



Claro Clinic (Pty) Ltd

PAIA MANUAL

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

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TABLE OF CONTENTS

1. Acronyms and abbreviations
2. Purpose of PAIA manual
3. Key contact details for access to information
4. Guide on how to use PAIA and how to obtain access
5. Categories of records which are available without a person having to request access
6. Description of the records which are available in accordance with any other legislation
7. Description of the subjects on which the body holds records
8. Processing of personal information
9. Availability of the manual
10. Updating of the manual

1. LIST OF ACRONYMS AND ABBREVIATIONS

1.1	“CEO”	Chief Executive Officer;
1.2	“CFO”	Chief Financial Officer;
1.3	“COO”	Chief Operations Officer;
1.4	“DIO”	Deputy Information Officer;
1.5	“IO”	Information Officer;
1.6	“Minister”	Minister of Justice and Correctional Services;
1.7	“PAIA”	Promotion of Access to Information Act No. 2 of 2000 (as Amended);
1.8	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.9	“Regulator”	Information Regulator; and
1.10	“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 CLARO CLINIC (PTY) LTD

3.1. Chief Information Officer

Name:	Anton Russouw
Tel:	021 974 7699
Email:	anton@lifepathgroup.co.za

3.2. Deputy Information Officer

Name: Daniel Van Dalen
Tel: 021 974 7699
Email: daniel@lifepathgroup.co.za

3.3 Access to information general contacts

Email: info@claroclinic.co.za

3.4 National or Head Office

Postal Address:

PO Box 13241,
N1 City, 7463

Physical Address: Block B, Belvedere Office Park, Pasita St, Rosenpark, Cape Town, 7550, Western Cape

Telephone: 021 974 7699

Email: info@lifepathgroup.co.za

Website: www.lifepathgroup.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-

¹ Section 17(1) of PAIA- *For the purposes of PAIA, each public body must, subject to legislation governing the employment of personnel of the public body concerned, designate such number of persons as deputy information officers as are necessary to render the public body as accessible as reasonably possible for requesters of its records.*

² Section 56(a) of POPIA- *Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of POPIA.*

³ Section 11(1) of PAIA- *A requester must be given access to a record of a public body if that requester complies with all the procedural requirements in PAIA relating to a request for access to that record; and access to that record is not refused in terms of any ground for refusal contemplated in Chapter 4 of this Part.*

⁴ Section 50(1) of PAIA- *A requester must be given access to any record of a private body if-*

- a) *that record is required for the exercise or protection of any rights;*
- b) *that person complies with the procedural requirements in PAIA 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.*

- 4.3.6.1. an internal appeal;
- 4.3.6.2. a complaint to the Regulator; and
- 4.3.6.3. an application with a court against a decision by the information officer of a public body, a decision on internal appeal or a decision by the Regulator or a decision of the head of a private body;
- 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 92¹¹.

⁵ Section 14(1) of PAIA- The information officer of a public body must, in at least three official languages, make available a manual containing information listed in paragraph 4 above.

⁶ Section 51(1) of PAIA- The head of a private body must make available a manual containing the description of the information listed in paragraph 4 above.

⁷ Section 15(1) of PAIA- The information officer of a public body, must make available in the prescribed manner a description of the categories of records of the public body that are automatically available without a person having to request access

⁸ Section 52(1) of PAIA- The head of a private body may, on a voluntary basis, make available in the prescribed manner a description of the categories of records of the private body that are automatically available without a person having to request access

⁹ Section 22(1) of PAIA- The information officer of a public body to whom a request for access is made, must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹⁰ Section 54(1) of PAIA- The head of a private body to whom a request for access is made must by notice require the requester to pay the prescribed request fee (if any), before further processing the request.

¹¹ Section 92(1) of PAIA provides that –“The Minister may, by notice in the Gazette, make regulations regarding-

- (a) any matter which is required or permitted by this Act to be prescribed;
- (b) any matter relating to the fees contemplated in sections 22 and 54;
- (c) any notice required by this Act;
- (d) uniform criteria to be applied by the information officer of a public body when deciding which categories of records are to be made available in terms of section 15; and
- (e) any administrative or procedural matter necessary to give effect to the provisions of this Act.”

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://www.justice.gov.za/inforeg/>).

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

4.6.2. isiZulu

5. CATEGORIES OF RECORDS OF CLARO CLINIC (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Hospital & Facility Brochures	PDF info for each facility: location, services (e.g., general psychiatry, addiction, adolescent care), facilities, contact details.	X	X
Treatment Program Guides	PDF/text about e.g., mental health issues, adolescent care, psychogeriatrics, ECT, TMS, ketamine therapy, and substance abuse rehabilitation.	X	X
POPI Act Policy & Admission Forms	Privacy policy under POPI, admission forms, FAQs, complaints/compliments forms PDF.	X	X
Support Groups & Aftercare Info	Support group schedules (e.g., aftercare calendar) and family support details.	X	X

Vacancies & Careers	Job listings across facilities—career opportunities in clinical, nursing, admin, or support roles.	X	X
Helpline & General Contact Info	24/7 helpline number, email addresses, social media handles, facility phone/fax/email.	X	X
Accreditations & Licensing	Department of Health registration, medical aid scheme contracts, service provider status documentation.	X	X
Articles & Educational Materials	Blog articles, informational leaflets on mental health topics, press releases, CPD events (e.g., Soweto's Functional Neurological Disorder CPD).	X	X

6. DESCRIPTION OF THE RECORDS OF CLARO CLINIC (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000
POPIA Policy & Patient Consent Forms	Protection of Personal Information Act 4 of 2013
Employment Contracts, Payslips, UIF Records	Basic Conditions of Employment Act 75 of 1997 Labour Relations Act 66 of 1995 Unemployment Insurance Act 63 of 2001
Tax Records, VAT, PAYE	Income Tax Act 58 of 1962 Value-Added Tax Act 89 of 1991
Occupational Health & Safety Compliance	Occupational Health and Safety Act 85 of 1993
Nursing & Health Professional Licenses	Nursing Act 33 of 2005 Health Professions Act 56 of 1974
Medical Records, Patient Files, Admission Registers	National Health Act 61 of 2003 Mental Health Care Act 17 of 2002

Pharmacy & Medication Registers	Medicines and Related Substances Act 101 of 1965
BEE Certificate	Broad-Based Black Economic Empowerment Act 53 of 2003
COIDA Registration & Injury on Duty Records	Compensation for Occupational Injuries and Diseases Act 130 of 1993
Environmental Health Records	National Environmental Management Act 107 of 1998
CPD Event Records, Training Logs	Health Professions Act 56 of 1974 South African Qualifications Authority Act 58 of 1995
Financial Statements & Audit Reports	Companies Act 71 of 2008 Auditing Profession Act 26 of 2005
Public Liability & Indemnity Insurance Policies	Short-Term Insurance Act 53 of 1998
Disciplinary & Grievance Records	Labour Relations Act 66 of 1995
Procurement & Supplier Contracts	Preferential Procurement Policy Framework Act 5 of 2000

7. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY CLARO CLINIC (PTY) LTD

Subjects on which the body holds records	Categories of records
Strategic	- Strategic Plans - Business Proposals - Annual Reports - Marketing & Growth Strategy Documents
Human Resources (HR)	- HR Policies and Procedures - Recruitment Adverts and Interview Records - Employment Contracts - Employee Records - Disciplinary Records - Training & CPD Logs

Finance	- Annual Financial Statements - Budgets and Forecasts - Invoices and Receipts - Bank Statements - Audit Reports
Supply Chain Management (SCM) / Procurement	- Supplier Database - Purchase Orders - Service Level Agreements (SLAs) - Vendor Contracts and Quotations
Health and Clinical Services	- Nursing Treatment Notes - Admission and Discharge Registers - Treatment Plans - Diagnostic Reports - Other Mental Health Care Records
Legal and Compliance	- PAIA Manual - POPIA Policies - Insurance Policies - Licenses and Permits - Legal Correspondence - Regulatory Submissions
ICT and Data Management	- IT Policies - Email Usage Logs - System Access Control Lists - Backup Records - Data Breach Logs
Facilities and Operations	- Maintenance Schedules - Occupational Health and Safety Reports - Fire Safety Certificates - Equipment Register
Pharmacy and Medication Control	- Schedule Drug Registers - Prescription Records - Stock Control Records - Destruction / Disposal Certificates
Marketing and Communications	- Website Content - Social Media Communications - Community Engagement Materials
Quality Assurance and Risk Management	- Incident Reports - Patient Feedback Logs - Complaints & Compliments Records - Risk Register - Quality Improvement Plans

Training and Development	- CPD Attendance Records - Training Schedules - Internal Training Records - Certificates of Completion
Board and Governance	- Board Meeting Minutes - Resolutions - Director Declarations - Share Register

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Claro Clinic (Pty) Ltd processes personal information for the following purposes:

- To admit, treat, and manage patients within its network of mental healthcare facilities
- To comply with obligations under healthcare legislation (e.g. Mental Health Care Act, National Health Act)
- To communicate with patients, healthcare providers, employees, suppliers, and regulatory bodies
- For human resource management including recruitment, employment and payroll processing
- For medical aid billing and payment processing
- To assess and verify qualifications and background checks of employees or contractors
- For legal, audit, and compliance purposes
- For marketing and stakeholder engagement (with consent, where applicable)

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
Patients	Full name, ID/passport number, contact details, medical aid information, medical history, diagnosis, treatment notes, admission records, discharge reports, mental health assessments

Employees	Name, ID number, contact details, residential address, qualifications, criminal and credit history, gender, race, employment records, banking details
Service Providers / Contractors	Company name, registration number, VAT number, contact person, contact details, trade references, B-BBEE status, bank account details
Healthcare Practitioners	Name, ID number, contact details, Professional Registration Number (HPCSA), specialisation, qualifications, Malpractice cover, CPD records
Job Applicants	Name, ID number, CV, employment history, qualifications, references, criminal/credit checks (where applicable)
Patient Family Members / Next of Kin	Name, relationship to patient, contact number, address (for emergency or consent purposes)
Website Visitors / Social Media Users	Feedback or message contents if submitted

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
ID numbers and names (for criminal checks)	South African Police Service (SAPS)
Qualifications (for verification)	South African Qualifications Authority (SAQA)
Medical aid and treatment information	Medical Schemes / Administrators (e.g. Discovery, Bonitas)
Patient records (limited, as permitted)	Referring Doctors / External Specialists (with consent)
Salary and tax information	South African Revenue Service (SARS)
Employment records and UIF details	Department of Employment and Labour

Contact details for marketing (if opted-in)	Direct Marketing Service Providers (with data subject consent)
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8.4 Planned transborder flows of personal information

Claro Clinic (Pty) Ltd may transfer or store personal information outside of the Republic of South Africa in the following instances:

- Cloud-based storage and backup services (e.g. Microsoft 365, Google Cloud, or equivalent providers), which may store data in countries such as Ireland, Netherlands, United States, or the United Kingdom
- Third-party processors (e.g. email service providers, practice management platforms) where infrastructure is hosted outside South Africa

Only service providers that comply with data protection laws comparable to POPIA or are bound by contractual clauses ensuring adequate protection are used.

Categories of personal information transferred:

- Employee and patient contact information
- Health records (with encryption)
- Operational and Financial records

8.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information

Claro Clinic (Pty) Ltd implements the following safeguards to ensure the confidentiality, integrity, and availability of personal information:

- Access Control: Role-based access to systems and physical files
- Data Encryption: At rest and in transit (e.g. SSL/TLS, encrypted storage devices)
- Firewall and Network Security: Use of firewalls, intrusion detection/prevention systems
- Endpoint Security: Antivirus and anti-malware software on all endpoints
- User Authentication: Secure passwords and, where applicable, multi-factor authentication
- Backups: Regular encrypted backups stored securely offsite/cloud
- Staff Training: Regular POPIA awareness training and confidentiality agreements
- Secure Disposal: Shredding of physical documents; secure deletion of digital data

- Audit Trails: Logging and monitoring of access to sensitive systems
- Third-party contracts: Service level agreements ensuring POPIA compliance for vendors and service providers

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

- 9.1.1 on the Life Path Health website: www.lifepathgroup.co.za;
- 9.1.2 at the offices of Claro Clinic (Pty) Ltd, free of charge during normal business hours; and
- 9.1.3 from the Information Regulator upon request.

9.2 A fee for a copy of the Manual, as contemplated in annexure B of the Regulations, shall be payable per each A4-size photocopy made.

10. UPDATING OF THE MANUAL

The Information Officer of Life Path Health (Pty) Ltd will on a regular basis update this manual.

Issued by

Daniel Van Dalen
Financial Director