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## **DOCUMENT RETENTION POLICY OF THE FENCING ASSOCIATION OF INDIA**

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### **1. OBJECTIVE OF THE POLICY**

The objective of this Policy is to have a comprehensive framework for the preservation of documents for a specific period of time to achieve the following objectives:

- 1.1 Effective governance and risk management;
- 1.2 Effective information management to ensure better administration and provision of continued access as required; and
- 1.3 Systematic disposal of non-current records that have outlived their administrative usefulness.

### **2. DEFINITIONS**

- 2.1 'Board/ Institution' means the Board/ Institution affiliated with the FAI.
- 2.2 'CFF' means the Commonwealth Fencing Federation.
- 2.3 'Executive Committee'/ 'EC' means the elected Executive Committee of FAI.
- 2.4 'FAI'/ 'Society' means the Fencing Association of India.
- 2.5 'FCA' means the Fencing Confederation of Asia.
- 2.6 'FIE' means the International Fencing Federation" or "Federation Internationale d'Esime.
- 2.7 'IOA' means the "Indian Olympic Association.
- 2.8 'LOC' means the Local Organising Committee.
- 2.9 'MYAS' means the Ministry of Youth Affairs and Sports.

2.10 'NADA' means the National Anti-Doping Agency.

2.11 'NF' means a National Federation.

2.12 'Policy' means mean this Policy.

2.13 'State/ Union Territory Associations' means the State/ Union Territory Associations affiliated with the FAI.

2.14 'WADA' means the World Anti-Doping Agency.

### **3. SCOPE OF THE POLICY**

For the purpose of achieving the above objectives, the documents covered as per this Policy have been broadly divided into two categories i.e. (i) documents that need to be retained permanently and (ii) documents that need to be retained for a period of up to eight years and not permanently.

This Policy applies to the records maintained in any format or medium. The records that are not required to be retained permanently shall be disposed of according to this Policy.

If the society informs the employee concerned, that its records are relevant to litigation or potential litigation or issues later, then the employee must preserve those records until the President or Secretary-General of the society determines that the records are no longer needed.

Such an exception would supersede any previously or subsequently established destruction schedule for those records. If an employee feels that an exception may apply, he/ she may voluntarily with the approval of the management retain the records and follow the decision on the possible applicability of an exception.

While minimum retention periods are suggested, any of the items not specifically identified in the classifications could be determined by the management/ Secretary-General, primarily by the application of the general guidelines affecting document retention identified in this Policy, as well as other pertinent factors.

### **4. AUTHORITY & RESPONSIBILITY**

A staff designated by the President or Secretary-General on its behalf, as Compliance Officer for Document Retention, shall be responsible for the preservation of the records.

### **5. TEMPORARY RECORDS, NOT TO BE MAINTAINED**

Temporary records include all documents that are intended to be superseded by final or permanent records, or which are intended to be used only for a very short period of time, including, but not limited to written memoranda and dictation to be typed in the future, reminders, to-do lists, interim reports and drafts. Such temporary records shall be deleted once the usefulness of it is obsolete or the final version is placed on record.

## 6. RETAINED RECORDS

Retained records include all documents that are not superseded by modification or addition, which are to be maintained permanently or a limited period of up-to eight years as described in the following classifications:

### 6.1 RECORDS OF ESTABLISHMENT

#### 6.1.1 To be retained permanently

- Original Certificate of Registration as a legal entity
- Original Memorandum of Association and Rules and Regulations
- Member Roll/ Register of Members
- Approved Minutes of the Meetings/ Meetings Book
- Signed copy of the Byelaws, Policies, and Rules/ Procedures
- Authorisation/ Licenses/ Certificates obtained from any statutory authorities including Original PAN Card, Goods and Service Tax Registration Certificate, etc.
- Annual Reports in electronic form
- Files relating to office premises including Land Deed, Original approval plans of construction, etc.
- Register of Preservation and Disposal of records (Schedule)

#### 6.1.2 To be retained for a minimum period of eight years

- Tender for purchase or service and responses
- Announcements
- Advertisements and responses
- Records of attendance in General Council Meetings and Executive Committee Meetings
- Minutes of the sub-committee meetings
- External and internal correspondence, process files and documentation, excluding 6.1.3
- Annual Reports

#### 6.1.3 To be retained for a minimum period of four years

- Records of Office Maintenance
- Inward/ Outward Registers
- Storeroom inventory and records
- Invites and communication of meetings
- Travel, Transport, and Hotel arrangements for FAI meetings

### 6.2 RECORDS OF THE INDIAN FENCING TEAM AND FAI DELEGATION AT INTERNATIONAL COMPETITIONS

#### 6.2.1 To be retained permanently

- Final list of participants including athletes/ fencers, coaches, managers, and support staff
- Final list of medallists and their performance
- Audio-visual and photographic content in electronic form
- Souvenir, Final Report, Coffee Table Book, Commemorative Medal, or/ and other items gifted by the LOC

6.2.2 To be retained for a minimum period of eight years

- Correspondence with FIE, FCA, CFF, LOC, Foreign NFs, MYAS, Sports Authority of India, WADA, NADA, State/ Union Territory Associations, Board/ Institution, State Ministry/ Government Departments, Vendors, Agencies, Suppliers, any Service Provider, Establishment or Individual; including publication, manual, accreditations, passport copies, details of entry, etc.
- External and internal correspondence, process files and documentation
- ACTC
- Camp Reports and Details
- TA/ DA Policy and Documents
- Coach's Reports
- Team Performance Analysis and Reports

6.3 RECORDS OF NATIONAL CHAMPIONSHIPS AND OFFICIAL FAI COMPETITIONS

6.3.1 To be retained permanently

- Final list of participating athletes/ fencers
- Final list of medallists and their performance
- Final Report of the Championships in electronic form

6.3.2 To be retained for a minimum period of eight years

- Manuals, Forms, Copies of Tender, List of Equipment, and all information pertaining to Technical Conduct, Competition Management and Operations of the Championships/ Competitions
- Audio-visual and photographic content in electronic form
- External and internal correspondences, process files and documentation regarding the Championships/ Competitions
- Replica, Design, Medals, and other items of Protocol

6.4 RECORDS OF BIDDING OR HOSTING COMPETITIONS OF FIE, FCA OR CFF

6.4.1 To be retained permanently

- Host City Contract and subsequent agreements with FIE, FCA or CFF
- Audio-visual and photographic content in electronic format
- Souvenir, Coffee Table Book, Commemorative Medal, or/ and such other items
- Final Report of the competition

6.4.2 To be retained for a minimum period of eight years

- Bid Application/ Book
- Correspondences with FIE, FCA, CFF, LOC, Foreign NFs, MYAS, Sports Authority of India, WADA, NADA, State/ Union Territory Associations, Board/ Institution, State Ministry/ Government Departments, Vendors, Agencies, Suppliers, any Service Provider, Establishment or Individual
- Manual, Other Reports, and Publications
- External and internal correspondence, process files and documentation
- Replica, Designs, Medals, and other items of Protocol

6.5 NON-COMPETITION RECORDS OF LIAISON WITH FIE, WADA, FCA, CFF, FOREIGN NF & OTHER INTERNATIONAL SPORTS ORGANISATIONS

6.5.1 To be retained for a minimum period of eight years

- Governance matters

- Meeting information of FIE, FCA, CFF, Foreign NFs, and other international sports organisations.
  - External and internal correspondence, process files, and documentation of all development and promotional activities of FIE, FCA, CFF, Foreign NFs and other international sports organisations; excluding 6.5.2 and 6.5.3.
- 6.5.2 To be retained for a minimum period of four years
- Unsuccessful applications for scholarships, programmes or activities.
- 6.5.3 To be retained for a minimum period of one year
- Greetings
- 6.6 NON-COMPETITION RECORDS OF LIAISON WITH MYAS, NADA, IOA, SPORTS AUTHORITY OF INDIA, STATE MINISTRY/ GOVERNMENT DEPARTMENTS & OTHER ORGANISATIONS IN INDIA
- 6.6.1 To be retained for a minimum period of eight years
- Non-Competition records and correspondence of liaison with MYAS, NADA, IOA, Sports Authority of India, State Ministry/ Government Departments, and other organisations in India
- 6.7 NON-COMPETITION RECORDS OF LIAISON WITH STATE/ UNION TERRITORY ASSOCIATIONS, BOARD/ INSTITUTION & OTHER STAKEHOLDERS
- 6.7.1 To be retained permanently
- Copy of the Certificate of Registration as a legal entity
  - Copy of the Memorandum of Association and Rules and Regulations
- 6.7.2 To be retained for a minimum period of eight years
- Copy of the Member Roll/ Register of Members
  - Copy of the updated Approved Minutes of the Annual General Meetings & Special General Meetings
  - Copy of the Minutes of the last two Election Meetings
  - Copy of the Annual Reports
  - Copy of the Audited Accounts Statements
  - External and internal correspondence, process files and documentation, excluding 6.7.3 and 6.7.4
- 6.7.3 To be retained for a minimum period of four years
- Unsuccessful applications for scholarships, programmes or activities.
- 6.7.4 To be retained for a minimum period of one year
- Greetings
- 6.8 INTELLECTUAL PROPERTY
- 6.8.1 To be retained permanently
- Original Documents of Copyright, Trademark, and Patent owned by the society
- 6.8.2 To be retained for a minimum period of eight years or till the validity of the license, whichever is higher
- License Documents
  - External and internal correspondence regarding the protection of IP

## 6.9 LEGAL DOCUMENTS [ARBITRATION & LITIGATION CASES]

### 6.9.1 Records of Litigation and Arbitration should be preserved for eight years from the date of the last order/ judgement passed by the Hon'ble Court or a Tribunal, which should be subject to:

- the file not being closed until the award/ judgment becomes final in all respects by a limitation or final decision in appeal/ revision
- cases involving important issues or containing material of a high precedent/reference value being retained for an appropriately longer period either initially or at the time of review by any Committee of the FAI

## 6.10 EVENTS, MARKETING, COMMUNICATION, SPONSORSHIP, AND TICKETING

### 6.10.1 To be retained for a minimum period of eight years

- Agreements to be retained for eight years or till the validity of the agreement, whichever is higher
- External and internal correspondence, process files and documentation excluding 6.10.2 and 6.10.3
- Event hosting agreements, contracts, and work orders.

### 6.10.2 To be retained for a minimum period of four years

- Event creative on electronic record

### 6.10.3 To be retained for a minimum period of one year

- Events invites, branding, and collaterals
- Press Release
- News Coverage
- Correspondence with Press/ Media
- Invites and generic exchanges

## 6.11 EMPLOYMENT/ PERSONNEL RECORD

### 6.11.1 To be retained permanently

- Note on the list of employees, their joining and relieving date, positions held and reasons for leaving.

### 6.11.2 To be retained for a minimum period of five years after the employee is alive

- Original application and documents submitted by the employee at the time of employment, appointment letter, contract, performance appraisal, letter of promotion, letter or relieving/ resignation, and copy of reference letters issued to him/ her.

### 6.11.3 To be retained for a minimum period of four years

- Attendance and Log book (if any)
- Leave records
- Job posting and file of applications
- External and internal correspondence regarding HR

## 6.12 FINANCE

### 6.12.1 To be retained for a minimum period of eight years

- Audit report u/s 12A(b)

- Income tax returns, TDS returns, GST returns, FCRA returns, and all other statutory returns
- Documents related to all statutory obligations in respect of employee benefit expenses e.g. PF, computation for TDS on salary, etc.
- All the assessment orders, appellate orders, refund / demand orders issued by various government departments
- Agreements along with all the correspondence in respect of sponsorship income, grants and other receipts
- Bank confirmations and certificates in respect of interest earned thereon. Also, the bank statements and bank balance confirmations along with reconciliation statements, if any
- Correspondence or agreements with respect to contributions to Members/ Units/ any stakeholder
- Minutes of the meetings which are related to budgets and have a financial impact on the financial statements
- Invoices and vouchers related to the acquisition and disposal of assets
- Any correspondences with the FIE and FCA which have a financial impact on financial statements
- All the journal vouchers, payment vouchers and invoices related to all the expenses
- Book of Accounts in Tally or any other software used by the society
- All the journal vouchers, receipt vouchers, and invoices related to the income.

## **7. DOCUMENT RETENTION SCHEDULE**

Document Retention Schedule with details of specification and classifications could be drafted and adopted with the approval of the Secretary-General, from time to time, primarily by the application of the general guidelines affecting document retention identified in this Policy, as well as other pertinent factors.

## **8. RECORD MAINTENANCE AND STORAGE**

- 8.1 All records in physical form are to be maintained by the Compliance Officer in particular department/ centralised storage of Records.
- 8.2 Electronic form of all of the records shall be maintained in media, magnetic, computer memory, microfilm, cloud or online storage and transferred to the centralized electronic record software database, when introduced.

## **9. DISPOSAL OF RECORDS**

Physical records disposed of pursuant to the retention periods specified in this Policy and Document Retention Schedule shall be disposed of using a crosscut shredder. In the case of an electronic record, the 'permanent delete' function is to permanently dispose of electronic records. The Administration Department shall adopt appropriate procedures to permanently dispose of non-paper physical records, such as photographs or audio/video recordings.

#### **10. HOLD ON RECORD DESTRUCTION AND DELETION**

If a legal case or other proceeding involving the society is reasonably foreseeable, the destruction of any possibly relevant documents, including e-mail, must cease immediately.

#### **11. COMPLIANCE**

Failure to comply with this Document Retention Policy may result in disciplinary action.