



PHOENIX COUNSELING PAIA MANUAL

(Promotion of Access to Information Act, 2000 – PAIA)



12 SEPTEMBER 2025
PHOENIX COUNSELING
59 Trezona Avenue, Mindalore, Krugersdorp, 1739



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1. Introduction

1.1 Purpose of this Manual

This manual is compiled in accordance with Section 51 of the Promotion of Access to Information Act, 2000 (PAIA), as amended by the Protection of Personal Information Act (POPIA).

It sets out how individuals may request access to records, the categories of information held, and the security measures applied to personal data.

1.2 Contact Details of the Private Body

Name of Body: Phoenix Counseling

Physical Address: 59 Trezona Avenue, Mindalore, Krugersdorp, 1739

Email: info@phoenixcounseling.co.za

Telephone: 084 658 0388

2. Information Officer

2.1 Designation and Contact Details

Name: Kaylee Julian Gollith

Designation: Founder, Counsellor & CEO (Information Officer)

Contact Details: (same as above)

2.2 Duties and Responsibilities

The Information Officer is responsible for:

- Ensuring compliance with PAIA and POPIA.
- Processing requests for access to records.
- Maintaining security and confidentiality of personal data.



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- Keeping the PAIA manual up to date.
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3. Guide on How to Use PAIA

3.1 Availability of the Guide

The PAIA guide, published by the Information Regulator, explains how to exercise the right of access to information. It is available in all official languages.

3.2 Contact Details of the Information Regulator

Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg

Telephone: 010 023 5200

Email: inforeg@justice.gov.za | complaints.IR@justice.gov.za

Website: www.inforegulator.org.za

4. Records Held by Phoenix Counseling

4.1 Categories of Records

- **Client Records:** Personal details, contact info, counseling notes, assessments, reports.
- **Administrative Records:** Financial statements, invoices, operational documents, appointment schedules.
- **Employee/Contractor Records:** CVs, contracts, payroll, leave records.
- **Correspondence:** Emails, letters, forms related to services.

4.2 Availability of Records

- Publicly available records (e.g., on the website).
 - Automatically available (on request without a PAIA application).
 - Records available only upon formal request.
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5. Access to Records

5.1 Procedure for Requesting Access

- Requests must be made in writing using **Form C** (available from the Regulator).
- Proof of identity and sufficient details must be supplied.
- Requests will be acknowledged within 30 days.

5.2 Prescribed Forms and Fees

- Form C must be used.
- Fees may apply for search, preparation, reproduction, or delivery of records.

5.3 Grounds for Refusal

Access may be refused if disclosure:

- Violates another person's privacy.
- Breaches confidentiality or endangers safety.
- Is prohibited by law.

6. Remedies Available if Access is Refused

6.1 Internal Remedies

- Written request for reconsideration by the Information Officer.

6.2 External Remedies

- Lodging a complaint with the **Information Regulator**.
- Applying to a court for relief.

7. Description of Categories of Data Subjects and Personal Information Processed

7.1 Clients



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Identification details, contact info, educational and health records, counseling notes.

7.2 Employees / Contractors

Personal details, contracts, payroll, HR information.

7.3 Third Parties / Service Providers

Business contact details, agreements, communications.

8. Purpose of Processing Personal Information

- Providing counseling services.
- Communicating with clients and guardians.
- Managing appointments and administration.
- Meeting financial and regulatory obligations.

9. Categories of Recipients of Personal Information

- Employees and counselors.
- Parents/guardians (where applicable).
- IT service providers (e.g., Google Drive).
- Accountants, auditors, regulatory bodies.

10. Planned Transborder Flows of Personal Information

Some data is stored on **Google Drive/Workspace** with servers outside South Africa.

Safeguards: Encryption, password protection, restricted access, compliance agreements.

11. Security Measures to Protect Personal Information



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- **Physical:** Locked filing cabinets, restricted access to offices.
 - **Digital:** Passwords, encryption, two-factor authentication.
 - **Access Control:** Only authorized staff may access files.
 - **Confidentiality:** All staff sign confidentiality undertakings.
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12. Retention and Disposal of Records

- Client records: 7 years minimum.
 - Financial records: 5 years minimum.
 - Disposal: Shredding (paper), secure deletion (digital).
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13. How to Access and Correct Personal Information

- Requests to access or correct must be submitted in writing.
 - Corrections will be made within a reasonable time upon proof.
 - Feedback will be provided to the requester.
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14. Availability of the PAIA Manual

- Available at Phoenix Counseling's office and by email request.
- Reviewed annually or as required by law.