

*The British Society for Histocompatibility &  
Immunogenetics (BSHI)*

*Data retention and  
destruction policy*

Related information:

[BSHI Privacy Policy](#)

[Information Commissioners Office](#)

Data Protection Officer: [secretary@bshi.org.uk](mailto:secretary@bshi.org.uk)

Policy revision:

DRP V1

Issue Date:

May 2019

Next review date:

May 2020

## 1.0 Policy statement

This policy represents the practice of The British Society for Histocompatibility & Immunogenetics (BSHI) with respect to the retention and destruction of documents and other records, both in hard copy and electronic media (which may be referred to as “documents” in this policy). The purposes of the policy include (a) storage and maintenance of documents necessary for the proper functioning of the organisation as well as to comply with current legal requirements; and (b) the destruction of documents which no longer need to be retained. BSHI is required by current Data Protection law, to securely dispose of data when it is no longer required regardless of the media or application type on which it is stored.

BSHI reserves the right to revise or this policy at any time.

## 2.0 Scope

This policy is relevant to elected members of the Executive Committee, members of relevant sub-committees and Data Processors.

## 3.0 Definitions

**Documents** – refers to any item containing data whether in hard copy or in any electronic format

**Personal data** – data which can be used to identify an individual

## 4.0 Procedures

In order to comply with this policy, the processes in this section **must** be adhered to.

More information regarding relevant timeframes can be found in detail in Appendix 1.

### 4.1 Hard copy document storage

When personal data is stored on paper, it should be kept in a secure place where unauthorised people cannot access it or see it. Guidelines below regarding data held on paper files should be followed:

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Paper and printouts are not left where unauthorised people could see them e.g. on a printer or scanner etc.
- Hard copy financial documents containing details such as a person’s bank details, must be locked away securely in the cupboards provided.
- End of year financial records need to be filed appropriately and held securely in a locked cupboard until transferred to an approved storage facility.

### 4.2 Hard copy document destruction

- Printouts with personal data should be kept securely whilst in use and disposed of securely when no longer required. Refer to destruction requirements below and Appendix 1 for more information.
- Hard copy bank statements should be retained for the legal requirement of 7 years and then disposed of confidentially.

- The destruction of hardcopy (paper) materials must be crosscut shredded, incinerated or pulped so they cannot be reconstructed. Until this time, these must be kept locked away and clearly marked “To Be Shredded” - access to these files must be restricted.

#### **4.3 Electronic document storage**

When data is stored electronically, it must be protected from unauthorised access, accidental deletion and hacking attempts. The following requirements are listed for this purpose but are not exhaustive; it is an individual’s responsibility to ensure they are working to these requirements:

- Personal and financial data held on databases and spreadsheets should be protected by strong passwords that are changed regularly and never shared between employees.
- If data is stored on portable devices (like a USB, laptop, CD or DVD), these should be kept locked away securely and then securely wiped when no longer required.
- Data should only be uploaded to approved cloud computing services that has individual password access.
- Access to servers containing personal data should be secure and the server itself must be stored in a secure location.
- Data should be held in as few places as necessary. Duplicate records or data sets should be deleted unless the reason for their duplication is for BSHI continuity back-ups.
- Data stored should have suitable backups to protect against data failure, corruption or outside interference.

#### **4.4 Electronic document destruction**

- Confidential and sensitive electronic data must be rendered unrecoverable when deleted e.g. through degaussing or electronically wiped using military grade secure deletion processes or the physical destruction of the media. If secure wipe programs are used, the process must define the industry accepted standards followed for secure deletion. Please follow your institutions destruction process if applicable.

#### **4.5 Emergency document storage**

Documents which are necessary for the continued operation of BSHI, in the case of a significant business disruption, shall be stored in a safe and accessible manner. Electronic documents will be regularly duplicated or backed up.

#### **4.6 Archive storage**

BSHI retains documents and information in both electronic and hard copy archives. Only necessary documentation should be retained.

#### **4.7 Third party storage providers**

Only third party storage providers that have been researched and match BSHI security standards should be used. Please see the approved list of third party providers for more information. If you are unsure, please contact the BSHI Data Protection Officer.

All third party storage providers should be monitored and any unwanted documents and information should be removed.

## **5.0 Responsibilities**

The Data Protection Officer and Data Processors are responsible for implementing this policy and ensuring regular reviews and updates are made.

**APPENDIX 1: Data retention and disposal schedule**

| Data item(s)  | Description   | Retention period                             |
|---|---|--|
| <b>BSHI General Documents</b>   | <ul style="list-style-type: none"> <li>Memorandum of Association</li> </ul>   | Life of organisation                         |
|   | <ul style="list-style-type: none"> <li>AGM Meeting minutes</li> </ul>   | Life of organisation                         |
|   | <ul style="list-style-type: none"> <li>Committee papers</li> </ul>  | Life of organisation                         |
|   | <ul style="list-style-type: none"> <li>Committee agendas</li> </ul>   | Life of organisation                         |
|   | <ul style="list-style-type: none"> <li>Informal minutes and action logs</li> </ul>  | 6 years                                      |
|   | <ul style="list-style-type: none"> <li>Policies</li> </ul>  | Scheduled reviews -previous versions 6 years |
| <b>Financial management:<br/>(Bank, petty cash and creditors records)</b> | <ul style="list-style-type: none"> <li>Paid/presented cheques and records of all cheques drawn for payment</li> </ul>                     | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>All other cheque records – cheque books received, butts, cancelled cheques etc.</li> </ul>         | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>Bank statements and reconciliations</li> </ul>   | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>Electronic banking – transactions, payment files, deposits, withdrawals and audit trail</li> </ul> | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>Creditors history records, lists and reports</li> </ul>  | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>Statements of accounts</li> </ul>  | 7 years                                      |
| <b>Financial management:<br/>Ledger records</b>                           | <ul style="list-style-type: none"> <li>General ledger produced for purposes of preparing certified financial statements</li> </ul>        | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>Creditor ledger</li> </ul>   | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>Other ledgers and related audit trails</li> </ul>  | 7 years                                      |

|   |   |  |
|---|---|--|
|   | <ul style="list-style-type: none"> <li>• Customer invoices</li> </ul>                         | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>• Supplier invoices</li> </ul>                         | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>• Supplier statements</li> </ul>                       | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>• Annual and quarterly financial statements</li> </ul> | 7 years                                      |
| <b>Financial customer purchase records</b>          | <ul style="list-style-type: none"> <li>• Purchase order records</li> </ul>                    | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>• Details of membership receipts</li> </ul>            | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>• Events registration receipts</li> </ul>              | 7 years                                      |
| <b>Financial management: income and expenditure</b> | <ul style="list-style-type: none"> <li>• Debtors/creditors records and invoices</li> </ul>    | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>• Credit notes and refunds</li> </ul>                  | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>• VAT Returns</li> </ul>                               | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>• Companies House submissions</li> </ul>               | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>• Charities Commission submissions</li> </ul>          | 7 years                                      |
| <b>Committee members</b>                            | <ul style="list-style-type: none"> <li>• Contact details including address</li> </ul>         | 6 years following cessation of tenure        |
|   | <ul style="list-style-type: none"> <li>• Declaration of Interest</li> </ul>                   | 6 years following cessation of tenure        |
|   | <ul style="list-style-type: none"> <li>• Expense claims and authorisation</li> </ul>          | 7 years                                      |
|   | <ul style="list-style-type: none"> <li>• Biographies and photographs</li> </ul>               | Review 2 years following cessation of tenure |
| <b>Events</b>                                       | <ul style="list-style-type: none"> <li>• Delegate registration forms</li> </ul>               | 3 years after event                          |

|   |   |  |
|---|---|--|
|   | <ul style="list-style-type: none"> <li>• Attendance signatures</li> </ul>   | 5 years  |
|   | <ul style="list-style-type: none"> <li>• Photographs</li> </ul>   | Reviewed after 5 years   |
|   | <ul style="list-style-type: none"> <li>• Supplier contracts and payments</li> </ul>   | 7 years  |
|   | <ul style="list-style-type: none"> <li>• Speaker presentations</li> </ul>   | 2 years  |
|   | <ul style="list-style-type: none"> <li>• Speaker details (contact, biographies and photographs)</li> </ul>  | 1 year   |
|   | <ul style="list-style-type: none"> <li>• Exhibition and sponsorship company information including sponsorship payments and contact details</li> </ul> | 7 years  |
|   | <ul style="list-style-type: none"> <li>• Company logo and profiles</li> </ul>   | 6 months after event   |
|   | <ul style="list-style-type: none"> <li>• Abstracts</li> </ul>   | 3 years after event  |
|   | <ul style="list-style-type: none"> <li>• Bursary applications</li> </ul>  | 1 year   |
|   | <ul style="list-style-type: none"> <li>• Award/ prize winners details inc. name and photograph</li> </ul>   | Reviewed after 10 years  |
|   | <ul style="list-style-type: none"> <li>• Rooming requirements</li> </ul>  | Financial records for 7 years, general details delete after event ends |
| <b>Training and Examination Documents</b> | <ul style="list-style-type: none"> <li>• Final marks and results</li> </ul>   | Life of the organisation   |
|   | <ul style="list-style-type: none"> <li>• Working documents</li> </ul>   | 1 year following completion of exam or training                        |
|   | <ul style="list-style-type: none"> <li>• Additional personal details separate to Final Marks and results identification</li> </ul>                    | 1 year following completion of exam or training                        |
| <b>Members</b>                            | <ul style="list-style-type: none"> <li>• Applications</li> </ul>  | 1 year   |
|   | <ul style="list-style-type: none"> <li>• Contact details</li> </ul>   | 3 years after membership ends  |

|              |   |         |
|--------------|---|---------|
|              | <ul style="list-style-type: none"><li>• Membership and payment history</li></ul>          | 7 years |
| <b>Other</b> | <ul style="list-style-type: none"><li>• Email addresses on general mailing list</li></ul> | 2 years |