

Retention Policy and Schedule



Introduction

The records, and files, of Swim England East Region form its corporate memory and record of its activities and achievements. These records contain accumulated experience, expertise and knowledge. They have a potential value to staff and volunteers and people interested in the work of the Region. However, this does not mean that all records can, or should, be retained indefinitely. From an administrative perspective, valuable storage space can be wasted with records that are not needed. Furthermore, it may be contrary to the General Data Protection Regulations (GDPR) to retain certain types of information for longer than is necessary.

Upon the dissolution of the unincorporated ASA East Region the Company Swim England East Region has taken over all the records of that association and will manage the records in accordance with that associations Policy and Schedule.

This policy is intended to give guidance on what records may be retained by the Region and set out acceptable retention periods, which are recommendations or minimum legal requirements if accompanied by an Act. It may be possible to retain records longer than the recommended periods, but serious thought must be given to reasons why records should be retained longer.

The purpose of a retention schedule is:

- to destroy those records no longer required
- to set a minimum period for retention
- to prevent the premature destruction of those records which must be retained for a specific period to meet legal and financial requirements
- to identify and preserve those records worthy of permanent preservation.

This schedule applies to both electronic and paper documents. Where electronic records are to be 'archived' by staff this will usually be to a file server maintained by Swim England. Where documents are archived, there should be a statement on the website informing members how these can be accessed. Where hard copies are to be archived these should be retained at the regional store room.

Retention and disposal under Freedom of Information Act (FOIA)

Under the Freedom of Information Act 2000 the controlled destruction of records and properly managed retention schedules are essential. Please note that the FOIA does not apply to the Region. Records selected for permanent preservation, i.e. having an historical importance, and no longer in regular use by the Region, should be archived as soon as possible. Records not selected for permanent preservation and which have reached the end of their administrative life should be destroyed in as secure a manner as is necessary for the level of confidentiality or security markings they bear.

If a record due for destruction is known to be the subject of a Data Subject Access Request (DSAR), destruction should be delayed until disclosure has taken place or, if the Region has decided not to disclose the information, until the complaint and appeal provisions under the General Data Protection Regulations (GDPR) have been exhausted.

Disposal

- Having drawn up a retention schedule, this should be put into operation.
- Each year as a minimum, the records which are no longer required under the schedule should be reviewed and destroyed.
- All information should be disposed of sensibly with regard to its level of confidentiality and sensitivity. Paper files containing names and details about persons and/or holding sensitive information should be shredded. This is in line with GDPR.
- Paper records for destruction should be shredded or destroyed by other secure method.
- Electronic data should be erased, taking care to ensure the relevant files have been deleted. Swim England IT may advise the best way to erase electronic records.

Records which may be routinely destroyed

As a rule, the following types of records have no significant operational, informational or evidential value. They can therefore be destroyed as soon as they have served their primary purpose.

Examples:

- Announcements and notices of meetings and other events, and notifications of acceptance
- Apologies for absence, providing these are properly recorded in the minutes
- Requests for information, such as maps, travel directions, brochures etc.
- Requests for, and confirmations of, reservations for internal services (e.g. meeting rooms, car parking spaces) where no internal charges are made
- Requests for, and confirmations of, reservations with third parties (e.g. travel, hotel accommodation, restaurants) when invoices have been received
- Transmission documents: envelopes, e-mail confirmation of receipt, routing slips, compliments slips and similar items which accompany documents but do not add any value to them
- Message slips
- Superseded address lists, distribution lists etc.
- Duplicate documents such as; 'CC' and 'FYI' copies; Unaltered drafts; 'Snapshot' printouts or extracts from databases; 'Day Files' (chronological copies of correspondence); Working papers, where the results have been written into an official document and which are not required to support it; Stocks of publications which are obsolete, superseded or otherwise useless e.g. magazines, marketing materials, catalogues, manuals, directories, forms, and other material produced for wide distribution.

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Retention Schedule

File	Examples	Retention Period	Source
Strategic Planning			
Strategic Plan Strategy Development	Regional Strategy final version	5 years after superseded	
Supporting papers for Strategic planning (drafts, minutes)	Administration around Strategy	2 years	
Papers, correspondence etc. governing the Company	Papers to, and from, the region regarding the Governance of the Company	5 years	
Policy and Procedure implementation	Annual Discipline Plans, Policy Documents	5 years after superseded	
Annual Reports		Final reports- permanent	
Finance			
Records; Ledgers, cash book, purchase ledger, sales ledger, assets register, nominal ledger, journal ledgers, debtors accounts purchase invoices and credit notes, copy sales invoices and credit notes, journal vouchers, stock records, petty cash vouchers, bank statements and reconciliation's, rental and hire purchase agreements, bank statements, purchase invoices, copy sales invoices, credit or debit notes issued or received, import documents		Paper records will be kept for seven complete financial years. Destruction will take place once the previous financial year's accounts have been fully signed off. Computerised records will be kept indefinitely.	Value Added Tax Act 1994, Taxes Management Act 1970, The Limitation Act 1980

Budget Plans		3 years end financial year for detailed plans and indefinitely for summary ones.	
Lease, rental etc. of property		6 years after disposal of property	The Limitation Act 1980
Inland Revenue correspondence		Review every 3 years	
Governance			
Minutes of meetings	Minutes of the following meetings: Board of Directors, Regional Operations Committee, Leadership Groups, and County Forums	Minimum of 6 years	
Confidential minutes	Retained by the Regional Chairman and passed to the incoming Chairman upon retirement	10 years	
Minutes of the Audit, Risk and Probity Committee	Retained by the ARP Chairman and passed to the incoming Chairman upon retirement	10 years	
Complaints	Complaints received from members, reviews compiled by external partners	3 years	
Supporting papers	Agendas and supporting reports and other papers	3 years	
Contracts and Agreement Management			
Contracts and agreements		6 years after termination	The Limitation Act 1980
Tendering, disputes over payment		6 years after termination	The Limitation Act 1980
Staff Management			
Staff files, training records, application form, CV, initial starting salary, offer letter, acceptance of terms and conditions of service	New starter paperwork	6 years after end of employment – note these	Employment Relations Act 1999

		records are maintained by the Swim England HR Team	
Appraisals	Staff appraisal paperwork	2 years	
Timesheets, monthly reports		2 years	
Employment contracts, certificate of qualifications, change of hours letters, disciplinary proceedings, grievances	Additional staff paperwork	6 years after employment ceases	Employees Relations Act 1999
References		2 years	
Current contact details		Until superseded	Employment Relations Act 1999
Annual leave records		2 years	
Job applications and interview records for unsuccessful applicants		6 months after notifying candidates	Equality Act 2010
Staff and applicant DBS disclosures		6 months after receipt	
Records Management			
Records on establishment and development of the Company's legal framework and governance	Constitution	When superseded, previous versions to be archived	
Data Subject Access requests	Requests by an individual on information stored by the region that affects them	5 years after request	
Handling of requests under Data Protection Act	General requests regarding data and the region	5 years after request	
Regional records held	List of record holders	When superseded	
Event Management			
Planning, administration documentation	Stock forms, correspondence, checklists, timetables etc.	2 years after event	
Project reports	Development day reports, camp reports, competition reports	4 years after event	

Event registers	Lists of attendees, staff, clubs/athletes entered	4 years after event	
Event Medical information, permission forms, other personal data captured	Medical form returns, permission forms, accident report forms	4 years after event	
DBS disclosures for event staff	Team managers, coaches assisting the region at events	6 months after receipt	
Competitions			
Published information prior to the competition	Entries, conditions, entry forms, schedules, qualifying times	Archive 3 months after the event	
Entries	Received entry forms	1 year after event	
Data following the competition	Results and Meet files	6 years – archive old results and meet files	
Marketing			
Corporate identity (logo, documents)	Logo images, documents containing old logo	When superseded	
News releases		2 years after event	
Images (of people) storage	Photos of winners at events, team photos, development day images	2 years after event. Must have written opt in permission from all individuals	
Generic images of objects and places storage	Water polo balls, blocks, Luton Inspire	4 years	
Regional Newsletters	Club Update, Discipline Newsletters, Coaches Newsletter	5 years	
Website Event Promotion Articles	Promoting entry forms, needing volunteers, spaces available etc.	Deleted immediately after event	
Website Event reporting	Event report, results now available, thank you' s, congratulations etc.	1 month post event	

Website Documents (excluding minutes, results, and records)	Booking forms, directions, reports etc.	1 year	
Social media engagement	Tweets, Facebook articles, Instagram pictures	6 months	
Office Management			
Store room Risk Assessment		1 year (superseded annually by an updated version)	
Insurance certificates		When superseded archive as there is a legal requirement to retain previous versions for 40 years.	