

PERSONAL DATA RECORD RETENTION POLICY

Introduction

This Personal Data Record Retention Policy applies to all personal data records of Badminton England. This policy applies to all of our employees, contractors and suppliers and other individuals working or providing services on behalf of Badminton England, or who have access to Badminton England's personal data records ("**you**"). This Personal Data Record Retention Policy should be read in conjunction with Badminton England's Data Protection Policy.

Keeping personal data records for the period necessary for their purpose, and ensuring such records are accessible if required, is good business practice and required by data protection law.

Scope

A personal data "record" refers to all documents, in whatever medium, received or created by Badminton England in the course of its business which contain personal data. Personal data consists of any information which related to an individual and/or information from which an individual can be identified, directly or indirectly. For example, information which identifies an individual may consist of that individuals' name, address, telephone number, photographs, location data and online identifiers (e.g. cookie identifiers and IP addresses) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of an individual.

Badminton England' Personal Data Records

The majority of personal data records Badminton England holds are related to staff, volunteers, members and fans.

Badminton England also holds a limited amount of personal data records relating visitors to our website and representatives from our suppliers and partners in connection with the provision of our services.

Storage of Personal Data Records

Badminton England's records must be stored in a safe, secure and accessible manner.

Retention Periods

Personal data records should only be retained for the **period necessary for their purpose**, unless a different period is required by applicable laws and regulations.

A full explanation of the retention periods is contained in the attached Annex 1.

Disposal of Personal Data Records

The destruction of paper personal data records must be conducted by shredding if possible. The destruction of electronic records must be conducted in accordance with Badminton England's IT Policy. You must follow the processes put in place by the IT Department to ensure that all backups and copies are included in the destruction of records.

Preservation of Evidence

Badminton England requires you to comply fully with this policy and the retention schedule at Annex 1.

You should note the following general exception to any stated destruction timeframe: If you believe, or the Legal Department informs you, that Badminton England records are relevant to a current Tribunal, County Court or High Court claim ("Claim"), a potential claim (that is a dispute that could result in a Claim), government investigation, audit or other event you must preserve and not delete, dispose, destroy or change those personal data records, including emails, until the Legal Department determines those personal data records are no longer needed.

ANNEX 1 – RECORDS RETENTION SCHEDULE

EMPLOYMENT PERSONAL DATA RECORDS

Type of employment record	Statutory Instrument / Code of Practice	Retention period or recommendation
<ul style="list-style-type: none"> ▪ Disclosure and Barring Service (DBS), formerly Criminal Records Bureau (CRB), checks and disclosures of criminal records forms 	ROA and Information Commissioner's Employment Practices Code Part 1.7.4 and 2.15.3	Should be deleted following recruitment process unless assessed as relevant to ongoing employment relationship. Once the conviction is spent, should be deleted unless it is an excluded profession
<ul style="list-style-type: none"> ▪ Job applications and interview records of unsuccessful candidates 	The Information Commissioner: Employment Practices Code Part 1: recruitment and selection (1.7.5)	6 months after notifying unsuccessful candidates (or longer, if there is a clearly communicated policy to keep candidates CVs for future reference). Application forms should give applicants the opportunity to object to their details being retained.
<ul style="list-style-type: none"> ▪ Current Bank details 	N/A	No longer than necessary.
<ul style="list-style-type: none"> ▪ Immigration checks 	Immigration, Asylum and Nationality Act 2006	2 years after termination of employment.
<ul style="list-style-type: none"> ▪ Any reportable accident, death or injury in connection with work 	Schedule 1, Part II, Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (SI 2013/1471)	3 years at least from the date that the report was made.
<ul style="list-style-type: none"> ▪ Maternity records 	Regulation 26, Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960)	3 years after the end of the tax year in which the maternity pay period ends.
<ul style="list-style-type: none"> ▪ Records in relation to hours worked and payments made to workers 	Section 9, National Minimum Wage Act 1998. Regulation 59, National Minimum Wage Regulations 2015 (SI 2015/621)	3 years beginning with the day upon which the pay reference period immediately following that to which they relate ends.
<ul style="list-style-type: none"> ▪ PAYE records 	Regulation 97, Income Tax (Pay as You Earn) Regulations 2003	3 years after the end of the tax year to which they relate. However it is sensible to keep them for 6 years as they may fall within the definition of payroll and wage records (see below).

Type of employment record	Statutory Instrument / Code of Practice	Retention period or recommendation
<ul style="list-style-type: none"> ▪ Personnel and training records ▪ Written particulars of employment, contracts of employment, and changes to terms and conditions. 	<p>Whilst there is no legal requirement to keep them for this long, it is recommended these are kept for 6 years since these records may be relevant to a tribunal, County Court or High Court claim.</p>	<p>6 Years after employment ceases.</p>
<ul style="list-style-type: none"> ▪ Working time opt-out forms ▪ Records to show you have complied with the Working Time Regulations (WTR) 	<p>Regulations 5 and 9, Working Time Regulations 1998</p>	<p>6 years is advisable since such records may be relevant to a claim but the legal requirement is 2 years after the date that they were entered into/ the relevant period.</p>
<ul style="list-style-type: none"> ▪ Payroll and wage records 	<p>Schedule 18, paragraph 21, Finance Act 1998</p>	<p>6 years from the financial year-end in which payments were made.</p>
<ul style="list-style-type: none"> ▪ Annual leave records 	<p>N/A</p>	<p>6 years at least or longer if holiday leave can be carried over.</p>
<ul style="list-style-type: none"> ▪ Record of advances for season tickets and loans to employees; and ▪ Death Benefit Nomination and Revocation Forms 	<p>N/A</p>	<p>6 years after repayment/ payment of benefit and during employment.</p>
<ul style="list-style-type: none"> ▪ Consents for the processing of personal and sensitive data. 	<p>Schedule 1, Data Protection Act</p>	<p>6 years after the data is processed and for as long as the data is processed.</p>
<ul style="list-style-type: none"> ▪ Collective Workforce Agreements; and ▪ Works Council minutes 	<p>N/A</p>	<p>Permanently.</p>

PERSONAL DATA RECORDS

A "corporate supplier / contractor / partner / stakeholder" is an individual within a client organisation acting in their professional capacity from whom Badminton England collects personal data (such as their name, role within the organisation, work email address, etc.).

An "individual member / coach / participant / fan / customer" is an individual acting in their personal capacity from whom Badminton England collects personal data (name, personal email address, etc.).

Type of record	Statutory Instrument / Code of Practice	Retention period or recommendation
<ul style="list-style-type: none"> ▪ Corporate supplier / contractor / partner / stakeholder contact details in respect of a purchase by or transaction with the corporate individual of Badminton England's products or services. 	<p>Whilst there is no legal requirement to keep them for this long, it is recommended these are kept for 6 years since these records may be relevant to a County Court or High Court claim.</p>	<p>6 years after the corporate supplier / contractor / partner / stakeholder has purchased a product from, or transacted with, Badminton England</p>
<ul style="list-style-type: none"> ▪ Individual member / coach / participant / fan / customer's contact details in respect of a purchase or transaction by the individual customer of Badminton England's products or services. 	<p>Whilst there is no legal requirement to keep them for this long, it is recommended these are kept for 6 years since these records may be relevant to a County Court or High Court claim.</p>	<p>6 years after the member / coach / participant / fan / customer has purchased a product from, or transacted with, Badminton England</p>
<ul style="list-style-type: none"> ▪ Marketing lists of corporate supplier / contractor / partner / stakeholder contact details 	<p>N/A</p>	<p>5 years after the personal data was first obtained or the corporate supplier / contractor / partner / stakeholder last interacted with Badminton England</p>
<ul style="list-style-type: none"> ▪ Marketing lists of individual member / coach / participant / fan / customer contact details 	<p>N/A</p>	<p>3 years after the individual member / coach / participant / fan / customer last interacted with Badminton England</p>