



FAIRHEADS BENEFIT SERVICES (PTY) LTD

SECTION 51 MANUAL

Promotion of Access to Information Act of 2000
(as amended)

Date of Compilation: March 2002

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The purpose of the Promotion of Access to Information Act No 2 of 2000 ("PAIA") is to:

- to give effect to the constitutional right of access to any information held by the State and any information that is held by another person and that is required for the exercise or protection of any rights;
- to provide that the Information Regulator, established in terms of the Protection of Personal Information Act, 2013, must exercise certain powers and perform certain duties and functions in terms of this Act; and
- to provide for matters connected therewith.

Recognising that:

- section 8 of the Constitution provides for the horizontal application of the rights in the Bill of Rights to juristic persons to the extent required by the nature of the rights and the nature of those juristic persons;
- section 32 (1) (a) of the Constitution provides that everyone has the right of access to any information held by the State;
- section 32 (1) (b) of the Constitution provides for the horizontal application of the right of access to information held by another person to everyone when that information is required for the exercise or protection of any rights;
- and national legislation must be enacted to give effect to this right in section 32 of the Constitution;

Bearing in mind that:

- the State must respect, protect, promote and fulfil, at least, all the rights in the Bill of Rights which is the cornerstone of democracy in South Africa;
- the right of access to any information held by a public or private body may be limited to the extent that the limitations are reasonable and justifiable in an open and democratic society based on human dignity, equality and freedom as contemplated in section 36 of the Constitution;

In order to:

- foster a culture of transparency and accountability in public and private bodies by giving effect to the right of access to information;
- actively promote a society in which the people of South Africa have effective access to information to enable them to exercise and protect all of their rights more fully.

access fee	means the prescribed fee in terms of section 54(6)
Act	means the Promotion of Access to Information Act, 2000 ("PAIA")
application	means an application to a court in terms of section 78 of the Act
biometrics	means a technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition;
client	means a member of a beneficiary fund, beneficiary of a trust, guardian/caregiver of a member/beneficiary
Constitution	means the Constitution of the Republic of South Africa, 1996 (Act No. 108 of 1996);
Court	<p>means –</p> <p>(a) the Constitutional Court acting in terms of section 167 (6) (a) of the Constitution; or</p> <p>(b)(i) a High Court or another court of similar status; or</p> <p>(ii) a Magistrate's Court for any district or for any regional division established by the Minister for the purposes of adjudicating civil disputes in terms of section 2 of the Magistrates' Courts Act, 1944 (Act No. 32 of 1944), either generally or in respect of a specified class of decisions in terms of this Act, designated by the Minister by notice in the Gazette and presided over by a magistrate, an additional magistrate or a magistrate of a regional division established for the purposes of adjudicating civil disputes, as the case may be, designated in terms of section 91A, [Sub-para. (ii) substituted by s. 6 of Act No. 24 of 2015.]</p> <p>Wording of Sections</p> <p>within whose area of jurisdiction—</p> <p>(aa) the decision of the information officer or relevant authority of the public body or the head of a private body has been taken;</p> <p>(bb) the public body or private body concerned has its principal place of administration or business; or</p> <p>(cc) the requester or third party concerned is domiciled or ordinarily resident;</p> <p>[Definition of "court" substituted by s. 1 of Act No. 54 of 2002.]</p> <p>Wording of Sections</p> <p>[General Note: Designation of magistrate's courts has been published under Government Notice No. R.585in Government Gazette 26332 of 14 May, 2004.]</p>

data subject	means the person to whom the personal information belongs
head	of, or in relation to, a private body means— (a) in the case of a natural person, including a person referred to in paragraph (c) of the definition of “political party”, that natural person or any person duly authorised by that natural person;
individual's next of kin	means (a) an individual to whom the individual was married immediately before the individual's death; (b) an individual with whom the individual lived as if they were married immediately before the individual's death; (c) a parent, child, brother or sister of the individual; or (d) if— (i) there is no next of kin referred to in paragraphs (a), (b) and (c); or (ii) the requester concerned took all reasonable steps to locate such next of kin, but was unsuccessful, an individual who is related to the individual in the second degree of affinity or consanguinity;
Manual	means the Promotion of Access to Information Manual compiled in terms of section 51 of the Act (“PAIA Manual”)
Notice	means notice in writing, and “notify” and “notified” have corresponding meanings;
official	in relation to a public or private body, means— (a) any person in the employ (permanently or temporarily and full-time or part-time) of the public or private body, as the case may be, including the head of the body, in his or her capacity as such; or (b) a member of the public or private body, in his or her capacity as such;
person	means a natural person or a juristic person;
personal information	means information relating to an identifiable natural person, including, but not limited to— (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; (b) information relating to the education or the medical, financial, criminal or employment history of the person;

- (c) any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assigned to the person;
- (d) the biometric information of the person;
- (e) the personal opinions, views or preferences of the person;
- (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- (g) the views or opinions of another individual about the person; and
- (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person,

but excludes information about an individual who has been dead for more than 20 years;

[Definition of “personal information” substituted by s. 110 read with para. 1 (c) of the Sch. to Act No. 4 of 2013 with effect from 30 June, 2021.]

Wording of Sections

private body	means a natural person who carries or has carried on any trade, business or profession, but only in such capacity; but excludes a public body;
Protection of Personal Information Act	means the Protection of Personal Information Act, no 4 of 2013 (“POPIA”)
record	of, or in relation to, a public or private body, means any recorded information— <ul style="list-style-type: none"> (a) regardless of form or medium; (b) in the possession or under the control of that public or private body, respectively; and (c) whether or not it was created by that public or private body, respectively;
Information Regulator	means the Information Regulator established in terms of section 39 of the Protection of Personal Information Act, 2013; <p>[Definition of “Information Regulator” inserted by s. 110 read with para. 1 (e) of the Sch. to Act No. 4 of 2013 with effect from 30 June, 2021.]</p>
request for access	in relation to a private body, means a request for access to a record of a private body in terms of section 50;
requester	in relation to a private body, means—

- (i) any person, including, but not limited to, a public body or an official thereof, making a request for access to a record of that private body; or
- (ii) a person acting on behalf of the person contemplated in subparagraph (i);

third party in relation to a request for access to a record of a private body, means any person (including, but not limited to, a public body) other than the requester, but, for the purposes of section 63, the reference to “person” must be construed as a reference to “natural person”;

transfer in relation to a record, means transfer in terms of section 20 (1) or (2), and “transferred” has a corresponding meaning;

working days means any days other than Saturdays, Sundays or public holidays, as defined in section 1 of the Public Holidays Act, 1994 (Act No. 36 of 1994).

Insofar as there is a conflict in the interpretation of or application of this Manual and the Act, the Act shall prevail.

The Fairheads PAIA Manual does not claim to be exhaustive of or to comprehensively deal with every procedure provided for in the Act. A requester is advised to familiarise him/her/itself with the provisions of the Act before lodging any complaint with the Information Regulator.

3 KEY CONTACT DETAILS AND AVAILABILITY OF THE MANUAL

The Manual may be accessed on the Fairheads’ website and is available for inspection from:

FAIRHEADS BENEFIT SERVICES (PTY) LTD	
INFORMATION OFFICER	
D Van Dieman	compliance@fairheads.com
HEAD OFFICE	
15th Floor, 2 Long Street, Cape Town	P O Box 4392, Cape Twon, 8000
Website	www.fairheads.com
Share call	0860 102 919
Queries	queries@fairheads.com
Complaints	complaints@fairheads.com

Fairheads is open on Mondays to Fridays from 08h00 to 17h00 daily.

4 WHO WE ARE

Fairheads is

- an administrator of trusts in terms of the Trust Property Control Act No 57 of 1988;
- an authorised financial services provider in terms of the Financial Advisory and Intermediary Services Act No 37 of 2002;

- an accountable institution in terms of the Financial Intelligence Centre Act No 38 of 2001;
- an approved Section 13 B administrator of beneficiary funds in terms of the Pension Funds Act No 24 of 1956; and
- a duly incorporated company registered in accordance with the Company Laws of South Africa

situated at 15th Floor, 2 Long Street Cape Town. Fairheads is a private body as defined by this Act.

5 THE ACT

PAIA was written to give effect to the constitutional right of access to information (*section 32 of the Constitution*) and to provide for the exercise or protection of any rights. Access to information creates a culture of transparency and accountability.

In terms of this Act, private bodies are required to compile a manual as a guide to requesters of access to a record. This Manual provides the procedure to be followed by requesters when requesting a record from Fairheads.

This Manual further sets out the type of records held by Fairheads and the availability of these records.

Where a request for information is made in terms of this Act, Fairheads must release the record to the requester if -

- (a) that record is required for the exercise or protection of any rights
- (b) that person complies with the procedural requirements in this Act relating to a request for access to that record; and
- (c) access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.

6 THE MANUAL AND THE INFORMATION REGULATOR'S GUIDE

In compliance with the requirements of the Act, and the continued promotion of transparency, accountability and effective governance, Fairheads Benefit Services (Pty) Limited has produced this Manual to facilitate your access to a record(s) in our custody.

The Manual -

- sets out processes which we need to put in place to facilitate access to a record as efficiently and inexpensively as is reasonably possible;
- outlines the conditions under which restricted access apply, including a record which relates to personal, commercial, financial, technical information and information which may affect court or police proceedings.

The Manual will assist the requester to

- check the types of records which are available without the requester having to submit a formal request (our clients)
- check the types of records which require a formal request for access accompanied by the fee determined by the record requested and prescribed in a Government Gazette (persons who are not our clients)
- access the relevant contact details of Fairheads' Information Officer who will assist the requester with the records they would like to access
- access the Information Regulator's revised Guide in English and Xhosa available on our website www.fairheads.com (Please refer below for the links to all the Guides available on the Information Regulator's website)

These limitations are set out in section 36 of the Constitution and sections 63 – 70 of the Act.

In terms of the release and access to a record, Fairheads must also comply with the provisions of PAIA and consider:

- (a) the purpose of the request and the purpose of processing the information
- (b) a description of the categories of data subjects and of the information or categories of information relating thereto
- (c) the recipients or categories of recipients to whom the personal information may be supplied;
- (d) planned transborder flows of personal information; and
- (e) a general description allowing a preliminary assessment of the suitability of the information security measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information which is to be processed.

Fairheads has a documented Procedure for Access to a Record in place which sets out the categories of requesters, the records that may be accessed upon request and the process to be applied for each category of requester.

The Information Regulator's Guide (section 10(1) of PAIA)

The Information Regulator has amended and updated the revised Guide which is available in all official languages including Braille.

The Guide sets out

- the object and purpose of PAIA and POPIA
- the details of public and private Information Officers and Deputy Information Officers
- the manner and form of requests for access to a record of a private body (section 50 of PAIA)
- assistance available from the Information Regulator in terms of PAIA and POPIA
- the remedies available in law to a complainant for any act or failure to act in terms of PAIA and POPIA
- the remedies available and the manner for lodging

- an internal appeal
- a complaint
- a court application against an Information Officer against a decision that has been made
- provision for the compilation of a Manual for a private body
- provisions for the voluntary disclosure of categories of records
- fees for requests to access a record
- regulations

The Guide is also available in the official languages on the Information Regulator’s website at

[PAIA Guide - Afrikaans](#)

[PAIA Guide - isiNdebele](#)

[PAIA Guide - isiXhosa](#)

[PAIA Guide - isiZulu](#)

[PAIA Guide - Swati](#)

[PAIA Guide - Sepedi](#)

[PAIA Guide - Sesotho](#)

[PAIA Guide - Tswana](#)

[PAIA Guide - Venda](#)

[PAIA Guide - Tsonga](#)

7. INFORMATION SECURITY MEASURES

Fairheads has robust security measures to protect personal information which will ensure the confidentiality, integrity and availability of the personal information which has been requested.

Fairheads continuously establishes and maintains appropriate, reasonable technical and organisational measures by taking appropriate, reasonable technical and organisational measures to prevent –

- loss of, damage to or unauthorised destruction of personal information; and
- unlawful access to or processing of personal information.

Fairheads has taken reasonable measures to -

- identify all reasonably foreseeable internal and external risks to personal information in its possession or under its control;
- establish and maintain appropriate safeguards against the risks identified; regularly verify that the safeguards are effectively implemented; and
- risk controls are continually updated in response to new risks or deficiencies in previously implemented risk controls to mitigate information security risk.

Some of the measures implemented include -

- Access Control;
- Agreements are concluded with service providers to implement security controls in compliance with POPIA;
- Anti-virus and Anti-malware Solutions;
- Awareness and Vigilance;
- Data Backups;
- Data Encryption;
- Defensive Measures; and
- Robust Monitoring, Auditing and Reporting capabilities;

[Fairheads Privacy Statement](#)

8. CATEGORIES OF RECORDS HELD BY FAIRHEADS

All requests for access to a record are evaluated on a case-by-case basis in accordance with the provisions of the Act. Requests for access to records must be done in writing alternatively, records may be requested telephonically subject to a security check to verify the identity of the requester.

All Fairheads' clients may access their own records without being subject to the Access to a Record Procedure.

CATEGORY OF RECORD	REQUEST FOR ACCESS	DOWNLOAD FROM WEBSITE
PERSONNEL RECORDS		
Conditions of employment and other personnel related contractual and quasi-legal records	X	
Correspondence related to the personnel	X	
Performance management records and other related internal records	X	
Personal records (provided by personnel themselves)	X	
Records provided by a 3 rd party relating to personnel	X	
Training schedules and training materials	X	
CLIENT RECORDS		
Records pertaining to clients and client services	X	
Records provided by a 3 rd party	X	
Records generated by Fairheads relating to clients including transactional data	X	
COMPANY RECORDS		
Agendas and Minutes of Meetings	X	
Audio-visual recordings	X	
Client databases	X	
Compliance, Risk and Investigations	X	
Events, conferences, seminars, functions	X	
Finance, accounting and administration records	X	

Human resources	X	
Information technology systems and documents	X	
Intellectual property	X	
Internal correspondence	X	
Internal policies and procedures	X	
Legal services	X	
Marketing , media and publications	X	X
Movable and immoveable property	X	
Operational records	X	
Product records	X	
Research and development	X	
Reports and Registers	X	
Shareholders	X	
Supply chains, suppliers, service providers	X	
Statutory records	X	
Strategic documents, plans and proposals	X	
Website	X	X
OTHER PARTY RECORDS		
Personnel, client or private body records which are held by another party on Fairheads' behalf	X	
Records held by Fairheads pertaining to other parties, including without limitation, financial records, correspondence, contractual records and records about Fairheads' contractors, suppliers and service providers	X	
Supplier and service provider records	X	
RECORDS MAINTAINED IN TERMS OF OTHER LEGISLATION INCLUDES BUT ARE NOT LIMITED TO -		
Administration of Estates Act, no 66 of 1965	X	
Basic Conditions of Employment Act, no 75 of 1997	X	
Broad Based Black Economic Empowerment Act, no 53 of 2003	X	
Children's Act, no 38 of 2005	X	
Companies Act ,no 61 of 1973	X	
Compensation for Occupational Injuries and Diseases Act ,no 130 of 1993	X	
Constitution of 1996	X	
Criminal Procedure Act, no 51 of 1977	X	
Electronic Communications and Transactions Act, no 25 of 2002	X	
Employment Equity Act, no 55 of 1998	X	
Financial Intelligence Centre Act, no 38 of 2001	X	
Financial Advisory and Intermediary Services Act, no 37 of 2002	X	
Financial Sector Regulation Act, no 9 of 2017	X	
Income Tax Act, no 58 of 1962	X	
Labour Relations Act, no 66 of 1995	X	
National Credit Act, no 34 of 2005	X	
Occupational Health and Safety Act, no 85 of 1993	X	
Pension Funds Act, no 24 of 1956	X	

Promotion of Access to Information Act, no 2 of 2000	X	
Protected Disclosures Act, no 26 of 2000	X	
Protection of Personal Information Act, no 4 of 2013	X	
Skills Development Act, no 97 of 1998	X	
Skills Development Levy Act, no 9 of 1999	X	
Trust Property Control Act, no 57 of 1988	X	
Unemployment Insurance Contributions Act, no 30 of 1996	X	
Unemployment Insurance Act, no 30 of 1996	X	
Value Added Tax Act, no 89 of 1991	X	

9. CATEGORIES OF RECORDS SUBJECT TO GROUNDS FOR REFUSAL TO ACCESS A RECORD

The records categorised below may be formally requested, but access to these records or parts thereof may be refused on legal grounds contained in Chapter 4, sections 62 – 70 of the Act.

Fairheads reserves the right to refuse access to records where the processing of the record will result in a substantial and unreasonable diversion of its resources.

Access will also be refused where requests are clearly frivolous and/or vexatious.

However, the Information Officer may grant a request for access to a record if –

- (a) the disclosure of the record would reveal evidence of a substantial contravention of, or failure to comply with the law; and
- (b) the public interest in the disclosure of the record clearly outweighs the harm contemplated in any of the grounds for refusal of access to records.

CATEGORY OF RECORD	ON REQUEST FORM ONLY
Agendas and Minutes of Meetings and correspondence	X
Assessment reports	X
Asset disclosures and asset protection procedures	X
Certain forensic reports	X
Certain Service Level Agreements	X
Certain Tender Documentation	X
Compliance Assessment Reports (PAIA and POPIA)	X
Confidential client communications	X
Draft reports, policies and discussions documents	X
Enforcement Notices, Settlement between the parties	X
Executive Management internal confidential communication	X
Information Notice	X
Internal communiqués	X
Invoices and proof of payments	X
Privileged information: held in the course of investigations, conciliation, closed hearings, attorney client information, national security based information or third party information	X

Records held by Legal Services Department	X
Research conducted by Service Providers or programs subject to contractual exemptions on disclosure	X
Research papers and Legal opinions	X
Search warrants and Subpoenas	X
Security related information	X
Specific Human Resource Personnel information, including, but not limited to files relating to disciplinary process and records, medical information and personal information	X

10 RECORDS THAT CANNOT BE FOUND OR DO NOT EXIST

The Act only applies to records that are in existence at the time that the request is received by the Information Officer. The Act does not compel Fairheads to create a record which is not in existence at the time the request is made. The Act provides that the record requested must be in Fairheads' possession or under our control. Record Management and Retention Policies apply in this regard.

When a record cannot reasonably be accessed, the requester will receive a response from the Information Officer in the form of an Affidavit or Affirmation which will confirm that the requester would have been granted access to a record had the record been located by Fairheads.

Likewise, requesters have the right to receive a response in the form of an Affidavit or Affirmation in the event that a record does not exist and therefore access could not be reasonably given.

11 DISPOSAL OF RECORDS

Fairheads reserves the right to lawfully dispose of certain records in terms of its Record Retention Schedule. Requesters will be informed whether a particular record has been disposed of where a requester has requested access to that particular record.

Fairheads may also correct or delete personal information upon the request from a data subject.

12 HOW TO ACCESS INFORMATION

A request for access to a record must be sent to the Information Officer. We do recommend that you read this Manual first before asking for access to the records which Fairheads has in its possession.

Any client of Fairheads may request his/her information directly from Fairheads free of charge.

Requests for access to records must comply with Section 53 of the Act.

Fairheads must respond to requests for information within 30 days. In the event that the records are still not available during that time, the Information Officer will be notify by the requester.

A. Direct access

Certain categories of information are automatically available without having to request them through the PAIA processes.

All Fairheads' clients have access to their account information.

B. Telephonic requests

Fairheads also accepts telephonic requests via our Contact Centre subject to a successful security check. Please use the Share Call number provided above

C. In-person requests

If a person is unable to complete the Form because of illiteracy or disability, such person may make the request in person at a Fairheads office.

D. Third party access - Prescribed form

If the request is made on behalf of a person by a third party, the third party is required to submit the request to the Information Officer. The Information Officer will notify the requester of the procedure to follow and/or any additional information which is required before a decision regarding access to a record can be made.

The prescribed time periods will not commence until all the required information has been provided to the Information Officer by the requestor.

The request will be processed according to Fairheads' Procedure to Access a Record which complies with the Act.

STEP 1: Completing the prescribed form:

<https://inforegulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form02-Reg7.pdf>

If you are not able to download this form from the website, please request the form from the Information Officer at compliance@fairheads.com

Complete the prescribed form in full, clearly indicating the record/s requested and sign the Form in the space provided for your signature.

The requester must submit the application form to the Information Officer at the address, or email address provided in this Manual.

Once the request has been assessed, the Information Officer will determine whether a fee is applicable before the access to a record can be granted.

STEP 2: Payment

The requester must pay the prescribed request fee if due and when requested to do so.

<https://inforegulator.org.za/wp-content/uploads/2020/07/Form-3-PAIA.pdf>

Upon receipt of payment, if applicable, the request may be processed.

If you are not able to download this form from the website, please request the form from the Information Officer at compliance@fairheads.com

E. Turnaround times for attending to requests

In terms of section 56(1) of the Act, the Information Officer must decide whether to grant or refuse a request and to give notice with reasons to that effect within 30 days of receipt of the request.

The 30-day time period may be extended ONCE by the Information Officer for a period of not more than 30 days depending on the nature of the request and the volume of the information that is required or if the information cannot be obtained within the original 30-day period.

The Information Officer must notify the requester in writing of the extension if one is required.

13. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS

Fairheads may refuse access to information on the following grounds and will provide

Mandatory protection of

- Commercial information unless the information is in the public interest
- Computer programmes owned by Fairheads
- Financial, commercial, client, technical information
- Information that might place Fairheads at a disadvantage in contractual or other negotiations
- Information that might prejudice Fairheads in commercial competition
- Privileged records from legal proceedings
- Research information
- Safety of individuals and the protection of property
- The privacy of a 3rd party who is a natural person in order to avoid the unreasonable disclosure of that person's personal information
- Trade secrets

Manifestly frivolous and vexatious requests for information and requests which require unreasonable diversion of resources will be declined.

14 THE INFORMATION REGULATOR

A requester referred to in section 74 of the Act may only submit a complaint to the Information Regulator in terms of this section after that requester has exhausted the internal appeal procedure against a decision of the Information Officer.

If the requester is aggrieved by the decision of the Information Officer, then the requester may submit a complaint within 180 days of that decision to the Information Regulator. The complaint to the Information Regulator must be in the prescribed manner and form for appropriate relief.

For ease of access, the forms are available for download on the Information Regulator's website:

<https://info regulator.org.za/paia-forms/>

If you are not able to download the forms, please contact our offices and request a copy of the form/s to be emailed to you. Please send your request to the Information Officer at compliance@fairheads.com

A requester aggrieved by the decision of the Information Officer may submit a complaint within 180 days of that decision to the Information Regulator. The complaint to the Information Regulator must be in the prescribed manner and form for appropriate relief.

<https://info regulator.org.za/wp-content/uploads/2020/07/InfoRegSA-PAIA-Form05-Reg10-1.pdf>

Please note that Fairheads' internal complaint process must be applied first in order to assist you, before lodging a complaint with the Information Regulator.

	Description	Amount
1.	The request fee payable by every requester	R140.00
2.	Photocopy/printed black & white copy of A4-size page	R2.00 per page or part thereof.
3.	Printed copy of A4-size page	R2.00 per page or part thereof.
4.	For a copy in a computer-readable form on: (i) Flash drive (to be provided by requestor) (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00 R40.00 R60.00
5.	For a transcription of visual images per A4-size page	Service to be outsourced. Will depend on quotation from Service provider.
6.	Copy of visual images	
7.	Transcription of an audio record, per A4-size page	R24.00
8.	Copy of an audio record on: (i) Flash drive (to be provided by requestor) (ii) Compact disc • If provided by requestor • If provided to the requestor	R40.00 R40.00 R60.00
9.	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. To not exceed a total cost of	R145.00 R435.00
10.	Deposit: If search exceeds 6 hours	One third of amount per request calculated in terms of items 2 to 8.
11.	Postage, e-mail or any other electronic transfer	Actual expense, if any."