

Charl Hattingh, Clinical Psychologist: document retention policy & data record- and destruction templates

[NOTE: amend this document to exclude documents not held by the Practice. It covers health legislation, labour laws, occupational healthm finance, commercial and consumer legislation. Amend provisions on archiving, destruction and non-statutory retention periods – in the first two tables examples are provided, please substitute with practice’s own versions of documents it holds (Parts A & B) and have those templates handy for all staff responsible for archiving & destruction]

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1. Purpose of this policy

The purpose of this document is to provide Charl Hattingh, Clinical Psychologist, with guidelines for document retention, based on the requirements of legislation and other policies.

The Protection of Personal Information Act, 2013, requires of responsible parties (i.e. this Practice) that process personal information, to only keep information “no longer than is necessary... to achieve its purpose”¹, or:

- As is required or authorized by law;²
- As is required by a contract;³
- As consented to by the data subject.⁴

Due to various legislative requirements, documents must be retained for a certain number of years, and in some cases in a particular format, and subject to prescribed criteria. Document retention also relates to the requirement that documents are accurate, up-to-date and not susceptible to unauthorised access, destruction, or abuse.

This Policy contains the general and specific rules relating to document retention for the allpersonal information held by the Practice.

- A. General Practice Policy on Filing, Retention, Archiving & Destruction
- B. Record-keeping system for archiving and destruction of information
- C. Retention periods by legislation: Detail how and for how long the practice have to securely store that information, with reference to specific laws
- D. Retention periods of contracts, etc.

¹ Section 14(1).

² Section 14(1)(a).

³ Section 14(1)(b).

⁴ Section 14(1)(c).

2. PART A: General rules for filing, archiving & retention of personal information

[Note the details below in the table can be more specific, depending on the complexity in a practice. For example, there may be a shared drive with only certain staff having access to it, or some cloud storage system with access control, or only a hard copy system.]

This Practice archives documents when half of its retention period has been achieved, or when storage (electronic and/or in hard copy) becomes impossible. The Practice's Information Officer, Charl Hattingh will oversee the filing, archiving and destruction of information.

All archiving & destructions are recorded in the POPI folder on Charl Hattingh's computer and signed by the person responsible for the destruction. Where destruction is undertaken by a third party, such party will issue a certificate to that effect, in the event that the records are requested or required under the PAIA at a future date.

GENERAL RULES FOR RETENTION, ARCHIVING & DESTRUCTION								
Document / database	Doc / database reference (insert ref if doc ref system is used, e.g. EmpCon2020/12/03 or Fin/Inv234 or...)	Retention	Start Date for retention	Archive date	Destruction date	Destruction override (e.g. legal process, query, complaint, possible evidence)	Destruction method	Destruction by (insert name; designation)
Employment contracts	Filed on backed-up computer of practice-owner only, hard copy in locked file cabinet.	5 years	From date of resignation/termination	Never	Year 6 after termination of employment	Retention period will be extended if: pending legal process or dispute by employee	Deletion from electronic database; hard copy shredded	Charl Hattingh, owner
Patient files (adults of sound mind, and with no possible legal issue)	Hard copy with pt files ordered by surname, first name in locked filing cabinet. Scanned hard copies in owner's computer, password protected. Backed up in secure cloud storage and password-protected external hard drive.	Until death of patient	Date of last visit	Never	Death of patient	File to be kept for as long as any complaint at HPCSA or another forum.	Hard copy shredded, electronic copy permanently deleted.	Charl Hattingh, owner
Invoices to patients	Soft copy in accounting system	Indefinite	Date of first visit.	Never	Never			

3. PART B: Template for document archiving or destruction

This table must be used by all staff to record specific instances of archiving and destruction, which must then be recorded as follows:

CONSOLIDATED RECORD OF ARCHIVING OR DESTRUCTION OF DOCUMENTS

Specific Document or group of documents	Doc / database reference (or...)	Archive / Destruction date	Reason for archiving / destruction (please refer to Parts A and C - table on general rules of retention, archiving and destruction AND the specific retention rules set by law and retention periods)	Destruction override (e.g. legal process, query, complaint, possible evidence)	Destruction / Archiving method & place	Archiving / Destruction by (insert name; designation)
<i>E.g. All inactive patient files for period Jan 2014 - Dec 2017</i>	<i>Pat-files</i>	<i>31 Jan 2021</i>	<i>Archiving: Practice Policy allows archiving 3 years after patient inactive in practice; ensure that archiving will keep for remainder of period as set by HPCSA (6 years in total)</i>	<i>N/a as no destruction before lapse of 6 years</i>	<i>Metrofile storage, files picked up by Metrofile but packed by staff</i>	<i>Administrative clerk, Mr F Ile</i>
<i>Mr PR Oblem Employment Contract</i>	<i>Shared drive & HR cupboard</i>	<i>28 Feb 2021</i>	<i>Destruction: 5 years after employment contract terminated</i>	<i>No override as no CCMA or other issue pending</i>	<i>Document deleted from electronic database and hard copy shredded</i>	<i>Practice manager, Ms AB Cee</i>
<i>Etc.</i>	<i>Etc.</i>	<i>Etc.</i>	<i>Etc.</i>	<i>Etc.</i>	<i>Etc.</i>	<i>Etc.</i>

4. PART C: How long information is to be kept

4.1. Constitutional legislation: PAIA (Promotion of Access to Information Act 2 of 2000)

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comments
All requested documents that cannot be found / do not exist	S55	Irrespective, if lost or does not exist, affidavit by IO that doc could not be found or does not exist	n/a	Investigate if practice rules were followed
Health records requested and knowledge of which could cause harm to requester	S61	As per HPCSA rules, or if also financial, as per financial legislation, disclosure however made to person nominated by patient whose records it is.	As per HPCSA (can be certified copies) or specific financial legislation	-
All personal information of persons deceased for longer than 20 years	S1	Can be retained, subject to specific legislation, but no longer "personal" 20 years after date of death	Not subject to any privacy rules	Not subject to any privacy rules
All documents listed in PAIA Manual	S3	Can be potentially requested and accessed. Should be retained to ensure access, as per law, consent or contract	As per specific law / contract / consent	-
Documents identified in PAIA Manual as subject to automatic access	S52	Documents must be retained as per specific rules, and removed from PAIA manual list once no longer available	As per specific law / contract / consent	-

4.2. Constitutional legislation: POPI Act

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comments
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All documents	S9, s10	Consent, contract and/or notification to include periods of retention and destruction	-	Include retention & destruction periods into all relevant documents
All documents	S14	Retention of record / database must always be stipulated	Depending on record	As stipulated
Historical, statistical, research data (anonymized)	S14(2)	Can be retained for longer, provided that used for no other purpose (e.g. marketing, vigilance, etc.)	Depending on record	Indicated on specific database as historical, etc. with timeframe and identifiers removed
Deletion or destruction of a record	S14(4)	Must destroy / delete when no longer needed, as per stipulated / agreed periods or upon completion of a task	See Part A & B of this Policy	-
Requested deletion or destruction (request by person or persons whose personal information is / was processed)	S14(5); reg 3	If permissible (e.g. if. not against statutory retention period), person uses POPI Regs prescribed Form 2.	None	No original and no copy should be in existence, electronically or in hard copy
Documents / databases created from previous information	S13, s15	New consent or contract must set new retention period or law must be followed that sets retention period, if retention was not originally set	Depending on record	
Documents / databased allegedly processed unlawfully, is inaccurate, or destruction or deletion is opposed	S6 and s7	Retain until matters are resolved and then retain as required, amend or destroy / delete	Retain as per specific retention period.	

4.3. Health legislation: National Health Act 61 of 2003 & Regulations issued thereunder

Practice deals with patient information relating to a number of its brands as it supplies products directly to consumers / customers. This information includes clinical information, and as such constitutes a “health record”.

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
Health records (incl notes from call centre, nurses, scheme motivations, etc.) and irrespective of held by Practice or an operator	S13	Record must be created and maintained . No regs yet as to duration of retention. Follow HPCSA rules. References Archives Act, but which only applies to records of “ enduring value ”, which records are transferred to the National Archive after 20 years , i.e. suppose 20 year retention.	Not stipulated	
Health records used for training, research	S16	If no individual details, no consent and keep as long as needed	Copies	
Health record changes & destruction	S17	Offence to not maintain and to destroy records unauthorized.	Originals & copies	
COVID-19 and other notifiable conditions	2017 Regs	Not prescribed, but as other health records (see below) and must be shared with regulators (NICD)	Not stipulated	

4.4. Health Legislation: Health Professions Act 56 of 1974, Ethical Rules & Booklets

The ethical rules and those contained in the Booklets are binding and a violation thereof could render professionals liable for charges of unprofessional or unethical conduct to section 41 of the Act. It also provides the best practice guideline for health record retention, in the absence of regulations being issued under section 13 of the National Health Act.

Applicable document(s) / databases	Section / Reg / Clause-Booklet, ⁵ Ethical Rule (ER) nr	Period of retention	Original or copy to be retained	Comment
All health records	ER15	All retained records must be signed	Originals or certified	
Certificates & reports	ER16	Retained reports & certificates must include info listed	Originals or certified	
Adult health records <i>[may need to be described and split up into specific records]</i>	Clause 9.2	6 years after record becomes dormant (last visit of patient)	Originals or certified copies	

4.5. Health legislation: Medical Schemes Act 121 of 1998

Applicable document(s) / databases	Section / Reg	Period of retention	Archiving rules	Comment
Claims to medical schemes and motivations that underpin it	Reg 5, 6 and 59; S47, 19 and 50	Claims must be made within 4 months, but schemes can claw back and investigate for periods or around 3 years after the claim was lodged. Complaints can be lodged at any stage, even years after non-payment of a claim, and records relating to claims, motivations, internal appeals, etc. is recommended to be kept for at least 5 years after decline of payment.	Not stipulated	Schemes in 59(3) matters require the acquisition documents of supplies, dispensing records, referrals, records relating to hospitalization.

4.6. Consumers / Patients: Consumer Protection Act 68 of 2008

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
Intermediaries (e.g. sales agents, brokers)	S27, reg 10	3 years after document created: Intermediary must keep the records, co top ensure contractually that intermediary does so.	Copies or electronic formats	
Competitions (all 18 pieces of information / documents as prescribed)	S36, Reg 11	3 years, but note SAMED Code requirement of 5 years where competition relates to the medical device business.	Not stipulated	After SAMED period of retention
Fixed-term consumer agreements	S14	Not stipulated in CPA but see National Credit Act below. General rule of not retaining for longer than necessary, and consents (e.g. if person added to a general consumer database for future marketing) must be considered	Not stipulated	As per co policy and NCA

⁵ Booklet 9 "Guidelines on the Keeping of Patient Records", September 2016.

4.7. Consumers / Patients: National Credit Act 34 of 2005

Applicable document(s) / databases	Section / Reg ⁶	Period of retention	Original or copy to be retained	Destruction rules
All documents to create credit agreement, debt review documents (see list in reg 55(1)(b))	S170, Reg 55	3 years after document created	Not stipulated	
Agreement / contract / applications (signed Ts&Cs / billing notices / agreements to r(e)pay)	S170, Reg 56	3 years after termination	Not stipulated	
All judgements	Reg 17(1)	5 years or until judgement is rescinded	Not stipulated	

4.8. Business Legislation: Companies Act 71 of 2008

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
AFS, accounting records;	S24(3)(c) & (d)	7 years after date of event	Originals in hard copy at a location in RSA	
MOI, rules and certificate of incorporation	S24(3)(a)	"maintained", i.e. keep indefinitely	Originals in hard copy at a location in RSA	
All other documents, accounts, records, etc. required by Companies Act	S24(1)	7 years, unless another law requires a longer period.	Originals in hard copy at a location in RSA	
Board / Practice Code of Conduct, Terms of Reference, etc.	King IV	Not prescribed, unless approved as part of above documents, then retain for 7 years	Not prescribed	

4.9. Business legislation: Electronic Communication and Transactions Act 25 of 2002 ("ECTA")

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
All electronic documents or documents saved in electronic versions	S11	Not without legal force and effect only because it is electronic. Usual retention periods for that type of document would therefore apply	Not necessarily, unless so. prescribed	

⁶ GNR.489 of 31 May 2006: Regulations made in terms of the National Credit Act, 2005 as amended.

Documents containing signatures	S13	Documents where parties agree on e-signatures or where advanced signatures ⁷ are used are valid and can be retained as hard-copies are / would have. Any electronically affixed signature not <i>per se</i> invalid. Note some contracts or documents require a "wet signature" meaning not electronic	Electronic	
Requirement that a document must be "In writing"	S12	Can be in form of a data message (i.e. electronic) and can be retained same as hard copy "in writing". Note difference of "by hand".	Electronic	
All documents that require retention	S16	As long as electronic record is accessible and represents accurately that document (e.g. could not have been changed afterwards), and origin and destination could be established, then retention as per stipulated and applicable period would be valid. ⁸	Electronic	
Documents required by legal processes, inspectors, etc,	S17, s28	Electronic form acceptable if electronic document reliable and accessible / usable for its purpose, and provided document is unaltered	Electronic	
Documents requiring Notarisation, acknowledgement and certification	S18	Can be validly done by advanced electronic signature, also where hard copy is required such certified electronic copy would be value	Electronic	
Agreements	S22	Not invalid purely because entered. into electronically, provided that no agreement to contrary entered into by parties, e.g. that wet signature into s21.	Electronic, unless agreed to be parties that not electronic	

4.10. Finance: Tax Administration Act 28 of 2011

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
Returns, whether required to be submitted or not and underpinning records	S29, s30	5 years after the date of submission / required submission / not required submission	Originals	
Records subject to, or aware of possible audit and/or subject to an appeal	S32	Until audit / appeal is concluded	Originals	

4.11. Finance: Income Tax Act 58 of 1962

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
All payroll, payroll calculations (deductions, benefits, etc.), returns, and all related info (EMP's)	Item 14, 4 th Schedule as gazetted ⁹	5 years from date of submission to SARS	Originals or. as prescribed by the SARS Commissioner.	

⁷ A signature recognize into s37: **Accreditation of authentication products and services.**—(1) The Accreditation Authority may accredit authentication products and services in support of advanced electronic signatures.

(2) An application for accreditation must—

(a) be made to the Accreditation Authority in the prescribed manner supported by the prescribed information; and

(b) be accompanied by a non-refundable prescribed fee.

(3) A person falsely holding out its products or services to be accredited by the Accreditation Authority is guilty of an offence.

⁸ A good example here is the HPCSA rules on health records. If electronically kept, must be kept as at a point in time, i.e. cannot be in a word-version, for example, that could be changed afterwards. Software that tracks changes and immortalize documents in points in time are therefore preferred.

⁹ <https://www.sars.gov.za/AllDocs/LegalDoclib/Notes/LAPD-INTR-IN-2012-14%20-%20Allowances%20Advances%20Reimbursements.pdf>.

4.12. Finance: Value Added Tax Act 89 of 1991

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
Records of goods / services supplied, invoices, credit notes, charts & codes of account, bank statements, etc., all customs documents,	S55, s15, s16, s20	5 years from date of submission of return	Originals, if for invoices not available, marked "copy"	

4.13. Finance: Financial Intelligence Centre Act 38 of 2001 ("FICA")

This Act applies to banks, long terms insurers, estate agents, those keeping assets in trust, financial advisories, etc. It does not apply to Practice, but requires awareness by Practice of the documents these entities must retain when a bank, broker, etc. enter into a business relationship or once-off transaction with Practice.

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
Due diligence documents including customer identity, purpose of business relationship, sources of funding, prominent foreign & local persons, family members & close associates	S21, s21A, s21B – 21H	5 years from date of each transaction; and 5 years after business relationship is terminated, if reported to Centre, 5 years from date of that report to FIC	Not specified, but as it could lead to criminal investigations, proposed originals	

4.14. Finance: Insolvency Act 24 of 1936

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
Insolvent: All property and cash transactions	S134	From 2 years prior to sequestration	Not specified, but recommend originals	
All documents during period of insolvency	S155	5 years after sequestration	Not specified, but recommend originals	

4.15. Finance: Prescription Act 68 of 1969

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
All records, irrespective of where those records are in retention processes	S3	3 years after date that debt due, but. can be interrupted once action starts on a matter.	Originals or certified copies required if in dispute during legal proceedings	

The Prescription Act applies to claims against another person or entity, other than the state. Although it is set at 3 years, those 3 years only commence after a matter has been left, and does not apply for as long as a matter is kept alive, i.e. by a complaint, correspondence, etc. It could therefore mean that other retention times must be extended, e.g. if there is a dispute or a case relating to an occupational incident, and this commences 2 years after the date of a record created by the Practice's Occupational Health and Safety Committee, that

record must be retained for as long as that matter is ongoing and cannot be destroyed after another 1 year (i.e. after the 3 years have lapsed). The Prescription Act's effect could therefore necessitate an extension of the retention periods.

4.16. Labour legislation: Basic Conditions of Employment Act 75 of 1997 and the regulations¹⁰ thereto

Applicable document(s) / databases	Section / Reg ¹¹	Period of retention	Original or copy to be retained	Comment
Written particulars of employment as listed in s29, incl all contracts and documents pertaining to the contract.	S29	3 years after termination of employment.	Not specified but must be in writing	
Certificate of service	S42, Reg 6	On employee file, 3 years after employment	Copy	
As long as employed, name & occupation, time worked, remuneration, dob, etc,	S31	3 years after last entry on record	Not specified	
Remuneration records as stipulated by s33: name & address, occupation, remuneration, period of salary, amounts, deductions & reasons therefor, actual amount paid, rate and overtime rate, hours worked, workplace, working hours	S33	3 years, but note EEA on pay differential reports if EE Plan runs 5 years or longer, and obligation to keep EE information for 5 years after last entry.	Not specified	
Sectoral determinations	S58	For as long as determination is applicable	Not specified	
Any record to which employment relates	S66	May be requested and must provided to a labour inspector. Documents for which no retention period is prescribed to be retained as per co policy	Not specified	
All records under BCEA	S76	Employer to prove authenticity	If no originals, certificates that copies are true	

4.17. Labour legislation: Employment Equity Act 55 of 1998

Applicable document(s) / databases	Section / Reg ¹²	Period of retention	Original or copy to be retained	Comment
All records that fall under EEA (including data on race and other grounds of no unfair discrimination & required data fields in EE Plan and EE Report; Employee declaration on gender, race, nationality & disability	S26, EEA1	Must be maintained, and retained for prescribed periods		
Workplace policies and procedures pertaining to employment	S5, s15, reg 8(4)	If analysis shows amendments required, all to be retained plus analyses for 5 years after EE Plan Expiry	Not prescribed	After longest retention period

¹⁰ GNR.1438 of 13 November 1998: General Administrative Regulations as amended on 22/03/2002; 25/07/2002 and 12/03/2010

¹¹ GNR.1438 of 13 November 1998: General Administrative Regulations as amended.

¹² GNR.595 of 1 August 2014: Employment Equity Regulations, 2014 (*Government Gazette* No. 37873). as amended.

EE Plan (duration of min 1 year and max 5 years) & all underpinning documents, e.g. employment records, payroll records, employment stats (country, province, professions, etc.)	S20, reg 9 EEA13	5 years after plan expiry	Not prescribed	
EE Report and all supporting documents (not Report is public (therefore subject to PAIA), and only income differential information is confidential)	S21, Reg 10	Not prescribed, but as it informs EE Plan and progress in it, would have to be retained for 5 years after expiry of Plan with all reports pertaining to that plan	Not prescribed	
Recruitment (incl applicants & all interviewees), promotion & training records (also of former employees), harassment	S5, s6, s19, s51	To be able to address matters of alleged discrimination on listed grounds, records relating to lawful consideration of race, gender, etc. is recommended to be kept for at least 5 years after event, longer if archiving is possible due to possible criminal charges in harassment cases and human rights aspects of complaints	Not prescribed, and generally complaints must be lodged. within timelines stipulated by e.g. LRA	
Minutes & supporting documents of EE Committee, consultation with general staff	S16	As per each EE Plan and each EE Report to which engagements pertain	Not prescribed	After retention period
Compliance orders	S37, Reg 14, EEA6	An inspector. May require records to be kept, and such order must be followed	As ordered	As ordered

4.18. Labour legislation: Employment Tax Incentive Act 26 of 2013

This Act establishes the ETI, and its actual administration is under the Income Tax Act, the Tax Administration Act and the SARS Act. Retention of documents must therefore following those Acts (in general 5 years after submission to SARS or indefinitely where submission had to be made to SARS but were not and then 5 years after actual submission, etc.).

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
Records of qualifying employees	S6	Not prescribed, but proof of qualifying criteria relating to employee to be maintained and retained at least 5 years after termination or 5 years after the date when employee no longer qualifies (e.g. older than 29 years, wages exceed that set out in section 4, etc.	Not stipulated	

4.19. Labour legislation: Labour Relations Act 66 of 1995 (LRA)

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
Collective agreement, arbitration award, determination made in terms of Wage Act, strikes and lock-outs	S205	At least 3 years from date of event / agreement's end.	Original or reproduced	After period of retention

Disciplinary record indicating nature of any disciplinary transgressions, the actions taken by the employer and the reasons for the actions	Clause 5, Schedule 8	Not specified, but required under EE Report (i.e. 5 years after expiry of EE Plan). Note letters of written warning may have to be removed based on co policy. Matters relating to ill health may have to be kept ito occupational health legislation, and matters relating to harassment and discrimination according to the EEA.	Not stipulated	After period of retention
Mandatory disclosure information for workplace forums; Mandatory disclosures in cases of proposed retrenchments Trade union access to information	S89 S189 & 189A S16	In order to disclose information required by workplace forums, such information would have to be retained. No periods prescribed, but may relate to documents such as financials that have to be retained under companies' legislation, tax legislation & employment laws.	Not prescribed	After period of retention
Privileged information, confidential information of which the disclosure would cause harm, employee personal information, non-disclosure by law or court order	S16(5)	Although retained for periods as prescribed, and potentially accessible under above sections, cannot be disclosed under s16, s89, and 189 & 189A.	As prescribed in other legislation or orders	As per relevant law, order, consent

4.20. Labour legislation: Unemployment Insurance Fund Act 63 of 2002

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
Name, id nr, address of employment & monthly remuneration	As per Income Tax Act	5 years after submission to SARS	Not specified	

4.21. Insurance: Pension Fund Act 24 of 1956

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
Board of a Fund to ensure all records kept	S7D	Must be kept properly and in accordance with legislation governing that type of record	As per specific law	
Pension Fund rules	-	Indefinitely due to its application many decades after its creation / when an employee retires and thereafter	As per specific law	

4.22. Insurance: Short-term Insurance Act 53 of 1998

Applicable document(s) / databases	Section / Reg	Period of retention	Original or copy to be retained	Comment
Policies, documents on claims, etc.	Not specifically governed	Not regulated, but retain for at least 4 years after policy expiry and for claims documents 3 years after claim has been finalised (ito prescription legislation and Income Tax Act)	Not provided	

5. PART D: Contract retention and management

The overriding POPI Act criterion, i.e. to only store personal information as long as necessary applies to the personal information included in a contract. Some contracts may have to be retained for longer than its effective life, namely for business purposes, should a relationship with a contractual party have to be re-established, for audit purposes (often linked to financial transactions and requirements, e.g. invoicing and payment), as stipulated in labour law, etc.

Follow above tables where specific contracts are concerned involving statutory periods. Also see above on ECTA.

Applicable document(s) / databases	Period of retention	Original or copy to be retained	Comment
Contracts that involves statutory retention periods	Retain for period that is longest, i.e. contract implementation, contract agreement, prescription or specific legislation (e.g. a principal investigator contract in a clinical trial should be retained indefinitely, as well as trials documents such as consents)	As specified in legislation or a per Practice rules or as per. ECTA	
Contracts with suppliers, rentals, leases, equipment, etc.	At least 3 years after contract terminated	As specified in legislation or a per Practice rules or as per. ECTA	
Non-disclosure agreements	Indefinitely	As specified in legislation or a per Practice rules or as per. ECTA	
Consents signed by practitioner	At least 3 years after period to which consent pertain	Original or valid electronic version / copy	