



Fife Festival of Music

Data Retention Policy

Introduction

Fife Festival of Music gathers personal information from individuals and external organisations, all of which is recorded in documents and records, both in hard copy and electronic form.

Examples of the types of information accumulated include but are not limited to, minutes, membership lists, newsletters and other communications such as letters and emails.

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.

It is, however, not practical or appropriate 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 Festival has in place systems for the timely and secure disposal of documents that are no longer required.

1. Roles and Responsibilities

All management committee members will adopt the retention and disposal guidance given in the Appendix to this policy and strive to keep records up to date.

2. Retention and Disposal Policy

Decisions relating to the retention and disposal of data should be guided by the Document Retention Schedule ((Guidance on the recommended and statutory minimum retention periods for specific types of documents and records), together with the advice regarding on-going business activities.

Note: 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.

3. Disposal

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Documents containing confidential or personal information should be disposed of either by shredding or by using confidential waste bins or sacks. Such documentation is likely to include financial details, contact lists with names and addresses.

Documents other than those containing confidential or personal information may be disposed of by recycling or binning.

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 in order 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 Festival 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.

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 removable format)

Sending the device to a specialist who will securely delete the data.

Appendix

This schedule is provided as a guide to common types of documents but is not exhaustive. Should any data processor be unsure, please discuss the case with the data controller, namely, the management committee. Avoid retaining information if there is no reason for doing so.

RECORD

Minutes of Annual General Meetings

Minutes of meetings

Databases for mailing lists/distribution

Miscellaneous contact information

Fixed Asset Records

Application for charitable status

Annual audit reports and financial statements

Sales and purchase records

RETENTION PERIOD

Permanent

6 years

Reviewed annually; delete out of date information

Delete once there is no longer a need to hold it

Permanent (up-dated as necessary)

Permanent

Permanent

5 years

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OSCR filings	5 years from date of filing
Records of financial donations	7 years
Bank statements, cancelled cheques, deposit slips	7 years minimum
Cash/cheque receipts	7 years
Electronic fund transfer documents	7 years
Invoices; petty cash vouchers	7 years
Filings of fees paid to professionals	7 years
Tax records	7 years minimum
Insurance claims/applications	Permanent
Insurance disbursement/denials	Permanent
Insurance contracts and policies	Permanent
Warranties	Duration of warranty plus 7 years
Records relating to potential, or actual legal proceedings	Conclusion of any tribunal or litigation proceedings plus 7 years

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

General guidance

- (1) If the document is an email it should be saved in a folder, otherwise it should be deleted.
- (2) Paper documents should be retained securely and confidentially until they are no longer relevant and then destroyed confidentially eg by shredding.

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