

PAIA MANUAL

Dr Heena Narotam Jeena

Prepared in terms of section 51 of the
Promotion of Access to Information Act
2 of 2000 (as amended)

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PROMOTION OF ACCESS TO INFORMATION ACT 2 of 2002 (AS AMENDED)
SECTION 51 MANUAL OF the practice PROPRIETARY LIMITED

1. LIST OF ACRONYMS AND ABBREVIATIONS

- “Guide”** A guide updated and published by the Information Regulator from time to time containing such information, in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in this act.
- “IO”** Information Officer
- “Practice manager”** means the practice manager of the Practice of Dr Heena Narotam Jeena, being Ms Christiné Benade or her successor in title
- “PAIA”** Promotion of Access to Information Act No 2 of 2000, as amended
- “POPIA”** Protection of Personal Information Act No 4 of 2013
- “Regulator”** Information Regulator
- “Republic”** Republic of South Africa

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

2.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;

2.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records and the categories of records held on each subject;

2.3 know the description of the records of the body which are available in accordance with any other legislation;

2.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;

2.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;

2.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;

2.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;

2.8 know the recipients or categories of recipients to whom the personal information may be supplied;

2.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and

2.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF the practice (PTY) LTD

3.1. Chief Information Officer

Name: Heena Narotam Jeena

Tel: (021) 8407230

Email: tests@drnarotamjeena.co.za

3.2 Access to information: general contacts

Practice Manager: Ms Christiné Benade

Email: tests@drnarotamjeena.co.za

4. GUIDE ON HOW TO USE PAIA AND HOW TO OBTAIN ACCESS TO THE GUIDE

4.1. The Regulator has, in terms of section 10(1) of PAIA, as amended, updated and made available the revised Guide on how to use PAIA ("Guide"), in an easily comprehensible form and manner, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA.

4.2. The Guide is available in each of the official languages and in braille.

4.3. The aforesaid Guide contains the description of-

4.3.1. the objects of PAIA and POPIA;

4.3.2. the postal and street address, phone and fax number and, if available, electronic mail address of-

4.3.2.1. the Information Officer of every public body, and

- 4.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA¹ and section 56 of POPIA²;
- 4.3.3. the manner and form of a request for-
 - 4.3.3.1. access to a record of a public body contemplated in section 113; and
 - 4.3.3.2. access to a record of a private body contemplated in section 504;
- 4.3.4. the assistance available from the IO of a public body in terms of PAIA and POPIA;
- 4.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;
- 4.3.6. all remedies in law available regarding an act or failure to act in respect of a right or duty conferred or imposed by PAIA and POPIA, including the manner of lodging
- 4.3.7. the provisions of sections 145 and 516 requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;
- 4.3.8. the provisions of sections 157 and 528 providing for the voluntary disclosure of categories of records by a public body and private body, respectively;
- 4.3.9. the notices issued in terms of sections 229 and 5410 regarding fees to be paid in relation to requests for access; and
- 4.3.10. the regulations made in terms of section 92.

4.4. Members of the public can inspect or make copies of the Guide from the offices of the public and private bodies, including the office of the Regulator, during normal working hours.

4.5. The Guide can also be obtained-

4.5.1. upon request to the Information Officer;

4.5.2. from the website of the Regulator (https://info regulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf)

4.6 A copy of the Guide is also available in the following two official languages, for public inspection during normal office hours-

4.6.1 English (copy available at: https://info regulator.org.za/wp-content/uploads/2020/07/PAIA-Guide-English_20210905.pdf)

4.6.2 Afrikaans (copy available at:

<https://www.sahrc.org.za/home/21/files/Reports/PAIA%20GUIDE%20english.pdf>)

5. CATEGORIES OF RECORDS OF the practice WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

The following information is made known automatically:

Category of records	Types of the Record	Available on Website	Available upon request
Practice Terms and Conditions	Practice information	N	Y
Fee list	Practice information	N	Y

Practice billing policy	Practice information	N	Y
Designation and numbers of key personnel for practice purposes	Contact information	Y	Y
This PAIA Manual	Information	Y	Y
POPIA Policy	Information	N	Y
Services information	Information	Y	Y

6. DESCRIPTION OF THE RECORDS OF the practice WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Information is available in terms of the following legislation, subject to conditions set by such laws. As legislation changes from time to time, and new laws may stipulate new matters and extend the scope of access by persons specified in such entities, this list should be read as not being a final and complete list.

Category of Records	Applicable Legislation
PAIA Manual	Promotion of Access to Information Act 2 of 2000
Financial and staff records	Income Tax Act 58 of 1962
VAT invoices / claims to funders	Value Added Tax Act 89 of 1991
Information that must be disclosed to employees under the LRA	Labour Relations Act 66 of 1995
Leave records	Basic Conditions of Employment Act 75 of 1997

All employment policies and practices and its analyses	Employment Equity Act 55 of 1998
Training plans and records	Skills Development- and Skills Development Levies Act 9 of 1999
Submissions and reports	Unemployment Insurance Act 63 of 2001
Claims and reports to the Compensation Fund	Compensation for Occupational Injuries and Disease Act 130 of 1993
Occupational Health and Safety committee records, Health and Safety Officer records	Occupational Health and Safety Act of 85 of 1993
Electronic records (emails, agreements, financial records)	Electronic Communications and Transactions Act 25 of 2002
All records pertaining to direct consumer interactions or directed to the public as potential consumers	Consumer Protection Act 68 of 2008
Credit records	National Credit Act 34 of 2005
Submissions, licences, permits, reports, correspondence	Medicines and Related Substances Act 101 of 1965; Hazardous Substances Act, 1973
Registrations and compliance records	Health Professions Act 56 of 1974
Registrations and compliance records	Nursing Act 33 of 2005
Information submitted to- or requested by the Competition Commission or other regulatory bodies	Competition Act 89 of 1998

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE PRACTICE

Subjects on which the body holds records	Categories of records
Internal records relating to our business as a healthcare practice	Our founding and other documents, minutes and policies; annual and other reports; financial records; strategic plans; operational records, policies and procedures; contracts; licences, trademarks and other intellectual property; marketing records; other internal policies and procedures; internal correspondence; statutory records; professional indemnity; insurance policies and records; etc.
Personnel / HR / employee records	Records of temporary/fixed term/part-time/permanent employees, locums, associates, contractors, partners, directors (executive and non-executive). Records include personal files, records third parties have provided to us about their / our staff; employment contracts, conditions of employment; workplace policies; disciplinary records; termination records; minutes of staff meetings; performance management records and systems and all employment-related correspondence.
Health records	Consents; patient information; health information; assessments; test results; financial and accounts information; research information; occupational health records and claims to Compensation- and Road Accident Fund; actuarial information; and similar information.
Supplier, vendor and service provider records	Supplier registrations; contracts; confidentiality agreements and non-disclosure agreements, communications; logs; delivery records; commissioned work; and similar information, some of which might be provided to us by such suppliers and providers under consultancy-, service- and other contacts
HPCSA, DoH, OHSC	Registrations; renewals; CPD information and certificates, lists; disciplinary action or inquiries; employment permissions; hospital shareholding records and reports; queries; inspection results; improvement plans; licences and permits; etc.
Third party information	Which may be in our possession, but which would be subject to the conditions set in relation to such possession and use or purpose limitations.

Subjects on which the body holds records	Categories of records
Business / health sector environment and market information	Information bought; publicly available information; commissioned information which pertains to the specific sector and market of our practice and factors that affect the business; information relating to professional and healthcare environment
Professional Association	Information provided by, submitted to, relating to associations to which the practice and/or practitioners belongs, and may include membership information, office-bearers information, information on attendees, etc. Minutes and other records of the trade association and its structures.

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Personal information is processed for the purposes of being a healthcare practice in South Africa, involved in the provision of healthcare services to patients / clients. Within this, the practice has to process the personal information of persons involved in, and persons who are the recipients of these activities, such as prescribers and users, (customers and clients), logistics and supply chain providers, vendors and suppliers, of government entities and regulators and of our colleagues in the industry and the larger health sector.

8.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
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Customers / Clients	name, address of practice / health facility (hospital, clinic) / pharmacy, HCP category, registration numbers
Service Providers / vendors / consultants	names, registration number, VAT numbers, address, trade secrets and bank details
Industry stakeholder lists	NASA (professional society) lists
Employees	address, qualifications, gender, race and other details required by the Employment Equity Act, Occupational Health and Safety Act
General contact lists / address database	names, contact numbers, email addresses

8.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Identity number and names, for criminal checks	South African Police Services
Patient details, healthcare provider details	SAHPRA, HPCSA, SAPC, SANC
Credit and payment history, for credit information	Credit Bureaus, NCR
Salary information and bank details	SARS, accountant, billing company
For CPD and training accreditation purposes	HPCSA, SAPC, SANC
Adverse event reports, quality complaints	SAHPRA
Race, gender, nationality of staff and others	B-BBEE Consulting and Rating Agencies

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
	DoEL in annual EE Report (anonymised)
Claims / invoices	to insurers / medical schemes / RAF / Compensation Fund
CVs, certificates and supporting documents relating to recruitment, job applicants and successful job applicants	Recruitment agencies, verification agencies
Criminal records, corruption and legal case records, identity numbers, company registration details, names of directors and shareholders	Credit Bureaus, external assessment / verification, compliance

8.4 Planned trans-border flow of personal information

The practice does have planned trans-border flow of personal information, specifically where tests have to be undertaken overseas. Such transfer of personal information takes place in accordance with section 72 of the POPIA, which means that patients are informed when tests are to be undertaken overseas, which includes the provision of information to such overseas entities. The practice enters into agreements to ensure that overseas processing is done in accordance with the principles entrenched in POPIA.

8.5. General description the suitability of the information security measures implemented or to be implemented

The practice stores information electronically and physically as follows:

- Electronic information is secured by firewalls, anti-virus and password secured access, set out IT standard used.
- Electronic information on shared drives operate on access control and permissions, accidental access must be reported to the Information Officer and IT immediately.

- No information, including personal information, may be downloaded from shared drives onto device hard drives or any external device.
- Physical records are kept as follows:
 - o Customer application forms are scanned and saved electronically. The hard copy is destroyed once the scanned copy is saved electronically.
 - o Employee records are filed electronically until a 3 year period after employees leave.

The practice has a written operator agreement in place with the third-party service provider that ensures that the service provider complies with its obligations as an operator as required under POPIA.

- There are security cameras installed in certain key areas, notices are put up to this effect and staff contracts include such surveillance as part of the conditions of employment. All such recordings are stored off-site and will only be accessed in cases of alleged breaches of processing, including unlawful access or destruction, of personal information.
- The office building is accessed through a single entrance, which requires the sign in of visitors entering for security reasons. The gate is manned with security personnel and boom gate, which is locked at night. The security company act as an Operator and an Operator agreement is in place, ensuring that no personal information provided is stored for longer than necessary and are permanently destroyed after its use. Frequent visitor information is stored indefinitely at the security company in full compliance with the provisions of the POPI Act, or until a contract or assignment comes to an end. The instruction for destruction or return of such information to the security company is provided by Information Officer to the Head of IT and Facilities ...
- Regular verification that the safeguards in place are effectively implemented and continually updated in response to any new risks or deficiencies;
- Notification in writing to the affected Data Subjects and reporting to the Information Regulator, should the Personal Information relating to the Data Subject be compromised or should there be a suspicion that the

Personal Information is compromised, this includes loss of a device containing Personal Information whether belonging to the practice or private and unintended deletion Personal Information. Notification may have to be made to the Information Regulator. All security and

access breaches or suspected or potential breaches of personal information must be reported to the Information Regulator or his/her designated Deputy immediately after such breach or potential breach becomes known.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 at the practice for public inspection during normal business hours;

9.1.2 to any person upon request and upon the payment of a reasonable prescribed fee; and

9.1.3 to the Information Regulator upon request.

10. UPDATING OF THE MANUAL

The Information Officer will on a regular basis update this manual.

This updated manual was issued by Dr. Heena Narotam Jeena on the 12th day of February 2026.



Signature: Information Officer