



UK Deaf Sport



DeaflympicsGB

UK Deaf Sport

Data Retention and Archiving Policy

The Issue Status

The Issue Status is indicated by the version number in the footer of this document. It identifies the Issue Status of the 'UK Deaf Sport Data Retention and Archiving Policy'.

When any part of this document is amended, a record is made in the Amendment Log shown below.

The 'UK Deaf Sport Data Retention and Archiving Policy' can be fully revised and re-issued at the discretion of the UK Deaf Sport Board.

Issue	Amendment	Date	Initials	Policy Owner	Approving Body	Date Approved by Approving Body	Review Date
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1. Purpose

- 1.1 The purpose of this policy is to express, outline and guide UK Deaf Sport's (UKDS) responsibilities for data retention and archiving in accordance with its legal and contractual obligations, especially with regards to UKDS's responsibilities to its stakeholders, employees and members.
- 1.2 UK Deaf Sport's data retention schedule (Appendix 1) will provide information on the type of data UKDS collects and the retention periods. It outlines your rights as an individual and the various definitions within the schedule.
- 1.3 This policy governs all paper-based and electronic documentation.
- 1.4 Individuals with a live contract, membership, or any form of business connection or interest with UKDS will have their data used and held by UKDS in accordance with our privacy policy, data protection and information security policies and procedures.
- 1.5 If an individual terminates their contract or membership with UKDS, or no longer requires their business connection or interest with UKDS, their data will be retained as per the data retention schedule (Appendix 1). Wherever possible, UKDS will anonymise personal data. If that is not possible as it will impact on how UKDS conducts its business and meets its legal and contractual requirements, UKDS will pseudonymise individual records by deleting personal data, such as names, and retaining identification numbers, for example. This will allow UKDS to manage risk and maintain business continuity.
- 1.6 Individuals who have opted-in to communication from UKDS will have their data used and held by UKDS in accordance with its privacy policy, data protection and information security policies and procedures.
- 1.7 An individual who has opted-out of communications from UKDS will have their data retained as per the data retention schedule (Appendix 1). Wherever possible, UKDS will pseudonymise individual records for example, by deleting personal data and retaining identification numbers. This will allow UKDS to manage risk and maintain business continuity.

2. Introduction

- 2.1 In order to carry out its business, UKDS needs to gather personal data and is fully committed to respecting all personal data it collects and stores and how long for.
- 2.2 UKDS recognises that retention and archiving requirements may differ depending on the reason for collecting and holding the data. UKDS will determine and document the requirements for each kind of data held to ensure we adhere to the right standards of data retention and archiving according to the relevant legislative and contractual requirements.
- 2.2 In all its operations, UKDS will take care to ensure that only the necessary data is retained, and no needless aggregation of documentation is sustained. All documentation that needs to be retained, will be kept in secure environments, appropriate to the classification of the data.

2.3 UKDS aims, where possible, to minimise the retention of documentation in paper-based form and strives to keep necessary documentation electronically. As such we will look at the possibility of making full use of any CRM-systems that are available to us.

- 2.4 UKDS also recognises its responsibilities under the UK GDPR and will ensure that:
- Personal Data is only held if the individual has given us informed consent
 - consent to hold and process data can be withdrawn at any time by the individual
 - individuals have the right to request access to data we hold about them
 - if the information is inaccurate the data subject has a right to have the data rectified without undue delay
 - the data subject has the right to have their data erased unless there is a legal ground for continued processing.

3. Legislative Context

3.1 UKDS will comply with the following legislation and other legislation as appropriate:

Name	Location
The Data Protection Act 2018	http://www.legislation.gov.uk/ukpga/2018/12/pdfs/ukpga_20180012_en.pdf
The Computer Misuse Act 1990	http://www.legislation.gov.uk/ukpga/1990/18/contents
Freedom of Information Act 2000	http://www.legislation.gov.uk/ukpga/2000/36/contents
The UK General Data Protection Regulation 2021	https://uk-gdpr.org/ https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/
The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019	https://www.legislation.gov.uk/ukdsi/2019/9780111177594/contents
The General Data Protection Regulation Keeling Schedule	https://uk-gdpr.org/wp-content/uploads/2022/01/20201102 - GDPR - MASTER Keeling Schedule with changes highlighted V3.pdf
Data Protection and Digital Information (No2) Bill	https://publications.parliament.uk/pa/bills/cbill/58-03/0265/220265.pdf
The Malicious Communications Act 1988 (Amended 2022)	https://www.legislation.gov.uk/ukpga/1988/27/section/1

4. Data Retention

- 4.1 UKDS will retain your details for as long as they are needed for the relevant purposes required for UKDS to conduct its business and continue operating.
- 4.2 UKDS may also retain certain records for other legitimate reasons (including after your relationship with UKDS has ended), for example to resolve any potential disputes, cross-check against future membership applications and to comply with other reporting and retention obligations.
- 4.3 UKDS will store paper documentation as required by UK Legislation. If there is no specified time to retain documentation that may form a record that requires auditing then UKDS will retain them for the statutory period of 6 years.
- 4.4 If UKDS ceases to trade it will discuss retention of the documentation with any stakeholders who still have an interest in data held by UKDS.
- 4.5 UKDS will keep electronic information/data for the same length of time as required for paper copies. We will also ensure that the electronic copy of the documentation is retained in a form that can be relied on for audit purposes.
- 4.6 UKDS will ensure that any documentation and data that falls under this policy is retained in secure environments in such a manner that it retains or increases the level of protection it has been designated.
- 4.7 For more details on how long UKDS keeps your data for, please review the data retention schedule (Appendix 1).

5. Data Deletion

- 5.1 UKDS will keep individual data in a secure area of their IT system for the time highlighted within the data retention schedule, to fulfil the specific purposes it was collected for. It will retain data after its initial usage for business purposes, such as serving a legal obligation.
- 5.2 After this period UKDS must erase the data and will do so through anonymisation and archiving the data or through data deletion if an individual requests for their data to be deleted (see right to request deletion).

6. Data Subject Rights

- 6.1 UKDS will comply with data protection legislation with regard to the rights of individuals or data subjects in relation to their personal data or information. This includes:
 - 6.1.1 The right to be informed about the collection and the use of their personal data: UKDS will tell individuals what data is being collected, how it's being used, how long it will be kept and whether it will be shared with any third parties. This right forms part of the UKDS's obligation to ensure the fair and transparent processing of personal data.

- 6.1.2 The right to access personal data and supplementary information: This requires UKDS to confirm they are processing the personal data and providing a description of the purposes for processing, including any individuals or organisations with whom the data is shared. Individuals can submit subject access requests, which obliges UKDS to provide a copy of any personal data we hold concerning the individual.
- 6.1.3 The right to have inaccurate personal data rectified, or completed if it is incomplete: If an individual discovers that the information UKDS holds on them is inaccurate or incomplete, they can request that it be updated. This right is linked to the duty to ensure that personal data is accurate, up-to-date, and erased or corrected without delay where it is inaccurate.
- 6.1.4 The right to erasure (to be forgotten) in certain circumstances: Individuals can request that UKDS erase their data in certain circumstances. For example, when the data is no longer necessary, the data was unlawfully processed, or it no longer meets the lawful ground for which it was collected. This includes instances where the individual withdraws consent. Data which cannot be deleted immediately will be held for UKDS's legal, regulatory or business purposes which are governed by other legal or regulatory bodies, for example HMRC.
- 6.1.5 The right to restrict processing in certain circumstances: Individuals can request that UKDS limits the way it uses personal data, often as an alternative to deleting it. This may be as the result of a dispute about the accuracy of the data, or the processing is unlawful, and the data subject requests the personal data is restricted rather than deleted. An individual can also exercise this right when they no longer use the service for which it was originally collected, but the UKDS needs it to establish, exercise or defend a legal claim.
- 6.1.6 The right to data portability: This allows an individual to obtain and reuse their personal data for their own purposes across different services. The data subject can request to receive a copy of their personal data from UKDS in a commonly used and machine-readable format or to have their personal data transmitted directly from UKDS to another data controller where technically possible.
- 6.1.7 The right to object to processing in certain circumstances: Individuals can object to data processing for direct marketing purposes, including profiling related to direct marketing, or for scientific or historical research purposes or statistical purposes unless the processing is necessary for the performance of a task carried out in the public interest. UKDS will stop processing information unless we can demonstrate compelling legitimate grounds for the processing that overrides the interests, rights and freedoms of the individual.
- 6.1.8 Rights in relation to automated decision making and profiling. This means an individual has the right not to be subject to a decision based solely on automated processing with no human involvement, such as profiling. This type of decision making uses personal data to make calculated assumptions about individuals that can have a significant impact on them. This includes where the data subject has consented.

7. Governance

- 7.1 The policy will be reviewed bi-annually, in partnership with UKDS's IT provider, in order to actively assess any improvements that can be made and propose these changes to the UKDS Board.
- 7.2 At the Board's discretion any updates and any additional procedures may be implemented within chosen timeframes. These updates or additional procedures will be incorporated into this Data Retention and Archiving Policy in the review period.

Appendix 1: Data Retention Schedule

Type of Data	Purpose	Personal Data	Retention Period
Personal contact	To allow direct communication between UKDS and an individual, for example for UKDS to service an application for an ICSD number	Title	10 years from last action
		Name	10 years from last action
		Address	10 years from last action
		Job role	10 years from last action
		Telephone number	10 years from last action
		Email address	10 years from last action
Organisation details	To allow identification of the connection between individuals and organisations they work with/for	Organisation name	10 years from last action
		Relationship/ workplace	10 years from last action
Interactions with UKDS	To facilitate interactions and requests between individuals and UKDS	Email communications	10 years from last action
		Telephone calls	10 years from last action
		Written correspondence	10 years from last action
Financial details	To enable UKDS to receive, make payment and record transactions between individuals or organisations and UKDS.	Bank details	Delete on termination
		Batch payment details - bank info included	Delete on termination
		Cheque/payment details	6 years (from end of fiscal year) from last action
		Credit/debit card details	Delete on termination
		Delivery notes	Delete on termination
		Direct Debit Mandates	Delete on termination
		Member fees	6 years (from end of fiscal year) from last action
		Membership payment charge	6 years (from end of fiscal year) from last action
		Order details	6 years (from end of fiscal year) from last action
		Purchase invoice	6 years (from end of fiscal year) from last action

		Sales invoices and credits	6 years (from end of fiscal year) from last action
Use of UKDS services	To enable and record the use of and movement through online systems	Username	Delete on termination
		Passwords	Delete on termination
		IP addresses	Delete on termination
		Record of attendance at events, conferences, CPD etc	6 years (from end of fiscal year) from last action
Identification and UKDS support	How UKDS identifies an individual, captures information to ensure eligibility into membership and competitions, services additional support as part of the membership benefits (for example, audiograms to ensure competition requirements are met at events)	Sporting/career history	10 years from last action
		CPD	10 years from last action
		Date of birth	10 years from last action
		Audiogram	Once ICSD number is obtained
		Ethnic origin	10 years from last action
		Gender	10 years from last action
		Qualifications	10 years from last action
UKDS Administration	Data that UKDS records to fulfil its business functions	Contracts	10 years from last action
		Mailing preferences	10 years from last action
		Member category	10 years from last action
		Membership number	10 years from last action
		Membership renewal date	10 years from last action
		Membership start date	10 years from last action
		Membership status	10 years from last action
		Type of membership	10 years from last action
UKDS People	Only applicable to UKDS people including employees, volunteers and contractors	Title	6 years (from end of fiscal year) from last action
		Forename	6 years (from end of fiscal year) from last action
		Surname	6 years (from end of fiscal year) from last action
		Date of birth	6 years (from end of fiscal year) from last action
		Copies of driving licence, passport, birth certificates	6 years (from end of fiscal year) from last action

		Proof of current address such as utility bill or bank statement	6 years (from end of fiscal year) from last action
		Evidence of how individuals meet the requirements of the role, including CVs and references	6 years (from end of fiscal year) from last action
		Evidence of individuals right to work in the UK and immigration status	6 years (from end of fiscal year) from last action
		Address	6 years (from end of fiscal year) from last action
		Bank details	6 years (from end of fiscal year) from last action
		Contact details - telephone, email, emergency	6 years (from end of fiscal year) from last action
		Gender	6 years (from end of fiscal year) from last action
		Ethnic origin	6 years (from end of fiscal year) from last action
		National insurance number	6 years (from end of fiscal year) from last action
		Nationality	6 years (from end of fiscal year) from last action
		Pension	6 years (from end of fiscal year) from last action
		Expenses claims	6 years (from end of fiscal year) from last action
		Salary and pay	6 years (from end of fiscal year) from last action
		Start date	6 years (from end of fiscal year) from last action
		Tax code	6 years (from end of fiscal year) from last action
		Income tax and National Insurance	3 years (from end of fiscal year) from last action
		Maternity and paternity	3 years (from end of fiscal year) from last action

		Parental leave	3 years (from end of fiscal year) from last action
		Pension benefits	12 years from the ending of any benefit payable
		Redundancy records	6 years (from end of fiscal year) from last action
		Sickness absence records	6 years (from end of fiscal year) from last action
		Grievances	6 years (from end of fiscal year) from last action
		Disciplinary sanctions	6 years (from end of fiscal year) from last action
		Appeals	6 years (from end of fiscal year) from last action
		Unsuccessful job applications	12 months after last action
		Termination of employment	6 years (from end of fiscal year) from last action
		References	12 months after last action
		Interview records	12 months after last action
		Working time Records (including overtime, annual holiday, jury service, time off for dependents, etc)	2 years (from end of fiscal year) from last action
		DBS checks	6 years (from end of fiscal year) from last action
		Criminal proceedings or convictions data	6 years (from end of fiscal year) from last action
Other	Other means by which UKDS may capture and retain data in relation to UKDS Membership or competition entry requirements	Appeals	10 years from last action
		Complaints	10 years from last action
		Declarations of interests	10 years from last action
		Investigations	10 years from last action
		Mailing lists	10 years from last action
		Personal data collated through survey completion	10 years from last action
		Parental consent	10 years from last action
		Register of annual general meetings	Life of the company

		Register of directors	Life of the company
		Sanctions	Life of the company
		Subject access requests	10 years from last action
		Unsubscribing lists	10 years from last action
		Other supporting documents	10 years from last action
Special Category Data	Other data which UKDS may capture and retain in relation to UKDS Membership and competition entry	Data concerning health	10 years from last action
		Personal data revealing religious or philosophical beliefs	10 years from last action
		Personal data revealing trade union membership	10 years from last action
		Personal data revealing racial or ethnic origin	10 years from last action
		Personal data revealing psychographic information (perspective, beliefs, values etc)	10 years from last action