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## Client Record Destruction Policy

### 1. Purpose

The purpose of this policy is to establish guidelines for the proper destruction of client records to ensure confidentiality and compliance with legal, regulatory, and organizational requirements.

### 2. Scope

This policy applies to all client records, regardless of format (paper, electronic, or other media), created, received, or maintained by the organization.

### 3. Definitions

- Client Records: Any documents or information that contain personal, financial, or confidential information about clients.
- Destruction: The process of eliminating or deleting records beyond any possibility of recovery.

### 4. Legal and Regulatory Compliance

The organization will comply with all applicable laws and regulations regarding the retention and destruction of client records, including but not limited to:

- General Data Protection Regulation (GDPR)
- IACP code of ethics
- IACP-Record-Keeping-and-Retention-Guidelines

### 5. Retention Period



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Client records will be retained for the period specified in the organization's Records Retention Schedule, which will be determined based on legal, regulatory, and business requirements.

#### 6. Destruction Methods

Records will be destroyed using methods appropriate to their format to ensure that they cannot be reconstructed or retrieved:

- Paper Records: Shredding, pulping, or incineration.
- Electronic Records: Overwriting, degaussing, or physical destruction of storage media.
- Other Media: Methods suitable to the media type to ensure complete destruction.

#### 7. Authorization and Documentation

- Destruction of records must be authorized by the designated records manager or another appropriate authority.
- A record of the destruction process must be maintained, including:
  - Description of the records destroyed
  - Date of destruction
  - Method of destruction
  - Person responsible for destruction

#### 8. Security Measures

- Records pending destruction must be stored securely to prevent unauthorized access.
- Access to records designated for destruction is limited to authorized personnel only.

#### 9. Training and Awareness

- All employees will receive training on the importance of record destruction and the procedures outlined in this policy.



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- Regular audits and reviews will be conducted to ensure compliance with the policy.

### 10. Policy Review

This policy will be reviewed annually and updated as necessary to reflect changes in legal, regulatory, or business requirements.

### 11. Consequences of Non-Compliance

Non-compliance with this policy may result in disciplinary action, up to and including termination of employment, as well as potential legal consequences.

### Record Retention Schedule (Example)

Record Type	Retention Period	Destruction Method
Client Contracts	7 years after end of contract	Shredding (paper), Deletion (electronic)
Financial Records	10 years	Shredding (paper), Deletion (electronic)
Medical Records	7 years after last visit	Shredding (paper), Overwriting (electronic)
Customer Support Records	3 years after resolution	Shredding (paper), Deletion (electronic)



# H I B E R N I U M

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Marketing  
Communication Data

2 years

Shredding (paper),  
Deletion (electronic)

## Implementation Steps

1. Develop Records Retention Schedule: Based on legal, regulatory, and business needs.
2. Train Employees: Ensure all staff understand the policy and procedures.
3. Secure Storage: Implement secure storage solutions for records pending destruction.
4. Document Destruction: Maintain logs of all destruction activities.
5. Regular Audits: Conduct periodic reviews to ensure compliance.