



PAJFC DATA RETENTION POLICY

1. PURPOSE

1.1 This Data Retention Policy concerns the controlled retention and destruction of documents by PAJFC (the Club), in particular those which may contain personal data. Retaining personal data for longer than necessary breaches legal rights under data protection legislation.

1.2 The broad purposes of this Policy are to:

- 1.2.1 enable compliance in relation to the retention and destruction of documents, wherever practicable, with legislative and regulatory requirements and the reasonable expectations of Club members and volunteers;
- 1.2.2 ensure important documents are retained for reference and future use;
- 1.2.3 organise important records for efficient retrieval;
- 1.2.4 enable quick and efficient response to an individual's request to see their personal data and understand how it has been processed by the Club;
- 1.2.5 retain records which might be required to prove compliance with a regulatory requirements or may help provide evidence in legal proceedings; and
- 1.2.6 improve the ability to manage complaints, litigation and investigations effectively.

2. SCOPE

2.1 This Policy applies to:

- 2.1.1 all records created or received in relation to the Club's operations, regardless of the media or format (e.g., electronic, e-mail, imaged, paper, etc.);
- 2.1.2 all physical locations where records are maintained, including locations operated by agents or suppliers that manage records on behalf of the Club;

- 2.1.3 all volunteers who create, receive, manage, or use records for or on behalf of the Club.
- 2.2 Where a specific type of record or document is not referenced in this Policy, the following general principles should be observed:
 - 2.2.1 personal data should only be retained for as long as necessary to satisfy the purposes for which it was collected;
 - 2.2.2 documents containing personal data may need to be retained for an extended period of time (generally for six years) if there is a **real risk** that they could be the subject of a claim, or may be relevant to future litigation;
 - 2.2.3 where the personal data in a document is deleted, or it is otherwise anonymised, the document may be retained for an extended period of time;

3. VOLUNTEER ROLES AND RESPONSIBILITIES

- 3.1 Volunteers are responsible for compliance with this Policy, including the appropriate management and storage of their records. Specific responsibilities include:
 - 3.1.1 creating, receiving and managing paper and electronic records as part of their volunteer role according to the Policy or as amended in the future;
 - 3.1.2 understanding how to use IT platforms and systems to properly archive, manage, use and delete documents;
 - 3.1.3 evaluating paper and electronic records to determine their appropriate classification and storage;
 - 3.1.4 consistently identifying both paper and electronic records to be destroyed according to this Policy.
- 3.2 The Club is committed to this Policy. Its effectiveness largely depends on volunteers taking note of, and adhering to, the Policy. If a volunteer believes someone else may have violated this Policy, either purposely or inadvertently, they should immediately report this to the Trustees as soon as possible so appropriate measures, which may include further training, can be applied.

4. DATA RETENTION

- 4.1 Schedule 1 identifies different categories of personal data and defines how long they need to be retained based on their legal, compliance, or operational requirements.
- 4.2 Certain documents may be discarded or deleted at the discretion of the user once they have served their temporary useful purpose. Examples may include:
- 4.2.1 duplicates of originals that have not been annotated;
 - 4.2.2 preliminary drafts of letters, memoranda, reports, worksheets and informal notes that do not represent significant steps or decisions in the preparation of an official record;
 - 4.2.3 books, periodicals, manuals, training binders and other printed materials obtained from sources outside the Club and retained primarily for reference purposes; and
 - 4.2.4 spam and junk mail.
- 4.3 Changes to this Policy may be made from time to time to take account of changes in legal, regulatory, or operational requirements. This Policy will be periodically reviewed by the Trustees.

5. DATA DESTRUCTION

- 5.1 Documents should be destroyed according to Schedule 1 where they are not subject to a Suspension Event (see Section 6).
- 5.2 Documents containing personal data (e.g. health, disability, ethnic origin, biometric, genetic or criminal record data), or bank account or payroll information should be shredded in all circumstances. Other documents should be destroyed by a method appropriate to their nature or level of confidentiality (e.g., shredding, recycling, deleting).
- 5.3 Under no circumstance should copies (i.e. duplicates or draft documents) be retained longer than official documents. This includes copies in all media and formats, such as photocopies, microfilm copies, and electronic files, files stored on removable media, hard disks, file servers, magnetic tape, or other storage devices.

6. SUSPENSION EVENTS

6.1 Documents may be impacted by one or more of the following suspension events:

6.1.1 if litigation or regulatory investigation (e.g. by The Charity Commission for England and Wales or the Information Commissioner's Office) is being contemplated, investigated or is taking place.

6.1.2 an individual has made a data subject request (including a subject access request) under applicable data protection legislation, or

6.1.3 a regulatory or law enforcement body has made a request.

Those applicable documents must be retained and not amended until the Trustees determines they are no longer needed. If such an event has arisen, all volunteers are required to notify the Trustees and comply with any suspension notice.

Intentional destruction of personal data following a subject access request **is a criminal offence**, and individuals can be prosecuted.

7. OTHER RELEVANT POLICIES AND GUIDELINES

The following policies and other documents must be read in conjunction with this Policy and must be adhered to at all times:

7.1.1 Privacy Policy

7.1.2 Data Breach Policy

SCHEDULE 1: Schedule of Retention Periods

Function	Record Type	Retention Requirement	Source of Requirement and Source Reference
General			
General	Database of players and their parents/carers	7 calendar years	HMRC guidance
General	General correspondence regarding contentious matters, including complainants	Duration of Club membership plus 6 years	Statutory limitation period (Limitations Act 1980)
General	General email correspondence not falling within any other record category listed	2 years	Recommended best practice to ensure compliance with Schedule 1, paragraph 5, Data Protection Act 1998 / Article 5 (1) (e) General Data Protection Regulation
General	Building condition surveys, mechanical and electrical engineering reports etc.	25 years	Recommended best practice
General	Asbestos inspections	40 years	Control of Asbestos at Work Regulations
General	Direct debit details	2 years after last payment has been received.	Recommended best practice to ensure compliance with Schedule 1, paragraph 5, Data Protection Act 1998 / Article 5 (1)

Pannal Ash Junior Football Club



		6 years in the case of contentious matters arising, effective from the date the matter is considered closed by the Club.	(e) General Data Protection Regulation
General	Volunteers	2 years after volunteering has ceased. 6 years in the case of matters arising, effective from the date the matter is considered closed by the Club. Then archived in event of a legal request for information, insurance claim, etc.	Recommended best practice to ensure compliance with Schedule 1, paragraph 5, Data Protection Act 1998 / Article 5 (1) (e) General Data Protection Regulation
General	Website users		Website cookies
Finance	Cash books, invoices, receipts, Gift Aid records	6 years	HMRC guidance
Finance	Management reports (does not include invoices, sales orders, or cash receipts).	6 years from year end	This period is a best practice recommendation.
Finance	Accounts payable and receivable	6 years from year end	This period is a best practice recommendation.

Pannal Ash Junior Football Club



Finance	VAT records (<i>i.e.</i> records of all delivery of goods or services, all intra-European Community acquisitions, all imports and exports, and all other information relevant for VAT purposes, including all VAT invoices sent or received)	6 years from the date on which the records were made	Paragraph 6, Schedule 11, VAT Act 1994 and HMRC Notice 700/21 (October 2013)
Finance	Corporate tax records (all records and supporting documents relevant to a corporate tax return)	The <u>latest</u> of: - 6 years after the end of the accounting period; - the date any enquiry into the return is completed; or - the date on which the enquiry window for the return closes.	Paragraph 21, Schedule 18, Finance Act 1998
Finance	Fixed asset accounting	Best practice of 25 years from the date of	Best practice

Pannal Ash Junior Football Club



	records (<i>i.e.</i> records related to the purchase, sale, and improvement of real property and equipment, as well as depreciation and amortisation)	disposal / sale of asset.	
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