



# Data Retention Policy

Revision V4.0

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## **INTRODUCTION**

This document sets out the MWBC Policy on the disposal and retention of records. It applies to all records, both in paper and electronic form.

We operate this policy to ensure that data is not held for longer than necessary.

One of the main aims of successful record management is to be able to find, quickly and readily, any information requested. We need to know what information we hold and to be able to locate it promptly and be in compliance with the GDPR.

## **PRINCIPLES**

MWBC will review information regularly to ensure that it is:

- Necessary – the information must hold some value for MWBC to carry out its functions.
- Proportionate – in order to justify the retention of the information, it must be proportionate to retain the information against the impact on individuals right to privacy.
- Adequate – in order to justify the retention of information, it must be as complete as possible.
- Relevant – Information must be fit for the purpose for which it is held.
- Accurate and up to date – all record details must be accurate, records must be updated with any new information.
- Of Historical value - it may also be necessary to retain information of particular legal or historical significance. This relates to past-periods data, used usually as a basis for analysis and monitoring data or trends.

Factors which may impact on the retention of information are:

- Contractual – there may be a contractual requirement to retain information for a specified period of time.
- Legal requirement –there may be a legal requirement to retain information for a specified period of time.
- Legitimate interest – we may have a legitimate interest to retain the information for a specified period of time (e.g. race results, rankings, qualifications etc).

## **DATA RETENTION TABLE**

Please see the table below for the maximum retention period for the relevant areas of MWBC. Full details regarding the personal information which we collect from you, where we collect it from and how we use it and your rights is contained within the Privacy Notices which can be found on our website.

<b>Category of information</b>	<b>MWBC Retention Period</b>	<b>Explanation of retention period</b>
Current members Information	Throughout the time the individual is a member of the club.	Data on current members needs to be up-to-date and accurate. Out of date data (such as a previous email address) will be deleted from all records as soon as MWBC is notified of the update. Once the individual is no longer a member you will need to refer to data on 'former members' below.
Emergency contact details for current members	Throughout the time the individual is a member.	If the member updates their emergency contact the previous details will need to be deleted immediately from all records. Best practice would dictate that the member informs the emergency contact that they have provided their details to you for the purpose of being an emergency contact.
Former members	12 months after last contact with the individual (with the exception of financial data which will be kept for 6 years).	MWBC may have a legitimate interest in retaining records for this period whilst they may be required in relation to support, complaints, appeals, and insurance purposes.  Non-relevant data on member records should be deleted sooner when it is no longer necessary and proportionate to retain (such as emergency contact data).
Meet /event attendee lists (held by MWBC)	12 months after the event.	MWBC may retain attendee lists as evidence of who did/didn't attend a particular meet/event. If under 18's were involved the length of time extends to 3 years past their 18 <sup>th</sup> birthday.
Meet/event attendee lists (provided to meet organisers)	Until the event has taken place.	Copies of attendee lists will be deleted/destroyed as soon after the event as possible. The club-held list should be the only one that is kept.
Emails	12 months, if important retain for up to 6 years.	Not all emails need to be retained.  If the content is deemed to be important and or relevant to a legitimate purpose, it may be kept for up to 6 years.
CCTV images	No more than 30 days.	Unless needed for the prevention or detection of crime.
Gift Aid Declarations	As long as the declaration is valid, plus 6 years.	Specifically for charities.

Minutes of Club Meetings	Potential to retain indefinitely subject to appropriate safeguards being in place.	Minutes of club meetings may be considered material with historical or statistical value and therefore retained under the exemptions afforded to: <ul style="list-style-type: none"> <li>• archiving purposes in the public interest;</li> <li>• scientific research purposes;</li> <li>• or statistical purposes.</li> </ul>
Accident reports – if relating to adults	6 years after completion of the Accident report.	These reports may be required as evidence if a claim is made on the MWBC insurance and should also be reported via the Incident reporting system.
Accident reports – if relating to children	To be kept for a minimum of 6 years after the child reaches the age of 18.	
Employee personnel records	6 years after the individual leaves employment with the club.	Including attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records.
Safeguarding	The Information gathered during the course of an investigation will be retained by MWBC. Data relating to children will be kept for at least 25 years. Where the concern relates to an adult's behaviour around children, the file will be kept securely until the adult reaches 65 or for 10 years whichever is longer.	This is in accordance with NSPCC guidelines on records retention and storage.

**When MWBC will review our Data Retention Policy**

When MWBC approach the end of the designated retention period we will review if we still need personal data and erase it, unless there is a clear justification for retaining it for a longer period.

MWBC are also required to review whether we still need personal data if an individual asks us to. Individuals have the right to erasure of personal data that we no longer need for our specified purposes.

**What MWBC will do with data we no longer require?**

Once MWBC no longer need personal data, we will erase (delete) it. MWBC will ensure that when erasing personal data it will be permanently deleted to reduce its availability and the risk of future misuse. In the case of electronic data MWBC recognise that it is not always possible to delete or erase all traces of data. However, MWBC will ensure that the data is put beyond use (including deletion from any back-up systems).