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|  | **EOGHAN RUA CLG CUIL RAITHIN**  **Eoghan Rua GAC Coleraine**  **Developing and Promoting Gaelic Games** |  |

**Eoghan Rua CLG**

**Club Retention and Disposal policy**

“Data minimisation” is one of the overarching principles in the General Data Protection Regulation (GDPR). It requires personal data to be retained only for so long as is necessary. Clubs should therefore define time limits *or* have criteria to determine when data should be disposed/deleted securely.

This policy will apply to our entire club including our officers, committee members and coaches. It sets out the procedures that are to be followed when dealing with personal data and how we aim to comply with the Regulation in so far as it is possible.

The Regulation states that all personal data shall be:

a) Processed lawfully, fairly, and in a transparent manner in relation to the data subject.

b) Be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, historical research purposes and/or statistical purposes shall not be considered to be incompatible with the initial purpose. c) Be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

d) Be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate is erased or rectified without delay. e) Be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, historical research and/or statistical purposes.

f) Be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

The retention periods should be set out clearly noting when any such data may be deleted.

**Personal Data**

Eoghan Rua will only retain personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Personal data may be further processed and stored for archiving in the public interest, statistical and/or historical research purposes. When doing so we will consider:

* Any link to the initial purpose.
* The context the data was collected in.
* The reasonable expectations of members.
* The nature of the data.
* The consequences of further processing and the existence of appropriate safeguards.
* Whether such data can be ‘anonymised’ if being preserved for research.

**Financial records**

There is statutory requirement to keep financial records for seven years. However, records may be kept for the last eight years, in order to ensure that year ends are available. Beyond the eight-year point, there is little justification in keeping bank statements, cheque stubs etc. unless there was an incident which was of particular significance. These records will be stored securely by the Club Registrar in a locked cabinet and password protected online.

**Registration Data lists**

Old registration data may have some historical and/or statistical value.. Paper records will be stored securely by the Club Registrar in a (not sure about this e.g. I don’t have a locked cabinet and I don’t keep paper records.) and electronic records will be password protected online. Since 2006 membership lists have been archived annually. The aim was to provide the club with an information source for a development draw. In 2023 the draw took place but the archived membership data was not used. From 2023 adult membership electronic data will be held for 5 years after the last membership payment. For juveniles the electronic data for players leaving minor grade will be deleted annually.

**Constitution**

Out-of-date constitutions need to be considered. Whilst details of changes will be included in AGM reports, there may be a historical interest in retaining original versions where possible, and which can be displayed as part of commemorative exhibitions.

**Committee and AGM/EGM minutes and documents**

Committee minutes and documents relating to AGMs and EGMs must be retained as the definitive record of all club business, together with the decisions made and policies agreed. Also as an information resource to resolve any procedural issues or disputes. These records will be stored securely by the Club Secretary in a locked cabinet and password protected online.

**Security and Storage**

All data and records are stored securely to avoid misuse or loss. We will process all personal data we hold by taking appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We don’t do this e.g. to my knowledge Fioreann and Klubfunder have never been asked to conform to our policies. May be better stated as; the club will transfer data to a data processor that has GDPR procedures and policies.

We may store data in the following places:

* Google Drive and Microsoft One Drive or other reputable storage provider.
* Third-party servers.
* Committee email accounts.
* Committee Laptops and external hard drives.
* Website server
* Paper files.

**Destruction and Disposal**

Upon expiry of our retention periods, we shall delete confidential or sensitive records and we shall either delete or anonymise less important documents.

Our Records Management Officers (Club Secretary, Treasurer and Registrar) are responsible for the continuing process of identifying the records that have met their required retention period and supervising their destruction. The destruction of confidential, financial, and personnel-related records shall be securely destroyed electronically or by shredding if possible. Non-confidential records may be destroyed by recycling

**Retention Policy**

Data retention is defined as the retention of data for a specific period of time and for back up purposes.

We shall not keep any personal data longer than necessary but acknowledge that this will be dependent on the different types of documents and data that we have responsibility for. As such, our General Data Retention period shall be for a period of 1 year. Our specific data retention periods are set out below:

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| --- | --- | --- |
| **Document Type** | **Statutory Retention Period** | **Recommended Period of Retention** |
|  |  |  |
| Annual report and accounts | N/A | Permanently |
|  |  |  |
| Taxation records and tax returns | Inspection possible up to 6 years after tax/accounting period | Permanently |
|  |  |  |
| VAT Records and Customs & Excise Returns | Inspection possible up to 6 years after tax/accounting period | Permanently |
|  |  |  |
| Cheques, bills of exchange and other negotiable instruments | N/A | 6 Years |
|  |  |  |
| Statements from and instructions to the bank | N/A | 6 Years |
|  |  |  |
| Title deeds for property | N/A | Permanently |
|  |  |  |
| Policy Documents | N/A | Permanently |
|  |  |  |
| Registration Data | N/A | Adults: for 5 years after membership ceases.  Juveniles until leave minor grade. |

Signed\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Rúnaí

Signed\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Cathaoirleach