

**GLASGOW & WEST OF SCOTLAND FAMILY HISTORY SOCIETY  
DATA RETENTION POLICY**

**1. Introduction**

- 1.1. The Society gathers personal information from individuals and external organisations as well as generating a wide range of personal data, all of which is recorded in documents and records, both in hard copy and electronic form.
- 1.2. Examples of the types of information accumulated and generated are set out in Appendix 1 of this policy but is not exhaustive.
- 1.3. In certain circumstances it will be necessary to retain documents to meet legal requirements and for operational needs. Document retention is also required to evidence agreements or events and to preserve information.
- 1.4. It is however not practical or appropriate for The Society to retain all records. Additionally, data protection principles require information to be as up to date and accurate as possible. It is therefore important that The Society has in place systems for the timely and secure disposal of documents that are no longer required.
- 1.5. This Data Retention Policy was adopted by the Society on 17<sup>th</sup> May 2018 and will be implemented on a day to day basis.

**2. Roles and Responsibilities**

- 2.1. The Council will adopt the retention and disposal guidance at Appendix 1 of this policy and strive to keep records up to date.

**3. Retention and Disposal Policy**

- 3.1. Decisions relating to the retention and disposal of data should be guided by:-
  - 3.1.1. Appendix 1 – Document Retention Schedule – Guidance on the recommended and statutory minimum retention periods for specific types of documents and records.
  - 3.1.2. Appendix 2 – Quick Guide to document retention.
- 3.2. In circumstances where the retention period for a specific document or category of documents has expired, a review should be carried out prior to disposal and consideration should be given to the method of disposal.

#### 4. Disposal

- 4.1. Documents containing confidential or personal information should be disposed of by shredding. Such documentation is likely to include financial details, contact lists with names and addresses.
- 4.2. Documents other than those containing confidential or personal information may be disposed of by recycling or binning.
- 4.3. Electronic communications including email, Facebook pages, twitter accounts etc and all information stored digitally should also be reviewed and if no longer required, closed and/or deleted so as to be put beyond use. This should not be done simply by archiving, which is not the same as deletion. It will often be sufficient simply to delete the information, with no intention of ever using or accessing it again, despite the fact that it may still exist in the electronic ether. Information will be deemed to be put beyond use if the Society is not able, or will not attempt, to use it to inform any decision in respect of any individual or in a manner that affects the individual in any way and does not give any other organisation access to it.
- 4.4. Deletion can also be effected by using one of the following methods of disposal:-
  - Using secure deletion software which can overwrite data;
  - Using the function of “restore to factory settings” (where information is not stored in a removeable format);
  - Sending the device to a specialist who will securely delete the data.

## Appendix 1

### Illustrative Data Retention Schedule

This Schedule is provided as a guide to common types of documents but is not exhaustive.

**Avoid retaining information if there is no reason for doing so. Consult with the Council if you are unsure.**

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RECORD	RETENTION PERIOD
Minutes of meetings	6 years
Confidentiality Agreements	100 years
Complaints concerning people	100 years
Employee records including: contracts, time records etc	Duration of employment + 6 years
Volunteer records	Duration of placement + 6 years
Databases for mailing lists/distribution	Reviewed annually, delete out of date information
Miscellaneous contact information	Delete once there is no longer a requirement to hold such information
Documents relating to litigation or potential litigation	Until matter is concluded plus 6 years

Hazardous material exposures	30 years
Payroll Records	Minimum, 6 years. No maximum
Contracts	6 years following expiration
Fixed Asset Records	Permanent
Application for charitable and/or tax-exempt status	Permanent
Resolutions	Permanent
Audit and review workpapers	5 years from the end of the period in which the audit or review was concluded
OSCR filings	5 years from date of filing
Records of financial donations	6 years
Accounts Payable and Receivables ledgers and schedules and all associated bookkeeping records	6 years
Annual audit reports and financial statements	Permanent
Electronic fund transfer documents	6 years
Tax records	Minimum 6 years
Insurance claims/ applications	Permanent

Insurance disbursements and denials

Permanent

Insurance contracts and policies (Directors and Officers, General Liability, Property, Workers' Compensation)

Permanent

Leases

6 years after expiration

Warranties

Duration of warranty + 6 years

Records relating to potential, or actual, legal proceedings

Conclusion of any tribunal or litigation proceedings + 6 years

## Appendix 2

### General guidance for documents NOT included in the retention schedule.

On-going business use is subjective, but generally refers to documents still required for on-going projects, or documents that may still need to be referred to for on-going activities.

