

Data Retention Policy

Defining how long information should be kept

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Owner: John Scott (Bees United Membership Secretary)

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2 Introduction

2.1 Purpose

Define the period of retention for each category of information stored by the organisation.

2.2 Scope

All data gathered and held by Brentford Football Community Society Ltd (t/a Bees United).

2.3 Key Principles and Definitions

2.3.1 Roles and Responsibilities

- Accountable Person (owner) – Define and seek approval of this policy, ensure all are familiar with responsibilities and procedures (see statement 3)
- Information Director – primary contact for all data protection, data privacy and information management matters and ensuring defined organisational measures are followed. John Scott is Information Director at time of approval
- Technology Director – responsible for ensuring all technological measures are specified, implemented, maintained and monitored. John Scott is the Technology Director at time of approval.
- All Directors – Understand the policies and ensure procedures are followed and data is protected
- Workers – Understand reasons for security measures and the consequences of not following process and procedure correctly and consistently

2.3.2 Applicable Regulations & Standards

- [Data Protection Act \(GDPR\)](#)
- [ISO 15489 – Records Management: Concepts & Principles \(2016\)](#)

3 Policy Statements

1. Deliberate or reckless failure to apply policies, process and procedures will result in the application of the **Disciplinary Process**.
2. Where possible, cloud-based storage solution will be setup to automated record destruction in line with other retention statements.
3. General company records will be retained indefinitely.
4. Information retention will be enforced according to the rules defined in the **Information Disposal Process**.
5. Company accounts, financial reports and supporting documents and records will be retained for at least 7 years from the date of creation.
6. Information that may be relevant to the company's tax position, including all books, records and associated documentation will be retained for 6 years following the end of the tax year to which they relate.
7. Personal details relating the membership of a natural person will be retained as long as the person continues to be a member. Termination of membership requires personal data to be deleted or redacted.
8. Email addresses processed for the purposes of communication with non-members will be deleted once consent is withdrawn (i.e. unsubscribed) or lapses (i.e. hard email bounce, audit review or the email address has not received a communication in more than 6 months).
9. Correspondence not relating to a contract will be retained for 1 year following its creation.
10. Information gathered on our website for the purposes of promoting and delivering our service is retained for 12 months from the date of consent being provided.
11. Information pertaining to the intellectual property (IP) of the company will be retained for 6 years following the end of life of the IP.
12. Records and documents relating to contracts will be retained for 7 years after the end of the contract.
13. Records and documents relating to insurance policies will be retained indefinitely.
14. Accident records will be retained for 3 years following the report of the incident, after which personal data will be redacted and the anonymised records retained indefinitely.

4 Implementation

4.1 Approval and review

This policy has been agreed and adopted by the board on the **DATE**

A review will be undertaken every 12 months or directly after a Breach.

4.2 Communications

The policy will be communicated as follows:

4.2.1 Externally

- Reflected in Privacy Notice, [published on the web site](#)
- Induction of 3rd party suppliers

4.2.2 Internally

- New director induction process
- Regular director training
- Discussion and reminders in meetings

4.3 Accountability

The Bees United Chairperson (Chair) is accountable for ensuring that this policy is fully implemented, followed and audited. Stewart Pervis was Chair at time of approval

5 Document Control

Key Details

Doc Ref.	POL-DataRetention-V01.docx	Date	18/6/21
Title	Data Retention Policy	Owner	Bees United Chair
Status	ISSUE 1.0	Audience	Directors, volunteers, suppliers
Purpose	Defining how long information should be kept	Tags	Personal, data, protection, privacy, retention

Version History

Version	Date	Author	Details
D01	25/5/21	Russell Cosway	Initial Draft
D02	17/6/21	Russell Cosway	Refinements to role holders
V01	1/7/21	Russell Cosway	Release

Approval

Name	Role	Job title	Contact Details
Stewart Purvis	Accountable	Chair	name@company.com
John Scott	Responsible	Information Director	name@company.com
Board of Directors	Approval	Directors	n/a

6 Bibliography

End of Document

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