



Sonia Roux
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Sonia Roux Sielkundige Dienste

PAIA Manual

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1. Introduction to the Practice

Sonia Roux conducts a private counselling psychology practice. The Practice is subject to various laws protecting the privacy and confidentiality of patients. It is conducted in accordance with applicable legislation such as the Health Professions Act. It is subject to the authority of the Health Professions Council of South Africa (“HPCSA”). The practitioners practising at the Practice are registered at the HPCSA and provide professional services within the scope and ambit of their registration, competence and training. The practitioners are bound by the Ethical Rules and Policies of the HPCSA, which include the duty to preserve patient confidentiality.

2. Purpose of the PAIA Manual

The purpose of this PAIA Manual is mainly to inform patients, the public and other persons and entities of the records held by the Practice, the personal information of data subjects processed by the Practice and how access can be obtained to these records. Information on the Practice and the Information Regulator is also provided.

3. Contact Details of the Practice

Practice Name:	Sonia Roux Sielkundige Dienste
Practice Number:	8644632
Head of the Practice:	Sonia Roux
Physical and Postal Address:	116 Nuffield Street, Rietondale, Pretoria, 0084
Telephone Number:	071 999 3331
Email:	admin@srsd.co.za
Website:	https://www.srsd.co.za/

4. Information and Deputy Information Officers of the Practice

The Information Officer of the practice is:

Name:	Sonia Roux
Email:	sonia@srsd.co.za
Telephone:	082 511 1911

The Deputy Information Officer of the practice is:

Name: Shayne Cramer
Email: shayne@srsd.co.za
Telephone: 082 511 1900

5. Guide of the Information Regulator

The Information Regulator compiled a Guide, in terms of Section 10 of the Promotion of Access to Information Act (PAIA), to assist persons wishing to exercise their rights in terms of this Act. This Guide contains, amongst others, the following information:

- The purpose of PAIA;
- The manner, form and costs of a request for access to information held by a body;
- Legal remedies when access to information is denied;
- Assistance that the Information Regulator can provide;
- Mechanisms to obtain the contact details of Information Officers; and
- Relevant legislation.

The Guide is available in all the official languages on the website of the Information Regulator or can be obtained from the Information Regulator at:

Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address: PO Box 31533, Braamfontein, Johannesburg, 2017
Contact number: 010 023 5200
E-mail: enquiries@infoeregulator.org.za
Website: <https://infoeregulator.org.za/>

The Guide can also be obtained upon request from the Information or Deputy Information Officer of the Practice. A copy of the Guide is available for public inspection during normal office hours at the Practice.

6. Subjects on which the Practice holds Records and the Categories of Records

The Practice holds the following categories of records:

Subjects on which the Practice holds records	Categories of records
Practice	Practice policies, financial records, assets, business agreements and engagements, strategic records, insurance and professional indemnity cover records
Patients	Medical records, patient forms, accounts and payment information, referral notes and reports and complaints
Healthcare practitioners	Referral base and related records
Human resources (HR)	HR policies and procedures, employee records, advertised positions

7. Information Available in terms of Legislation

The practice holds records as may be required in terms of the legislation listed below subject to the specific protection offered by these laws:

Applicable Legislation	Category of Records
Basic Conditions of Employment Act 75 of 1997 and Labour Relations Act 66 of 1995	Employment contracts and related documentation
Children's Act 38 of 2005	Consent forms
Consumer Protection Act 68 of 2008 and Medical Schemes Act 131 of 1998	Invoices related to medical treatment provided
Electronic Communications and Transactions Act 25 of 2002	Proof of electronic transactions
Health Professions Act 56 of 1974	Proof of registration (practitioners), other records required by the Ethical Rules and CPD records
Income Tax Act 58 of 1962 and Tax Administration Act 28 of 2011	Employees' tax-related information and payments made to vendors, service providers and suppliers

National Health Act 61 of 2003	Medical records and consent documents, where necessary
Occupational Health and Safety Act 85 of 1993 and Compensation for Occupational Injuries and Diseases Act 130 of 1993	Health and safety incidents; ergonomics records; claims and records related to treatment of occupational diseases and injuries
Promotion of Access to Information Act 2 of 2000	PAIA Manual and PAIA Guide
Protection of Personal Information Act 4 of 2013	PAIA Manual, Privacy Policy and other policies related to the protection of personal information
Skills Development Levies Act 9 of 1999 and Skills Development Act 97 of 1998	Records related to payment of levies
Unemployment Contributions Act 4 of 2002 and Unemployment Insurance Act 63 of 2001	Records related to payment of UIF contributions and relevant employee records
Value Added Tax Act 89 of 1991	VAT records

8. Records Automatically Available

The information on the website is automatically available without having to request access by completing Form 2. Access and usage of the information on the website are subject to the Website Terms and Conditions as well as the Privacy Policy of the Practice.

9. Purposes of Processing Personal Information

The Practice processes the personal information of data subjects for the following purposes:

- to conduct and manage the Practice lawfully, including administering the practice and claiming and collecting payment for services rendered from responsible persons/entities;
- for treatment and care of patients;
- for career counselling of patients;
- for communication purposes (e.g., reminders of patient appointments);
- for the maintenance of Practice records, including patients' medical records and employee records;
- for employment/contracting and related matters of employees and healthcare practitioners;
- for reporting to persons and bodies, including referring practitioners, as required and authorised by you or the law;

- for historical, statistical, and research purposes;
- to enforce the rights of the Practice; and/or
- for any other lawful purpose related to the Practice.

10. Data Subjects, their Personal Information and Potential Recipients

The Practice holds the personal information in respect of the categories of data subjects specified in the tables below as may be relevant in the circumstances. The potential recipients of data subjects' personal information and records are also included in the tables. Information and records are only disclosed to recipients as may be necessary in the circumstances and authorised in terms of the law or otherwise with the consent of the relevant data subjects.

10.1 Employees, Healthcare Practitioners of the Practice and Job Applicants

Categories of personal information	Names and contact details, title, identity number/date of birth, HPCSA/statutory council number, position or role in the practice, nationality, gender, race, qualifications, specialisation, professional registration-related information, interests and other information included on CVs; relevant medical and disability information; employment-related information including information to comply with tax and other applicable laws; bank details; professional indemnity cover; vetting reports (qualifications and criminal records) and references of job applicants; next-of-kin information correspondence; Records created in the performance of their duties; and health and safety-related incidents.
Potential Recipients	Law enforcement and government agencies, as part of a corporate transaction, administrative and clinical staff of the Practice, service providers (e.g. IT support) of the Practice, the Practice's accountant/auditor, professional advisers and insurers of the Practice, patients, banks, professional societies, peer review bodies, associated schools, vetting and recruitment agencies; and next-of-kin (emergencies) as may be applicable.

10.2 Patients

Categories of personal information	Contact or other identifying information, such as name, address, telephone number, date of birth/identity number, age, gender, nationality, home language, marital status, health information including health status and medical history, medication, information received from other referring and treating healthcare practitioners, psychometric test results, family doctor's name, school and school subject information, potential career choices, occupation, employer, contact details and other relevant information about the persons who may provide consent on behalf of patients and of those responsible for the payment of accounts, accounts and payment details including details of the patient's medical scheme, employment details, names and contact details of next-of-kin, other information recorded on patient forms, correspondence, and any other information recorded on patient documentation, such as consent forms.
Potential Recipients	Law enforcement and government agencies, as part of a corporate transaction, administrative and clinical staff of the Practice, service providers (e.g. IT support) of the Practice, the Practice's accountant/auditor, professional advisers of the Practice, the insurers of the Practice, treating and referring practitioners, relevant schools, persons acting on behalf of patients, persons responsible for the payment of accounts, next-of-kin, debt collectors and attorneys as may be applicable.

10.3 Referring and Treating Healthcare Practitioners

Categories of personal information	Names and contact details, titles, qualifications, practice code numbers, registered professions, interests, other information included on letterheads/referral notes and correspondence.
Potential Recipients	Law enforcement and government agencies, as part of a corporate transaction, administrative and clinical staff of the Practice, service providers (e.g. IT support) of the Practice, the Practice's

	accountant/auditor, professional advisers of the Practice, the insurers of the Practice, patients and persons who may act on their behalf.
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10.4 Suppliers, Vendors and Other Third Parties

Categories of personal information	Person/entity's name and contact details, names, titles and contact details of relevant persons/office bearers, agreements and related information, practice code numbers, invoices, official documentation, including newsletters and statements, references and correspondence.
Potential Recipients	Law enforcement and government agencies, as part of a corporate transaction, administrative and clinical staff of the Practice, service providers (e.g. IT support) of the Practice, the Practice's accountant/auditor, professional advisers of the Practice, the insurers of the Practice, banks, patients, attorneys and debt collectors.

11. Personal Information sent across the Borders of the Republic of South Africa

The Practice is not planning to send any personal information about any data subject to any third party in a foreign country. Should this be required, relevant data subject consent will be obtained, unless the information may be lawfully transferred across the borders. Transfers of such information will occur in compliance with the requirements of the law.

12. Security measures to protect personal information

The Practice is committed to ensuring the security of the personal information in its possession or under its control to protect it from unauthorised processing and access as well as loss, damage or unauthorised destruction. Cybercrime is, however, rife and escalating. There are inherent risks when information is stored or transmitted electronically (e.g. by email). The Practice will take all reasonable steps to protect the personal information. It continually reviews and updates its information protection measures to ensure the security, integrity and confidentiality of this information following industry best practices. The measures it adopts to ensure the security of personal information include technical and organisational measures and internal policies to prevent unauthorised access, loss or use of personal information, for

example, locking of rooms with physical records; access control to electronic records and off-site data back-ups. In addition, only those practitioners and employees who require access to the information to treat patients and discharge their functions are permitted access to the relevant information and only if they have concluded agreements with or provided undertakings to the practice requiring them to implement appropriate security measures and to maintain the confidentiality of the information. Suppliers and vendors must comply with the security mechanisms stipulated in the law. They are subject to sanctions for any security breach. All security breaches are taken seriously and are addressed per the requirements of the law.

13. Procedure to obtain access to records or information

The fact that information and records are held by the Practice as listed in this Manual should not be construed as conferring upon any requester any right to that information or record. PAIA grants a requester access to records of a private body if the record is required for the exercise or protection of any right. If a public body lodges a request, the public body must be acting in the public interest. Access to records and information is not automatic. Any person, who would like to request access to any of the above records or information, is required to complete a request form (Form 2), which is available from reception, the Information and Deputy Information Officer of the Practice and the Information Regulator at the contact details stipulated above and on the website of the Practice.

The requester must provide sufficient detail on the request form to enable the Information or Deputy Information Officer to identify the record and the requester. The requester must identify the right he/she is seeking to exercise or protect and explain why the record is required for the exercise or protection of that right. If a request is made on behalf of another person, the requester must submit proof of the capacity in which the request is made to the satisfaction of the Information Officer. Access to the requested records or information or parts of the records or information may be refused in terms of the law. Requesters will be advised of the outcome of their requests.

14. Fees Payable to obtain the Requested Records or Information

Fees may be charged for requesting and accessing information and records held by the Practice. These fees are prescribed in terms of PAIA. Details of the fees payable may be obtained from reception or the Information or Deputy Information Officer. The fees are also available from the Information Regulator.

15. Availability of this Manual

A copy of this Manual is available for inspection, free of charge, at the Practice and on its website. A copy of the Manual may also be requested from the Information or Deputy Officer against payment of a fee as may be advised.