



THE CARE CO
@ HOME

PAIA Manual

Promotion of Access to Information Act 2 of 2000

This manual is published in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, as amended. It explains what records The Care Co holds, how to ask for one, what it costs, and what to do if you are turned down.

It also sets out the information required by section 51(1)(c)(ii) to (vi) of the Act about how we process personal information.

The Care Co (Pty) Ltd · trading as The Care Co @ Home

Registration number	2026/410791/07
Information Officer	Sinta Schroeder, Director and Registered Nurse (SANC 14777502)
Email	sinta@thecareco.co.za
Telephone	+27 69 711 3278
Website	thecareco.co.za
Area served	Gqeberha (Port Elizabeth), Eastern Cape
Compiled	11 August 2026
Last revised	11 August 2026

1 What this manual is for

Everyone in South Africa has a constitutional right of access to information. PAIA is the law that puts it into practice, and this manual is how we make that right usable at The Care Co.

Reading it, you should be able to work out:

- which of our records you can get without making a formal request
- what subjects we keep records on, and what kinds of records those are
- which records we hold because other legislation requires it
- who to contact, and exactly how to make a request
- what a request costs and how long it takes
- the grounds on which we may lawfully refuse, and what you can do about it
- how we process personal information, who receives it, and how we protect it

PAIA applies to us regardless of our size. The exemption that once relieved smaller private companies of the duty to compile a manual ended on 31 December 2021, so every private body in the country has had to have one since 1 January 2022.

Two different rights, often confused. Under PAIA you may request *any* record we hold, but you have to show that you need it to exercise or protect a right. Under section 23 of POPIA you may ask what personal information we hold *about you*, and you do not have to justify that. Both are dealt with below. If you are asking about your own information, or about the information of someone you care for, section 12 is the part you want.

2 About us

The Care Co (Pty) Ltd, trading as The Care Co @ Home, is a nurse-led home care provider in Gqeberha (Port Elizabeth). We assess people at home, write individual care plans, and place vetted carers with elderly people, people recovering from illness or surgery, and children living with disability.

Care is delivered in the patient's own home. We have no consulting rooms and no public office, so there is nowhere to walk in. Everything below is arranged by email, telephone or WhatsApp.

3 Who to contact

Sinta Schroeder is the Director and therefore the head of the private body under PAIA. Under section 56 of POPIA the head of a private body is automatically its Information Officer, so she holds both roles. Every request, question and complaint comes to her.

Information Officer	Sinta Schroeder Director and Registered Nurse, SANC 14777502
Email	sinta@thecareco.co.za
Telephone and WhatsApp	+27 69 711 3278

Website	https://thecareco.co.za
Deputy Information Officer	None appointed. The company has one director and she performs the function herself. If a deputy is appointed later, this manual will be updated.
Postal and physical address	We work from patients' homes and have no public premises. To inspect a record or this manual in person, or to send something by post, contact the Information Officer and she will arrange a time and give you an address.

4 The Regulator's guide on how to use PAIA

The Information Regulator has published a plain-language guide, under section 10 of PAIA, for anyone who wants to use the Act. It covers what PAIA and POPIA are for, how to word a request to a public or private body, what help you can ask for, and every remedy available if a request goes wrong. It is available in all official languages and in braille.

You can get it:

- from the Regulator's website at inforegulator.org.za, under PAIA
- from the Regulator directly, on 010 023 5200 or 0800 017 160, or at enquiries@inforegulator.org.za
- from us, free of charge, by asking the Information Officer for a copy

5 Records you can get without making a request

These are published, and you are welcome to them without a form, a fee, or a reason.

CATEGORY	WHAT IT IS	HOW TO GET IT
This PAIA manual	The document you are reading	Website, or by email on request
Privacy and POPIA notice	How we collect, use, share and protect personal and health information, and your rights	Website, or by email on request
Services and how we work	The care we provide, how an assessment works, our clinical approach, service area	Website
Company identity	Registered name, registration number, the Information Officer's SANC registration number, contact details	Website
Fees and terms of care	The initiation fee, what it covers, how invoicing and medical aid motivations work	On request, before care is arranged

Making these available voluntarily is what section 52 of PAIA allows for. We have not published a formal notice under section 52 in the *Government Gazette*; the table above serves the same practical purpose.

6 Records we hold because other legislation requires it

Listing a record here does not mean it is available on request. It means the law obliges us to create or keep it. Access still runs through the procedure in section 8.

RECORDS	LEGISLATION
Memorandum of incorporation, company registers, annual returns, accounting records and financial statements	Companies Act 71 of 2008
Patient health records, including assessments, care plans, clinical notes and handovers	National Health Act 61 of 2003
Registration and practice records of the registered nurse	Nursing Act 33 of 2005
Tax records, returns and supporting documents	Income Tax Act 58 of 1962; Tax Administration Act 28 of 2011; Value-Added Tax Act 89 of 1991, if and when we are registered for VAT
Employment records for carers and other staff, including contracts, hours worked and remuneration	Basic Conditions of Employment Act 75 of 1997; Labour Relations Act 66 of 1995
Contributions and returns in respect of employees	Unemployment Insurance Act 63 of 2001; Unemployment Insurance Contributions Act 4 of 2002; Compensation for Occupational Injuries and Diseases Act 130 of 1993, where applicable
Records of how personal information is processed, consents obtained, and any security compromise	Protection of Personal Information Act 4 of 2013
This manual, and records of requests received and how they were handled	Promotion of Access to Information Act 2 of 2000

7 Subjects we hold records on

The company was registered in 2026 and is newly trading, so some of these categories are still small and one or two are not yet populated. The list describes what we hold and what we will hold as the business runs.

SUBJECT	CATEGORIES OF RECORD HELD
Patients and their care	Clinical intake assessments, individual care plans, clinical notes, medication and vital sign records, wound and catheter care records, falls and mobility assessments, handover notes between carers, review and visit records, incident reports

SUBJECT	CATEGORIES OF RECORD HELD
Clients and representatives	Enquiries, contact and address details, identity and next of kin details, service agreements, correspondence
Referrals and clinical liaison	Referral letters and discharge summaries from hospitals, doctors, social workers and care facilities; correspondence with the patient's own doctors, the rehabilitation doctor supporting our clinical oversight, and allied health professionals
Carers and recruitment	Applications and CVs, interview records, qualification and SANC verification where applicable, SAPS and fingerprint clearance results, employment contracts, confidentiality undertakings, rosters and time records, payroll records, training and supervision records, disciplinary records
Finance and billing	Invoices and statements, initiation fee records, receipts and payment records, medical aid invoices and motivation letters, bank records, accounting records, annual financial statements, tax returns and assessments
Company and statutory	CIPC registration documents, memorandum of incorporation, director and company registers, annual returns, insurance policies and correspondence
Suppliers and service providers	Agreements and correspondence with accounting, IT, hosting, email and other service providers, including the terms that require them to protect information we entrust to them
Governance and compliance	This manual, the privacy and POPIA notice, internal policies and procedures, records of information requests, records of any security compromise and of notifications made
Marketing and website	Website content and source files, brand and design files, brochures and printed material, social media content. The website sets no cookies of its own and runs no analytics or advertising scripts.

8 How to make a request

Step 1 — Use the prescribed form

Requests must be made on **Form 2, Request for Access to Record**, prescribed by regulation 7 of the PAIA Regulations, 2021. A copy is attached as Annexure B. The current version is always available from the Regulator at infoeregulator.org.za, and if the two ever differ the Regulator's published version is the one that counts. Ask the Information Officer and she will email you a copy.

Step 2 — Complete it fully

Fill in enough detail that the record can actually be found. In particular:

- your full names, identity number and contact details
- where you are asking on someone else's behalf, their details, the capacity in which you act, and written proof of that authority. For a patient who cannot act for themselves, that means a power of attorney, a curatorship or guardianship order, or comparable proof
- proof of identity, attached
- a clear description of the record you want, with a reference number if you have one
- the form in which you want it (printed copy, electronic copy, inspection in person) and how you want it delivered
- **the right you are exercising or protecting, and why this record is required for it.** This is the part most requests get wrong. Section 50 of PAIA only obliges a private body to release a record where it is required for the exercise or protection of a right, so a request that leaves this blank cannot be granted

Step 3 — Send it to the Information Officer

Email it to sinta@thecareco.co.za. If you would rather deliver it by hand or by post, telephone **+27 69 711 3278** and she will arrange it.

Step 4 — Pay the request fee

We will send you a notice asking for the request fee of **R140.00** before the request is processed. Section 12 sets out the one situation where no request fee is payable.

Step 5 — We decide, within 30 days

Section 56 of PAIA gives us 30 days from receiving the request to decide, and to tell you the decision in writing. Where the request is for a large number of records, or where records have to be searched for in a way that would unreasonably interfere with running the business, section 57 lets us extend that once by up to a further 30 days. If we extend it, we will write to you and say why, and you may complain to the Regulator about the extension.

Step 6 — Access fees, then the record

If we grant the request, we will tell you in writing what access fee applies and how it was worked out. The record follows once that is paid. If we refuse, we will tell you which section of the Act we rely on, and how to take it further.

A practical note. Most of what people want from us is their own file, or the file of someone they are caring for. That is usually quicker and cheaper to deal with as a POPIA section 23 request than as a formal PAIA request. Ask Sinta first. If a formal request turns out to be the right route, she will say so and send you the form.

9 What it costs

These are the fees prescribed for private bodies in Annexure B to the PAIA Regulations, 2021, as published by the Information Regulator. We charge the prescribed amounts and nothing on top. The amounts exclude VAT.

FEE	AMOUNT
Request fee, payable by every requester before the request is processed	R140.00
Photocopy or printed black and white copy, per A4 page or part of a page	R2.00
Printed copy of an A4 page, per page or part of a page	R2.00
Copy in computer-readable form on a flash drive or compact disc you provide	R40.00
Copy in computer-readable form on a compact disc we provide	R60.00
Transcription of an audio record, per A4 page	R24.00
Copy of an audio record on a flash drive or compact disc you provide	R40.00
Copy of an audio record on a compact disc we provide	R60.00
Transcription or copy of visual images	Outsourced, charged at the service provider's quoted price
Searching for and preparing the record, for each hour or part of an hour after the first hour	R145.00
Maximum chargeable for searching and preparation	R435.00
Deposit, where the search is likely to take more than six hours	One third of the access fee
Postage, email or other electronic transfer	Actual expense, if any

The statutory exemption from access fees, for requesters below a set income threshold, applies only to public bodies. It does not apply to us. If a fee genuinely puts a request out of reach, say so in writing when you make it and Sinta will consider what can be done.

10 When we may refuse

PAIA does not leave refusal to our discretion. Chapter 4 of Part 3 of the Act sets out the grounds, most of them obligatory, and we may not go outside them. Where a ground applies to part of a record only, we must release the rest.

SECTION	GROUND
63	Protection of the privacy of a third party who is a natural person, where release would be an unreasonable disclosure of their personal information. In a care business this is the ground that comes up most often, because a patient's file frequently contains information about family members and carers as well.
64	Protection of the commercial information of a third party, such as trade secrets, or financial and commercial information whose release would harm them.
65	Protection of information given to us in confidence, where releasing it would be a breach of a duty of confidence owed under an agreement.
66	Protection of the safety of individuals and of property, including where release could reasonably be expected to endanger someone.
67	Records privileged from production in legal proceedings, unless the privilege has been waived.
68	Protection of our own commercial information, including trade secrets and information whose release would put us at a disadvantage in negotiations or in competition.
69	Protection of research information, whether a third party's or our own, where release could expose the researcher or the subject of the research.
70	The public interest override. Even where a ground above applies, we must release a record if it would reveal a substantial contravention of the law or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm.

A patient's clinical record carries an additional duty of confidentiality under the National Health Act, which we take as seriously as PAIA. That is not a way of avoiding a valid request. It is the reason we ask for proof of identity and, where you act for someone else, proof that you are entitled to.

11 If you are not satisfied

There is no internal appeal against a decision of a private body. PAIA reserves internal appeals for public bodies, so if we refuse your request, or do not answer within the time allowed, you have two routes.

Complain to the Information Regulator

Use **Form 5, Complaint Form**, prescribed by regulation 10. It is on the Regulator's website. Send it to **PAIAComplaints@inforegulator.org.za**. The complaint must be lodged within 180 days of the refusal, or of the 30 days expiring without an answer. Out of time, you can apply for condonation and the Regulator will send you the templates.

Apply to court

Section 78 of PAIA lets you apply to a court for appropriate relief instead, within 180 days.

Information Regulator	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200, or toll free 0800 017 160
PAIA complaints	PAIAComplaints@inforegulator.org.za
General enquiries	enquiries@inforegulator.org.za
Website and portal	inforegulator.org.za · eservices.inforegulator.org.za

Contact details for the Regulator were confirmed against inforegulator.org.za on 11 August 2026. They have changed before. If a message bounces, check the website for the current details.

12 Asking about your own information

Section 23 of POPIA gives you the right to ask what personal information we hold about you, without giving a reason and without showing that a right is at stake. It is a different and simpler route than a PAIA request, and for most people it is the right one.

- **Confirming whether we hold anything about you is free.** POPIA says so, and we will answer that question at no charge.
- **Getting the record itself** is done on Form 2, and the PAIA fees in section 9 apply. We will give you a written estimate before we do the work.
- **Correcting or deleting** information that is wrong, misleading, out of date or held without a lawful reason is free. Email Sinta and say what is wrong.
- **Proof of identity is required** before we release anything, and where you ask on behalf of a patient we need proof that you are entitled to act for them.

Withdrawing consent you gave earlier is your right, but be aware that it may mean we can no longer provide care safely, and it does not reach records we are legally obliged to keep.

13 How we process personal information

This section carries the information section 51(1)(c) of PAIA requires about our processing of personal information. Our privacy and POPIA notice, on the website, says the same things at greater length and in plainer terms.

13.1 Why we process it

- To carry out a clinical assessment and write an individual care plan
- To match a suitable carer and brief them on what the person needs
- To deliver care safely, and to hand over properly between carers and shifts
- To review care as a person's needs change
- To invoice, and to prepare invoices and motivation letters for a medical aid on request
- To recruit, vet, employ and supervise carers, including criminal record checks
- To keep the clinical, employment, financial and statutory records the law requires
- To respond to a complaint, an incident or a claim

We rely on POPIA's provision permitting a care provider to process health information where it is necessary for proper treatment and care, subject to a duty of confidentiality, and on the agreement of the patient or a person legally entitled to act for them. We do not use anyone's information for marketing. We do not build profiles and we make no automated decisions about people.

13.2 Whose information we hold, and what

CATEGORY OF DATA SUBJECT	INFORMATION PROCESSED
Patients, including children living with disability	Name, date of birth, identity number, home address and contact details, next of kin, medical aid details, and health information: diagnoses and medical history, current medication, vital signs and monitoring records, wound care and dressing records, catheter care records, mobility and falls risk, nutrition and swallowing needs, continence needs, and mental health or cognitive screening, including for children. Also practical information about the home relevant to care, such as access and stairs.
Family members, representatives and emergency contacts	Name, relationship to the patient, contact details, address, identity number where needed for records, invoicing or a medical aid claim, and proof of authority to act
Carers, other staff and applicants	Name, contact details, identity number, address, qualifications and professional registration, work history, SAPS and fingerprint clearance results, banking and payroll details, tax and UIF details, rosters and time records, training, supervision and disciplinary records
Referring and treating professionals	Name, professional registration, practice, and contact details
Suppliers and service providers	Contact person and details, company registration and VAT numbers, addresses, banking details
Website visitors and enquirers	Whatever you put in a message to us, and standard technical logs kept by our hosting provider, including IP address and the time of a request. No cookies of ours, no analytics, no advertising or social media tracking.

13.3 Who may receive it

INFORMATION	RECIPIENT
What is needed to deliver that person's care, not the whole file	The carer assigned to the patient
Clinical information needed for a medical review	The rehabilitation doctor supporting our clinical oversight
Clinical information, so that care at home lines up with treatment	The patient's own doctors
Clinical information, where the patient or representative has agreed	Physiotherapists, occupational therapists, speech therapists, dieticians and wound care specialists
Handover information	A referring hospital, care facility or social worker
Invoices, motivation letters and supporting clinical detail, on request	The patient's medical aid scheme

INFORMATION	RECIPIENT
Identity number and name, for criminal record and fingerprint checks	The South African Police Service and the accredited vetting provider
Professional registration details, for verification	The South African Nursing Council
Payroll, tax and contribution information	The South African Revenue Service, the Unemployment Insurance Fund, and the Compensation Fund where applicable
Financial and business records	Our accountant, bank and insurers
Data held in the ordinary course of running the business	Our IT, email and hosting providers, under agreements requiring them to protect it and use it only as instructed
Whatever the law compels	A court, a regulator, or a professional body

We do not sell personal information and we do not share it for advertising.

13.4 Information sent outside South Africa

Our website is served by Cloudflare, a global network, so a request for a page may be handled by a server outside the country. The website itself holds no client information, so that affects technical logs only.

Our business email runs on Google Workspace, which stores and processes mail on servers outside South Africa. Correspondence about a patient therefore leaves the country in the ordinary course. POPIA permits this where the information receives a level of protection comparable to South African law, which is a condition we take into account when choosing a provider and which we review if we change providers.

13.5 How we protect it

We are a small organisation, and this is honestly what that looks like:

- Devices holding client information are password protected and encrypted
- Only the Information Officer has access to complete client files
- Carers see the care plan and the information relevant to their own patient, not other people's records
- Paper records are kept locked away, and are not left in vehicles or in patients' homes
- Carers sign confidentiality obligations as part of their contract, and those continue after they leave
- We avoid sending health information over WhatsApp, and we ask families not to either
- Accounts are protected by strong, unique passwords and two-factor authentication where the service supports it
- Records are backed up so that information is not lost
- Service providers are engaged under terms requiring them to protect what we entrust to them

If personal information is lost, or accessed by someone who should not have it, POPIA obliges us to notify the Information Regulator and, in most cases, the people affected. We will do that.

13.6 How long we keep it

These periods match our privacy and POPIA notice.

- **Adults:** health records for at least six years from the last entry in the record
- **Children:** until the child's 21st birthday, because a person has three years after turning 18 to bring a claim
- **Financial and tax records:** as long as tax and company law requires, normally five years

These follow section 13 of the National Health Act and the record-keeping guidance applied in South African healthcare. When a period ends, records are destroyed securely: paper is shredded and electronic records are deleted.

14 Where to find this manual

A copy of this manual is available:

- on our website at **thecareco.co.za**, free to read and download
- by email, free, from the Information Officer on request
- for inspection in person, by arrangement with the Information Officer, since we have no public premises
- to the Information Regulator on request
- as a printed copy, on request, at R2.00 per A4 page as prescribed in Annexure B to the Regulations

15 Keeping it current

The Information Officer reviews this manual at least once a year, and updates it sooner if anything in it changes: contact details, the records we hold, who receives personal information, where it is stored, or the prescribed fees. The revision date on the cover shows when it was last checked.

Issued in terms of section 51 of the Promotion of Access to Information Act 2 of 2000.

Sinta Schroeder

Director, Head of the Private Body and Information Officer
The Care Co (Pty) Ltd · Registration number 2026/410791/07

Date: _____

A Annexure A — Making a request, at a glance

QUESTION	ANSWER
Which form?	Form 2, prescribed by regulation 7. Annexure B, or from infoeregulator.org.za
Send it where?	sinta@thecareco.co.za , or arrange delivery on +27 69 711 3278
What must I attach?	Proof of identity. Written proof of authority, if you are asking for someone else
What must I explain?	The right you are exercising or protecting, and why this record is required for it
What does it cost to ask?	R140.00 request fee, payable before we process it
What does the record cost?	R2.00 per printed page, plus search and preparation after the first hour at R145.00 an hour, capped at R435.00. We tell you in writing before you commit
How long?	30 days, extendable once by up to 30 more, with written reasons
Refused, or no answer?	No internal appeal against a private body. Complain to the Information Regulator on Form 5 within 180 days, or apply to court under section 78
I only want my own information	Ask Sinta. Confirming whether we hold anything about you is free under section 23 of POPIA. See section 12

B Annexure B — Form 2, Request for Access to Record

Prescribed by regulation 7 of the PAIA Regulations, 2021. Reproduced here for convenience. If this copy and the version published by the Information Regulator ever differ, the Regulator's version is the one that applies.

Before you start. Attach proof of your identity. If you are asking on behalf of someone else, attach proof that you are authorised to. If a box is too small, continue on a separate page, attach it, and sign every additional page.

To	The Information Officer, The Care Co (Pty) Ltd Email: sinta@thecareco.co.za · Telephone: +27 69 711 3278 Postal or physical delivery by arrangement with the Information Officer
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☐ This request is made in my own name ☐ This request is made on behalf of another person

Your details

Full names	
Identity number	
Capacity in which the request is made if on behalf of another person	
Postal address	
Street address	
Email address	
Telephone and mobile	

Details of the person you are acting for, if applicable

Full names	
Identity number	
Postal address	
Street address	
Email address	
Telephone and mobile	

The record you want

Description of the record, or the relevant part of it	
Reference number, if you have one	
Any further particulars	

Type of record

- ☐ Written or printed
- ☐ Visual images, such as photographs, slides, video recordings, computer-generated images or sketches
- ☐ Recorded words or information that can be reproduced in sound
- ☐ Held on a computer, or in electronic or machine-readable form

Form of access

- ☐ Printed copy of the record, including copies of visual images, transcriptions and electronically held information
- ☐ Written or printed transcription of visual images
- ☐ Transcription of a soundtrack, as a written or printed document
- ☐ Copy on a flash drive, including visual images and soundtracks
- ☐ Copy on a compact disc, including visual images and soundtracks
- ☐ Copy saved to cloud storage

Manner of access

- ☐ Personal inspection of the record, by arrangement
- ☐ Post, to my postal address ☐ Post, to my street address ☐ Courier, to my street address
- ☐ Email ☐ Cloud share or file transfer

Preferred language if the record is not available in that language, access may be given in the language it exists in	
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The right you are exercising or protecting

Which right	
Why this record is required in order to exercise or protect that right	

Fees

- A request fee of R140.00 must be paid before the request is considered.
- You will be told in writing what access fee applies, and how it was calculated.
- The access fee depends on the form of access and the time reasonably needed to find and prepare the record.

If you believe you qualify for an exemption from a fee, give your reason	
How would you like us to correspond with you?	☐ Post ☐ Email ☐ Other, specify

Signed at _____ on this _____ day of _____ 20 _____

Signature of the requester, or of the person on whose behalf the request is made

FOR OFFICIAL USE

Reference number	
Request received by	
Date received	
Request fee received	
Access fee	
Deposit, if any	
Signature of the Information Officer	