

IAPS DATA RETENTION POLICY

General principles

In accordance with the principles of 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 or processing and any other relevant factors. Issues to be considered 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, eg. 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 eg. 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 - the data subject has withdrawn consent to processing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. Has the data subject requested the erasure of data or the restriction of processing?
4. Is the retention still necessary for the original purpose of processing?
5. Exceptions may apply to the processing for historical, statistical or scientific purposes.

During the retention period:

All staff should ensure that they periodically review the data they retain and there should be no more than 13 months between such reviews. They should record the date this review took place and should complete the log held by the data controller when it has been done.

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 (eg. 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

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

Current retention periods

The current retention periods established by IAPS are provided at Annex A.

Annex A IAPS Data Retention schedule - summary

1. Purpose of this document

A vital part of the associations' Data Protection Policy and practice is that personal data is retained for the appropriate period of time – neither too long nor too short. The Data Protection Policy states that 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 document is 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.

NB. While this document summarises and clarifies the Full Data Retention schedule, running to ten pages, it does not supersede it. The time limits for those items subject to legislation as specified in detail in the Data Retention schedule (and outlined in Section 3 below) remain in force, and should be referred to in cases of doubt.

2. Current plus two-year rule

As stated in the Data Protection policy, personal data should not be held for more than two years after it ceases to be current, unless there is a specific reason for doing so (see Para 3 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.

3. 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.

Category	Examples and retention period
Financial records	<ul style="list-style-type: none">• Purchase ledger, sales ledger, cash book payments etc.• Payroll data <p style="text-align: center;"><i>Current year plus six</i></p>
Complaints	<ul style="list-style-type: none">• Correspondence with complainants <p style="text-align: center;"><i>Current year plus 6</i></p>
Contractual arrangements	<ul style="list-style-type: none">• Service level agreements• Legal contracts• Tender documentation <p style="text-align: center;"><i>Life of contract plus six years</i></p>

Council papers

- Articles and Instruments

Permanent

- Agendas and minutes of meetings (not supporting papers)

Current year plus six

Data Protection/SAR

- Correspondence regarding DP/SAR requests

Current year plus six

Personnel records

Data Retention schedule

- Wide variety of specific retention limits – please see detailed

from six months to permanent (EL insurance)

Health and Safety records

- Please see detailed Data Retention schedule

Retention Schedule Up to 50 Years

IAPS Full Data Retention schedule:

Section	Type of data	Retention period	Medium	Reason
Accounts	SAGE Payroll records	Current Tax Year + 6	Paper & electronic	HMRC
	Pay slips	Current Tax Year + 6	Paper	HMRC
	P454	Current Tax Year +6	Paper	HMRC
	P60	Current Tax Year + 6	Paper	HMRC
	P11D	Current Tax Year + 6	Paper	HMRC
	Overtime claims	Current tax year + 2	Paper	Association policy
	Salary letters	Current Tax Year + 6	Paper & electronic	HMRC
	Pension opt out	Current year plus 3	Paper	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	Permanent	Paper & electronic	Association policy
	Corporation Tax returns	Current Tax Year + 6	Paper	HMRC
	VAT returns	Current Tax Year + 6	Paper & electronic	HMRC
	Bank statements	Current Tax Year + 6	Paper & electronic	HMRC
	Bank reconciliations	Current Tax Year + 6	Paper & electronic	HMRC
	Expenses claims	Current Tax Year + 6	Paper	HMRC
	Purchase invoices	Current Tax Year + 6	Paper	HMRC

Section	Type of data	Retention period	Medium	Reason
	Sales invoices	Current Tax Year + 6	Electronic	HMRC
	Fixed asset Invoices	Life of asset + 1 year	Paper	HMRC
	Copyright returns	Current Tax Year + 6	Electronic	HMRC/Contract
	Remittances advices received	Current Tax Year + 6	Paper	HMRC
	Remittance advices sent	6 months	Electronic	Association policy
	Statements sent	6 months	Electronic	Association policy
	Statements received	Current year+ 1	Paper	Association policy
	Delivery notes	Current year + 4	Paper	Association policy
	Credit card bills	Current Tax Year + 6	Paper	HMRC
	Tender quotes	Current year +1	Paper & electronic	Association policy
	Administrators/liquidators' reports	Current Tax Year + 6	Paper & electronic	HMRC
	Cheque stubs & paying in books	6 years after last entry	Paper	HMRC
Contracts	Tender bids - unsuccessful	End of tender period + 6 months	Paper & electronic	Association policy
	Tender bids – successful	Life of tender + 6 years	Paper & electronic	Association policy
	Contracts	Period of contract + 6 years	Paper & electronic	Association policy
iTrust	Directors' records (appointments and resignations)	Term of office + 6 years	Paper & electronic	Charity Policy
	Trustee records (appointments and resignations)	Term of office + 6 years	Paper & electronic	Charity Policy
	Statutory Registers	Permanent	Paper	Statutory requirement

Section	Type of data	Retention period	Medium	Reason
	Trustees' reports	Current year + 6	Paper & electronic	HMRC
	Financial statements	Current year + 6	Paper & electronic	HMRC
	Memorandum, articles and byelaws (current)	Until replaced by AGM	Paper & electronic	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
	Minutes of meetings	Permanent	Paper & electronic	Charity Commission
	Gift aid declarations	Current year + 4	Paper & electronic	HMRC
	Gift aid claims	Current year + 4	Paper & electronic	HMRC
	Bank statements	Current year + 6	Paper & electronic	HMRC
	Bursary/SAS financial reports	Current year + 6	Paper & electronic	Charity Policy
	Beneficiary academic reports	End of support + 1 year	Paper & electronic	Charity Policy
	Benevolent applications	End of support + 1 year	Paper & electronic	Charity Policy
	Invoices	Current year + 6	Paper & electronic	HMRC
Governance	Directors' appointment forms	Term of office + 6 years	Paper & electronic	Association policy
	Directors' resignations	Term of office + 6 years	Paper & electronic	Association policy
	Statutory registers	Permanent	Paper	Statutory Requirement
	Memorandum, articles and byelaws (current)	Until replaced by AGM	Paper & electronic	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
AGM	Agenda	10 years	Electronic & paper	Association policy
	Minutes	Permanent	Electronic & paper	Regulatory Requirement/

Section	Type of data	Retention period	Medium	Reason
				Association Policy
	Supporting papers	Current year + 6	Electronic	Association policy
	Written notes of AGM	Retained until minutes are approved	Paper	Association policy
Council	Agenda	10 years	Electronic & paper	Association Policy
	Minutes	Permanent	Electronic & paper	Regulatory Requirement
	Supporting papers	Current year + 6	Electronic	Association policy
	Where reference is made in any board papers signed by the Chairman a hard copy of those board papers must be retained in addition to the hard copy of the minutes themselves	Permanent	Paper	Regulatory Requirement
	Chairman's notes	o/c of meeting	Electronic & paper	Association policy
	Written notes of Council	Retained until minutes are approved	Paper	Association policy
	Papers held by Council members	Deleted/disposed of by one month following the meeting	Electronic & paper	Association policy
	Meeting papers in Dropbox	Deleted immediately after meeting	Electronic	Association policy
Committees	Agenda	Current year + 6	Electronic & paper	Association policy
	Minutes	Current year + 6	Electronic & paper	Association policy
	Supporting papers	Current year + 6	Electronic & paper	Association policy
	Chairman's notes	Nil	Electronic & paper	Association policy

Section	Type of data	Retention period	Medium	Reason
	Written notes of Committee	Retained until minutes are approved	Paper	Association policy
	Papers held by Committee members	Deleted/disposed of by one month following the meeting	Electronic & paper	Association policy
	Meeting Papers in Dropbox	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)	6 months 1 year	Paper Electronic	Association policy Association policy
	Membership acceptance form	Duration of membership	Paper	Association policy
	Inspection reports (file open)	1 year (until closed) 1 year (until closed)	Paper Electronic	Association policy Association policy
	Inspection reports inc. responses (file closed)	6 months 1 year	Paper Electronic	Association policy Association policy
	DfE Notices to Improve (file closed)	6 months 1 year	Paper Electronic	Association policy Association policy
	Committee meeting minutes and associated documents	Current academic year +2	Electronic	Association policy
	Dropbox – All meeting papers inc. applications and inspection files	Until following Committee meeting	Electronic	Association policy
	Mentors' information sheets	1 year		
	Mentoring visit note	Current academic year +2	Paper	Association policy
	Mentors' salary / expenses claims	1 year	Electronic (Outlook)	Association policy
	List of Members – Directory	Permanent	Hard copy	Association policy

Section	Type of data	Retention period	Medium	Reason
		1 year	Electronic	Reference for production
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
	Equality Monitoring Forms	6 months after appointment	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	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 + 6	Paper & electronic	Association policy
	Declaration of wishes	1 year after leaving	Paper	Association policy
	Fit notes	Current year + 3	Paper	SSP Rules
	Self certs	Current year + 3	Paper	SSP rules
	Return to work interviews	Current year + 2	Paper & electronic	Association policy
	Disciplinary records	Current year + 2	Paper & electronic	Association policy
	Competency records	Current year + 2	Paper & electronic	Association policy
	Redundancy records	Date of leaving + 2	Paper & electronic	Association policy
	Occupational health reports	Current year + 3	Paper & electronic	Association policy
	Exit interviews	Date of leaving + 2	Paper & electronic	Association policy
	Holiday forms	Current year + 6	Paper	Association policy
	Special leave requests & responses inc	Current year + 3	Paper & electronic	SMPP etc rules

Section	Type of data	Retention period	Medium	Reason
	Paternal/maternity/adoption etc			
	Flexible working requests	Current year + 3	Paper & electronic	SMPP etc rules & Association Policy
	Professional references provided	1 year after leaving	Paper & electronic	Association policy
	Complaints and grievances	Current year + 6	Paper & electronic	Association policy
H&S	First aid training	Current year + 3	Paper & electronic	HSE
	Accident book	3 years after last entry	Paper	HSE
	Risk assessments	Current year + 6	Paper & electronic	IAPS
	RIDDOR reports made	3 years	Electronic online from HSE website	HSE
	Fire alarm checks	3 years	Electronic	HSE
	Boiler checks	Current year + 6	Paper & electronic	HSE
	COSHH certificate	Date of last use + 2	Paper & electronic	HSE
	First Aid box check	1 year	Paper or electronic	IAPS
	Asbestos records	50 years	Paper & electronic	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 + 6	Electronic – R drive	Association policy
Complaints	From public	Current year + 6	Paper & electronic	Association policy
	From members	Current year + 6	Paper & electronic	Association policy
Insurance	PL certificates	Permanently	Paper	Insurers advice/Association policy
	EL certificates	Permanent	Paper	Insurers advice/Association policy
	Copy driving licences	1 year after leaving	Paper	Insurers advice/Association policy

Section	Type of data	Retention period	Medium	Reason
Courses and conferences	Bookings	Current year + 6	Electronic and paper	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 requirements, access requirements	Current year + 2	Electronic and paper	Association policy
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

Section	Type of data	Retention period	Medium	Reason
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, officials, volunteers, national governing bodies, venues and suppliers	Permanent	Electronic	Ability to contact for future work opportunities
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	HMRC (Invoice detail)
	Database	30 days	Electronic	Association Policy
	Emails	Up to current year + 6 years	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
	Completed SAR responses	6 years after completion	Electronic	Association Policy
	ICO registrations	Permanent	Hard copy	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

Section	Type of data	Retention period	Medium	Reason
All draft documents	All draft documents	To be deleted upon finalisation	Electronic or paper	Association Policy