



British Arachnological Society - Records Retention Policy

The purpose of this Records Retention Policy ("**Policy**") is to ensure that records of the British Arachnological Society (BAS) are appropriately retained. Please review this policy alongside the BAS Privacy Notice and Data Protection Policy. This Policy governs the **retention** of records that must be kept to meet legal obligations or business requirements and the **destruction** of records that the BAS is no longer required to retain.

The British Arachnological Society needs to retain records for legal and operational reasons, as well as for purposes of good governance. However, it is neither necessary nor advisable to retain all records. For instance, data protection law requires an organisation to delete personal information which is no longer needed for the purposes for which it was obtained (or for compatible purposes). These data protection requirements must be balanced against a number of other legal and regulatory requirements which establish minimum retention periods for certain types of records.

Where the law prescribes specific retention periods for specific types of records, the obligation to retain the record will prevail over any deletion obligations contained in data protection law. This Policy should be read alongside the Retention Schedule at **Appendix 1** which sets out the records retention periods for specific named records held by The British Arachnological Society

Who needs to comply with this policy?

This policy applies to all British Arachnological Society records. Council Members, Trustees and other appointed Officers undertaking a role at the BAS are required to understand records retention obligations under this policy. Questions concerning this policy should be directed to the Accountable Person/internal lead, whose email address is membership@britishspiders.org.uk.

All members and volunteers are reminded that they must always take steps to keep British Arachnological Society's data secure, in line with its Data Protection Policy.

A failure to comply with this Policy and the British Arachnological Society's Records Retention Schedule is a serious matter, and it should be noted that such a failure could lead to disciplinary action.

Definitions

A **Record**: For the purposes of this Policy, a record is defined as information that is created, transmitted or received in the course of business of the organisation, or in the pursuit of the British Arachnological Society's organisational objectives, regardless of physical or electronic format or media, and must be retained for a specific period of time because the information:

- serves as necessary documentation of an action, decision or statement;
- has critical business/organisational value; or
- must be kept for legal, accounting or other regulatory requirements.

These Records may contain personal information (as defined under UK GDPR).

All other organisational information is considered “disposable” and may be safely deleted or destroyed in an appropriate manner after it has served its useful purpose.

Litigation Hold: In certain circumstances, a member may receive correspondence to indicate that records are subject to a Litigation Hold. This may be the case where Records are potentially relevant for pending or reasonably anticipated litigation, regulatory audits or investigations. Information that is subject to a Litigation Hold must be retained and should not be destroyed, regardless of whether it is a Record or information that is otherwise disposable, even if it no longer serves another useful purpose and it has come to the end of its retention period.

Record Retention Schedule: A record retention schedule defines the time period for which the BAS must keep its Records, based on legal, regulatory, fiscal, operational and historical requirements, as well as other business/organisational and operations-related requirements. After reaching the required time period for retention, these Records should be deleted or destroyed in an appropriate manner.

Principles

The Principles of this Records Retention Policy are:

- a Record must be retained for the minimum period indicated in the Records Retention Schedule;
- at the expiration of the minimum time period indicated in the Records Retention Schedule, a Record should be deleted or destroyed in a secure and appropriate manner, unless the Records Retention Schedule indicates it may be continued to be retained for a longer period. In such an event, where there is a continuing business/organisational need to retain the Record, it may be retained for an additional period which is necessary for the processing activity. The British Arachnological Society will determine in these situations if it is relevant to inform the data subject;
- Record deletion may be achieved, for example, by deleting the Record, through automated IT processes that flag out-of-date Records for scheduled deletion, or through any other means that will achieve effective and timely deletion of the Record within a reasonable period following its required deletion in accordance with this Policy;
- The normal process is for the retention period to start at the end of an engagement period, or from the date of last contact with an individual, e.g. retention period of volunteer data starts from the end of their role, and members’ data from the end of their membership with the British Arachnological Society or from the last date of contact with the member. However, there may be some variation to this process. Therefore, the retention periods specified in the Record Retention Schedule shall apply to Records with effect from the date stated. This may be from the date of their creation, from the date of last amendment, or from the end of an engagement period.
- Reference materials obtained from sources outside of the British Arachnological Society, such as articles and textbooks, may be kept indefinitely, if they still have a useful purpose.

Responsibilities

All officers, (including Council Members, Trustees and other appointed officers) undertaking a role are required to manage Records and information consistent with this Policy, the Record Retention Schedule(s) and any Litigation Hold communications. If you become aware that Records have been retained beyond the periods specified in the Record Retention Schedule, you should bring this to the attention of the relevant officer at the

earliest opportunity. All officers are required to undergo training on the retention of Records and are responsible for keeping their training up to date. This should be reviewed annually.

Reminders and Updates

Periodically, officers may receive a reminder of this Policy via email. They may also receive updates to this Policy, a description of supporting procedures, and information related to the Record Retention Schedule.

Unless specifically indicated, revisions to the Record Retention Schedule apply to all existing Records.

Training will be provided as applicable.

Appendix 1: Retention Schedule for Records

1. Data relevant to BAS Officers, employees (currently none) subcontractors, and external / third party communications : D is the last date of role/engagement

Record	Retention Period	Responsible person
Identification Documents, Personal Information such as address, contact information etc	D+3 y	Secretary
Employee or subcontractor: All data relating to their employment, including assessments, training, performance reviews, evaluations and supervision notes	D+7 y	Secretary
Retention of mailing data by the mail distribution organisation (currently H J Ling) following each mailing	D + 6w	Membership Officer
Access to data relevant to the role of an officer (e.g. officer's email account, membership or financial records) – Note that the retention period specified applies only to the retiring officer. The replacement officer will have access to all data up to the time it is deleted in accordance with periods specified elsewhere in this Appendix	D	Secretary / IT Officer
Contributions to the BAS <i>Newsletter</i> and <i>Arachnology</i> (including contributors' last known contact details)	Perpetuity	Secretary
Correspondence received from any external organisations, third party	On case-by-case basis	Secretary

2. Members: D- date of membership termination/last engagement

Former members' Title, Given Name, Family Name, Watsonian Vice County (for members in UK), Country of residence (for members not in the UK), Date joined and Date left	Perpetuity*	IT Officer
Remaining personal data linked to an individual membership	D+3 y	IT Officer
Reports submitted following grant awards	Perpetuity	Secretary

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3. Events, Fundraising, Donations, Marketing

Mailing list, marketing communication records	D+3y or until consent is withdrawn	Secretary or Membership Officer
Donation, gift aid, legacies	D+7 y	Treasurer
Fundraising contacts (contacted based on consent)	D+3y or until consent is withdrawn	Secretary or Treasurer

* A Data Protection Impact Assessment has been carried out, to justify the use of such data for the gathering of statistics.