PAIA MANUAL

Prepared in terms of section 14 of the Promotion of Access to Information Act 2 of 2000 (as amended)

DATE OF COMPILATION: 03/09/2025
DATE OF REVISION: 29-09-2025

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1. LIST OF ACRONYMS AND ABBREVIATIONS

NB: please insert relevant acronyms and abbreviations

1.1	**"CEO"**	Chief Executive Officer
1.2	**"DIO"**	Deputy Information Officer;
1.3	**"IO"**	Information Officer;
1.4	**"Minister"**	Minister of Justice and Correctional Services;
1.5	**"PAIA"**	Promotion of Access to Information Act No. 2 of 2000(as Amended;
1.6	**"PFMA"**	Public Finance Management Act No.1 of 1999 as Amended;
1.7	**"POPIA"**	Protection of Personal Information Act No.4 of 2013;
1.8	**"Regulator"**	Information Regulator.

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

2.1 check the nature of the records which may already be available at, without the need for submitting a formal PAIA request; iCAN Independent Connected Audiology Network

2.2 have an understanding of how to make a request for access to a record of the iCAN Independent Connected Audiology Network;

2.3 access all the relevant contact details of the persons who will assist the public with the records they intend to access;

2.4 know all the remedies available from the iCAN Independent Connected Audiology Network regarding request for access to the records, before approaching the Regulator or the Courts;

2.5 the description of the services available to members of the public from iCAN Independent Connected Audiology Network and how to gain access to those services;

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

2.7 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;

2.8 know if the iCAN Independent Connected Audiology Network 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

2.9 know whether the iCAN Independent Connected Audiology Network has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. ESTABLISHMENT OF THE iCAN Independent Connected Audiology Network

The company is a Non-Profit company without member which was established on 13 March 2024.

3.1. Objectives/Mandate

The company's objective is Community Health Care Services.

4. STRUCTURE OF THE iCAN Independent Connected Audiology Network AND FUNCTIONS

4.1. Structure

Directors:

Natalie Peta Buttress

Gideon Pieter Ceronio

Tanya Heather Hanekom

Kara Hailey Hoffman

Administrator:

Bev Scott

4.2 Functions

Community Health Care Services

5. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE iCAN Independent Connected Audiology Network

5.1. Chief Information Officer

Name:	Kara Hailey Hoffman
Tel:	031-2081014
Email:	kara@ican.org.za
Fax number:	n/a

5.2 Access to information general contacts

Email:	info@ican.org.za

5.3 National / Head Office

Postal Address:	5 Vickers Place, Durban North, 4051

Physical Address:	5 Vickers Place, Durban North, 4051
Telephone:	072 860 6352
Email:	info@ican.org.za
Website:	www.independentaudiologists.co.za

6. DESCRIPTION OF ALL REMEDIES AVAILABLE IN RESPECT OF AN ACT OR A FAILURE TO ACT BY THE iCAN Independent Connected Audiology Network

a) process for complaining to the Information Regulator or any regulatory body; and/or

b) process for approaching the Court with jurisdiction for appropriate relief.

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

7.1. The Regulator has, in terms of section 10(1) of PAIA, 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.

7.2. The Guide is available in each of the official languages.

7.3. The aforesaid Guide contains the description of-

7.3.1. the objects of PAIA and POPIA;

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

7.3.2.1. the Information Officer of every public body, and

7.3.2.2. every Deputy Information Officer of every public and private body designated in terms of section 17(1) of PAIA[1] and section 56 of POPIA[2];

7.3.3. the manner and form of a request for-

7.3.3.1. access to a record of a public body contemplated in section 11[3]; and

7.3.3.2. access to a record of a private body contemplated in section 50[4];

7.3.4. the assistance available from the Information Officer of a public body in terms of PAIA and POPIA;

7.3.5. the assistance available from the Regulator in terms of PAIA and POPIA;

7.3.6. 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-

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[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.

7.3.6.1. a complaint to the Regulator; and

7.3.6.2. 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;

7.3.7. the provisions of sections 14[5] and 51[6] requiring a public body and private body, respectively, to compile a manual, and how to obtain access to a manual;

7.3.8. the provisions of sections 15[7] and 52[8] providing for the voluntary disclosure of categories of records by a public body and private body, respectively;

7.3.9. the notices issued in terms of sections 22[9] and 54[10] regarding fees to be paid in relation to requests for access; and

7.3.10. the regulations made in terms of section 92[11].

7.4. Members of the public can inspect or make copies of the Guide from the offices of the public or private bodies, including the office of the Regulator, during normal working hours. The Guide can also be obtained-

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[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."

7.4.1. upon request to the Information Officer;

7.4.2. from the website of the Regulator (https://www.justice.gov.za/inforeg/).

8. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD BY THE iCAN Independent Connected Audiology Network

Subjects on which the body holds records	Categories of records held on each subject
Strategic Documents, Plans, Proposals	Annual Reports, Strategic Plan, Annual Performance Plan.
Human Resources	- HR policies and procedures; - Advertised posts; - Employees records; - Learning and development e.g.: skills development and training plans - Employment equity plan and statistics
Medical and Health Records	- Biographical Data; - Medical Data; - Medical History
Corporate Governance and Statutory Records	- Company Secretarial Records - Statutory Filings - Policies and Procedures
Financial Records	- Accounting Records - Tax Records - Banking Records - Audit Records

Client and Customer Records	- Biographical Data - Contracts and Agreements - Correspondence - Transaction Records
Supplier and Service Provider Records	- Biographical Data - Contracts and Agreements - Financial Records
Property and Asset Records	- Immovable Property - Movable Assets - Maintenance Records
Information Technology Records	- Hardware and Software - System Records - Policies
Marketing and Communication Records	- Promotional Material - Client Communications - Surveys and Feedback
Legal Records	- Contracts and Agreements - Litigation Records - Regulatory Compliance

Operational Records	- Policies and Procedures - Strategic Plans - Project Records

9. CATEGORIES OF RECORDS OF THE iCAN Independent Connected Audiology Network WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

NB: Please specify the categories of records of the body which are available without a person having to request access in terms of this Act, type of document and how the document can be accessed. These are mostly records that maybe available on the website and a person may just download or request telephonically or by sending an email or a letter. Below is the template that can be used.

Category	**Document Type**	Available on Website	Available upon request
Tender document	- Advertised tender - Name of successful bidder	X	
Legislation /Regulations	-		
Strategic Documents (Plans and Report)	- Organisational profile (Overview, Objectives, Functions, Architecture) - Annual Reports; - Strategic Plan; - Annual Performance Plan; - Strategic and Performance Plans;	X	
Company Information	- Company name, registration Number and registered office - Names of directors and auditors - Memorandum of Incorporation - Broad company profile	x	
Statutory/Public Records	- CIPC registration documents Available on public records - Vat and tax registration Number - B-BBEE certificate or affidavit	x	

Financial Information	- Annual financial statements, If required by law to be published - Public auditor's reports (where Applicable)	x	
Policies and Manuals	- This PAIA Manual - POPIA (Protection of Personal Information Act) Privacy Notice - Code of Conduct/Ethics Policy	x	
Marketing and Communication	- Company brochures, newsletters, and marketing material - Information on services offered (audiology services) - Pricing structures (if published) - Company website content and official social media platforms	x	
Employment/HR Information (General)	- Employment Equity reports (if applicable and submitted to the Department of Labour) - Skills Development reports (summary level, not personal data)	x	

Public Announcements	- Press releases and public statements - Notices of annual general meetings (where applicable to shareholders) - Published tenders or procurement opportunities	x	

10. SERVICES AVAILABLE TO MEMBERS OF THE PUBLIC FROM THE iCAN Independent Connected Audiology Network AND HOW TO GAIN ACCESS TO THOSE SERVICES

10.1 Powers, duties and function

The public can gain access to our website www.ican.org.za for information or email admin@ican.org.za for queries or visit our consulting rooms.

11. PUBLIC INVOLVEMENT IN THE FORMULATION OF POLICY OR THE EXERCISE OF POWERS OR PERFORMANCE OF DUTIES BY iCAN Independent Connected Audiology Network

As a private healthcare provider, this audiology practice does not typically formulate public policy or exercise public powers in the same manner as public bodies. However, it recognises the importance of patient and public input in service quality and clinical practices. The following opportunities exist for involvement:

- **Patient Feedback Mechanisms**
  Patients are encouraged to provide feedback regarding the services received. This feedback is reviewed regularly and may inform internal policies relating to patient care, appointment systems, and accessibility of services.
- **Complaints and Suggestions**
  Any member of the public may lodge a complaint or suggestion relating to the services provided. These are reviewed by the management team, and changes to practice protocols or procedures may be implemented where appropriate.
- **Community Outreach and Public Health Education**
  The practice may engage with the community through outreach programs or public awareness campaigns on hearing health. These programs often incorporate community input to align with local needs.
- **Collaboration with Professional Bodies**
  The practice may contribute to the development of audiology standards and guidelines through participation in forums or professional associations (e.g., the South African Association of Audiologists), where collective input influences national or provincial healthcare policies.

12. PROCESSING OF PERSONAL INFORMATION

12.1 Purpose of Processing

The company processes personal information for the following purposes, in line with its functions as a marketing services provider to audiology businesses:

- Clients (Audiology Practices and Professionals)
  - Owners, partners, directors, and employees of audiology practices
- Patients (of Audiology Practices, where Information is lawfully provided)
  - Individuals responding to marketing campaigns (prospective of existing patients)
- Suppliers and Service Providers
  - Businesses and individuals providing goods and services to the company
- Employees and Job Applications
  - Current and former staff members, as well as prospective employees
- Regulatory Authorities and Professional Bodies
  - Where information is required by law, compliance, or industry standards

12.2 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
Clients (Audiology Practices)	• Contact details (names, addresses, phone numbers, email addresses) • Business registration details, VAT/tax number • Marketing content, branding, and promotional material • Billing and payment records
Patients (End-Consumers of Clients)	• Contact details (name, email, phone, address) where provided for campaigns • Demographic information (age, location, hearing-related interests/preferences) • Consent records for marketing communications • Responses to surveys, newsletters, and promotional campaigns

Suppliers and Service Providers	• Company names, contact details, banking details for payment • Contractual information and correspondence
Employees and Job Applicants	• Biographical data (names, contact details, ID numbers) • Employment history, CVs, qualifications, references • Payroll data (banking details, remuneration, tax numbers, UIF, pension) • Performance management records, disciplinary records • Health data (only where legally required, e.g. occupational health
Regulatory and Statutory	• Information necessary for SARS, CIPC, Department of Labour, or Industry compliances • Records of statutory returns, compliance reports

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

- To provide marketing services to audiology practices (designing, implementing, and managing campaigns)
- To communicate with clients, suppliers, and stakeholders
- To invoice and process payments
- To recruit, manage, and administer employees and contractors
- To comply with legal and regulatory obligations
- To manage and improve client relationships
- To conduct research, surveys, and market analysis
- To maintain records for audit, tax, and risk management purposes
- To carry out internal administrative and operational functions

Category of personal information	**Recipients or Categories of Recipients**
Biographical Data (names, ID numbers, contact details, demographic info)	Internal company staff (HR, Payroll, admin), Clients Information Regulator and Statutory authorities
Employment records (contracts, performance records, leave, disciplinary records)	Internal HR and management, SARS and Department of Labour, Pension/Provident fund administrators
Payroll and Remuneration Data (bank details, tax numbers, salary info)	SARS, UIF, Medical aid providers, Company auditors
Medical/Health Data (occupational health, sick leave certificate, injury on duty reports)	Internal HR, Medical aid administrators, Compensation Fund, Occupational Health practitioners
Client information (practice names, contact details, Vat numbers, marketing content)	Internal staff, External IT/marketing service providers, SARS, Auditors
Supplier/Service Provider Data	SARS, Company auditors, Internal finance team
Financial and Accounting Records	Internal finance staff, SARS, CIPC, Banks
Corporate Governance Records (MOI, minutes, share registers, shareholder agreements)	Directors, Shareholders, CIPC, Auditors, Legal advisors
IT and Sytems Data (username, access logs, software licenses)	External IT support, Internal IT team, Regulators, Cybersecurity consultants
Marketing and Communications Data	Internal marketing staff, Clients, External design, pringing, email service providers, General public

Legal Records (contractd, litigation files, compliance records)	Internal management, External legal advisors, Courts and tribunals, Regulators (SARS, CIPC)

12.4 **Planned transborder flows of personal information**

No transborder of flows of perefonal information are taking place.

12.5 **General Description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity and availability of the information**

The company is committed to ensuring the confidentiality, integrity and availability of all personal information in its possession or under its control. In order to achieve this, the following broad information security measures are implemented:

Organisational and Administrative Safeguards

- Access to personal information is restricted to authorised staff who require such access to perform their duties.
- Staff members are bound by confidentiality agreements and trained on data protection and POPIA compliance.
- Policies and procedures are implemented for information governance, retention, and secure disposal of records.
- A “need-to-know” principle applies to limit unnecessary exposure of personal data.

Physical Safeguards

- Company premises are secured by controlled access (keys, alarms, or access control systems).
- Paper records are stored in lockable filing cabinets or secure storage areas.
- Visitor access to the premises is restricted and monitored.

Technical Safeguards

- IT systems are protected by password controls, firewalls, anti-virus software, and encryption where appropriate.
- Regular data backups are performed to ensure business continuity and availability of records.
- User access to systems is role-based and reviewed periodically.
- Security patches and updates are applied to software and operating systems to mitigate risks.

Monitoring and Incident Response

- Data access and usage is monitored to detect unauthorised activities.
- An incident response plan exists to address breaches or suspected breaches of personal information.
- Where applicable, breaches will be reported to the Information Regulator and affected data subjects in line with POPIA requirements.

Third-Party and Outsourced Service Providers

- Contracts with third-party service providers (e.g. IT, cloud, marketing platforms) include obligations to maintain adequate security measures.
- Service providers are assessed for compliance with POPIA and related security standards.

13. AVAILABILITY OF THE MANUAL

13.1 This Manual is made available in the following three official languages-

13.1.1 English;

13.1.2 Afrikaans

13.1.3 Zulu

13.2 A copy of this Manual or the updated version thereof, is also available as follows-

13.2.1 on www.independentaudiologists.co.za, if any, of the public body;

13.2.2 at the head office of the public body for public inspection during normal business hours;

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

13.2.4 to the Information Regulator upon request.

13.3 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.

14. UPDATING OF THE MANUAL

The iCAN Independent Connected Audiology Network will, if necessary, update and publish this Manual annually.

Issued by

Kara Hailey Hoffman

Director