



# **IAPS Data Retention Policy**

Owner: IAPS Data Officer

Version No: v2.4

### **Document Location**

This document will be published online on the IAPS website. Paper copies are valid only on the day they are printed. The source document will be held by the IAPS Data Officer.

### **Purpose of this document**

This document lists the types of records or information that IAPS holds to provide the association's services, what it will be used for, and how long IAPS intend to keep it. It shows the standard retention periods for different categories of information held by the association.

### **Document Version Control**

<b><u>Version Number</u></b>	<b><u>Purpose/Change</u></b>	<b><u>Author</u></b>	<b><u>Date</u></b>
V1.0	Document published	IAPS Finance and Operations Director	June 2018
V2.0	New format	IAPS Data officer	May 2019
V2.1	Annual review	IAPS Data officer	November 2020
V2.2	Added new logo and changed council to Board, amendments to Table 1.	IAPS Data officer	September 2021
V2.3	Amendments to Table 1.	IAPS Data officer	April 2022
V2.4	Amendments to Table 1.	IAPS Data officer	May 2023

This document is subject to annual review. Next review due by May 2024.

### **Distribution**

This document should be provided to data subjects at the time their data is being obtained if it is being obtained directly.

## 1. General Principles

In accordance with the principles of the UK GDPR and the association's Data Protection Policy, IAPS will only keep data for as long as it is necessary. The actual retention period will differ based on the type of data processed, the purpose of processing and any other relevant factors. Considerations include:

1. Whether any legal requirements apply for the retention of any particular data. For example:
  - Trade law;
  - Tax law;
  - Employment law;
  - Administrative law;
  - Regulations regarding certain professions, e.g. safeguarding.
2. In the absence of any legal requirements, personal data may only be retained as long as necessary for the purpose of processing. This means data is to be deleted e.g. when:
  - the data subject has withdrawn consent to processing;
  - a contract has been performed or cannot be performed anymore; or
  - the data is no longer up to date.
3. Whether the data subject has requested the erasure of data or the restriction of processing
4. Whether the retention is still necessary for the original purpose of processing
5. Exceptions may apply to the processing for historical, statistical or scientific purposes.

## 2. Association Policy:

It is the association's policy to retain all information only for as long as specified in the Data Retention Schedule and, in general, no longer than two years plus the current year

This section provides a summary of the Data Retention Schedule and gives an indication of the kind of personal data which needs to be retained for longer than the standard years stipulated in the Policy. For the data retention requirements for specific data items, the full data retention schedule (Table 1) should be referred to.

### 2.1 Current plus two-year rule

As stated in the Data Protection Policy, personal data should not be held for more than the current year plus two years, unless there is a specific reason for doing so (see section 2.2 for the specific categories requiring different retention periods). The definition of current will vary according to the personal data: for example, it will mean until the course or event has finished where it relates to participants, or until a member of HQ staff has ceased being employed by the Association where it relates to staff.

It should be remembered that the 'current plus two years' rule is a maximum period for retention. If there is no need to keep the personal data that long, then it should be disposed of securely before the two years' time-limit.

### 2.2. General Exceptions to the two-year rule

This section gives a guide to the categories which have legislation determining the length of time for which personal data within that category should be retained. An indication is given to the main section of the Data Retention Schedule dealing with this category.

<b>Category</b>	<b>Examples &amp; Retention period</b>
Financial records	<ul style="list-style-type: none"> <li>• Purchase ledger, sales ledger, cash book payments etc.</li> <li>• Payroll data</li> </ul> <p><i>Current year plus six</i></p>
Complaints	<ul style="list-style-type: none"> <li>• Correspondence with complainants</li> </ul> <p><i>Current year plus 6</i></p>
Contractual arrangements	<ul style="list-style-type: none"> <li>• Service level agreements</li> <li>• Legal contracts</li> <li>• Tender documentation</li> </ul> <p><i>Life of contract plus six years</i></p>
Board Papers	<ul style="list-style-type: none"> <li>• Articles and Instruments</li> </ul> <p><i>Permanent</i></p> <ul style="list-style-type: none"> <li>• Agendas and minutes of meetings (not supporting papers)</li> </ul> <p><i>Minimum of 10 years from date of the meeting</i></p>
Data Protection/SAR	<ul style="list-style-type: none"> <li>• Correspondence regarding DP/SAR requests</li> </ul> <p><i>Current year plus six</i></p>
Personnel records Retention Schedule	<ul style="list-style-type: none"> <li>• Wide variety of specific retention limits – please see detailed Data Retention Schedule</li> </ul> <p><i>from six months to permanent (EL insurance)</i></p>
Health and Safety records	<ul style="list-style-type: none"> <li>• Please see detailed Data Retention Schedule</li> </ul> <p><i>Retention Schedule Up to 50 Years</i></p>

### 2.3 During the retention period:

In order to ensure compliance with the association’s data retention policy, staff should ensure that they periodically review the data they retain with no more than 13 months between such reviews. Details of these reviews will be recorded in the data retention review log held by the data controller.

### 2.4 Expiration of the retention period

In most cases at the expiration of the applicable retention period, personal data should be deleted from electronic storage and destroyed in accordance with current IAPS procedures if hard copy. Not

all data will need to be completely erased after the expiration. It is sufficient to anonymise the data. This may, for example, be achieved by means of:

- erasure of the unique identifiers which allow the allocation of a data set to a unique person;
- erasure of single pieces of information that identify the data subject (whether alone or in combination with other pieces of information);
- separation of personal data from non-identifying information (e.g. an order number from the customer's name and address); or
- aggregation of personal data in a way that no allocation to any individual is possible.

In some cases, no action will be required if data cannot be allocated to an identifiable person at the end of the retention period, for example, because:

- the pool of data has grown so much that personal identification is not possible based on the information retained; or
- the identifying data has already been deleted.

## 2.5 Information obligations

In addition to other information obligations, in the context of data retention data subjects must be informed of:

- the retention period;
- if no fixed retention period can be provided – the criteria used to determine that period; and
- the new retention period if the purpose of processing has changed after personal data has been obtained.

## 2.6 Current Retention periods

The current retention periods established by IAPS are provided in Table 1.

Table 1 - IAPS Full Data Retention Schedule:

Section	Type of Data	Retention Period	Medium	Reason and comments
Accounts	SAGE Payroll records	Current Tax Year + 6	Paper & electronic	Legal (HMRC)
	Pay slips	Current Tax Year + 6	Paper	Legal (HMRC)
	P45	Passed onto payroll bureau and deleted.	Paper & electronic	Legal (HMRC)
	P60	Current Tax Year + 6	<del>Paper</del> Electronic	Legal (HMRC)
	P11D	Current Tax Year + 6	<del>Paper</del> Electronic	Legal (HMRC)
	Overtime claims	Current tax year + -6	Paper	Association policy
	Salary Letters	Current Tax Year + 6	Electronic	Legal (HMRC)
	Pension opt out	Current year plus 3	Electronic	Legal (Pension regulator, re-enrolment)
	Full Financial Statements	Permanent	Paper & electronic	Association policy
	Filleted Financial Statements	Permanent	Paper & electronic	Association policy
	Quarterly Management accounts	Current Tax Year + 6	Paper & electronic	Association policy
	External audit reports	Current Tax Year + 6	Paper & electronic	Association policy
	Corporation Tax returns	Current Tax Year + 6	Paper & electronic	Legal (HMRC)
	VAT returns	Current Tax Year +6	Paper & electronic	Legal (HMRC)
	Bank statements	Current Tax Year + 6	Paper & electronic	Legal (HMRC)
	Bank Reconciliations	Current Tax Year + 6	Paper & electronic	Legal (HMRC)
	Expenses Claims	Current Tax Year + 6	Paper	Legal (HMRC)
	Purchase invoices	Current Tax Year + 6	Paper	Legal (HMRC)
	Sales invoices	Current Tax Year + 6	Electronic	Legal (HMRC)
	Fixed asset Invoices	Life of asset + 1 year	Paper	Legal (HMRC)
	Copyright returns	Current Tax Year + 6	Electronic	Legal (HMRC/Contract)
	Remittances advices received	Current Tax Year + 6	Paper	Legal (HMRC)
	Remittance advices sent	6 months	Electronic	Association policy
	Statements sent	6 months	Electronic	Association policy
	Statements received	Current year+ 1	Paper	Association policy

Section	Type of Data	Retention Period	Medium	Reason and comments
	Delivery notes	Current year + 6	Paper	Association policy
	Credit card bills	Current Tax Year + 6	Paper	Legal (HMRC)
	Tender quotes	Current year +1	Paper & Electronic	Contract (Association policy)
	Administrators/Liquidators reports	Current Tax Year + 6	Paper & Electronic	Legal (HMRC)
	Cheque Stubs & paying in books	6 years after last entry	Paper	Legal (HMRC)
Contracts	Tender bids - unsuccessful	End of tender period plus 6 months	Paper & Electronic	Association policy
	Tender bids – successful	Life of tender plus 6 years	Paper & Electronic	Association policy
	Contracts	Period of contract plus 6 years	Paper & Electronic	Association policy
itrust	Directors records (appointments and resignations)	Term of office plus 6 years	Paper & Electronic	Charity policy
	Trustee Records (appointments and resignations)	Term of office plus 6 years	Paper & Electronic	Charity policy
	Statutory Registers	Permanent	Paper	Legal (Statutory requirement)
	Trustee's reports	Current year plus 6	Paper & Electronic	Legal (HMRC)
	Financial Statements	Current year plus 6	Paper & Electronic	Legal (HMRC)
	Memorandum, Articles and Byelaws (current)	Until replaced by AGM	Paper & Electronic	Legal (Statutory requirement)
	Memorandum, Articles and Byelaws (drafts)	Deleted upon finalisation	Paper & Electronic	Association policy
	Memorandum, Articles and Byelaws (historic copies)	Permanent	Paper & Electronic	Association policy

<b>Section</b>	<b>Type of Data</b>	<b>Retention Period</b>	<b>Medium</b>	<b>Reason and comments</b>
	Minutes of meetings	Permanent	Paper & Electronic	Charity Commission
	Gift aid declarations	Current year plus 6	Paper & Electronic	Legal (HMRC)
	Gift aid claims	Current year plus 6	Paper & Electronic	Legal (HMRC)
	Bank statements	Current year plus 6	Paper & Electronic	Legal (HMRC)
	Bursary/SAS Financial Reports	Current year plus 6	Paper & Electronic	Charity policy
	Beneficiary academic reports	End of support plus 1 year	Paper & Electronic	Charity policy
	Benevolent applications	End of support plus 1 year	Paper & Electronic	Charity policy
	Invoices	Current year plus 6	Paper & Electronic	Legal (HMRC)
Consultancy@IAPS	Enquires received via the IAPS website	Delete from IAPS forms within one month of receipt	Electronic	Association policy
<b>Governance</b>	<b>Statutory Registers</b>	<b>Permanent</b>	<b>Electronic</b>	<b>Statutory requirement</b>
	Register of Members (for classes of members as listed in the Articles)	After 10 years from the end date of last class of membership	Paper & Electronic	Association policy (Regulatory requirement is minimum of 10 years from date of the end of membership)
	Memorandum, Articles and Byelaws (drafts)	Deleted upon finalisation	Paper & Electronic	Association policy
	Memorandum, Articles and Byelaws (historic copies)		Paper & Electronic	Association policy
	AP01 and TM01 forms	after 10 years from the date on which the individual	Paper & Electronic	Association policy



Section	Type of Data	Retention Period	Medium	Reason and comments
		resigned as a director		
AGM	Agenda	10 years	Electronic & Paper	Association policy
	Minutes	Permanent	Electronic & Paper	Legal (Regulatory Requirement/ Association policy)
	Supporting Papers	Current year plus 6	Electronic	Association policy
	Written notes of AGM	Retained until minutes are approved	Paper	Association policy
	Proxy	90 days after AGM	Electronic	Statutory requirement
	Chair's notes	1 year after AGM	Electronic	Association policy
	Chief Executive Report	Permanent	Electronic	Association policy
Board	Agenda	10 years	Electronic	Association policy
	Minutes	Permanent	Electronic & Paper	Association policy (Regulatory Requirement is minimum of 10 years from date of the meeting)
	Supporting Papers	Current year plus 10 apart from committee minutes as they are retained as per committee minutes retention policy	Electronic	Association policy
	Where reference is made in any Board papers signed by the Chair, a hard copy of those	Permanent (to align with Minutes)	Paper	Association policy (Regulatory requirement is

Section	Type of Data	Retention Period	Medium	Reason and comments
	Board papers must be retained in addition to the hard copy of the minutes themselves. This only applies when Board papers are considered necessary to understand the Minutes.			minimum of 10 years from date of the meeting)
	Chair's Notes	One year following the meeting	Electronic & Paper	Association policy
	Written notes of the Board	Retained until minutes are approved	Paper	Association policy
	Recordings of meetings	Delete upon receiving Chair's approval on draft minutes'	Electronic	Association policy
	Papers held by Board members	Deleted/disposed of by one month following the meeting	Electronic & Paper	Association policy
	Meeting Papers in cloud storage service	Deleted immediately after meeting	Electronic	Association policy
Committees	Agenda	Current year plus 6	Electronic & Paper	Association policy
	Minutes	Minimum of 10 years	Electronic & Paper	Association policy (Regulatory requirement is minimum of 10 years from date of the meeting)
	Supporting Papers	Current year plus 6	Electronic & Paper	Association policy
	Chair's Notes	Nil	Electronic & Paper	Association policy

<b>Section</b>	<b>Type of Data</b>	<b>Retention Period</b>	<b>Medium</b>	<b>Reason and comments</b>
	Written notes of Committee	Retained until minutes are approved	Paper	Association policy
	Recordings of meetings	Delete upon receiving Chair's approval on draft minutes'	Electronic	Association policy
	Papers held by Committee members	Deleted/disposed of by one month following the meeting	Electronic & Paper	Association policy
	Meeting Papers in cloud storage service	Deleted immediately after meeting	Electronic	Association policy
	General Representatives Annual Applications	3 months after voting closes	Electronic	Association policy
Membership	Membership Application Forms (inc. references) following election	Up to 6 months (Paper) Current year plus 6 (Electronic)	Paper Electronic	Association policy Association policy
	Membership Acceptance Form	Duration of membership	Paper	Association policy
	Inspection reports inc. responses (until file closed)	Up to 6 months (Paper) Current year plus 6 (Electronic)	Paper Electronic	Association policy Association policy
	DfE Notices to Improve (until notice is lifted/file closed)	Up to 6 months (Paper) Current year plus 6 (Electronic)	Paper Electronic	Association policy Association policy
	Committee meeting minutes and associated documents	Minimum of 10 years	Electronic	Association policy (Regulatory)

Section	Type of Data	Retention Period	Medium	Reason and comments
				requirement is minimum of 10 years from date of the meeting)
	Cloud storage service – All meeting papers inc. applications and inspection files	Up to/until following Committee meeting	Electronic	Association policy
	Mentors Experience and Information Log	Current academic year +2	Electronic	Association policy
	Mentoring Visit Note	Current academic year +2	Paper Electronic	Association policy
	Mentors salary / expenses claims	Current academic year +2	Electronic	Association policy
	List of Members – Directory (Website) for Retired and Honorary Members	Duration of membership, or removal of consent	Electronic	Consent
	List of Members – Directory (Website) for members (excluding retired and honorary)	Duration of membership	Electronic	Association policy
	List of Members – Directory (Website) for historic association positions such as previous chairmen	Permanent	Electronic	Association policy
	NAHT – include for invoicing	For duration of invoicing requirement	Electronic	Association policy
	Membership changes document	Current academic year plus 2	Electronic	Association policy
	Members election document	Current academic year plus 2	Electronic	Association policy

<b>Section</b>	<b>Type of Data</b>	<b>Retention Period</b>	<b>Medium</b>	<b>Reason and comments</b>
HR	Job application forms & references received - Unsuccessful	6 months after appointment	Paper & Electronic	Association policy
	Job Application form & references received - Successful	1 year after leaving	Paper & Electronic	Association policy
	Medical forms	1 year after leaving	Paper & Electronic	Association policy
	DBS Checks	1 year after leaving	Paper	Association policy
	Proof of right to work in the UK	1 year after leaving	Paper & Electronic	Legal (Legislations)
	Proof of qualifications	1 year after leaving	Paper & Electronic	Association policy
	Offer letter	1 year after leaving	Paper & Electronic	Association policy
	Contracts	1 year after leaving	Paper & Electronic	Association policy
	Job descriptions	1 year after leaving	Paper & Electronic	Association policy
	Confirmation letter	1 year after leaving	Paper & Electronic	Association policy
	Appraisal	1 year after leaving	Paper & Electronic	Association policy
	Employee Loan records	End of loan plus 6	Paper & Electronic	Association policy
	Declaration of wishes	1 year after leaving	Paper & Electronic	Association policy
	Fit notes	Current year plus 3	Paper	SSP Rules
	Self Certs	Current year plus 3	Paper	SSP rules
	Return to work interviews	Current year plus 2	Paper & Electronic	Association policy
	Disciplinary records	Current year plus 2	Paper & Electronic	Association policy
	Competency records	Current year plus 2	Paper & Electronic	Association policy
	Redundancy records	Date of leaving plus 2	Paper & Electronic	Association policy
	Occupational Health reports	Current year plus 3	Paper & Electronic	Association policy
	Exit interviews	Date of leaving plus 2	Paper & Electronic	Association policy
	Holiday forms	Current year plus 6	Paper & Electronic	Association policy
	Special leave requests & responses including Paternal/maternity/adoption etc	Current year plus 3	Paper & Electronic	SMPP etc rules

Section	Type of Data	Retention Period	Medium	Reason and comments
	Flexible working requests	Current year plus 3	Paper & Electronic	SMPP etc rules & Association Policy
	Professional references provided	1 year after leaving	Paper & Electronic	Association policy
	Complaints and Grievances	Current year plus 6	Paper & Electronic	Association policy
	Consents from employees for processing of personal and sensitive data	For as long as the data is processed and such retention of the data is necessary in respect of the purpose for which it was originally collected	Paper & Electronic	Association policy given the principles of Data Protection Laws
H&S	First aid training	Current year plus 3	Paper & Electronic	Legal (HSE)
	Accident Book	3 years after last entry	Paper	Legal (HSE)
	Risk assessments	Current year plus 6	Paper & Electronic	Association policy
	RIDDOR reports made	3 years	Electronic Online from HSE Website	Legal (HSE)
	Fire alarm checks	3 years	Electronic	Legal (HSE)
	Boiler checks	Current year plus 6	Paper & Electronic	Legal (HSE)
	COSHH Certificate	Date of last use plus 2	Paper & Electronic	Legal (HSE)
	First Aid Box Check	1 year	Paper or Electronic	Association policy
	Asbestos records	50 years	Paper & electronic	Legal (HSE)
Safeguarding	Reports from member schools	Permanent	Electronic – R drive	Association policy
	Reports from Courses & events	Permanent	Electronic – R drive	Association policy
	Police data requests	Current year plus 6	Electronic – R drive	Association policy

<b>Section</b>	<b>Type of Data</b>	<b>Retention Period</b>	<b>Medium</b>	<b>Reason and comments</b>
	Documents relevant to allegations/charges/offences relating to safeguarding	Permanent	Electronic – R drive	Association policy
Complaints	From Public	Current year plus 6	Paper & electronic	Association policy
	From Members	Current year plus 6	Paper & electronic	Association policy
Insurance	PL certificates	Permanently	Paper	Insurers advice/Association policy
	EL certificates	Permanent	Paper	Insurers advice/Association policy
Courses and Conferences	Bookings	Current year +6	Electronic and Paper	Legal (HMRC)
	Speaker Registration Forms	Current year +2	Paper	Association policy
	Conference Brochures	Permanent	Paper & Electronic	Association policy
	Delegate Application Forms	Current year +2	Paper	Association policy
	Correspondence	Current year +2	Electronic and Paper	Association policy
	Delegate Evaluation Forms	Current year	Electronic and Paper	Association policy
Courses	Delegate name	Current year +2	Electronic and Paper	Association policy
	Delegate address, email and telephone (school or personal), dietary requirements, access requirements	Current year +2	Electronic and Paper	Association policy
	Speakers, Officials, guests: names, email and telephone (business or personal), dietary	Current year +2	Electronic and Paper	Association policy

Section	Type of Data	Retention Period	Medium	Reason and comments
	requirements, access requirements			
Conferences	Delegates, guests, officials, speakers, IAPS Staff, Social Guests, Exhibitors, Sponsors: names, email and telephone (business or personal), dietary requirements, access requirements	Current year +2	Electronic and Paper	Association policy
iART	Application Form	6 months after exhibition	Electronic	Association policy
	Food allergies	6 months after exhibition	Electronic	Association policy
SPORT	Competitor details (name, school and year group)- online entry form	Current year +2	Electronic	IAPS Sport
	Event Results	Permanent	Electronic	To keep a record of results
	Contact details (organisers, volunteers and officials)	Current year + 2	Electronic	Association policy
	Contact details (venues, NGB's and suppliers) non personal contacts – business names, phones and addresses	Permanent	Electronic	Association policy
IT	On site Back up files	7 days	Electronic	Association policy
	Right to be forgotten records for backups	Permanent	Electronic	Association policy
	'Phone records	Current year plus 6	Paper	Legal (HMRC (Invoice detail))
	Data base	30 Days	Electronic	Association policy



Section	Type of Data	Retention Period	Medium	Reason and comments
	Emails	Up to current year plus 6 years	Electronic	Association policy
	Information Security and Management policies	Permanent	Electronic	Association policy
	Asset register	Permanent	Electronic	Association policy
	IAPS Surveillance System Images	30 days (unless exemption approved by Data Controller as per Surveillance Systems Policy))	Electronic	Association policy
Reception	Visitors books	6 months after last entry	Paper	Association policy
	Post signing logs	3 months from last entry	Paper	Association policy
Data records	Completed SAR responses	6 months after completion	Paper	Association policy – to enable this to be moved to electronic
	Completed SAR responses	6 years after completion	Electronic	Association policy
	ICO registrations	Permanent	Hard copy & electronic	Association policy
	Reports of Breaches	Permanent	Electronic	Association policy
	Permissions to include	Permanent	Electronic & Paper	Association policy
	Requests to be forgotten	Until completed	Electronic or Paper	Need to be forgotten
	Garden Party consent	Delete immediately after event	Electronic	Association policy
	Website/social media photographs	Up to 3 years from consent confirmation	Electronic	Association policy (consent based)

<b>Section</b>	<b>Type of Data</b>	<b>Retention Period</b>	<b>Medium</b>	<b>Reason and comments</b>
	Contact records - members	Duration of membership plus up to 3 years (*see note on events)	Electronic	Association policy
	Contact records – staff at member schools	Duration of employment at members school (*see note on events)	Electronic	Association policy
	Contact records – Others (excludes those individuals referenced in other sections e.g delegates, speakers)	Current year plus 2 (*see note on events)	Electronic	Association policy
	Contact records – historic previous Presidents, Vice-Presidents, Chairmen, Chief Executives, Secretaries of IAPS, members who have served on the Board or as officers of IAPS	Permanent	Electronic	Association policy
	Group member list (Forum)	For duration of person’s contact record being held	Electronic	Association policy
	Marketing Lists/newsletter lists	Duration of membership (for individual or while working at member school), request to unsubscribe, removal of consent or expression of interest in particular topic	Electronic	Association policy

<b>Section</b>	<b>Type of Data</b>	<b>Retention Period</b>	<b>Medium</b>	<b>Reason and comments</b>
	Teams chat messages (internal)	Automatically deleted after 30 days	Electronic	Association policy
All Draft documents	All draft documents	To be deleted upon finalisation	Electronic or paper	Association policy

\*Note on Contract records with events: For contact records which include details of events attended prior to 31 March 2020, the retention period from the date of the last event prior to this date is up to 7 years. The minimum amount of data to be held (name, school and event details)