



REG NO.: 2022/773267/21

PAIA MANUAL

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

DATE OF COMPILATION: 30/06/2025

INTRODUCTION

1. LIST OF 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	“POPIA”	Protection of Personal Information Act No.4 of 2013;
1.7	“Regulator”	Information Regulator; and
1.8	“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 M&D RADIOLOGY INCORPORATED

3.1. Chief Information Officer

Name:	Martin Vermaak
Tel:	(011) 075 8980/8988
Email:	operations@manddhoedspruit.co.za
Fax number:	N/A

3.2. Deputy Information Officer

Name: Garth Heymans
Tel: (011) 593 4499
Email: garth@jsh.co.za
Fax Number: N/A

3.3 Access to information general contacts

Email: N/A

3.4 **National or Head Office**

Postal Address: 219 Beyers Naude Drive
North Cliff
Randburg
2195

Physical Address: 219 Beyers Naude Drive
North Cliff
Randburg
2195

Telephone: (011) 0758980/8988

Email: operations@manddhoedspruit.co.za

Website: www.manddradiology.co.za

Nature of Business: Radiology

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

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.*

- 4.3.3.2. 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-
 - 4.3.6.1. 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 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.

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.

- 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.
- 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 and Afrikaans

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.”

4.7 If a request for access to information is denied, the requester may:

- Lodge a complaint with the Information Regulator using the prescribed form available at <https://www.justice.gov.za/inforeg/>.
- Approach a competent court for appropriate relief.

There is no internal appeal process for private bodies. A requester must rely on external remedies if dissatisfied with a response.

5. CATEGORIES OF RECORDS OF M & D RADIOLOGY INC WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record
Digital Infrastructure records	Website
Advertising	Brochures

VOLUNTARY DISCLOSURE OF RECORDS

At this stage, no notice has been submitted to the Minister in terms of section 52(2) of PAIA regarding the voluntary disclosure of categories of records. Accordingly, no categories of records have been voluntarily disclosed.

5. DESCRIPTION OF THE RECORDS M & D RADIOLOGY INC WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of Incorporation (MOI), share registers (if applicable), resolutions, director details, annual returns	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

Patient medical records, health screening forms, informed consent forms, treatment histories	National Health Act, 2003
Practitioner registration details, proof of compliance with HPCSA requirements, CPD records	Health Professions Act, 1974
Consent forms and medical records for child patients, parental/guardian documentation	Children's Act, 2005
Employee contracts, leave records, payslips, working hours logs	Basic Conditions of Employment Act, 1997
Disciplinary records, grievance proceedings, CCMA correspondence (if any)	Labour Relations Act, 1995
Employment equity plans and reports, demographic breakdowns, internal audits	Employment Equity Act, 1998
Injury-on-duty records, claims submitted to Compensation Commissioner	Compensation for Occupational Injuries and Diseases Act, 1993
Health and safety protocols, incident reports, PPE checklists, staff training logs	Occupational Health and Safety Act, 1993
Tax clearance certificates, IRP5s, PAYE records, VAT submissions	Income Tax Act, 1962
Consent forms, privacy notices, data processing agreements, security policies	Protection of Personal Information Act, 2013 (POPIA)

6. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY THE M & D RADIOLOGY INC

Subjects on which the body holds records	Categories of records
Human Resources	- HR policies and procedures

Subjects on which the body holds records	Categories of records
	<ul style="list-style-type: none"> - Advertised posts - Employees records
Medical Records	<ul style="list-style-type: none"> - Medical Health Records - Medical Aid Records

8. PROCESSING OF PERSONAL INFORMATION

8.1 Purpose of Processing Personal Information

Personal information is collected and stored in terms of facilitating the conduct execution and nature of the business.

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	Name, address, identity numbers, employment status and bank details.
Employees	Address, qualifications, gender and race
Emergency Contacts	Name, relationship, Contact details, consent of use
Supplier/Service Providers	Business contact information, bank details, Tax compliance, Contractual agreements
Medical Aid Schemes and Insurers	Personal data of the representative individual
Regulators	Personal data of the representative individual
Visitors	Name, contact details, identity numbers, CCTV Footage and health screening information

Legal Grounds for Processing

Processing of personal information is conducted in accordance with Section 11 of POPIA, which allows such processing if:

- the data subject or a competent person consents;
- processing is necessary to carry out actions for the performance of a contract;
- processing complies with an obligation imposed by law;
- processing protects a legitimate interest of the data subject;
- processing is necessary for pursuing the legitimate interests of M & D Radiology Inc or a third party to whom the information is supplied.

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/Staff Health Information, compliance and screening records	Department of Health Inspectors
Identity, Membership, Medical, Billing	Medical Aid Schemes or Insurers
Identification, History, Treatment and Referral	Other Healthcare Providers

Cross-Border Transfer of Personal Information

Where necessary, personal information may be transferred outside the Republic of South Africa. Such transfers will only occur in compliance with Section 72 of POPIA and will be limited to countries that provide an adequate level of protection, or where appropriate safeguards (such as binding corporate rules or contractual clauses) are in place.

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

M & D Radiology Inc implements a range of security safeguards to protect personal information, including:

- Firewalls, anti-virus and anti-malware solutions;
- Encrypted electronic records;
- User access controls and password protections;
- Secure offsite backups;
- CCTV storage in secure locations;
- Staff training on data privacy and safe handling procedures;
- Role-based access and logging of system activity.

9. AVAILABILITY OF THE MANUAL

9.1 A copy of the Manual is available-

9.1.1 on www.manddradiology.co.za

9.1.2 head office of M & D Radiology Inc. for public inspection during normal business hours;

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

9.1.4 to 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. PROCEDURE FOR REQUESTING ACCESS TO RECORDS

A person who wants access to a record held by M & D Radiology Inc must complete the prescribed PAIA Form 2 (available from the Information Regulator's website) and submit it to the Information Officer by hand, post, or email.

Fees:

- A request fee may be charged (R140).
- Additional access fees may apply depending on the request.

The requester will be notified within 30 days whether the request has been approved. Further information about fees can be found in Annexure B of the PAIA Regulations.

Form 2 and fee details are available at: <https://www.justice.gov.za/inforeg/>

11. UPDATING OF THE MANUAL

The head of the M & D Radiology Inc. will on a regular basis update this manual.

Issued by

A handwritten signature in black ink, appearing to be 'M. Vermaak', written over a horizontal line.

Martin Vermaak

Operations Manager