CRISIS OF CARE

(PTY) LTD

POPIA and PAIA Manual

Prepared in terms of section 51 of the Promotion of Access to Information Act 2 of 2000, incorporating the disclosures required by the Protection of Personal Information Act 4 of 2013

Version: August 2026

1. Introduction

The Promotion of Access to Information Act 2 of 2000 ("PAIA") gives effect to the right of access to information set out in section 32 of the Constitution. It allows a person to request access to a record held by Crisis of Care (Pty Ltd) ("Crisis of Care" or "the Company"), subject to the grounds of refusal set out in PAIA. This Manual is prepared in terms of section 51 of PAIA.

The Protection of Personal Information Act 4 of 2013 ("POPIA") sets out eight conditions for the lawful processing of personal information. This Manual incorporates the disclosures a responsible party is required to make under POPIA, in addition to the section 51 PAIA requirements.

Correctly requested, this Manual enables Crisis of Care to:

- inform a requester what personal information Crisis of Care holds about them; and
- provide access to a record falling within the scope of PAIA, provided it is not information subject to mandatory or discretionary protection.

It also explains, in general terms, how Crisis of Care processes personal information in line with POPIA.

2. Availability of This Manual

In accordance with section 51 of PAIA and the relevant POPIA regulations, this Manual is available:

- on the Crisis of Care website, [website URL], at no cost;
- by arranging with the Information Officer to view a hard copy during normal business hours, at no cost; and
- from the Information Officer, who will provide a copy at the prescribed fee.

3. About Crisis of Care

Crisis of Care provides crisis intervention, counselling, referral, training, research and advocacy services relating to psychosocial and mental health needs, working with individuals, groups, organisations, and partners such as SAPS and community structures.

Name of organisation	Crisis of Care (Pty) Ltd
Registration number (CIPC)	2020/201073/07
Registered address	38 15th Street Newlands Johannesburg
Postal address	38 15th Street Newlands Johannesburg
Telephone	0694228066
Email (general)	crisisofcare@gmail.com
Website	[website URL]
Director and Information Officer	Miss Keitumetse Fatimata Moutloatse crisisofcare@gmail.com

4. The Section 10 Guide and How to Access It

The Information Regulator has published a Guide in terms of section 10 of PAIA, explaining how a person may exercise any right under the Act. It is available in all official languages from the Information Regulator, whose contact details are as follows:

Physical address	JD House 27 Stiemens Street Braamfontein, 2001
Postal address	Private Bag X2700 Houghton, 2041
Telephone	010 023 5200
Email	inforeg@justice.gov.za
Website	https://www.justice.gov.za/inforeg/docs.html

5. Records Voluntarily Available (No Request Required)

The following are available without the need for a formal PAIA request:

- this PAIA and POPIA Manual;
- general information about Crisis of Care's services;
- annual narrative and financial reports, once approved; and
- governance documents approved for public release (e.g. a summary of the Board Charter).

No further notice has, at this stage, been published listing any other categories of records as automatically available in terms of PAIA.

6. Categories of Records Held

The categories below describe, in general terms, the records Crisis of Care holds. Inclusion in this list does not mean a record is available for release — PAIA sets out grounds on which access may be refused, for example to protect the privacy of a third party or information subject to legal privilege.

Category	Examples of Records	Personal Information?
Governance	MOI, Board Charter, Board minutes, policies	Limited (director details)
Compliance	CIPC, SARS, B-BBEE and applicable council/registration records (e.g. HPCSA)	Limited (company/officer details)
Client / service records	Case notes, intake forms, consent forms, referral records	Yes — includes special personal information
HR records	Contracts, CVs, screening/vetting results, payroll	Yes
Financial records	Invoices, bank statements, financial statements	Limited

Category	Examples of Records	Personal Information?
Marketing / communications	Website content, newsletters, social media records	Minimal

7. Records Kept in Terms of Legislation

Crisis of Care holds records in terms of the following legislation, where applicable:

- Companies Act 71 of 2008
- Income Tax Act 58 of 1962
- Value-Added Tax Act 89 of 1991
- Broad-Based Black Economic Empowerment Act 53 of 2003
- Consumer Protection Act 68 of 2008
- Basic Conditions of Employment Act 75 of 1997
- Skills Development Act 97 of 1998
- Labour Relations Act 66 of 1995
- Unemployment Insurance Act 63 of 2001
- Employment Equity Act 55 of 1998
- Health Professions Act 56 of 1974, and applicable HPCSA (or relevant council) guidelines
- Mental Health Care Act 17 of 2002
- the Protection of Personal Information Act 4 of 2013 and the Promotion of Access to Information Act 2 of 2000, which are most relevant to this Manual.

8. Notice in Terms of Section 51(1)(b)(ii)

No notice has been published to date in terms of this section of PAIA.

9. Personal Information Processing Disclosures (POPIA)

9.1 Purpose of Processing

Crisis of Care processes personal information to provide crisis intervention, referral and psychosocial support services; to manage staff, contracted practitioners and volunteers; to meet legal, regulatory and funder reporting obligations; and to operate the organisation generally (finance, administration, communications).

9.2 Categories of Data Subjects

- Clients / service users
- Employees, contracted practitioners and volunteers
- Board members
- Donors, funders and partner-organisation contacts

9.3 Categories of Personal Information Processed

- Identifying information (name, contact details, ID number)
- Special personal information: health information, and information relating to being a victim of crime, collected in the course of crisis intervention and case work

- Employment and professional registration information (for practitioners)
- Financial information (for payroll, donations, invoicing)

9.4 Recipients of Personal Information

Personal information may be shared, on a need-to-know basis and where legally permitted, with: referral partners (e.g. SAPS, the Department of Social Development, the Department of Health) for continuity of care; the Company's professional advisors (auditors, lawyers); regulators and funders where a legal or contractual obligation requires it; and the Company's case-management system provider, acting as an operator under a written agreement.

9.5 Planned Cross-Border Transfers

[State whether personal information is transferred outside South Africa — for example if the case-management system or email provider hosts data abroad — and confirm the safeguard relied on under section 72 of POPIA.]

9.6 General Description of Security Measures

- Role-based access controls limiting record access to staff directly involved in a matter
- Password-protected, and where available encrypted, electronic systems
- Locked physical storage for any paper records
- Confidentiality undertakings signed by all staff, practitioners and volunteers
- A documented Data Breach Response Procedure

10. Procedure for Request of Access

10.1 Records Held by Crisis of Care (PAIA Requests) — Sections 53 to 57 and 60

- The requester completes Form C (attached) or the Information Regulator's current prescribed form and submits it to the Information Officer at the address or email in Section 3.
- The requester must provide sufficient detail to enable the Information Officer to identify the record(s) requested and the requester.
- The requester must identify the right sought to be exercised or protected and explain why the record is required for that purpose.
- If the request is made on behalf of another person, proof of authority must be submitted to the Information Officer's satisfaction.
- A request fee is payable before a request (other than for the requester's own personal information) is processed; the requester will be notified of the amount.
- If the request is granted, a further access fee is payable for search, reproduction and preparation time exceeding the prescribed hours.
- The Information Officer will decide on and notify the requester in writing within 30 calendar days of receipt, stating any fees payable.
- If a record cannot be found or does not exist, Crisis of Care will notify the requester by affidavit that access cannot be given.
- Should a request be refused, the notice will state adequate reasons and the requester's right to complain to the Information Regulator.
- This Manual does not itself create any right of access to information, except as provided in PAIA.

10.2 Own Personal Information (POPIA Access / Correction Requests)

A data subject who wants to access, correct, or request deletion of their own personal information may contact the Information Officer directly — a simpler process than a formal PAIA request, and free of charge for a data subject accessing their own information.

11. Grounds for Refusal of Access

Access to certain records may be, or must be, refused under Chapter 4 of PAIA and POPIA. This includes where:

- the information is commercial information of a private body;
- the public interest is not served by disclosure;
- disclosure would unreasonably affect the privacy or interests of another individual — particularly relevant to client case records;
- mandatory protection applies to a third party's commercial information (e.g. trade secrets, financial or technical information, or information that could cause commercial harm or disadvantage);
- disclosure would breach a duty of confidence owed to a third party, or confidentiality protected by agreement;
- disclosure would endanger the safety of individuals or the protection of property;
- the record is subject to legal professional privilege, including once legal proceedings have commenced;
- the record consists of research information belonging to a third party; or
- the request is clearly frivolous or vexatious or would involve an unreasonable diversion of resources.

Reasons for any refusal are given in writing, together with information on the right to lodge a complaint with the Information Regulator.

12. POPIA Guide: Exercising Data Subject Rights

POPIA sets out minimum conditions for the lawful processing of personal information by Crisis of Care. A more detailed internal POPIA Guide, describing how personal information is processed, is held by the Information Officer.

12.1 Objection to Processing

A person who wants to object to the processing of their personal information in terms of section 11(1)(d) to (f) of POPIA must contact the Information Officer by email, together with documentary proof supporting the objection.

12.2 Correction or Deletion of Personal Information

A person who wants Crisis of Care to rectify, delete or destroy personal information in terms of section 24 of POPIA must email the Information Officer, together with documentary proof supporting the request.

12.3 Complaints

A person may submit a complaint to the Information Regulator in the prescribed manner and form, alleging interference with the protection of a data subject's personal information. A responsible party or data subject may, in terms of section 63(3) of POPIA, further submit a complaint to the Regulator if aggrieved by an adjudicator's determination. The Information Regulator's contact details are:

Business address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Email	complaints.IR@justice.gov.za
Website	www.justice.gov.za

13. Review

This Manual is reviewed at least annually, and whenever PAIA, POPIA, or the categories of records Crisis of Care holds change materially.

ANNEXURE A

FORM C

REQUEST FOR ACCESS TO RECORD OF PRIVATE BODY

(Section 53(1) of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000))

[Regulation 10]

A. Particulars of Private Body

The Head: Crisis of Care (Pty) Ltd

B. Particulars of Person Requesting Access to the Record

- The particulars of the person requesting access must be given below.
- The address and/or fax number in the Republic to which the information is to be sent must be given.
- Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname: _____

Identity number: _____

Postal address: _____

Fax number: _____

Telephone number: _____ Email address: _____

Capacity in which request is made, when made on behalf of another person: _____

C. Particulars of Person on Whose Behalf Request Is Made

This section must be completed ONLY if a request for information is made on behalf of another person.

Full names and surname: _____

Identity number: _____

D. Particulars of Record

1. Description of record or relevant part of the record: _____

2. Reference number, if available: _____

3. Any further particulars of the record: _____

E. Fees

- A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid.
- You will be notified of the amount required as the request fee.
- The fee payable for access to a record depends on the form in which access is required, and the reasonable time required to search for and prepare the record.
- If you qualify for exemption from payment of any fee, please state the reason below.

Reason for exemption from payment of fees: _____

F. Form of Access to Record

If you are prevented by a disability from reading, viewing or listening to the record in the form of access provided for below, state your disability and indicate in which form the record is required.

1. Written or printed record: ☐ copy of record ☐ inspection of record

2. Visual images (photographs, slides, video, computer-generated images, sketches): ☐ view the images ☐ copy of the images ☐ transcription of the images

3. Recorded sound: ☐ listen to soundtrack/audio ☐ transcription of soundtrack ☐ written or printed document

4. Record held electronically: ☐ printed copy of record ☐ printed copy of information derived from the record ☐ copy in computer-readable form (CD)

If you requested a copy or transcription of a record, do you wish it posted to you (postage payable)? ☐ Yes ☐ No

G. Particulars of Right to Be Exercised or Protected

1. Indicate which right is to be exercised or protected: _____

2. Explain why the record requested is required for the exercise or protection of that right:

_____

H. Notice of Decision Regarding Request for Access

You will be notified in writing whether your request has been approved or denied. If you wish to be informed in another manner, please specify the manner and provide the necessary particulars.

How would you prefer to be informed of the decision regarding your request for access to the record?

_____

Signed at …… this …… day of …… 20……

SIGNATURE OF REQUESTER / PERSON ON WHOSE BEHALF REQUEST IS MADE