

DE BEERS BENEFIT SOCIETY

SOCIETY POLICY DOCUMENT

INFORMATION MANAGEMENT POLICY

<u>Revision no</u>	<u>Review cycle</u>	<u>Effective date</u>
004	At least every two years	29 September 2020



A registered medical scheme
Registration no. 29/4/2/1068

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Organisation	De Beers Benefit Society (the Society)				
Subject	Information Management Policy				
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1. PURPOSE

The purpose of this policy is to document the requirements for the implementation and maintenance of information management systems and processes designed to collect, process, distribute, retain and safeguard information to ensure the reliable, consistent, effective and efficient management thereof.

Information is one of the Society's most important assets and a significant portion thereof is irreplaceable. It is therefore important that information is safeguarded and managed with due care.

In addition, if the information is of a personal and/or confidential nature, access should be restricted to authorised individuals only.

2. SCOPE

The policy applies to the Board of Trustees (the Board), Board Committees and the Society employees whether employed on a permanent or temporary basis, as well as service providers to the Society.

The policy covers all information, regardless of the storage media (e.g. electronic or paper) and whether it originates from within the Society or from an external source, that is held in discrete computer applications, databases (e.g. third party administration systems, financial systems and computer network storage) or hard copy document storage areas (e.g. strong rooms and dedicated on-site / off-site storage and archive facilities).

The policy does not cover the procedures to evaluate and confirm the authenticity of information prior to and whilst it is being processed and stored. Procedures must be implemented to ensure that electronically stored documents or information may be relied on as being authentic in the event of a dispute (legal or otherwise) arising.

3. DEFINITIONS AND ACRONYMS

Definition / Acronym	Description
The Board	Board of Trustees
King IV Report	King IV Report on Corporate Governance for South Africa
EDMS	Electronic Document Management System
DBPF	De Beers Pension Fund
FSCA	Financial Sector Conduct Authority
MLA	Member Ledger Administration (DBPF)
PPSHA	PPS Healthcare Administrators
MSO	Medical Services Organisation
PENBEN	De Beers Pension Fund and Benefit Society
POPIA	Protection of Personal Information Act No. 4 of 2013
SOPs	Standard Operating Procedures

4. RESPONSIBILITIES AND AUTHORITY

Designation	Responsibility
The Board	To approve this policy.

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Designation	Responsibility
Principal Officer	- Policy owner and policy interpretation as required; - To ensure that the policy is implemented, maintained and regularly reviewed and updated; and - To promote and ensure compliance with this policy.
Society Manager	- The drafting and review of this policy and procedure manual; - To ensure that SOPs are maintained by the Society to support this policy, that these are aligned to this policy and that they are implemented; and - To advise the Principal Officer of any non-compliance with the policy, the procedure manual or the SOPs.
Heads of Departments and Supervisors	- To ensure employees and service providers are aware of and adhere to the information management practices and requirements defined in this policy; - To ensure that the relevant policies and procedures are applied in the departments concerned and to advise the Society Manager of any deviations; - To advise the Society Manager of any matters that may result in non-compliance with this policy; - To advise the Society Manager of any changes in the business environment that may impact on the information management practices and requirements defined in this policy; and - To ensure that the removal of information from systems or network storage areas and destruction of physical documents, are undertaken in accordance with this policy.
Office Manager	- Alignment of this policy to associated organisational policies and procedures, as well as regulatory requirements and provisions; - Maintaining the technology associated with the information management systems, including appropriate system accessibility, software version control, security and back-up procedures; and - To ensure that the removal of information from systems or network storage folders and destruction of physical documents, is undertaken in accordance with this policy.

Any matter relating to Information Management not provided for in this policy must be referred to the Principal Officer who may exercise his discretion in dealing with the issue prior to reporting the matter at the next scheduled meeting of the Board along with a proposed policy change, if appropriate.

5. POLICY

5.1 Objectives

The objectives of the policy are to:

- provide a framework to ensure that information is classified, structured, validated, safeguarded, managed, stored and monitored reliably, efficiently and effectively;

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- mitigate the information management risk exposure of the Society;
- ensure that the information management systems and processes are adequately secured, maintained, regularly reviewed and updated;
- ensure the trustworthiness, reliability, authenticity and integrity of stored information;
- ensure that information is retained in a format and for periods as prescribed by legislation or as may be required for operational reasons;
- facilitate effective implementation of electronic storage of information where the retention of the original documentation is not required by legislation; and
- enable the Society to demonstrate that an electronic document is a true copy of the original, whether that original was an electronic data file or an original physical source document. *(The legal opinion obtained pointed out that the authenticity of an electronically stored document will be determined by a court of law or equivalent body in the event of there being a dispute and there is no certainty in this regard, although comprehensive policies and procedures being in place supporting the electronic capturing, storage and retrieval process will mitigate negative outcomes to some extent.)*

In addition, the policy intends to ensure that the Society employees:

- are able to identify and retrieve information about a particular member, activity, subject or transaction efficiently and timeously;
- understand the importance and confidential nature of the information;
- have the appropriate access to information as required and authorised;
- are categorised in terms of their access to particular sets of information; and
- only share information with third parties who are authorised to have access to the information in terms of a written agreement and where permitted by prevailing legislation i.e. the POPIA.

5.2 Regulatory and governance framework

The policy takes account of the following regulatory and operational information management requirements that must be complied with:

- Medical Schemes Act and Regulations, as amended;
- Council for Medical Schemes Circulars;
- POPIA;
- Electronic Communications and Transactions Act;
- Other relevant legislation and regulations;
- Rules and Rulings of the Society;
- Resolutions passed by the Board; and
- Other organisational policies, procedures and SOPs.

In addition, the recommended best practices as contained in the South African National Standards (SANS) 15801 - Electronic Imaging and the King IV Report, where appropriate and applicable, have been considered in formulating this policy.

5.3 Organisational policies

The policy should be implemented and applied in conjunction with the following organisational policies:

- Agreement Management Policy;

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- Confidentiality Policy;
- Conditions of Employment Policy;
- IT Policies;
- Promotion of Access to Information; and
- Signing Authorities Policy.

5.4 Information covered

Information collected, processed, distributed and retained, including correspondence, by the various disciplines / departments within the Society are grouped as follows for purposes of this policy:

- Members' personal information;
- Agreements and contracts;
- Employee, labour relations and health and safety records;
- Society general information and statutory records¹;
- Income Tax and Value Added Tax (VAT) records; and
- Accounting and financial records.²

5.5 Storage media

Source documents, whether electronic or physical, will be stored either in the Society and third party's administration and other computer systems (including applications and databases) or in physical document storage areas or in both, as provided for in Annexure A.

Refer to Annexure A for the applicable retention periods and storage media, as prescribed by legislation or as may be required for operational reasons.

The Society has a responsibility to ensure that information is only accessible to authorised individuals within reason and in an appropriate format. In order to achieve this, a consistent approach is required in preserving the quality and integrity of information, as well as ensuring that information can be identified and retrieved in a predictable manner.

The Society should also consider its broader business goals when determining information management requirements. In addition, the Society employees are required to be familiar with and consider the overall operational information and legislative requirements rather than just those applicable to their department.

In order to achieve the above, the following must be dealt with in the SOPs:

- The retrieval needs of authorised individuals within each department;
- Using meaningful document titles and adding relevant keywords to enable other users to identify and retrieve documents;
- Structuring the storage and retrieval of information in the context of the associated storage media in a way that reflects the activities of a department (*e.g. setting up network folder structures according to the activities of a department*); and
- Applying version control to identify the sequence in which documents were created to ensure that the most recent version is retrieved.

¹ Including the Board and Board Committee agendas, electronic resolutions and minutes of meetings.

² Including audit trails and reports generated from administration and financial systems.

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5.6 Electronic file formats

5.6.1 Scanned images

The file format to be used for storing scanned images of original documents, where the retention of the original documents is not required by legislation or for operational reasons, must ensure an acceptable scanned image quality using a reasonable file size, as well as promoting the sustainable retrieval of the stored information.

The Society administration system uses Adobe® as the preferred file format for scanned images. Therefore, in order to standardise the scanning of documents within the Society, Adobe® should be used for the scanning of all original documentation for electronic filing purposes.

Office Administration is to ensure that the Adobe® software version to be used remains the latest approved version and to consider the impact changes to the Society's operating systems and / or hardware may have on the software.

Scanned images should be date stamped to ensure that the most recent version can be identified where there is more than one version of a particular document.

5.6.2 Other electronic data

Where electronic data, whether it originates from within the Society or externally, must be retained as defined in Annexure A only file formats that are supported by the Society's operating system (*e.g. Windows*) and desktop applications (*e.g. Microsoft Office*) are permissible.

Office Administration is to ensure that the versions of the operating system and desktop applications are the latest approved versions and to consider the impact changes to the operating system and/or desktop applications might have on this policy.

5.7 Retention of information

Due to and depending on multiple legislative requirements and / or operational reasons, information must be retained for a minimum period of time aligned to such requirements.

There is however no legislation that clearly sets out the retention periods for the various types of documents held by medical schemes in particular. The King IV Report recommends that entities should determine their document retention requirements based on a risk assessment, subject to the minimum retention period expressly prescribed in legislation. Therefore, whilst legislation or standard practice may indicate certain minimum retention periods, it is up to the Society to determine whether it wishes to retain a particular document for a longer period based on operational requirements.

Annexure A provides for the applicable retention periods as prescribed by legislation or as may be required for operational reasons. In addition, Annexure A also includes reference to other legislation and / or medical scheme industry best practice. Where no clear reference could be obtained from either legislation or standard practice documents, the retention period as prescribed in the Companies Act has been adopted.

The Society and DBPF are accommodated in the same building and share a general office administration and infrastructure environment, as well as on-site / off-site storage and archival facilities. Annexure A therefore includes reference to DBPF records.

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5.8 Compliance monitoring

It is important that compliance with all aspects of this policy can be demonstrated across all the Society departments.

The following are responsible to ensure that compliance with this policy is maintained:

Compliance Area	Position		Department
	Responsible (Obtain)	Accountable (Maintain)	
Member Administration	Supervisor - Registrations	Medical Scheme Administrator	Registrations and Contributions
Claims Administration	Supervisor - Claims	Medical Scheme Administrator	Claims
Hospital Authorisations	PPSHA	Medical Scheme Administrator	PPSHA
Finance	Financial Accountant	Society Financial Manager	Finance
Office Administration	Office Administration Assistants and IT	Office Manager	Office Administration
Employees' personnel records	Supervisor - MLA	Chief Operating Officer	Staff Payroll

6. FIDUCIARY DUTY

It is the Board and Management's fiduciary duty and in some instances legislated duty to take reasonable care to ensure that information held by it is safeguarded and protected.

If a reasonable or likely risk is identified that could lead to unforeseen destruction, unauthorised access to or falsifying or corruption of stored information, reasonable steps must be taken to safeguard the information.

6.1 Accountability

The matrix below indicates the accountability for the various activities involving the management of information at all levels:

Activity	Society Manager	Medical Scheme Administrator	Office Manager	Society Financial Manager
Risk mitigation and safeguarding	X		X	
Input reconciliation and quality control (Processing, scanning and storing)		X		X

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Activity	Society Manager	Medical Scheme Administrator	Office Manager	Society Financial Manager
Ongoing training	X	X	X	X
Regular backups of systems and assurance of the integrity of the backups	X		X	
Society administration and other third-party systems (Structured member and other data)	X	X	X	X
Computer network and other storage areas (Unstructured member and other data)	X	X	X	X
Adherence and implementation of legislative and statutory requirements / changes	X	X	X	X
Procedural changes and documenting thereof		X		X
Hardware maintenance and software version control			X	
Independent contractors and service providers' awareness	X	X	X	X
System security: Logical user access control	X	X	X	X
Authorising deletion / destruction of information	X	X	X	X

6.2 Segregation of duties

The appropriate segregation of the following duties is fundamental to provide reasonable assurance as to the integrity and reliability of the Society' information management systems and processes to safeguard, verify and maintain information:

6.2.1 Input reconciliation (Scanned images)

The relevant departmental supervisor or employee so authorised will reconcile all source documentation that was scanned into the various systems to the daily audit trails and / or registers.

6.2.2 Quality control (Scanned images)

The relevant departmental supervisor or employee so authorised will perform sample testing from the daily audit trails and / or registers to ensure that the scanner is performing to agreed standards and that the scanned images may be considered to be of a satisfactory quality.

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6.2.3 Data entry (Scanned images)

The capturing of the scanned images for classification purposes must be done according to the agreed categories as specified in Annexure B and the guidelines in sections 5.5 and 5.6 of this policy.

6.2.4 Information deletion / destruction

Deletion or destruction of information should be done strictly according to Annexure A and such destruction must be initiated by the relevant supervisor and authorised by the relevant HOD (authorised individual as listed in section 6.1.)

6.2.5 Information security

In order to protect information, the following security measures need to be implemented:

- Access to information should be restricted to authorised individuals by implementing and documenting the required physical and logical access controls;
- Granting of and changes to individual user access within the various systems must be authorised by the relevant HOD and Society Manager via the installation and maintenance of encryption software on laptops and other mobile devices; and
- By installing and maintaining virus detection software on all desktop workstations, laptops, other mobile devices and network servers.

7. PROCESSES AND PROCEDURES

7.1 General

The Society needs to implement and must maintain documented processes and procedures to ensure that this policy is complied with and that:

- information is secure, accessible, accurate, reliable and up to date;
- quality control and good corporate governance standards are set, maintained and achieved; and
- regulatory and legislative compliance is provided for.

These processes and procedures must be directed at:

- implementing the objectives of this policy;
- creating role clarity and clearly defined workplace accountability;
- ensuring knowledge retention and sharing amongst employees;
- enhancing the general understanding with regard to information management;
- establishing a platform for continuous process and efficiency improvements;
- managing change relating to information management; and
- supporting the process of measuring and tracking operational performance.

7.2 Procedure manual

7.2.1 Documentation

A comprehensive procedure manual must be developed and must be maintained to support the implementation of this policy by describing the processes and procedures to

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be followed with regard to the practical implementation of this policy in relation to the areas noted in 7.2.2 below.

Importantly the Society needs to document the processes and procedures to be followed in order that it can be demonstrated that an electronic file, whether it was created or existed within the various systems, has not changed since it was created or imported and is a true copy of the original, regardless of whether the original was itself an electronic data file or physical source document.

This policy should therefore be read and implemented in conjunction with the procedure manual.

7.2.2 Content

The following processes and procedures must be covered in the procedure manual:

- Document image capturing;
- Document scanning and importing;
- Indexing;
- Output authentication;
- Information retention;
- Information destruction / deletion;
- Backup and system recovery;
- System maintenance;
- Version control; and
- Maintenance of documentation.

7.2.3 Compliance with the procedure manual

The processes and procedures detailed in the procedure manual apply to all the Society employees. A current and appropriately authorised version of this manual must be made available and maintained on the Society intranet portal.

In order to ensure that Society employees remain aware of the need to apply this policy and procedure manual, awareness must be reinforced through regular staff briefings and training sessions as appropriate.

7.2.4 Updating and reviews

In order to ensure that the processes and procedures remain appropriate, the procedure manual must be kept up to date and in alignment with the policy. The procedure manual must be reviewed annually or when policy changes are agreed. Reviews may also be necessary where legal or regulatory changes take place. In addition:

- Each department is responsible for the periodic review and updating of its SOPs aligned to the latest version of this policy and procedure manual;
- Document control should be applied to ensure that any changes to the procedure manual are tracked;
- Any changes to processes and procedures should be properly considered and tested to ensure that they address operational requirements and that the requirements of this policy are not compromised; and
- Previous versions of the procedure manual should be retained in compliance with this policy.

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8. AUTHORISATION AND APPROVAL

Approved by Board.



CHAIRPERSON OF THE SOCIETY
C W COLTMAN

Date: 16/10/2020.

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ANNEXURE A – RETENTION OF RECORDS

The PENBEN are accommodated in the same building and share an office administration and infrastructure environment, as well as on-site/off-site storage and archive facility. This Annexure therefore includes reference to the DBPF specific records. Where no specific reference is made to either the Society or DBPF, it applies to both organisations.

Record	Preferred storage media	Period of Retention (Years)		Comparison with other legislation or industry practice
		Original and/or Electronic	Original (if only electronic)	
1. Electronic Data – Personal Information				
Personal information relating to employees, members, pensioners and their dependants and the purpose for which data was collected.	Electronic	For as long as information is used for the purpose obtained and at least 1 year thereafter or Longer if required or authorised by law, reasonably required by the organisation for a lawful purpose relating to its activities and maintained for purposes of proof.	POPIA and the Electronic Communication and Transaction Act	
Record of any third party to whom personal information was disclosed.	Electronic			
2. Agreements and Contracts				
Agreements of historical significance	Original	Indefinitely	n/a	Standard Practice ³
Agreements / Software maintenance, licensing and service level agreements with service / preferred providers (after date of termination)	Original and Electronic	7	n/a	Companies Act
Other agreements / contracts (after date of termination)	Original and Electronic	7	n/a	Companies Act
Correspondence related to agreements (after date of termination)	Original and Electronic	7	n/a	Companies Act
3. Employee Records / Labour Relations / Health and Safety				
Basic Conditions of Employment Act (Written particulars of employee after termination of employment)				
Employee's name and occupation	Electronic	5	Nil	n/a

³ Global Information Management Information Systems and Metrofile

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		Original and/or Electronic	Original (if only electronic)	
Remuneration paid to each employee	Electronic	5	Nil	n/a
Time worked by each employee	Electronic	5	Nil	n/a
Labour Relations Act				
Records of each employee specifying the nature of any disciplinary transgressions, the actions taken and the reasons for the actions	Original and Electronic	Indefinitely	n/a	n/a
Unemployment Insurance Act				
Names, identification numbers, monthly remuneration and contact details of current employees	Electronic	5	Nil	n/a
Occupational Health and Safety Act				
Records of incidents reported at work	Original	3	n/a	n/a
Other				
Staff payroll reconciliations (including leave and overtime)	Original and Electronic	5	n/a	n/a
Property Records				
Deeds of title	Original and Electronic	Indefinitely or until property disposed of	n/a	Standard Practice
Lease agreements (after date of termination)	Original and Electronic	7	n/a	Tax Administration Act
4. Pension Fund Statutory Records				
Actuarial valuation reports	Original and Electronic	Indefinitely	n/a	Standard Practice
Annual financial statements	Original and Electronic	Indefinitely	n/a	7 years but standard practice appears to be indefinitely
Annual and other statutory returns	Electronic	7	One	Companies Act

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Record	Preferred storage media	Period of Retention (Years)		Comparison with other legislation or industry practice
		Original and/or Electronic	Original (if only electronic)	
Minutes of board and board committee meetings, as well as electronic resolutions	Original and Electronic	Indefinitely	n/a	7 years from the date of meeting but standard practice appears to be indefinitely
Registration certificate	Original and Electronic	Indefinitely	n/a	7 years but suggested period is indefinitely as it is a founding document
Register of trustees and board committee members (After date of termination of office)	Original and Electronic	Indefinitely	n/a	7 years from termination of office but standard practice appears to be indefinitely
Rules and Rulings	Original and Electronic	Indefinitely	n/a	Standard practice
Trustees and board committee members' declaration of interest (After date of termination of office)	Original and Electronic	7	n/a	7 years from termination of office – Companies Act
Records of proceedings related to the justification of a complaint - Adjudicator	Electronic	Indefinitely	n/a	Section 30 of the Pension Funds Act
Complaints register (Adjudicator, member, pensioner, beneficiaries and FSCA)	Electronic	Indefinitely	n/a	Pension Funds Act
Correspondence - Registrar	Original and Electronic	Indefinitely	n/a	Standard Practice
5. Benefit Society Statutory Records				
Complaints register (Council for Medical Schemes)	Electronic	Indefinitely	n/a	Medical Schemes Act
Annual financial statements	Original and Electronic	Indefinitely	n/a	7 years but standard practice appears to be indefinitely
Annual and other statutory returns	Electronic	7	One	Companies Act
Rules and Rulings	Original and Electronic	Indefinitely	n/a	Standard practice

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		Original and/or Electronic	Original (if only electronic)	
Minutes of board, board committee, AGM and special general meetings, as well as electronic resolutions	Original and Electronic	Indefinitely	n/a	7 years from the date of the meeting but standard practice appears to be indefinitely
Proxy forms from members for Society AGM's	Original and Electronic	For as long as the resolution to which it pertains, remains in place	n/a	7 years from the date of the meeting – Companies Act
Registration certificate	Original and Electronic	Indefinitely	n/a	7 years but suggested period is indefinitely as it is a founding document
Register of trustees and board committee members (After date of termination of office)	Original and Electronic	Indefinitely	n/a	7 years from termination of office
Trustee and board committee members declaration of interest (After date of termination of office)	Original and Electronic	7	Nil	7 years from termination of office but standard practice appears to be indefinitely
Correspondence and records related to the justification of a complaint	Original and Electronic	Indefinitely	n/a	Standard Practice
Correspondence – Council for Medical Schemes (Society)	Original and Electronic	Indefinitely	n/a	Standard Practice
6. Accounting / Financial records				
Bank instructions	Original	7	n/a	Companies Act
Bank statements / vouchers / deposit slips	Original	7	n/a	Companies Act
Cash books or similar records i.e. resignation control books (DBPF – Manual Pre 2005)	Original	Indefinitely (for purposes of proof)	n/a	Internal Policy
Cheques	Original	7	n/a	Companies Act
Contribution schedules and reconciliations	Electronic	7	One	Companies Act
Recovery schedules and reconciliations (Society)	Electronic	7	One	Companies Act

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Record	Preferred storage media	Period of Retention (Years)		Comparison with other legislation or industry practice
		Original and/or Electronic	Original (if only electronic)	
Full member listings (DBPF) <i>(Year-end reports only)</i>	Pre 2004 Original Post 2004 Electronic	Indefinitely <i>(To be read with section 1)</i>	n/a	Internal Policy
Actuarial valuation data (DBPF)	Pre 2004 Original Post 2004 Electronic	Indefinitely <i>(To be read with section 1)</i>	n/a	Internal Policy
Courier dispatch documents	Original	1	n/a	Standard Practice
Sundry creditor's statements and invoices	Original	7	n/a	Companies Act
Sundry debtor's statements and invoices	Original	7	n/a	Companies Act
Fixed assets register	Electronic	7	One	Companies Act
General ledgers and sub-ledgers i.e. debtors and creditors	Electronic	7	Nil	Companies Act
Investment records and reconciliations	Original	7	n/a	Companies Act
Journal books and vouchers	Original	7	n/a	Companies Act
Medical service providers – invoices and statements (Society)	Electronic	Indefinitely <i>(To be read with section 1)</i>	3 months <i>(Paper claims only)</i>	Internal Policy
Member monthly statements and medical service provider remittance advices (Society)	Electronic	Indefinitely <i>(To be read with section 1)</i>	Nil	Internal Policy
Monthly general ledger and other reconciliations, including exception reports and audit trail reports	Original and Electronic	7	n/a	Companies Act
Pensioner payroll reports and reconciliations (DBPF)	Original and Electronic	7	n/a	Companies Act
Pensioner files / records (DBPF)	Pre EDMS Original ⁴	Indefinitely <i>(To be read with section 1)</i>	n/a	Internal Policy

⁴ These files will be converted into an electronic format over a period of time and the original files destroyed

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		Original and/or Electronic	Original (if only electronic)	
	<u>Post EDMS</u> Electronic			
Pensioner files/records (Society)	<u>Pre EDMS</u> Original ⁴ <u>Post EDMS</u> Electronic	Indefinitely (To be read with section 1)	n/a	Internal Policy
Terminated pensioner files/records – No next of kin (DBPF)	<u>Pre EDMS</u> Original <u>Post EDMS</u> Electronic	Indefinitely (To be read with section 1)	n/a	Internal Policy
Payment requisitions (Members, pensioner and other third parties)	Original	7	n/a	Companies Act
Petty cash books and vouchers	Original	7	n/a	Companies Act
Purchase journals/ invoices/orders	Original	7	n/a	Companies Act
Member's withdrawal files/records (DBPF) - Record cards (Pre 1990) - Payment and Termination vouchers (1990 to 1998) - Section 14 transfers (Pre 2003) - Resignation files (1998 to 2013) - Purchase of annuity (Pre 2014)	<u>Pre EDMS</u> Original <u>Post EDMS</u> Electronic	Indefinitely (To be read with section 1)	n/a	Internal Policy
Working member files/records - Active and Terminated (Society)	<u>Pre 2002</u> Original <u>Post 2001</u> Electronic	Indefinitely (To be read with section 1)	n/a	Internal Policy
Working member files/records (DBPF)	<u>Pre EDMS</u> Original <u>Post EDMS</u> Electronic	Indefinitely (To be read with section 1)	n/a	Internal Policy
Year-end working papers	Electronic	7	3	Companies Act

SOCIETY POLICY DOCUMENT

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Revision no	004	Review cycle	At least every two years	Effective date 29 September 2020

Record	Preferred storage media	Period of Retention (Years)		Comparison with other legislation or industry practice
		Original and/or Electronic	Original (if only electronic)	
7. Income Tax and VAT				
Income tax (PAYE), VAT returns / reconciliations / Third party data	Original and Electronic	5	n/a	Income Tax Act
Tax certificates	Electronic	Indefinitely (To be read with section 1)	Nil	Internal Policy
Tax certificates – Namibia (DBPF)	<u>Pre 2010</u> Original <u>Post 2009</u> Electronic	<u>Original</u> 5 <u>Electronic</u> Indefinitely (To be read with section 1)	n/a	Internal Policy
8. Member Communication				
Benefit Beat, Pensioner Focus, Fund Focus, Annual Reports and other member communication	Electronic	Indefinitely	Nil	Internal Policy

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ANNEXURE B – MEMBER DOCUMENTATION CATEGORIES

Category	Description
1	Member and provider correspondence (sub-divide)
2	Member and provider bank details
3	Authorisations
4	Claims

Member hard copy files, prior to the implementation of an electronic document management system, will be converted to a single scanned image (refer category 1 above).

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REVISION HISTORY

Revision no	Description	Date Reviewed	Date Approved	Minute no
001	New policy created	August 2016	21 September 2016	20.16.3
002	Reviewed	August 2018	26 September 2018	50.18
003	Reviewed	August 2019	18 September 2019	43.19
004	Reviewed	September 2020	29 September 2020	45.20.2