

VERTEBRA CHIROPRACTIC

PAIA MANUAL

Prepared in accordance with Section 51 of the Promotion of Access to Information Act, 2000

Practice	Vertebra Chiropractic
Practitioner / Information Officer	Dr Sonia Bowers
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Private Body / Sole Practitioner Healthcare Practice

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1. Introduction

The Promotion of Access to Information Act, 2000 (PAIA) gives effect to the constitutional right of access to information. This Manual has been prepared in accordance with Section 51 of PAIA and describes the records held by Vertebra Chiropractic and the procedure to be followed when requesting access to those records.

Vertebra Chiropractic is a private chiropractic healthcare practice operated by Dr Sonia Bowers as a sole practitioner. The Practice provides chiropractic assessment, diagnosis, treatment and related healthcare services.

The Practice processes personal information and special personal information relating to patients in accordance with the Protection of Personal Information Act, 2013 (POPIA), applicable healthcare legislation and professional obligations.

2. Purpose of the Manual

The purpose of this Manual is to:

- describe the records held by the Practice;
- explain how a person may request access to records held by the Practice;
- identify the Information Officer responsible for PAIA and POPIA matters;
- explain how personal information is processed by the Practice;
- promote transparency, accountability and lawful information management; and
- support compliance with PAIA and POPIA.

3. Scope of the Manual

This Manual applies to all records held by Vertebra Chiropractic, whether maintained in physical, electronic or any other format. It applies to patient records, clinical records, administrative records, financial and billing records, medical aid records, clinical correspondence, electronic records, compliance records and related records held in the ordinary course of the Practice.

4. Availability of the Manual

This Manual is available:

- for inspection at the offices of Vertebra Chiropractic during normal business hours;
- upon written request to the Information Officer;
- in electronic format upon request;
- on the Practice website, where applicable; and
- through any method made available by the Information Regulator, where applicable.

The Practice reserves the right to amend this Manual from time to time. The most recent version replaces all previous versions.

5. Information Officer Details

In terms of PAIA and POPIA, the Information Officer is responsible for ensuring compliance with applicable information access and information protection legislation.

Information Officer	Dr Sonia Bowers
Practice Name	Vertebra Chiropractic
Physical Address	44 Kenilworth Road Kenilworth

	Cape Town Western Cape 7708
Postal Address	44 Kenilworth Road Kenilworth Cape Town Western Cape 7708
Telephone	087 135 4456
Email	sonia@vertebra.co.za
Website	www.vertebra.co.za

All requests for access to records, complaints, objections and enquiries relating to PAIA and POPIA should be directed to the Information Officer.

6. Guide on How to Use PAIA

A Guide to PAIA has been compiled by the Information Regulator in terms of Section 10 of PAIA. The Guide contains information to assist persons wishing to exercise rights under PAIA and POPIA.

Regulator	Information Regulator (South Africa)
Telephone	010 023 5200
Toll free	0800 017 160
General enquiries	enquiries@inforegulator.org.za
PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

The Information Regulator's website should be consulted for the latest guidance, forms and contact details.

7. Applicable Legislation

The Practice maintains records in accordance with, among others, the following legislation where applicable:

- Promotion of Access to Information Act, 2000;
- Protection of Personal Information Act, 2013;
- Allied Health Professions Act, 1982;
- National Health Act, 2003;
- Electronic Communications and Transactions Act, 2002;
- Consumer Protection Act, 2008;
- Income Tax Act, 1962;
- Value-Added Tax Act, 1991;
- Occupational Health and Safety Act, 1993, where applicable;
- Basic Conditions of Employment Act, 1997, where applicable; and
- any other legislation applicable to healthcare practitioners and private healthcare practices.

8. Categories of Records Held

The Practice maintains records in both physical and electronic form. The following categories describe the types of records ordinarily held by the Practice.

Category	Records
Patient registration records	Names, identity or passport numbers, dates of birth, addresses, email addresses, telephone numbers, emergency contacts, occupation and employer details where voluntarily provided.
Clinical records	Medical histories, presenting complaints, examination findings, clinical assessments, treatment records, progress notes, outcome measures, consent forms and clinical correspondence.
Referral and healthcare correspondence	Referral letters prepared by the Practice, referral letters received from healthcare practitioners, specialist reports, general practitioner reports, physiotherapy reports and related healthcare correspondence.
Diagnostic and investigation records	Blood test results, pathology reports, radiology reports, MRI reports, CT reports, ultrasound reports, bone density reports and diagnostic investigations relevant to patient care. The Practice does not ordinarily maintain physical radiographic films.
Administrative and communication records	Appointment records, scheduling records, booking records, telephone messages, SMS reminders, email correspondence, WhatsApp correspondence and patient communication records where relevant to care or administration.
Financial and medical aid records	Medical aid membership information, claims records, invoices, statements, payment records and accounting records required by law.
Website and enquiry records	Website enquiries and related communications submitted to or received by the Practice, where applicable.
PAIA and POPIA records	PAIA requests, POPIA complaints, consent records, objection requests, access-to-records requests and compliance documentation.

9. Records Not Held by the Practice

The Practice does not ordinarily maintain the following records:

- employee records, as the Practice does not have direct employees;
- payroll records;
- CCTV recordings;
- access-control records; or
- manufacturing or industrial records.

If the operational position of the Practice changes, this Manual should be updated accordingly.

10. Processing of Personal Information in terms of POPIA

10.1 Purpose of Processing

Personal information may be processed for the following purposes:

- provision of chiropractic healthcare services;
- assessment, diagnosis and treatment;
- patient administration and communication;

- appointment scheduling and reminders;
- medical aid administration and claims processing;
- billing, invoicing and payment administration;
- referral to healthcare practitioners where authorised or clinically appropriate;
- review of diagnostic, radiology and pathology information relevant to care;
- record keeping, legal compliance and professional obligations; and
- responding to requests, complaints and regulatory requirements.

10.2 Categories of Personal Information Processed

- identification information;
- contact information;
- occupation or employer information voluntarily supplied;
- medical aid information;
- financial and billing information;
- healthcare and clinical information;
- diagnostic information; and
- communication records.

10.3 Special Personal Information

The Practice processes special personal information relating to health, including medical histories, clinical findings, diagnostic reports, pathology results, blood test results, imaging reports, treatment records and referral information. Such information is processed for legitimate healthcare purposes and related administrative requirements.

10.4 Methods of Collection and Communication

Personal information may be collected, received, stored, transmitted or communicated through:

- patient registration forms and informed consent forms;
- consultations and clinical records;
- telephone calls;
- SMS, email and WhatsApp communications;
- referral correspondence;
- radiology providers, pathology laboratories and other healthcare practitioners;
- medical aid administrators;
- secure healthcare portals; and
- electronic practice management systems.

11. Operators, Service Providers and Recipients

The Practice may utilise third-party operators and service providers to assist in providing healthcare, administrative and practice management services. The Practice remains the Responsible Party for patient information.

11.1 Navitas

The Practice utilises Navitas as its electronic practice management system. Navitas stores and processes patient administration records, appointment records, billing and invoicing records, medical aid information, clinical records and related healthcare information on behalf of the Practice. Navitas acts as an Operator

under POPIA. Navitas has provided POPIA compliance confirmation, security information and an Operator Agreement for the Practice's compliance records.

11.2 Thetha Connect

The Practice utilises Thetha Connect for telephone answering, appointment scheduling and diary management. Thetha Connect may access limited patient information necessary to perform these services, including patient names, contact details and appointment information. Thetha Connect has provided POPIA compliance confirmation and a Privacy Notice, and has confirmed that authorised personnel are subject to confidentiality obligations, access controls and POPIA awareness and compliance training.

11.3 Authorised Reception and Administrative Personnel

Authorised reception and administrative personnel may assist the Practice with administrative functions, including handing patient registration, informed consent and other practice forms to patients, receiving completed forms, retrieving physical patient records and refiling physical patient records. Access to patient information is limited to what is necessary for these administrative duties. Such personnel are required to maintain confidentiality and have signed confidentiality undertakings.

11.4 Other Recipients

Information may be disclosed, where necessary, lawful and appropriate, to:

- medical aid schemes;
- healthcare practitioners involved in patient care;
- radiology providers and pathology laboratories;
- professional advisers, accountants or legal representatives where required;
- regulatory authorities where required by law; and
- other persons or entities where the patient has authorised disclosure or where disclosure is legally required.

The Practice does not sell patient personal information.

12. Cross-Border Processing

Personal information stored within the Practice's electronic practice management system may be hosted or processed outside South Africa by authorised service providers. Where this occurs, the Practice takes reasonable steps to ensure that appropriate safeguards are in place and that such processing complies with POPIA.

13. Security Safeguards

13.1 Physical Records

- Physical patient files are stored within the Practice premises.
- The practice room is secured when not in use.
- Access is restricted to authorised persons.
- A spare key is maintained for business continuity purposes and access is restricted to authorised personnel.
- Reception and administrative personnel with access to patient forms or files have signed confidentiality undertakings.

13.2 Electronic Records

- Password-protected systems are used where appropriate.
- Access to electronic records is restricted to authorised users.
- Secure healthcare portals may be used to access diagnostic reports and imaging information.
- Electronic practice management systems are used for administration, clinical records, billing and diary management.
- Operators and service providers are expected to maintain appropriate confidentiality and security safeguards.

13.3 Communications

The Practice may communicate with patients by telephone, SMS, email and WhatsApp for appointment scheduling, appointment reminders, administrative communication, referral arrangements and healthcare-related communication. The Practice takes reasonable steps to protect patient information, but patients should be aware that electronic communications may carry inherent security risks.

14. Access Request Procedure

A requester seeking access to a record held by the Practice must submit a request in writing to the Information Officer. The prescribed PAIA Form 2 may be used for formal PAIA requests. Patients requesting access to their own patient records may also use the Practice's Patient Request for Access to Records form.

The request must provide sufficient information to enable the Practice to:

- identify the requester;
- verify the requester's identity;
- identify the record requested;
- determine the form of access requested;
- determine the right sought to be exercised or protected, where required; and
- communicate with the requester.

Where a request is made on behalf of another person, proof of authority must be provided. Access to records is not automatic and may be refused where permitted or required by law. The Information Officer will consider the request in accordance with PAIA, POPIA, healthcare confidentiality obligations and the rights of third parties.

15. Grounds for Refusal of Access

Access to records may be refused where refusal is authorised or required by PAIA or other applicable law. Grounds for refusal may include:

- protection of the privacy of a third party;
- protection of confidential personal information;
- protection of special personal information relating to health;
- protection of commercially confidential information;
- protection of records subject to legal privilege;
- protection of the safety of individuals;
- protection of information where disclosure would constitute a breach of a legal duty; and
- requests that are manifestly frivolous, vexatious or abusive to the extent permitted by law.

Where a request is refused, the requester will be informed of the reasons for refusal and any rights available under PAIA.

16. Prescribed Fees

The Practice may charge fees permitted under PAIA and its Regulations. A personal requester seeking access to records containing their own personal information will generally not be required to pay a request fee. Where applicable, prescribed request fees, access fees, reproduction fees and search fees shall be those determined from time to time in terms of PAIA and its Regulations. The Information Officer will advise a requester of any applicable fees before processing proceeds where required by law.

17. Record Retention Schedule

The Practice retains records for periods considered appropriate having regard to healthcare, legal, professional and regulatory requirements. The following periods serve as a guideline:

Record Category	Retention Period
Adult patient records	Minimum 6 years after last treatment
Records relating to minors	Until the patient reaches age 21 years, or at least 6 years after the last treatment, whichever is longer
Referral letters and specialist reports	Retained with patient file
Diagnostic reports and investigations	Retained with patient file
Medical aid records	Minimum 6 years
Financial and taxation records	Minimum 5 years
Appointment and administrative records	Minimum 5 years, unless otherwise required
PAIA requests	Minimum 5 years
POPIA complaints and compliance records	Minimum 5 years
Operator agreements and confidentiality undertakings	For the duration of the relationship and thereafter for a reasonable compliance period

Records may be retained for longer periods where required by law, professional obligations, litigation, insurance requirements or legitimate healthcare purposes.

18. Complaints Procedure

Any person who believes that the Practice has failed to comply with PAIA or POPIA may submit a written complaint to the Information Officer.

Information Officer	Dr Sonia Bowers
Practice	Vertebra Chiropractic
Address	44 Kenilworth Road Kenilworth Cape Town Western Cape 7708
Email	sonia@vertebra.co.za
Telephone	087 135 4456

The Practice will investigate complaints and respond within a reasonable period. Where a complainant is dissatisfied with the outcome, the complainant may lodge a complaint with the Information Regulator.

PAIA complaints	PAIAComplaints@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za

Telephone	010 023 5200
Toll free	0800 017 160
Website	www.inforegulator.org.za

19. Version Control

Version	Date	Description
1.0	30 June 2026	Updated PAIA and POPIA Manual for Vertebra Chiropractic

20. Notes for Compliance Folder

The following documents should be kept with this Manual in the Practice's PAIA and POPIA compliance folder:

- Patient Privacy Notice;
- Patient Request for Access to Records form;
- proof of PAIA Annual Report submission;
- Navitas POPIA confirmation, Privacy Policy and signed Operator Agreement;
- Thetha Connect POPIA confirmation and Privacy Notice;
- signed confidentiality undertakings for authorised reception and administrative personnel;
- current Informed Consent form with privacy acknowledgement wording; and
- any future updates or compliance correspondence.

Commitment to Privacy and Confidentiality

Vertebra Chiropractic is committed to protecting patient confidentiality and processing personal information lawfully, transparently and securely in accordance with PAIA, POPIA, the National Health Act, the Allied Health Professions Act and other applicable South African legislation. The Practice recognises the sensitive nature of healthcare information and undertakes to implement reasonable safeguards to protect personal information entrusted to it by patients and other stakeholders.