

PAIA MANUAL

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

**DATE OF COMPILATION: 29/06/2026
DATE OF REVISION: 29/06/2026**

1. INTRODUCTION

This manual explains the types of records maintained by the practice and outlines the process for requesting access to those records in accordance with the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) ("PAIA"). It also describes the circumstances under which information may be disclosed, subject to applicable legislation.

The current version of this manual is available on the practice's website at www.counsellingbybianca.com. It may be reviewed and amended periodically to reflect changes in the practice's operations or updates to applicable legislation, regulations, and professional standards.

The practice is committed to protecting the confidentiality and privacy of all personal information entrusted to it. Its policies and procedures relating to the collection, use, storage, and disclosure of information are guided by PAIA and other applicable South African legislation, including, where relevant, the Consumer Protection Act, 2008 (Act No. 68 of 2008), the Debt Collectors Act, 1998 (Act No. 114 of 1998), the Health Professions Act, 1974 (Act No. 56 of 1974), the Medical Schemes Act, 1998 (Act No. 131 of 1998), the Mental Health Care Act, 2002 (Act No. 17 of 2002), the National Health Act, 2003 (Act No. 61 of 2003), and the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) ("POPIA"). The practice also complies with the ethical standards and professional guidelines issued by the Health Professions Council of South Africa (HPCSA).

This manual is governed by the laws of the Republic of South Africa. Should any provision be found to be invalid, unlawful, or unenforceable, that provision shall be interpreted or enforced to the fullest extent permitted by law so as to give effect to its intended purpose. The remaining provisions shall continue to apply and remain fully effective. Headings and section titles are included for ease of reference only and do not affect the interpretation or legal effect of this manual.

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

2.1 check the categories of records held by the practice 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 practice, by providing a description of the subjects on which the practice holds records and the categories of records held on each subject;
- 2.3 know the description of the records of the practice which are available in accordance with any other legislation;
- 2.4 access all the relevant contact details of the 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 whether the practice 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 OF BIANCA KITCHING

3.1. Chief Information Officer

Name: Bianca Kitching
Tel: 074 202 9518
Email: kitchingbianca@gmail.com
Website: www.counsellingbybianca.com
Practice Address: 97 Protea Road, Protea Heights, Brackenfell, 7560

3.3 Access to information general contacts

Email: kitchingbianca@gmail.com

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

- 4.1. The Information 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 provides information on:

- 4.2.1. The purpose and objectives of PAIA and POPIA.
- 4.2.2. How to submit a request for access to information.
- 4.2.3. The prescribed forms, applicable fees, and procedures for requesting information.
- 4.2.4. Circumstances under which access to information may be refused.
- 4.2.5. The remedies available where a request for access to information has been declined.

4.3. A copy of the PAIA Guide can be obtained directly from the Information Regulator using the following contact details:

- 4.3.1. Website: <https://inforegulator.org.za/>
- 4.3.2. Telephone: 010 023 5200
- 4.3.3. Email: enquiries@inforegulator.org.za

5. CATEGORIES OF RECORDS OF THE PRACTICE OF BIANCA KITCHING WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

- 5.1.1 Records that are publicly accessible, including those made available on the Bianca Kitching website, may be obtained without submitting a formal request for access.
- 5.1.2 Other records that are not subject to confidentiality restrictions may likewise be accessed without a formal application. Access to these records is subject to prior arrangement with the Information Officer, and an appointment must be scheduled before inspection.

6. DESCRIPTION OF THE RECORDS OF THE PRACTICE OF BIANCA KITCHING ARE AVAILABLE ONLY ON REQUEST IN ACCORDANCE WITH PAIA AND OTHER LEGISLATION

Subjects on which the practice holds records	Categories of records
Practice Records	<ul style="list-style-type: none"> - Practice policies - Practice registrations
Financial Records	<ul style="list-style-type: none"> - Bank statements - Banking details - Tax returns - Insurance & indemnity policies
Client Records	<ul style="list-style-type: none"> - Intake and Consent forms - Correspondence - Referral communication - Session and process notes - Progress reports

7. PROCESSING OF PERSONAL INFORMATION

7.1 Purpose of Processing Personal Information

Personal information is collected and processed for the purpose of delivering professional, ethical, and effective psychological and counselling services. This includes communicating with clients regarding appointments and treatment progress, scheduling and managing consultations, maintaining accurate, secure, and confidential client records, complying with applicable legal and regulatory requirements, and meeting the reporting obligations of relevant professional bodies and referring healthcare practitioners.

7.2 Description of the personal information that the practice collects

The practice collects only personal information that it is legally authorised to obtain. This information may include, but is not limited to:

Categories of Data Subjects	Personal Information that may be processed
Client Information	Name, contact and personal information, client intake, medical aid information, emergency contact name and contact details
Practice Correspondence	Booking records, attendance, and communications with practice, emails, and other practice correspondence
Counselling Notes	Session progress and process notes, progress notes and other information voluntarily provided by the client as part of the therapeutic process
Accounting Information	Client invoices and statement, proof of payments

7.3 Practice policies on the manner of collecting and using personal information

- 7.3.1 The collection and processing of personal information are essential to the effective delivery of counselling services.
- 7.3.2 The practice is dedicated to collecting only the personal information that is necessary, relevant, and obtained with the client's knowledge and consent.
- 7.3.3 Personal information is primarily gathered directly from clients through completed intake and consent forms, information disclosed during counselling sessions, and any other details that clients choose to provide voluntarily. Where appropriate, and only with the client's explicit consent or where permitted by applicable legislation, relevant information may also be obtained from authorised third parties, such as a referring healthcare practitioner, psychologist, or medical doctor.
- 7.3.4 From time to time, the practice may use fully anonymised and de-identified information for purposes such as professional supervision, clinical consultation, research, quality assurance, practice audits, or service evaluations. No information that could reasonably identify a client

will be disclosed in these circumstances. Where the practice is legally required to process or disclose personal information for any additional purpose, this will only occur in accordance with applicable laws and after implementing appropriate technical and organisational safeguards to protect the privacy and rights of clients.

7.4 Disclosure of personal information to 3rd parties

Under specific and clearly defined conditions, the practice may be legally required to disclose personal information or may be entitled to do so without obtaining the client's consent.

- 7.4.1 The practice must share personal information when there is a reasonable belief that a client poses a risk of harm to themselves or others, when a child or vulnerable adult requires safeguarding, or when disclosure is compelled by a court order.
- 7.4.2 All invoices submitted to medical aid providers must include the appropriate ICD-10 code.
- 7.4.3 In the event of non-payment, relevant credit information may be shared with credit bureaus or legal representatives. The practice may also be required to provide necessary information to assist medical schemes in preventing or investigating fraudulent activity.
- 7.4.4 In the case of deceased clients, information may be disclosed with the written permission of the executor of the estate or the deceased client's next of kin.
- 7.4.5 The practice reserves the right to disclose appropriate information when necessary to safeguard its legal rights, assets, or operations.
- 7.4.6 Where external parties are engaged (such as auditors or IT service providers or practice management software) and may have access to personal data in the course of their duties, the practice will take reasonable steps to ensure confidentiality and data security. This includes entering into confidentiality agreements and prioritising providers with

established data protection standards.

7.5 General description of Information Security Measures to be implemented by the practice of Bianca Kitching to ensure the confidentiality, integrity and availability of the information

- 7.5.1 The practice retains personal information for as long as it is legally required. In accordance with the requirements of the Health Professions Council of South Africa.
- 7.5.2 To safeguard stored information, the practice implements a range of security measures, including password-protected electronic devices, regularly updated security software, and the secure, locked storage of physical client files. These protections are routinely assessed and enhanced to reduce the risk of unauthorised access, accidental loss, disclosure, or destruction of personal data.
- 7.5.3 The practice website is protected using HTTPS and an SSL certificate, and ongoing steps are taken to maintain and monitor the security of the site.
- 7.5.4 Any physical documents containing personal or sensitive information that are no longer required are disposed of in a secure manner to ensure confidentiality is maintained.
- 7.5.5 Access to records may be limited in accordance with the refusal grounds outlined in this PAIA manual. In particular, where records are considered confidential to a third party, consent from that third party will be required, in addition to the standard requirements, before Bianca Kitching can consider granting access.

8. Process to request information in accordance with PAIA

- 8.1 A requester must follow all procedural requirements set out in the Promotion of Access to Information Act (PAIA) when applying for access to records.

- 8.1.1 The requester is required to complete the prescribed Form C (available at <https://info regulator.org.za/>) and submit it to the Information Officer. The completed form, together with the applicable request and reproduction of copies fee schedule, must be sent to the Information Officer via the physical, or email address provided in this document. Form C and the prescribed fee schedule are available on the Information Regulator's website, or may alternatively be requested from the Information Officer of the practice. The form must be completed with sufficient detail to enable the Information Officer to identify both the requested record(s) and the requester.
- 8.1.2 The requester must specify the preferred method of access and provide a postal address within South Africa for correspondence.
- 8.1.3 The requester is required to indicate that the information is sought in order to exercise or protect a legal right, and must clearly describe the nature of that right, including why access to the record is necessary for its exercise or protection.
- 8.1.4 The Information Officer will respond to the request within 30 days, unless exceptional circumstances are provided by the requester and accepted by the Information Officer, justifying a deviation from this timeframe.
- 8.1.5 The requester will be informed in writing whether access has been granted or refused. Where further reasons for the decision are required, the requester must specify the format and details of such a request.
- 8.1.6 Where a request is made on behalf of another person, proof of authority to act on that person's behalf must be provided to the reasonable satisfaction of the Information Officer.
- 8.1.7 The requester is required to pay the applicable fee before the processing of the request can proceed further.
- 8.1.8 The stipulated timeframes for responding will begin only once the requester has submitted all required and relevant information.
- 8.1.9 Where feasible, the Information Officer may sever a record and provide

access solely to the portion requested that is not legally restricted from disclosure.

- 8.1.10 Each request for information will be evaluated individually on its own merits and in accordance with the relevant laws and legal principles.

9. Grounds for Refusal of Access to Personal Information

9.1 The practice of Bianca Kitching may decline a request for access to information under the following circumstances:

- 9.1.1 Protection of privacy under the Protection of Personal Information Act 4 of 2013, including personal data of individuals, deceased persons, or organisations.
- 9.1.2 Safeguarding confidential or commercially sensitive information, such as trade secrets, financial or technical data, or information shared in confidence that could harm a third party's interests or competitiveness.
- 9.1.3 Protection of confidential information covered by agreements.
- 9.1.4 Protection of individual safety and security of property.
- 9.1.5 Preservation of legally privileged information.
- 9.1.6 The information constitutes the organisation's own confidential or proprietary material, including trade secrets, software, or commercially sensitive data.
- 9.1.7 Disclosure could negatively affect business negotiations or competitive position.
- 9.1.8 Research data must be protected where disclosure could identify parties involved or compromise the research.
- 9.1.9 If a record cannot be found or does not exist, the Information Officer must formally confirm this in writing, which is treated as a refusal under the Act.

10. AVAILABILITY OF THE MANUAL

10.1 A copy of the Manual is available-

10.1.1 on www.counsellingbybianca.com, for public inspection during normal business hours;

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

10.1.3 to the Information Regulator upon request.

10.2 A fee for a copy of the Manual shall be payable per each A4-size photocopy made.

11. UPDATING OF THE MANUAL

The head of the practice of Bianca Kitching will on a regular basis update this manual.

Issued by

Bianca Kitching
Practice Owner