

The Wallingford Sports Trust

Policies and procedures

18. Data Retention Policy

1. Purpose, Scope & Users

This policy sets the required retention periods for specified categories of personal data and sets out the minimum standards to be applied when destroying certain information within The Wallingford Sports Trust (“The Trust”)

This Policy applies to all employees, trustees, volunteers, advisors or service providers that may collect, process, or have access to data (including personal data and / or sensitive personal data). It is the responsibility of all of the above to familiarise themselves with this Policy and ensure adequate compliance with it.

This policy applies to all information used at the Trust. Examples of documents include:

- Emails
- Hard copy documents
- Soft copy documents
- Video and audio

2. Retention Rules

2.1. General Principles

In the event, for any category of documents not specifically defined elsewhere in this Policy (and in particular within the Data Retention Schedule) and unless otherwise mandated differently by applicable law, the required retention period for such document will be deemed to be 3 years from the date of creation of the document.

The Board of Trustees will define the time period for which the documents and electronic records should to be retained through the Data Retention Schedule. As an exemption, retention periods within Data Retention Schedule can be prolonged in cases such, if there is a chance records of personal data are needed by the Trust to prove compliance with any legal requirement.

2.2. Safeguarding of Data during Retention Period

All electronic data including that stored on Sage should be backed up on an external hard drive/ CD or cloud storage. The possibility that data media used for archiving will wear out shall be considered. If electronic storage media are chosen, any procedures and systems ensuring that the information can be accessed during the retention period (both with respect to the information carrier and the readability of formats) shall also be stored in order to safeguard the information against loss as a result of future technological changes.

2.3. Destruction of Data

The Trust and its employees should therefore, on a regular basis, review all data, whether held electronically on their device or on paper, to decide whether to destroy or delete any data once the purpose for which those documents were created is no longer relevant. See Appendix 1 for the Data Retention schedule. Once the decision is made to dispose according to the Retention Schedule, the

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data should be deleted, shredded or otherwise destroyed to a degree equivalent to their value to others and their level of confidentiality.

2.4. Breach, Enforcement and Compliance

The Board of Trustees has the responsibility to ensure compliance with this Policy. Failure to comply with this Policy may result in adverse consequences, including, but not limited to, loss of customer confidence, litigation, financial loss and damage to the Trust's reputation, personal injury, harm or loss. Non-compliance with this Policy by permanent, temporary or contract employees, or any third parties, who have been granted access to Trust premises or information, may therefore result in disciplinary proceedings or termination of their employment or contract. Such non-compliance may also lead to legal action against the parties involved in such activities.

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Appendix 1 – Data Retention Schedule

Financial Records

Personal Data Record	Retention Period
Payroll records	Seven years after the end of the tax year
Supplier contracts	Seven years after contract is terminated
Chart of Accounts	Permanent
Independent Examination	Permanent
Financial statements	Permanent
General Ledger	7 years
Bank statements	7 years
Finance Invoices (sales & purchases)	7 years
Cheque stubs	7 years
Bank deposit slips	7 years
Business expenses documents	7 years
Credit card receipts	3 years
AWP bookings data	3 years
Petty cash receipts/documents	3 years
HMRC identification numbers	Permanent
HMRC correspondence	7 years from end of tax year
Annual Charity Commission returns & filings	Permanent

Business records

Personal Data Record	Retention Period
Charity Constitution	Permanent
Incorporation documents	Permanent
Trust Policies & Procedures	Permanent
Trustee meeting minutes	Permanent
Exec Meeting Minutes	?
AGM minutes	Permanent

Employee Records

Personal Data Record	Retention Period
Disciplinary, grievance proceedings records, oral/verbal, written, final warnings, appeals	As per legal requirement (6 years after employment ceases)
Applications for jobs, interview notes for recruitment	Delete immediately where candidate was unsuccessful. Duration of employment where the candidate was successful.
Wages/salary records, overtime/bonus payments Payroll sheets, copies	7 years
Employee bank details	Duration of employment
Personal records, contracts of employment,	As per legal requirement
Employee address details	Duration of employment
Accident reports & records	As per legal requirement (3 years from the

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	date of the last entry, if the accident involves a child/ young adult, then until that person reaches the age of 21)
Certificates self-certificates, statutory sick pay forms	As per legal requirement (There is no longer a specific statutory retention period, employers still have to keep sickness records to best suit their business needs. It is advisable to keep records for at least 3 months after the end of the period of sick leave in case of a disability discrimination claim.)
Maternity pay records & details	As per legal requirement (3 years after the end of the tax year in which the maternity period ends)
Pensions information	As per legal requirement

Trustee data (Senior executive records ~ those on a senior management team or their equivalents)

Personal Data Record	Retention Period
Email address, address , DOB	Term of office [Permanently for historical purposes]

Contracts

Personal Data Record	Retention Period
Property Lease	Permanent
Grant funding agreements	Permanent
Insurance Policies	Permanent

Customer / Clubs data

Personal Data Record	Retention Period
Name, email addresses	Retained while a current customer. Once an organisation requests all records to be deleted, data will be anonymised
Photos	?

IT

Personal Data Record	Retention Period
Downloads	Cleared monthly
Inbox – emails containing PII attachments deleted after 3 years	3 years
Personal hard drive	Review quarterly , any documents containing PII deleted after 3 years
Drop Box	Reviewed quarterly, any documents containing PII deleted after 3 years.

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