



## GDPR DATA RETENTION POLICY

### 1. INTRODUCTION

- 1.1 This Policy sets out the obligations of the English Volleyball Association Limited (t/a Volleyball England) (“the **Organisation**”) regarding retention of personal data collected, held, and processed by the Organisation under the UK General Data Protection Regulation and the Data Protection Act 2018 (“the Regulation”).
- 1.2 Unless otherwise stated, defined terms in this Policy shall have the same meaning set out in the Articles of Association and in the Framework Document accessible on the Organisation's [website](#).
- 1.3 In this Policy:
  - 1.3.1 "personal data" means as any information relating to an individual who can be identified (directly or indirectly) from that information;
  - 1.3.2 "data subject" means the individual to whom the personal data relates;
  - 1.3.3 "sensitive personal information" means personal information about an individual’s race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (or non-membership), genetics information, biometric information (where used to identify an individual) and information concerning an individual’s health, sex life or sexual orientation.
- 1.4 Under the Regulation, personal data shall be kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. In certain cases, personal data may be stored for longer periods where that data is to be processed for archiving purposes that are in the public interest, for scientific or historical research, or for statistical purposes (subject to the implementation of the appropriate technical and organisational measures required by the Regulation to protect that data).
- 1.5 This Policy sets out the type(s) of personal data held by the Organisation, the period(s) for which that personal data is to be retained, the criteria for establishing and reviewing such period(s), and when and how it is to be deleted or otherwise disposed of.
- 1.6 This policy is complimentary to, and should be read in conjunction, with our Data Protection Policy, our Privacy Policy and our Cookies Policy – each of

which can be accessed [here](#) – and which contain further information regarding the protection of personal information in those contexts. All three policies are referred together as the "Data Policies".

- 1.7 Failure by staff, volunteers, sub-contractors, outsourced services providers, or other parties working with the Organisation to comply with the Data Policies may lead to disciplinary action under our Codes of Conduct and Grievance and Disciplinary Policy.

## 2. **AIMS AND OBJECTIVES**

- 2.1 The primary aim of this Policy is to set out limits for the retention of personal data and to ensure that those limits, as well as further data subject rights to erasure, are complied with. By extension, this Policy aims to ensure that the Organisation complies fully with its obligations and the rights of data subjects under the Regulation.

- 2.2 In addition to safeguarding the rights of data subjects under the Regulation, by ensuring that excessive amounts of data are not retained by the Organisation, this Policy also aims to improve the speed and efficiency of managing data.

## 3. **SCOPE**

- 3.1 This Policy applies to all personal data held by the Organisation and by third-party data processors processing personal data on the Organisation's behalf.

- 3.2 Personal data, as held by the Organisation is stored in the following ways and in the following locations:

- 3.2.1 Third-party servers, operated by third party suppliers and outsourced providers including, without limitation:

- (a) Microsoft 365 Cloud Data is held in the EU, Microsoft Campus, Thames Valley Park, Reading, Berkshire, RG6 1WG
- (b) Memset Website Hosting Platform located at 87 Dunsfold Park, Stovolds, Cranleigh, GU6 8TB
- (c) SportLomo, Unit 3, McHale Road Sports Park, Castlebar Mayo Ireland
- (d) Globacol Ltd, Barnsley Business Innovation Centre, Wilthorpe, Innovation Way, Barnsley, South Yorkshire S75 1JL

- 3.2.2 Computers permanently located in the Organisation's premises at SportPark, 3 Oakwood Drive, Loughborough, LE11 3QF;

- 3.2.3 Laptop computers and other mobile devices provided by the Organisation to its employees and volunteers;
- 3.2.4 Computers and mobile devices owned by employees, volunteers, and sub-contractors;
- 3.2.5 Physical records stored at the Organisation's premises at SportPark, 3 Oakwood Drive, Loughborough, LE11 3QF.

#### 4. **DATA SUBJECT RIGHTS AND DATA INTEGRITY**

- 4.1.1 All personal data held by the Organisation is held in accordance with the requirements of the Regulation and data subjects' rights thereunder, as set out in the Organisation's Data Protection Policy.
- 4.1.2 Data subjects are kept fully informed of their rights, of what personal data the Organisation holds about them, how that personal data is used and how long the Organisation will hold that personal data (or, if no fixed retention period can be determined, the criteria by which the retention of the data will be determined).
- 4.1.3 Data subjects are given control over their personal data held by the Organisation including the right to have incorrect data rectified, the right to request that their personal data be deleted or otherwise disposed of (notwithstanding the retention periods otherwise set by this Data Retention Policy), the right to restrict the Organisation's use of their personal data, and further rights relating to automated decision-making and profiling.

#### 5. **TECHNICAL AND ORGANISATIONAL DATA SECURITY MEASURES**

- 5.1 The technical measures in place within the Organisation to protect the security of personal data are set out in Part 20 of the Data Protection Policy.
- 5.2 The organisational measures in place within the Organisation to protect the security of personal data are set out in Part 21 of the Data Protection Policy.

#### 6. **DATA DISPOSAL**

- 6.1 Upon the expiry of the data retention periods set out below in Part 7 of this Policy, or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise disposed of as follows:

- 6.1.1 Personal data stored electronically (including any and all backups thereof) shall be deleted securely;
- 6.1.2 Personal data stored in hardcopy form shall be shredded and securely disposed of.

## 7. **DATA RETENTION**

- 7.1 As stated above, and as required by law, the Organisation shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed.
- 7.2 Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed).
- 7.3 The Organisation has set retention periods for certain records as set out below. Where no period is set out the following criteria shall be used to establish retention periods (and such criteria shall be used in reviewing retention periods):
  - 7.3.1 The objectives and requirements of the Organisation;
  - 7.3.2 The type of personal data in question;
  - 7.3.3 The purpose(s) for which the data in question is collected, held, and processed;
  - 7.3.4 The Organisation's legal basis for collecting, holding, and processing that data;
  - 7.3.5 The category or categories of data subject to whom the data relates.
- 7.4 If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.
- 7.5 Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Organisation to do so (whether in response to a request by a data subject or otherwise).
- 7.6 If there is any uncertainty, the Data Protection Officer should be consulted to determine the appropriate retention period.
- 7.7 In limited circumstances, it may also be necessary to retain personal data for longer periods where such retention is for archiving purposes that are in the public interest, for scientific or historical research purposes, or for statistical

purposes. All such retention will be subject to the implementation of appropriate technical and organisational measures to protect the rights and freedoms of data subjects, as required by the Regulation.

## 7.8 Data Retention Periods:

<b>Record</b>	<b>Retention Period</b>
Member Data (including player and technical official's registrations)	Duration of membership and 6 years thereafter
Complaints	1 year from conclusion of complaint
Supplier records	6 years
Partner records	6 years
Accounting records	3 years from the date on which the record was made
Records of all proceedings at directors' meetings, including: —board minutes —minute books —written resolutions of the board —register of sealed documents	10 years from the date of the meeting
Minutes of all proceedings of general meetings	10 years from the date of the meeting
Copies of all members' resolutions passed outside general meetings	10 years from the date of the resolution
Reports and accounts required by HMRC	6 years
Register of directors and their residential addresses	Indefinitely for the register itself
Register of disclosed interests	Indefinitely for the register itself An old entry may be removed from the register if more than six years have elapsed since the entry was made A third party may apply for an entry relating to them to be removed from the register, if it is incorrect
Register of members (Affiliated Clubs)	Indefinitely for the register itself Former members may be removed from the register after 10 years from the date their membership ceases
Rejected job applicant records, including: —application letters/forms —CVs —references —certificates of good conduct —interview notes —assessment and psychological test results	6 months after applicant is notified of rejection

Application records of successful candidates, including: —employment application forms of successful applicants —copies of academic and other training received —references —correspondence concerning employment —CVs —interview notes and evaluation forms —assessment and psychological test papers and results	6 years after employment ceases
Employment contracts, including: —personnel and training records —written particulars of employment —changes to terms and conditions	6 years after employment ceases
Copies of identification documents (eg passports)	6 years after employment ceases
Identification documents of foreign nationals (including right to work)	2 years from the date of termination of employment
Records concerning a temporary worker	6 years after employment ceases
Employee performance records, including: —probation reviews —review meeting and assessment interviews —appraisals and evaluations —promotions and demotions	6 years after employment ceases
Records relating to and/or showing compliance with Working Time Regulations 1998 including: —registration of work and rest periods —working time opt-out forms	2 years from the date on which the record was made
Redundancy records	6 years from date of redundancy
Annual leave records	6 years after the end of each tax year
Parental leave records	6 years after the end of each tax year
Sickness records	6 years after the end of each tax year
Records of return to work meetings following sickness, maternity etc	6 years the end of each tax year
Records for the purposes of tax returns including wage/salary records, records of overtime, bonuses and expenses	6 years
PAYE records, including: —wage sheets —deductions working sheets —calculations of the PAYE income of employees and relevant payments	3 years
Income tax and NI returns, income tax records and correspondence with HMRC	3 years after the end of the financial year to which they relate

Records demonstrating compliance with national minimum wage requirements	3 years beginning with the day upon which the pay reference period immediately following that to which they relate ends
Details of benefits in kind, income tax records (P45, P60, P58, P48 etc), annual return of taxable pay and tax paid	4 years
Employee income tax and national insurance returns and associated HMRC correspondence	3 years from end of tax year to which they relate
Statutory sick pay (SSP) records	3 years after the end of the tax year to which they relate
Wage/salary records (including overtime, bonuses and expenses)	6 years
Records relating to hours worked and payments made to workers	3 years
Statutory maternity pay records, calculations, certificates or other medical evidence	3 years after the end of the tax year in which the maternity period ends
Records of reportable injuries, diseases or dangerous occurrences —reportable incidents —reportable diagnoses —injury arising out of accident at work (including the Organisation’s accident book)	3 years from date of the entry (if an accident relates to a child or young adult—until that person reaches 21 years)

## 8. **ROLES AND RESPONSIBILITIES**

- 8.1 The Organisation’s Data Protection Officer is the Chief Executive Officer who can be contacted at [dpo@volleyballengland.org](mailto:dpo@volleyballengland.org)
- 8.2 The Data Protection Officer shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Organisation’s other Data Policies, and with the Regulation and other applicable data protection legislation.
- 8.3 The Data Protection Officer shall be directly responsible for ensuring compliance with the above data retention periods throughout the Organisation.
- 8.4 Any questions regarding this Policy, the retention of personal data, or any other aspect of Regulation compliance should be referred to the Data Protection Officer.

9. **IMPLEMENTATION OF POLICY**

- 9.1 This version of the Policy was deemed effective as of 1<sup>st</sup> July 2024. For a copy of the previous version of this policy please contact the DPO. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date. This policy was last updated on the date set out in the footer (and any such updates shall be deemed to take effect from that date).