



Farmstrong Scotland

Document Management Policy

May 2025

Purpose

The purpose of this Document Management Policy is to establish clear guidelines for the creation, storage, retrieval, and disposal of documents within the Farmstrong Scotland (the Charity). This policy ensures compliance with legal and regulatory requirements, including the General Data Protection Regulation (GDPR), supports efficient operations, and preserves organisational knowledge.

Scope

This policy applies to all Trustees, employees, contractors, and stakeholders of the Charity who create, access, or manage documents in both physical and digital formats. It covers all documents related to the Charity's operations, including but not limited to member records, financial records, meeting minutes, contracts, and marketing materials.

3. Responsibilities

- Board of Trustees: Oversee the implementation and compliance of the document management policy.
- Data Protection Officer (DPO): Ensure that all data-related activities comply with GDPR requirements and act as the primary contact for data protection matters.
- Document Custodians: Designated individuals responsible for managing specific categories of documents.
- All Staff and Stakeholders: Ensure proper handling, storage, and disposal of documents in accordance with this policy.

4. Document Lifecycle

4.1 Creation and Classification

- Documents should be accurately and clearly titled and classified according to their type and purpose.
- Metadata, including date of creation, author, and relevant GDPR-compliant data categories, must be included for digital documents.

4.2 Storage

- Physical documents must be stored in secure filing cabinets or storage rooms with controlled access.
- Digital documents should be stored in the Charity's approved document management system, with appropriate access controls and encryption for sensitive data.

4.3 Access and Retrieval

- Access to documents will be granted based on role and necessity, adhering to the principle of least privilege.
- A document retrieval log must be maintained to track access to sensitive or personal data.

4.4 Retention

- Documents must be retained in accordance with the Charity's retention schedule, which aligns with legal, operational, and GDPR requirements.
- Retention periods for key document categories are as follows:
- Trustee & Volunteer records: 7 years after contact/relationship ceases unless a longer period is legally required.
- Financial records: 6 years.
- Contracts: 6 years after termination.
- Meeting minutes: Indefinitely, unless otherwise specified.

4.5 Disposal

- Expired documents must be securely destroyed. Physical documents should be shredded, and digital files permanently deleted using GDPR-compliant software.
- Disposal must be documented, including the type of document, date of disposal, and responsible party.

5. Security and Confidentiality

- All documents must be protected against unauthorized access, alteration, or loss.
- Sensitive and confidential documents, including personal data, must be labelled appropriately, and stored in secure environments.
- Regular assessments of security measures will be conducted to ensure ongoing protection.

6. GDPR Compliance

6.1 Lawful Basis for Processing

All personal data must be processed under a lawful basis as defined by GDPR (e.g., consent, contractual necessity, legal obligation).

6.2 Data Categories

The Charity processes personal data in the following categories:

- Basic Personal Data: Name, address, phone number, email address.
- Special Categories of Personal Data (Sensitive Data): Racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (used for identification), health data, and data concerning a person's sex life or sexual orientation.
- Financial Information: Bank account details, payment records, transaction history.
- Professional Information: Job title, employment history, qualifications.
- Technical Data: IP addresses, cookies or online identifiers, geolocation data.
- Criminal Convictions and Offenses: Data related to criminal records or alleged offenses (processed only with appropriate safeguards).

6.3 Data Subject Rights

- The Charity will uphold data subjects' rights, including the right to access, rectification, erasure ("right to be forgotten"), and data portability.
- Requests must be handled within 30 days unless an extension is justified.

6.4 Data Breach Notification

- Any personal data breach must be reported to the DPO immediately.
- Breaches posing a risk to data subjects' rights must be reported to the Information Commissioner's Office (ICO) within 72 hours.

6.5 Record of Processing Activities

The Charity will maintain a detailed record of all personal data processing activities, as required by GDPR Article 30.

7. Training

All Trustees and employees will receive training on document management practices, with specific emphasis on GDPR compliance, data protection principles, and handling sensitive information.

8. Definitions

- Document Custodian: An individual responsible for managing a specific set of documents.
- Retention Schedule: A predefined timeline for keeping documents based on legal and operational needs.
- Data Subject: Any individual whose personal data is processed by the Society.
- Personal Data: Any information relating to an identified or identifiable individual.
- Metadata: Data that provides information about other data, such as creation date and author.
- GDPR: The General Data Protection Regulation, which governs the processing and protection of personal data within the EU and UK.
- Sensitive Data: Special categories of personal data requiring additional protection under GDPR, including health, genetic, and biometric data.
- Encryption: The process of converting information into a secure format to prevent unauthorized access.

10. Approval and Revision History

- Approved by: Farmstrong Trustees
- Date of Approval: 21st May 2025
- Revision Date: by 21st May 2026

11. Contact Information

For questions or concerns about this policy, please contact:

Alix Ritchie, Programme Director

Farmstrong Scotland

Email: alix@farmstrongscotland.org.uk

12. Review & Monitoring

- a. Review: This policy will be reviewed at least annually or as required, to consider changes in legislation, guidance, and good practice.
- b. Monitoring: The Charity will monitor the implementation and effectiveness of this policy, seeking feedback and suggestions for improvement from volunteers, office bearers, staff, volunteers, and other stakeholders.

13. Policy Dissemination

This Policy will be made available to all Trustees, staff, volunteers, and stakeholders upon request or via Farmstrong Scotland website and will be communicated to relevant stakeholders as appropriate. By adhering to this Policy, Trustees, staff, volunteers and stakeholders contribute to the overall well-being and positive culture of the Farmstrong Scotland.