

Complaints and Feedback Policy

Protea Pathways (Pty) Ltd

PUBLIC POLICY | VERSION 1.0

Effective date	7 September 2026
Review date	7 September 2027, or earlier if the law or services change
Applies to	Protea Childcare, Protea Education, Protea Online, Protea Global and proteapathways.com
Document owner	Director / Information Officer

This document reflects Protea Pathways' current operating model. It applies together with the relevant quotation, booking confirmation, consent forms and mandatory South African law, and will be reviewed when services, suppliers or legal requirements change.

1. Purpose

Protea Pathways welcomes concerns and feedback as part of safe, accountable and respectful service. A person will not be disadvantaged for raising a genuine concern in good faith.

2. How to complain

Submit the complaint to Narina Monique Minnaar at info@proteapathways.com or 066 399 9277. Include your name and contact details, the relevant division or service, booking reference if applicable, dates, people involved, what happened and the outcome you are seeking. Anonymous safeguarding concerns will still be considered, although limited information may affect the investigation.

3. Response stages

Acknowledgement	Immediately where practical and no later than 1 business day
Initial risk assessment	Immediately for safeguarding, safety, privacy or urgent service risks
Initial outcome target	Within 24 hours for straightforward matters
Complex matter update	Provided within 24 hours if safeguarding, evidence or third-party input requires more time
Final outcome	A clear written response with findings, action and available escalation route as soon as reasonably possible

4. Fair handling

- ☐ The complaint will be handled by someone with appropriate authority and, where possible, no unmanaged conflict of interest.
- ☐ Relevant people will have a fair opportunity to provide information.
- ☐ Records will be factual, confidential and limited to people who need access.
- ☐ Protea Pathways will distinguish service recovery, disciplinary processes, safeguarding referrals, privacy remedies and legal disputes.
- ☐ No promise of a particular outcome will be made before the facts are assessed.

5. Safeguarding and emergencies

A concern about immediate danger, abuse, neglect, exploitation or a person unsuitable to work with children must be escalated under the Safeguarding and Child Protection Policy without waiting for the ordinary complaint timeline. Emergency services or the appropriate authority must be contacted where required.

6. Privacy and PAIA complaints

Privacy requests and complaints should first be directed to the Information Officer. PAIA requests must follow the prescribed process. Where the internal response does not resolve the matter, a person may use the complaint mechanisms of the Information Regulator and any other remedy available by law.

7. Consumer escalation

The owner will reconsider a disputed outcome using any new information provided. Because Protea Pathways is currently owner-operated, there is no separate internal appeal officer. A consumer may use an available ombud, the National Consumer Commission, a provincial consumer authority, tribunal or court where applicable. Protea Pathways will not state that internal review is the only available remedy.

8. Learning and records

Complaint trends, corrective actions and recurring risks will be reviewed by management. Records will be retained securely under an approved retention schedule, with access limited according to role and legal need.

Policy administration

Questions, correction requests and policy concerns may be sent to info@proteapathways.com or 066 399 9277.

- ▣ Policy owner: Narina Monique Minnaar, Owner and Information Officer.
- ▣ Version: 1.0, effective 7 September 2026.
- ▣ Scheduled review: 7 September 2027, or earlier after a material operational or legal change.
- ▣ The current published version replaces earlier website copies of the same policy.

Photography, Video and Testimonial Policy

Protea Pathways (Pty) Ltd

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1. Principle

Consent to photography, video, audio, testimonials or marketing is optional and separate from consent needed to deliver a service. Refusing media consent will not reduce the quality of childcare, education or support.

2. Written consent

For a child, consent must be obtained from the parent, guardian or other competent person before identifiable content is captured or used, unless a different lawful basis clearly applies. The consent form must specify the type of media, purpose, channels, duration and whether names or other identifiers may be used.

3. Safe creation and publication

- ❑ Do not show unnecessary identifying details, school names, addresses, live locations, medical information or private family circumstances.
- ❑ Do not create or publish images showing intimate care, distress, injury, unsafe conduct or content that could undermine a child's dignity.
- ❑ Use company-approved devices and transfer content promptly to approved storage. Do not retain company media in personal galleries or private cloud accounts.
- ❑ Check the consent record before every publication or reuse, including reposting older content.
- ❑ Use only the channels and purposes recorded in the consent.

4. Events and third parties

At weddings and events, Protea Pathways controls only media created or commissioned by it. The client and event organiser should be informed of childcare areas and consent boundaries. Staff may not share images taken by guests or photographers through company channels without the required authority.

5. Testimonials

Testimonials must be genuine, accurately represented and used with permission. A child's full name should ordinarily not be used. Incentives, if any, must be disclosed and must not be linked to pressure for a positive statement.

6. Withdrawal and deletion

Media consent is valid for 12 months from signature unless a shorter period is stated, and may be withdrawn earlier by contacting Narina Monique Minnaar at info@proteapathways.com. Protea Pathways will stop new use within a reasonable time and remove content under its control where reasonably possible, while explaining any lawful or practical limits relating to material already printed, lawfully distributed or retained for evidence.

7. Retention

Unused media should be deleted promptly. Approved content and consent records will be kept only for the approved campaign or retention period. The final consent form must state the period and deletion approach.

8. Consent record fields

Child / participant	[FULL NAME]
Parent / guardian	[FULL NAME AND RELATIONSHIP]

Permitted media	[PHOTO / VIDEO / AUDIO / TESTIMONIAL]
Permitted purposes	[INTERNAL LEARNING / WEBSITE / SOCIAL MEDIA / PRINT]
Use of first name	[YES / NO]
Consent period	12 months from signature, unless a shorter period is written here: -----
Signature and date	-----

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Official legal and regulatory references

Protection of Personal Information Act 4 of 2013: <https://www.gov.za/documents/protection-personal-information-act>

Promotion of Access to Information Act resources and private-body manual template:
<https://eservices.inforegulator.org.za/paiamanuals/>

Information Officer registration and POPIA resources: <https://inforegulator.org.za/popia/>

PAIA and POPIA complaints: <https://inforegulator.org.za/complaints/>

Consumer Protection Act 68 of 2008: <https://www.gov.za/documents/consumer-protection-act>

Electronic Communications and Transactions Act 25 of 2002:
<https://www.gov.za/documents/electronic-communications-and-transactions-act>

Children's Act and child-protection register information: <https://www.justice.gov.za/vg/children.html>