Retention, archiving and disposal policy

Charl Hattingh | Clinical psychology

Purpose and custody

My psychology practice operates as Charl Hattingh, Clinical Psychologist, a sole proprietorship. It returned to this structure on 22 August 2026. Wordweb Inc remains responsible for psychology records created while the practice operated through that company; I handle requests about those records in my capacity as its Information Officer. This does not assign all earlier records to the company. This policy governs retention, archiving and secure disposal; it is not an instruction to delete existing records now. Charl Hattingh authorises decisions in the appropriate capacity.

Retention decisions

Keep each record while a service, lawful business purpose or applicable legal, professional or contractual duty requires it. Consider all overlapping requirements and apply the longer relevant period. Record the category, retention trigger, reason and review date. Do not assume every record has one universal expiry date.

Clinical records

Adult clinical files should be retained for at least six years after becoming dormant, with longer retention where clinical need, HPCSA guidance or legal circumstances require it. Minors' records need at least the applicable protection through age 21 as well as any longer relevant minimum. Certain records, including specified incapacity, occupational and research circumstances, can require substantially longer retention. Check the current HPCSA guidance before disposal; six years is not an automatic deletion date.

Tax and accounting

SARS generally requires tax records for five years from submission of the return; other starting points apply if no return is required or a required return remains outstanding. Audits, investigations and disputes can extend retention. Check the category with Accuity before disposal; apply any longer company or other duty.

Projects and correspondence

Retain service/project material for the work and the applicable contractual or legal purpose. Review unnecessary duplicates and identifiers separately from records that must be preserved. Client deletion instructions must be checked against overriding obligations; where no fixed period applies, document a purpose-based review date.

Retention, archiving and disposal policy - continued

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Storage and archiving

Therapy notes are held on my computer, in Dropbox and in Heidi Health. I use xneelo for website hosting and domain email, Zoho Books for bookkeeping and Accuity for accounting. Invoices contain patient names; involvement in accounting does not give the accountants access to therapy notes. Google Drive holds no patient information or psychology-practice details. Moving an inactive record into an archive does not authorise disclosure or destruction. Keep an index adequate to locate retained records and preserve appropriate access restrictions.

Holds on destruction

Suspend routine deletion for records relevant to an access request, complaint, claim, litigation, investigation, audit or other preservation duty, including reasonably anticipated proceedings. Retain until the hold and all other duties are resolved.

Secure disposal procedure

Before disposal, confirm the responsible body, expiry/justification, absence of holds and effect on linked records. Record approval and method. Destroy paper securely; use appropriate secure deletion for electronic records and account for provider retention, synchronised copies and backups. Do not promise that deleting one copy immediately erases every backup. Do not alter the original clinical record to hide corrections.

Simple event record

Use an event record when archiving, disposing of or transferring custody: date; responsible body; record category/reference; date range; reason and authority; retention review; method/destination; outstanding backup/provider limits; and Charl Hattingh's approval. Keep only necessary identifiers in the event record. No prior events are implied by this blank procedure.

Sources and review

HPCSA patient-record guidance
SARS record-keeping rules
Companies Act, sections 24-25 (company records)
POPIA, section 14

Review before the first destruction exercise and when duties or services change. Retention decisions require the applicable record-specific check; this concise policy is not an exhaustive statutory schedule.