

# DATA RETENTION POLICY

Updated: October 2023



Scottish  
**Volleyball**

# Data Retention Policy

## Introduction

The policy addresses the question of how long Scottish Volleyball (SV) should keep data. This is important for a number of reasons, including the following:

- Information storage has a cost whether it is on paper or on computer. Keeping information when it is no longer required is wasting money.
- General Data Protection Regulation 2018 (GDPR) requires that personal data processed for any purpose "shall not be kept for longer than is necessary for that purpose.
- Some information degrades over time and will eventually lose its value and accuracy.
- Information requests under the DPA, where SV may have to disclose information held. Holding unnecessary and potentially incorrect information will increase the cost of processing such requests and increases the risk of SV holding incorrect information which could breach the DPA.

## Aims

The aim of the policy is to provide guidance to employees, Board members, agency staff, elected members (or other public representatives), trustees, employees of association organisations and volunteers on how they should manage the data held by SV. Its key purposes are to assist in determining what data should be held and how long it should be held for. Each employee/board member is responsible for reviewing the data SV holds and making arrangements for appropriate disposal or archive.

## Scope

This policy applies to all staff, board members and all permanent and temporary employees of SV.

Each member of staff is responsible for ensuring that any data they store is, as far as possible, accurate, up-to-date, and complete. Staff are also responsible for bringing to the attention of the CEO/Office Manager when they notice incorrect or incomplete information contained within SV records.

This policy identifies what data is held by SV. This will change over time and the data retention schedule contained within section 7 of this policy will need regular review and updating of the data we hold and the associated legal and best practice requirements.

Data retention periods derive from a number of sources. These include statutory and other legal sources, SV's policy, and good or best industry practice. Legal

requirements will always take precedence. Generally, statutory requirements define the minimum time that data should be kept. For example, the DPA provides that personal data should be kept no longer than necessary for the purposes for which it is required. This policy does not replace but builds on the guidelines contained within the SV Data Protection Policy covering a broad range of our services and activities.

If there is no specific guidance, SV will retain records as long as is necessary for the defence of legal claims.

In many cases, it may not be appropriate to destroy data immediately and it may be stored at the SV Office prior to being disposed of.

This policy is relevant to records which are electronic, paper or records which have been transferred to another format.

### **Storage of Documents**

SV holds a wide range of data on our business, our staff, our members, our participants, and a number of other stakeholders. It will be held in a range of physical and computerised forms.

The data retention schedule contained at the end of this policy describe what information is held, the retention period and who is responsible for review and disposal that is no longer required to be held.

### **Archiving and Deleting of Emails**

It is recommended that the following steps are followed with regard to SV email accounts.

- ⑥ Immediately delete emails that do not need to be kept. This would include things such as promotional messages, personal messages, messages related to setting up meetings.
- ⑥ Emails containing reports or meeting notes should be deleted having saved the document if it is required. Please ensure all documents are saved in the appropriate folder within the company server, which will prevent multiple copies of the same document being stored.
- ⑥ Try to avoid sending emails with large attachments to many people. Put the document on server and email the link instead.
- ⑥ Consider if any emails over a certain age are required. Consider if you could set a period after which all emails should be deleted as a matter of course.
- ⑥ Important emails related to a particular business activity can be saved in the folders where all other related documents are stored. They can then be deleted from the email system.
- ⑥ Consider that emails could be part of a subject access request under the

DPA. If we receive a request, we are obliged to provide all details we hold within a prescribed statutory timescale. This could take a great deal of time if there are a number of emails across a range of email inboxes.

Note: It is a criminal offence to destroy information after a request for that information has been received, unless the information would have been destroyed, even if the request had not been received.

- 🌀 Only keep emails where there is a clear business need to have a record or audit trail of a particular communication.

## **Disposal of Information**

Paper records should be destroyed using the appropriate means, either through confidential waste, shredding, or other forms of suitable disposal. This particularly applies when personal data is being disposed of.

Where a third party or contractor is appointed to manage disposal of records SV must assess the risk and ensure the contractor meets the necessary requirements under this policy and the DPA.

Where the CEO/board member deem that records require to be held for longer than the recommended and/or legal requirement a clear rationale must be identified. In some cases, this may relate to risk an area of dispute, complaint, or legal case.

## **Other Relevant Documents**

This policy should be read in conjunction with the SVs' Data Protection Policy.

## **Policy Review**

This policy will be reviewed every 2 years or as otherwise required by changes in the law. Policy reviews will take account of:

- 🌀 Legislative, regulatory, and good practice requirements.
- 🌀 SV performance in the storage, archive, or deletion of data.
- 🌀 The views of any stakeholder in the use of personal data related to document retention.

## Data Retention Schedule

Record	Statutory retention period	Best Practice Retention
<b>Health and Safety</b>		
Accident books, accident records/reports	3 years after the date of the last entry	N/A
Health and safety assessments	40 years	N/A
Risk assessments (current)	N/A	Between 6 to 40 years, depending on the risk assessment
<b>Employees</b>		
Income tax and NI returns, income tax records, including correspondence with <b>sportscotland</b> payroll and the Inland Revenue	Not less than 3 years after the end of the financial year to which they relate	N/A
Records relating to events notifiable under the Retirement Benefits Schemes (Information Powers) Regulations 1995, records concerning decisions to allow retirement due to incapacity, pension accounts and associated documents	6 years from the end of the scheme year in which the event took place, or the date upon which the accounts/reports were signed/completed	N/A
Statutory Maternity Pay records, calculations, certificates (Mat B1s) or other medical evidence	3 years after the end of the tax year in which the maternity period ends	N/A
Statutory Sick Pay records, calculations, certificates, self-certificates	3 years after the end of the tax year to which they relate	N/A
Wage/salary records (also overtime, bonuses, expenses)	6 years. In practice these are retained by <b>sportscotland</b> payroll	N/A
<b>Insurance</b>		

Annual insurance schedule	N/A	6 years
Employer's Liability Insurance certificates (ELI)	40 years	N/A
Claims and related correspondence	N/A	At least 2 years after settlement
Current and former policies	N/A	Retained permanently on file
Indemnities and guarantees	5 or 20 years after expiry of policy (20 years for land)	N/A
<b>Human Resources</b>		
Personnel records	N/A	6 years following cessation of employment
Prospective employee correspondence	N/A	12 months following appointment of successful candidate
<b>Members</b>		
Members – Individual and Associate (hard copy data)	N/A	3 years following end of final year of membership
Members – Individual (electronic data)	N/A	Retained permanently on file
Club Members	N/A	Constitution – retained permanently on file
Club Members – registered members' personal data (hard copy data)	N/A	3 years following end of final year of membership
Club Members – registered members' personal data (electronic data)	N/A	Retained permanently on file
Bank and Credit Card Information	N/A	6 years – for audit purposes
Course and competition entry forms (hard copy)	N/A	12 months
<b>The Company</b>		
Elected volunteers data	N/A	Retained permanently on Companies House website
General and Board Meeting minutes	N/A	Board papers and signed copies of minutes are retained permanently on file
Annual Reports	N/A	Retained permanently as electronic data

Company Manual	N/A	Retained permanently as electronic data
Other meeting minutes	N/A	4 years
Strategic Plans	N/A	Retained permanently as electronic data
Deeds / office lease	N/A	Retained permanently on file
Consultancy Contracts	N/A	Retained permanently on file
Insurance Certificates and Policy Documents (except ELI)	N/A	3 years
<b>sport</b> scotland Investment Agreement	N/A	6 years following expiry of the applicable investment cycle
Grant applications and agreements	N/A	6 years following expiry of the current grant
Safeguarding, including Events Protocol, Code of Conduct, coach and route setter records	N/A	4 years
Certificate of incorporation	Retained permanently on file	N/A
Memorandum and Articles of Association	N/A	Retained permanently on file
Declarations of interest	N/A	6 years
<b>Finance</b>		
Accounting records	3 years – private companies	N/A
Balance sheets and supporting documents	N/A	6 years from end of accounting period
Annual report and accounts (signed version)	N/A	Retained permanently on file
Budget and internal financial reports	N/A	2 years
VAT records and related correspondence	6 years	N/A
Invoices/Purchase orders	6 years	N/A
Credit and debit notes	6 years	N/A
Cash book documentation	6 years	N/A
Creditors, debtors and cash income	6 years	N/A

Other banking records and all financial data	N/A	6 years
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