



THE ISLE OF GIGHA HERITAGE TRUST

Retention Policy

Author signature

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Date

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Chair of IGHT Board signature

G W D

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Revision History

Version	Section	Page	Detail Amended	Amended By	Date
1	All	All	New policy for GDPR compliance	S Bannatyne	April 2020

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i. Introduction

This policy has been created for compliance with the General Data Protection Regulation 2018.

This policy outlines the responsibilities of Isle of Gigha Heritage Trust directors and employees regarding document handling and control.

ii. Retention times

A data flow map is shown in Appendix A, to illustrate the document control process. All IGHT and subsidiary company documents are retained using the schedule in Appendix B. The full document register is available to IGHT directors and employees.

iii. Security

- All IGHT and subsidiary company documents are to be kept in the IGHT office only.
- Where possible, documents are to be kept in locked cabinets within the IGHT office or scanned to the company server.
- All archived documents must be kept in locked storage.
- A register of documents that have been shredded is to be kept.
- All documents are to be shredded, either using an in-house shredder or sent to a registered confidential waste disposal facility.
- All waste sent to such a facility will be placed in official bags with security tags.
- Full traceability of the confidential waste must be kept.

iv. Risks/Liabilities/Disclaimers

- It is IGHT's and employees' responsibility to take precautions against documents from being accessed by unauthorised users.
- IGHT reserves the right to take appropriate disciplinary action up to and including termination for non-compliance with this policy.

Appendix A: Data Flow Map

Information provided to IGHT / GTL / GREL / GGPL



Controlled by Office Employees



Information processed by third parties e.g. payroll, HMRC



Stored by Office Employees in secured office



Viewed by Office Employees / Directors / Auditors



Archived in secured storage area



Securely disposed of after retention time

Appendix B: Retention Schedule

Document	Type	Retention time	Comments
Board meeting minutes	Paper based folder	Continuous	
Board meeting minutes	Electronic	Continuous	
Company Policies	Paper based folder	Continuous	Until policy is reviewed and superseded
Company Policies	Electronic	Continuous	Until policy is reviewed and superseded
Company annual accounts	Paper based folder	Continuous	
Company accounts	Electronic	Continuous	
Current project works	Paper based folder	Continuous	
Current project works	Electronic	Continuous	
Job advertisements	Paper based folder	None	
Job advertisements	Electronic	Continuous	Kept for reference
Job applications	Paper based	Duration of recruitment process	
Job applications	Electronic	Duration of recruitment process	
Personnel files - current employees	Paper based folder	Duration of employment	
Personnel files - ex-employees	Paper based folder	6 months after termination of post	Documents specific to performance only
Payroll	Paper based folder	7 years	HMRC Requirement
Payroll	Electronic portal	Rolling deletion	
IGHT member registrations	Paper based folder	Duration of membership	
IGHT member registrations	Excel doc	Duration of membership	
Homehunt registrations	Paper based folder	Duration of registration	
Homehunt register	Excel doc	Duration of registration	
Directors registrations	Paper based folder	Duration of registration	Full information found at Companies House
Gift Aid registrations	Paper based folder	7 years	HMRC requirement
Gift Aid registrations	Excel doc	7 years	HMRC requirement
Tenancy agreements	Paper based folder	Duration of tenancy	
Tenancy agreements - ex-tenants	Paper based folder	7 years	Legal requirement
Tenant correspondence	Paper based folder	Duration of tenancy	Important correspondence only

Friends of Gigha	Paper based folder	Duration of membership	
Friends of Gigha	Excel doc	Duration of membership	
Contractors quotes	Paper based folder	Kept until work commences	
Contractors work	Paper based folder	7 years	Filed with Purchase Invoices
Contractors work - grant funded projects	Paper based folder	Continuous	
Server	Electronic	Continuous	
Back up hard drives	Electronic	Continuous	
Moorings registrations	Paper based folder	None	
Online holiday cottage registrations	Electronic portal	Duration of account with online travel agent	Online travel agents have their own Privacy Notices
Laptop device	Electronic	Duration of employment	
Drone photographs	Electronic	Continuous	
CCTV recordings	Electronic	30 days rolling deletion	
Newsletter	Electronic	Continuous	
Website admin	Electronic	Continuous	
Bank Statements	Paper based folder	7 years	HMRC requirement
Purchase Invoices / Expenditure	Paper based folder	7 years	HMRC requirement
Sales Invoices / Income	Paper based folder	7 years	HMRC requirement