in accordance with PAIA.

9. FEES PAYABLE

- 9.1 There are two types of fees payable in terms of the Act, namely the request fee and the access fee/s – as set out in section 22 of PAIA.
 - 9.2 A requestor, who seeks access to a record containing personal information about the requestor, is not required to pay the request fee. Every other requestor, who is not a personal requestor, must pay the prescribed request fee.
 - 9.3 The Information Officer must notify the requestor (other than a personal requestor) by relevant means, requiring the requestor to pay the prescribed fee (if any) before further processing the request.
 - 9.4 The request fee payable to JOSHCO is R35.00.
 - 9.5 After the Information Officer has made a decision on the request, the requestor must be notified of such decision and the reasons substantiating that decision in the manner requested by the requestor.
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- 9.6 If the request is granted, an 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 for disclosure.

10. REFUSAL TO GRANT ACCESS TO A RECORD

- 10.1 JOSHCO will grant you access to a record if it is filled out in accordance with paragraph 7.3 and where the requested fees have been paid.
- 10.2 A request for access to a record will be refused if it falls into one or more of the following grounds of refusal stipulated in PAIA:
- 10.2.1 mandatory protection of privacy of a third party who is a natural person;
 - 10.2.2 mandatory protection of certain records of SARS;
 - 10.2.3 mandatory protection of commercial information of a third party;
 - 10.2.4 mandatory protection of certain confidential information, and protection of certain other confidential information, of a third party;
 - 10.2.5 mandatory protection of safety of individuals and protection of property;
 - 10.2.6 mandatory protection of police dockets in bail proceedings, and protection of law enforcement and legal proceedings;
 - 10.2.7 mandatory protection of records privilege from production in legal proceedings;
 - 10.2.8 defence, security and international relations of the Republic;
 - 10.2.9 economic interests and financial welfare of the Republic and commercial activities of the public bodies;
 - 10.2.10 mandatory protection of research information of a third party and protection of research information of the public bodies;
 - 10.2.11 operations of public bodies; and
 - 10.2.12 manifestly frivolous or vexatious request or substantial and unreasonable diversion of resources.

11. REMEDIES AVAILABLE AFTER A DECISION OF THE INFORMATION OFFICER

- 11.1 Requestors and third parties may challenge decisions made by the Information Officer in the following instances, and in the manner prescribed below.
- 11.2 A decision of JOSHCO to:
 - 11.2.1 refuse a request for access; or
 - 11.2.2 extend the period to deal with request; or
 - 11.2.3 grant access in a particular form.
- 11.3 A third party may lodge a complaint with the Information Regulator if they are not happy with a decision of the Information Officer of JOSHCO to grant a request for access.
- 11.4 If the requestor is not satisfied with the reasons provided by the Information Officer following a refusal of access to information, the requestor may:
 - 11.4.1 within 180 days of receiving the decision, lodge a complaint with the Information Regulator; and
 - 11.4.2 the complaint can be made by filling in and submitting the complaint form attached as "Annexure 3".
- 11.5 The requestor may approach the Court either before or after exhausting the complaints procedure with the Information Regulator.

12. CATEGORIES OF RECORDS

12.1 RECORDS THAT ARE AUTOMATICALLY AVAILABLE

- 12.1.1 Records of a public nature, typically those disclosed on the JOSHCO website <https://www.joshco.co.za> and in its various annual reports, may be accessed without the need to submit a formal application.
- 12.1.2 Other non-confidential records, such as statutory records maintained at CIPC, may also be accessed without the need to submit a formal application, however, please note that an appointment to view such records will still have to be made with the Information Officer.

12.2 RECORDS WHICH MAY BE REQUESTED

JOSHCO retains records in the following categories as listed below. It must be noted that a requestor to the information below is not automatically allowed access to these records and that access to the records may be refused in accordance with grounds for refusal listed in sections 33 to 46.

12.2.1 Operational Information and Agreements

12.2.1.1 documents relating to the policy, objectives and governance of the JOSHCO;

12.2.1.2 directives, resolutions and instructions of the Board of the JOSHCO;

12.2.1.3 joint-venture agreements with subsidiaries and/or agreements with any person, government or administration;

12.2.1.4 rental agreements, title deeds, mortgage bonds and notarial bonds relating to movable and immovable property;

12.2.1.5 company records relating to companies established by the JOSHCO or in association with joint-venture partners and/or any person for the purpose of developing or exploiting an invention or technological expertise;

12.2.1.6 memorandums of understanding; and

12.2.1.7 metadata and spatial information.

12.2.2 Finance and Accounting records relating to the following categories

12.2.2.1 bank account records;

12.2.2.2 books of account and financial statements;

12.2.2.3 auditor's annual report;

12.2.2.4 audited financial statements;

12.2.2.5 financial statements of subsidiaries;

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- 12.2.2.6 annual report, including statement of financial position and statement of Income and expenditure certified by the Auditor-General;
 - 12.2.2.7 annual budget and corporate plan as provided for in the Municipal Finance Management Act ("MFMA");
 - 12.2.2.8 Value Added Tax (VAT), Standard Income Tax on Employees (SITE) and Pay as You Earn (PAYE) records; and
 - 12.2.2.9 additional information required by the Minister.
- 12.2.3 Human Resources Records**
- 12.2.3.1 policies and procedures;
 - 12.2.3.2 personnel files – subject to the rules governing the POPIA;
 - 12.2.3.3 contracts, conditions of service and other agreements;
 - 12.2.3.4 pension fund records of the pension fund established under the Associated Institutions Pension Fund Act, 1963 (Act 41 of 1963).
 - 12.2.3.5 documentation relating to employee benefits – subject to rules governing POPIA;
 - 12.2.3.6 list of employees; and
 - 12.2.3.7 minutes of Committee Meetings.
- 12.2.4 Moveable and Immoveable Property Records**
- 12.2.4.1 title deeds in respect of properties owned by company;
 - 12.2.4.2 agreements of Lease with tenants and concessionaires; and
 - 12.2.4.3 mortgage bonds, liens, notarial bonds and other security interest.
- 12.2.5 Risk Management Records**
- 12.2.5.1 occupational health and safety reports;
 - 12.2.5.2 insurance reports and policies; and

12.2.5.3 incident reports relating to security and safety.

12.2.6 Procurement Records

12.2.6.1 procurement policy including new documentation

12.2.6.2 minutes of Tender Board;

12.2.6.3 Tender Board submissions;

12.2.6.4 request for quotations;

12.2.6.5 advertised tenders;

12.2.6.6 bids received;

12.2.6.7 public adjudication;

12.2.6.8 bids awarded;

12.2.6.9 supplier registration form; and

12.2.6.10 expression of interest.

12.2.7 Housing Management Records

12.2.7.1 community development;

12.2.7.2 community building initiatives and outreach;

12.2.7.3 funding proposals; and

12.2.7.4 tenant support services.

12.2.8 Revenue Management

12.2.8.1 leasing administration; and

12.2.8.2 customer surveys.

12.2.9 Housing Development

12.2.9.1 Greenfield and Brownfield developments;

- 12.2.9.2 hostel redevelopment;
- 12.2.9.3 inner city refurbishments/conversions;
- 12.2.9.4 CoJ public stock/upgrades;
- 12.2.9.5 communal and transitional housing; and
- 12.2.9.6 student accommodation.

PART B: POPIA MANUAL

13. PROTECTION OF PERSONAL INFORMATION

- 13.1 On 19 November 2013, Parliament assented to the POPIA, which aims to, *inter alia*:
 - 13.1.1 promote the protection of personal information processed by public and private bodies; and
 - 13.1.2 introduce certain conditions to establish minimum requirements for the processing of personal information.
- 13.2 The overall purpose of POPIA is to ensure that the processing of all personal information and special/sensitive personal information by responsible parties adheres to the eight conditions for lawful processing set down in Chapter 3 of POPIA.
- 13.3 JOSHCO requires personal information relating to both individual and juristic persons in order to carry out its functions and determines the manner in which such information must be processed.
- 13.4 JOSHCO is therefore a Responsible Party as defined in POPIA. As a Responsible Party, JOSHCO places great importance on the security of all personal data and has ensured that its measures are in place to guarantee the privacy and protection of all personal information it processes.
- 13.5 Personal information collected by JOSHCO will be collected and processed in accordance with the conditions for lawful processing of personal information set out in POPIA.
- 13.6 In this regard, JOSHCO is accountable for the integrity and security of the personal information in its possession or under its control and ensures that:

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- 13.6.1 personal information is processed lawfully, reasonably and in a manner that does not infringe on the privacy of its data subjects;
- 13.6.2 personal information is collected for a specific, explicitly defined and lawful purpose related to its functions;
- 13.6.3 the further processing of any personal information is in accordance with the purpose for which it was collected;
- 13.6.4 personal information is complete, accurate, not misleading and updated where necessary;
- 13.6.5 it maintains the documentation of all processing operations and notification to the data subject when collecting personal information;
- 13.6.6 adequate safeguards are in place to secure the integrity and confidentiality of personal information in its possession;
- 13.6.7 data subjects are made aware of personal information collected and the purpose of the collection; and
- 13.6.8 anyone processing personal information on its behalf, processes such information only with its knowledge or authorisation and treats the personal information as confidential and does not disclose it unless required by law or in the course of the proper performance of their duties.

14. PURPOSE FOR WHICH JOSHCO PROCESSES PERSONAL INFORMATION

- 14.1 JOSHCO will process personal information for the following purpose:
 - 14.1.1 to fulfil its statutory obligations in terms of applicable legislation;
 - 14.1.2 to obtain information necessary to provide contractually agreed services to its customers;
 - 14.1.3 monitoring, maintaining and managing JOSHCO's contractual obligations to customers, clients, suppliers, service providers, employees, directors and other third parties;
 - 14.1.4 marketing and advertising;

- 14.1.5 resolving and tracking complaints;
- 14.1.6 verification of employee's information during recruitment process;
- 14.1.7 historical record keeping, research and recording statistics necessary for fulfilling the JOSHCO's business objectives;
- 14.1.8 to institute legal proceedings for the recovery of outstanding rental, levies and/or taxes from its tenants;
- 14.1.9 payment of invoices;
- 14.1.10 verification of information and performing checks including financial and tax status;
- 14.1.11 to collect money due and payable to JOSHCO in respect of rates and services;
- 14.1.12 to provide accurate monthly billing with the appropriate and correct tariffs and charges;
- 14.1.13 to assess methods to determine the credit worthiness of its applicants; and
- 14.1.14 any other reasonably required purpose related to JOSHCO's operations.

15. CATEGORIES OF DATA SUBJECTS WHOSE PERSONAL INFORMATION WILL BE PROCESSED BY JOSHCO

- 15.1 JOSHCO will process the personal information of the following categories of data subjects:
 - 15.1.1 customers, representatives, agents, partners, contractors and service providers of such customers;
 - 15.1.2 representatives, agents, contractors, vendors, service providers and third parties
 - 15.1.3 members of board of directors JOSHCO;
 - 15.1.4 members of JOSHCO' Executive;
 - 15.1.5 existing and former employees (including contractors, agents, temporary and casual employees);

15.1.6 existing and former tenants; and

15.1.7 complainants, correspondents and enquirers.

16. PERSONAL INFORMATION PROCESSED BY JOSHCO

16.1 Name, identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;

16.2 Biometric Information;

16.3 Information relating to the education or the medical, financial, criminal or employment history of the data subject;

16.4 Information relating to the race, gender, marital status, national origin, age, disability, language and birth of the data subject;

16.5 Personal opinions, views or preferences of the data subject;

16.6 Confidential correspondence sent by the data subject; and

16.7 Credit rating or credit worthiness of the data subject.

17. SPECIAL CATEGORIES OF PERSONAL INFORMATION

17.1 The processing of special personal information is generally prohibited, however, JOSHCO is allowed to process special personal information in the following circumstances:

17.1.1 the data subject has granted JOSHCO consent to process their special personal information;

17.1.2 the processing is in compliance with a legal obligation;

17.1.3 the processing is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment and security;

17.1.4 the processing is necessary to protect the vital interests of the data subject or another person where the data subject is physically or legally incapable of consenting; and

17.1.5 the processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of employees.

18. SPECIAL CATEGORIES OF PERSONAL INFORMATION COLLECTED IN RESPECT OF EMPLOYEES

18.1 Race or ethnicity;

18.2 Criminal behaviour;

18.3 Trade union membership;

18.4 Medical records collected at the on-site medical centre, information about your health, including any medical condition; and

18.5 Biometric data.

19. JOSHCO MAY SUPPLY PERSONAL INFORMATION TO THE FOLLOWING CATEGORIES OF RECIPIENTS

19.1 Such disclosures will only be processed in full compliance with relevant legislation, e.g., POPIA and the Constitution of the Republic of South Africa:

19.1.1 regulatory, statutory and government bodies;

19.1.2 suppliers, service providers, vendors, agents and representatives of the employees of the shareholders and other stakeholders;

19.1.3 third-party verification agencies and credit bureau;

19.1.4 collection agencies; and

19.1.5 banks and other financial institutions.

20. SECURITY MEASURES

20.1 JOSHCO continuously establishes and maintains appropriate, reasonable technical and organisational measures to ensure that the integrity of the personal information in its possession or under its control is secure.

20.2 Through its ICT Policy and stringent security measures, JOSHCO ensures that personal information is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, or access by having regard to the requirements set out in POPIA.

20.3 JOSHCO will carry out regular assessments to:

20.3.1 identify all reasonably foreseeable internal and external risks to personal information in its possession and control;

20.3.2 verify that safeguards are effectively implemented to secure personal information; and

20.3.3 where applicable, JOSHCO updates its existing safeguards to maintain the security of the personal information in its possession and control.

21. RETENTION PERIODS FOR PERSONAL INFORMATION

21.1 In terms of the Protection of Personal Information Act, JOSHCO is required to keep your personal data for no longer than is necessary for the purposes for which it is processed. After your personal data is no longer necessary for the purposes for which it was processed, it will be archived for the required retention period as contained in JOSHCO'S Records Management Policy and File Plan.

21.2 Once the retention period has expired, the personal information will be irreversibly destroyed. Any personal information submitted to JOSHCO for marketing, subscription or service update notifications will be kept by the JOSHCO until such time that you notify us that you no longer wish to receive this information.

22. UPDATING OF THE MANUAL

The Information Officer will attend to the updating of this manual on an annual basis.

Next review: Jan 2027.

Issued by:

Adv. Mpendulo Magutshwa (Deputy Information Officer).