

THE BELONGING THERAPY

DATA RETENTION & SECURE DISPOSAL POLICY

Practice	The Belonging Therapy
Data controller	Liana McDonald
Version / review	Version 1.0 September 2026 Review annually or sooner if requirements change

1. Purpose

This policy explains how The Belonging Therapy retains, reviews and securely disposes of personal information and clinical records. It supports compliance with UK data protection requirements, including the principles of data minimisation, storage limitation, integrity and confidentiality.

Personal data will not be kept indefinitely 'just in case'. Retention periods are based on the purpose for holding the information, professional and legal considerations, and the need to be able to account for the therapy provided.

2. Scope

This policy applies to personal data held in paper or electronic form, including enquiries, consultation records, client information, therapy agreements, assessments, risk and safeguarding records, session notes, correspondence, information-sharing records, complaints and relevant financial/administrative records.

3. Principles

- Only information that is adequate, relevant and necessary for the purpose will be recorded and retained.
- Records will be accurate and proportionate, with clinical notes focused on information relevant to the therapeutic work, safety, decision-making and continuity of care.
- Identifiable personal information will be retained only for as long as there is a justified purpose.
- Retention will be reviewed periodically and information that is no longer required will be securely destroyed or irreversibly anonymised.
- Longer retention may be justified where there is an active complaint, safeguarding matter, legal claim, regulatory/professional process, or another documented reason.

4. Retention schedule

The following are The Belonging Therapy's standard retention periods. They are review points rather than an instruction to retain information unnecessarily. Where a different period is required, the reason will be documented.

Record category	Standard retention period	Notes
Enquiries where therapy does not proceed	12 months after last meaningful contact	Retain only the minimum needed to manage the enquiry, follow-up or any related concern.
Adult client clinical record	7 years after therapy ends	Includes assessment, therapy agreement, session notes, measures, correspondence and closing record. Review at the end of the period before disposal.
Client aged under 18 at the end of therapy	Until age 25, or 7 years after therapy ends if that is later	This practice primarily works with clients aged 16+. This longer period protects continuity and accountability where the client was a minor.
Risk / safeguarding records	Retain with the relevant clinical record; extend where necessary	Do not destroy while a safeguarding, legal, complaint or professional matter remains active or reasonably foreseeable.
Information-sharing consent / liaison	Retain with the relevant clinical	Includes consent,

records	record	withdrawal/amendment and relevant professional correspondence.
Complaints records	7 years after the complaint is concluded	May be retained longer where a professional, regulatory, insurance or legal process remains active.
Financial / accounting records	At least 5 years after the relevant 31 January Self Assessment filing deadline	Retained separately from clinical notes where practicable, in line with HMRC record-keeping requirements.

5. When the retention period starts

For clinical records, the retention period normally starts from the date therapy ends or the last substantive clinical contact. For an enquiry that does not proceed, it starts from the last meaningful contact. For a complaint, it starts when the complaint and any associated process are concluded.

6. Reasons for extending retention

A record may be retained beyond the standard period where there is a clear and documented reason, for example an unresolved complaint, safeguarding concern, court or legal process, insurance notification, professional conduct matter, or where deletion would conflict with another legal or professional obligation. The need for continued retention will be reviewed rather than treated as indefinite.

7. Secure storage during retention

- Electronic records will be protected by appropriate access controls, strong passwords and device/account security. Access will be limited to Liana McDonald and any person who has a legitimate, authorised need for access.
- Paper records, where used, will be kept in secure locked storage when not in use.
- Clinical records will be kept separate from unnecessary identifying or administrative information where practicable.
- Backups and cloud services used for personal data will be selected and managed with confidentiality and data-protection obligations in mind.
- Information used in supervision will be shared on a proportionate basis and identifying details will be minimised where practicable.

8. Review and disposal

Retention will be reviewed at least annually as part of practice governance, with records flagged for review when their standard retention period expires. Before disposal, The Belonging Therapy will check whether there is any continuing lawful or professional reason to retain the information.

- Paper records will be cross-cut shredded or disposed of through an appropriate confidential-waste service.
- Electronic records will be securely deleted from active systems and, where applicable, removed or placed beyond use within backups in accordance with the relevant system's deletion arrangements.
- Simply moving information to an archive, offline folder or deleted-items folder is not treated as secure disposal if the information remains recoverable and in use.
- Where information is retained only in anonymised form, anonymisation must be irreversible so that the individual is no longer identifiable.

9. Requests for erasure

Clients may ask for personal data to be erased. The right to erasure is not absolute. Each request will be considered against the purposes and lawful grounds for continued retention, including any relevant legal, safeguarding, insurance or professional obligations. Where information is no longer required and no valid reason for retention remains, it will be securely erased.

10. Closure, incapacity or transfer of practice

The Belonging Therapy will maintain arrangements for the secure management of records if the practice closes or Liana McDonald becomes unable to practise. Any authorised person acting under professional-will or incapacity arrangements will have access only to the information necessary to protect clients, manage records appropriately and meet legal/professional responsibilities.

11. Relationship with other documents

- Privacy Notice
- Therapy Agreement
- Safeguarding Policy & Procedures
- Complaints Policy & Procedure
- Information Sharing Consent Form

12. Review

This policy and retention schedule will be reviewed annually and sooner if legislation, ICO guidance, professional requirements, insurance conditions, the client group or The Belonging Therapy's record-keeping arrangements change.