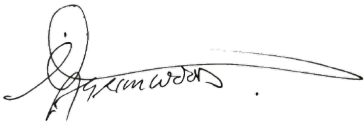




# Document Retention Policy

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## Document Retention Policy

### Introduction:

It is Kheth'Impilo's (KI) policy to maintain complete, accurate and high-quality records.

Records containing personal information, as regulated by the Protection of Personal Information Act, 4 of 2013 ("POPIA"), must not be retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed unless retention of the record is required or authorized by law; the responsible party reasonably requires the record for lawful purposes related by law; the reasonable party reasonably requires the lawful purposes related to its functions or activities; retention of the record is required by a contract between the parties thereto, or the data subject has consented to the retention of the record. Furthermore, in terms of POPIA, once the record housing the Personal Information is no longer required, then such record must be destroyed or deleted, as soon as reasonably and practically possible, which destruction or deletion must be done in a manner that prevents its reconstruction in an intelligible form.

No Board Member, Executive, Manager, Employee, Intern, Learner, Volunteer and service providers of Kheth'Impilo shall knowingly destroy a document with the intent of obstructing or influencing the investigation or proper administration of any matter with the organisation or in relation to or contemplation of any such matter or case. This policy covers all records and documents of Kheth'Impilo; i.e. financial records, patient records and human resources records.

Kheth'Impilo reserves the right to amend and or alter this policy at anytime

### Responsibility for Administration:

All clusters, departments satellite offices shall be responsible for administering this policy.

### Objective and Purpose for this Policy:

The objective of this policy is to ensure that Kheth'Impilo and its personnel comply with POPIA and the requirement to manage, archive and destroy records and documents, when such records and documents are no longer required.

The purpose of this policy is to provide clear guidelines and directions and establish standardised and suitable records and documents management procedures which apply to all the organisational records and documents. Furthermore, to direct Kheth'Impilo personnel on how they must manage, archive and destroy such records and documents when they are no longer required.

*Note: Please be aware that "documents" includes not only documents in paper form, but e-mail messages, attachments and all other forms of electronically stored information. Also be aware that the rules and procedures apply to all computers, servers and other electronic devices provided to you by the organisation for the use in the business of the organisation, regardless of whether those computers or devices are used on the organisation's premises or elsewhere.*

### Creation of Document Management Archive:

Kheth'Impilo and its head of departments shall ensure that an archive for the company records and documents are constructed, which archive will accommodate the retention of physical records and documents and electronic records and documents provided that all the electronic records and documents may only be stored onto the categories of storage medium that meets the prescripts of the Electronic Communications and Transactions Act 25 of 2002 and which facility will once established be brought to the attention of all personnel.

### Archiving of Documents

All Kheth'Impilo personnel shall be responsible for archiving all records and documents created and/or held by Kheth'Impilo, as per the requirements detailed in Table 1, and who shall when such records and documents record

archived, reflect this status under the department records management register (hereinafter referred to as the “Department Record Management Register”) referred to under the Organisational POPIA Policy.

### Disposal and Destruction of Documents and Records

Records and documents shall only be destroyed if the period detailed in Table 1, below has lapsed. Such destruction will always be subject to the approval of the personnel manager, which approval will be in the form of a written document.

Records and documents that are not required to be kept in terms of Table 1 should be destroyed as soon as they are no longer required.

Duplicates and copies of all records and documents when the originals are available and intact should be destroyed.

All paper-based records and documents that must be destroyed must be shredded.

All electronic records and documents that must be destroyed must be on instruction from the head of department in writing.

Once records and documents have been destroyed, a **destruction certificate** should be issued by the person or company destroying such records and documents.

**Commented [HJ1]:** @Shahiema: We need to design a destruction certificate for in-house use.

### Litigation or Promotion of Access to Information Act 2 of 2000 (PAIA) Hold

Where there is reasonable expectation of future litigation, records and documents related to such potential cases must be retained (litigation hold).

Furthermore, where a request for records and documents is received under a PAIA request, such records and documents must be retained until the PAIA process is complete. Kheth’Impilo will take the necessary steps to ensure compliance with its obligations under PAIA, and all other applicable legislation.

In the event of litigation or PAIA hold, such records and documents must be retained and must not be destroyed even if the retention period has expired. The legal or PAIA hold status must be indicated under the relevant folder where the records and documents are kept or stored.

### Consequences of Non-Compliance

Compliance with this policy and any related procedures and policies is mandatory.

Any transgression of this policy and any related procedures and policies will be investigated and may lead to disciplinary action against the transgressor.

TYPE OF DOCUMENT	MINIMUM RETENTION REQUIREMENT	DOCUMENT OWNER
A. EXECUTIVE OFFICE:		
ALL KI registered entities including NPO and PBO registration documents	Permanent	Executive Assistant
Board Meetings	Permanent	Executive Assistant
Executive Committee	Permanent	Executive Assistant
Trademark Registrations and Copyrights	Permanent	Executive Assistant

Research and Publications	Permanent	Executive Assistant
Policies and Procedures	Permanent	HRP Manager
Statutory Reports	Permanent	Executive Assistant
B. GRANT RECORDS:		
Original Grant proposal	7 Years	Programme Director
Grant Agreements and subsequent modifications (if applicable)	7 Years	Programme Director
Final Grant reports, financial and narrative	7 Years	Programme Director
Evidence of returned grant funds	7 Years	FIN Manager
C. FUNDER / DONATIONS RECORDS:		
Donor List	7 Years	Executive Assistant
Donor Acknowledgments	7 Years	Executive Assistant
Donor Reports	7 Years	Executive Assistant
D. MANAGEMENT PLANS AND PROCEDURES:		
Strategic Plans	Permanent	Executive Assistant
Staffing, programs, communication, finance, fundraising and evaluation plans	5 years	Executive Assistant
Disaster Recovery plan	Same as above	Executive Assistant
E. FINANCE:		
Accounts payable ledgers and schedules	7 years	Fin Manager
Audit reports	Permanent	Fin Manager
Audits – internal reports	Permanent	Fin Manager
Investment Records (deposits, earnings, withdrawals)	Permanent	Fin Manager
Bank reconciliations	5 years	Fin Manager
Bank Statements	5 years	Fin Manager
Contracts and or Lease agreements (still in effect)	Permanent	Fin Manager
Contracts and or Lease agreements (expired)	5 years	Fin Manager
Service level agreements (still in effect)	Permanent	Fin Manager
Service level agreements (expired)	5 years	Fin Manager
Memorandum of Understanding (still in effect)	Permanent	Fin Manager
Memorandum of Understanding (expired)	5 years	Fin Manager
Gift Registers		
Correspondence (general)	7 Years	Fin Manager
Correspondence (legal and important matters)	7 Years	Fin Manager
Correspondence (service providers/vendors)	7 Years	Fin Manager
Depreciation Schedules	5 years	Fin Manager
Duplicate deposit slips	5 years	Fin Manager
Expense Analyses/expense distribution schedules	5 years	Fin Manager

Financial Statements (year-end)	5 years	Fin Manager
Invoices from vendors	5 years	Fin Manager
Asset Inventories	5 years	Fin Manager
Petty Cash receipt/documents	5 years	Fin Manager
F. TAX RECORDS:		
Tax Returns and worksheets	5 years	Fin Manager
Withholding Tax statements	5 years	Fin Manager
Tax Exemption documents	5 years	Fin Manager
G. INSURANCE RECORDS:		
Insurance Policies (still in effect)	5 years	Fin Manager
Insurance Policies (expired)	5 years	Fin Manager
Insurance Records	5 years	Fin Manager
Insurance (disability claims)	5 years	Fin Manager
H. PERSONNEL RECORDS:		
Employment applications	5 years	HRP manager
Employment Contract (still in effect)	5 years	HRP Manager
Employment Contracts (expired)	5 years	HRP Manager
Accidents Reports	5 years	HRP manager
Minutes records	5 years	HRP manager
Personnel Files	5 years	HRP manager
Personnel files (terminated employees)	5 years	HRP manager
I. PAYROLL RECORDS:		
Payroll records	5 years	HR Manager
Pay slips (copies)	5 years	HR Manager
IRP5's	5 years	HR Manager
Timesheets	5 years	HR Manager
Unclaimed records	5 years	HR Manager
J. E-MAIL AND OTHER COMPUTER BASED CORRESPONDENCE Developed and or maintained by employees on the organisation drives/computers:		
Employee correspondence e.g. e-mails	7 years	IT Manager
K. DOCUMENT PROTECTION:		
Documents – hard copy, online or other media stored in a protected environment for the duration of the Document Retention Schedule. Computer backup media will be included.	5 years (same as personnel)	Department heads
L. DOCUMENT DESTRUCTION:		
Hardcopy of documents will be destroyed by shredding or fire after they have been retained until the end of the Document Retention Schedule. Copies of computer backup will be destroyed by fire or other proven means to destroy such media after they have been retained until the end of the Document Retention Schedule.	Will obtain certificate of confidential destruction, from service provider.	

M. PROVISION OF DOCUMENTATION FOR INVESTIGATION OR LITIGATION:		Executive Assistant
Documents requested and subpoenaed by legal authorised personnel will be provided within 5 working business days. This provision will be authorised by the Board to CEO. No documents will be concealed, altered or destroyed with the intent to obstruct the investigation or litigation.		
N. PATIENT HEALTH RECORDS	6 Years	Programmes Director
A patient health record is the longitudinal collection of an individual's personal and health information, recorded by a healthcare practitioner or at the directive of the healthcare practitioner, regardless of the form or medium used to make such a record. (HPCSA)		

Reviewed by H. Julius, Program Director, Kheth'Impilo

Date: 10 October 2024

Version 4

Next Review Date: 10 October 2025