

DOCUMENT RETENTION POLICY OF HOCKEY INDIA

August 2019

DOCUMENT RETENTION POLICY

1. Objective of the Policy:

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

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

2. Definitions:

- a. "Society" means Hockey India (HI)
- b. "Executive Board" means elected Executive Board of HI.
- c. "Policy" means this policy
- d. "FIH" means International Federation of Hockey
- e. "AHF" means Asian Hockey Federation
- f. "LOC" means Local Organising Committee
- g. "MYAS" means Ministry of Youth Affairs and Sports
- h. "WADA" means World Anti-Doping Agency
- i. "NADA" means National Anti-Doping Agency
- j. "NSF" means National Sports Federation

3. Scope of the Policy:

For the purpose of achieving the above objectives, the documents covered as per this policy have been divided in two categories i.e. (i) documents which need to be retained permanently and (ii) documents which need to be retained for a period of up-to specified periods 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 off 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 management retain the records and follow the decision on possible applicability of an exception.

While minimum retention periods are suggested, any of the items not specifically identified in the categories 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:

The Compliance Officer, as designated by the Executive Board on its behalf, shall be responsible for 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 specified period as described in the following classifications:

a. Records of Establishment

(i) To be retained permanently

- Certificate of Registration as legal entity
- Original Memorandum of Association and Rules and Regulation

- Member Roll/Register of Members
- Approval Minutes of the Meetings/Minutes of the Meeting Original Book
- Original/ Signed Copy of Rules, Regulations and Policy
- Authorization/Licenses/ Certificates obtained from any statutory authorities
- Annual Reports in electronic form
- Files relating to office premises including Land Deed, Original approval plans of construction
- Register of Preservation and disposal of records
- Original Permanent Account Number (PAN) Card
- Goods and Service Tax Registration Certificate

(ii) To be retained for period of eight years

- Tender for purchase or service and responses
- Announcements
- Advertisements and responses
- Records of attendance in General Meetings and Executive Board Meetings
- Minutes of the sub-committee meetings
- Internal correspondence process files and documentation, excluding 6.a.(iii)
- Annual Reports
- Annual Filing with Registrar of Societies

(iii) To be retained for period of four years

- Records of Office Maintenance
- Inward/ Outward Registers
- Store Room Inventory & Records
- Invites and communication of meetings
- Travel, Transport and Hotel arrangement for HI meeting

b. Records of Team India and HI Delegation at International Tournaments

(i) To be retained permanently

- Final List of participants including athletes, coaches, managers and support staff
- Final List of medalists and their performance
- Audio-Visual and Photographic content in electronic form
- Souvenir, Commemorative Medals and other items gifted by LOC
- Final Report or Coffee Table Book published by LOC
- ACTC
- TA/DA Policy
- Coach's reports
- Team performance analysis reports
- Camp details

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(ii) To be retained for period of eight years

- Correspondence with FIH, AHF, , LOC, MYAS, WADA, NADA, NSFs
State Ministry/Government Departments, Vendors, Agencies, Suppliers, any
Service Provider, Establishment or Individual; including publication, manual,
accreditations, passport copies, details of entry, etc.
- Internal correspondence, process files and documentation
- SAI Communications

c. Records of National Championship

(i) To be retained permanently

- Host city Contract (s)
- Final list of participating athletes, teams and member units, and medalists and
their performance
- Audio-Visual and Photographic content in electronic form
- Final Report of the National Championships in electronic form

**(ii) To be retained till the conduct of next two editions of the Games or minimum
Period of eight years, whichever is higher.**

- Manuals and Reports of previous two editions of the Games
- Forms, Copies of Tender, List of Equipment's and all information pertaining to
Technical Conduct, Competition Management and Operations of previous two
editions of the Games.
- External and internal correspondences, process files and documentation of
previous two editions of the Games.
- Replica, Design, Medals and other items of Protocol.

d. Records of bidding or hosting Tournaments of FIH, IOC or AHF

(i) To be retained permanently

- Host City Contract (s) and subsequent agreements with FIH, IOC or AHF
- Audio-Visual and Photographic content in electronic format
- Souvenir, Commemorative Medal, and other items of protocol
or collectibles.
- Final Report or Coffee Table Book

**(ii) To be retained till eight year after the completion of bidding or hosting in case
of successful bid**

- Bid Application and Book
 - Correspondences with FIH, AHF, IOC, MYAS, WADA, NADA, NSFs, State Ministry/ Government Departments, Vendors, Agencies, Suppliers, any Service Provider, Establishment or Individual
 - Manual Reports and Publications
 - Internal correspondence, process files, and documentation
 - Replica, Designs, Medals and other items of Protocol
 - Brand manuals
 - Closing reports
- e. Non-Games records of liaison with FIH, AHF IOC, Foreign NOCs & other international sports organizations**
- (i) To be retained for period of eight years**
- Governance
 - Meeting Information of IOC, AHF, FIH, and other International sports organizations.
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- (ii) To be retained for period of four years**
- Unsuccessful applications for scholarship, programmers or activities
 - Unsuccessful applications of tenders
 - Unsuccessful applications of recruitments
- (iii) To be retained for period of one year**
- Greetings
 - Press Release
- f. Non-Games records of liaison with MYAS, WADA, NADA, NSFs, Member Units, State Ministry/Government Departments**
- (i) To be retained for minimum period of eight years**
- Non-Games records of liaison with MYAS, WADA, NADA, Member Units, State Ministry/ GovernmentDepartments shall be kept for eight years.
- (i) To be retained permanently**
- Copy of Certificate of Registration as legal entity
 - Copy of Memorandum of Association and Rules and Regulation

(ii) To be retained for period of eight years

- Copy of Member Roll/ Register of Members of HI
- Copy of updated Approved Minutes of the Annual EB Meetings & General Meeting.
- Documents pertaining to elections.
- Copy of Annual Reports
- Copy of Audited Accounts Statements for eight years **or one year after completion of CAG Audit, whichever is later.**
- External and internal correspondence, process files and documentation
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h. Intellectual Property

(i) To be retained permanently

- Original Documents of Copyright, Trademark and Patent owned by the society

(ii) To be retained for period of eight years or till validity of the license, whichever in higher

- License Documents
- External and Internal correspondences regarding protection of Olympic Signs and Property and IP of the society.

i. Legal Documents [Arbitration & Litigation CASES]

(i) Records of Litigation and Arbitration should be preserved for 3 years from the date of the last order/ judgment 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 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 HI.

j. Events, Marketing, Communications, Sponsorship and Ticketing

(i) To be retained for period of eight years

- Agreement to be retained for eight years or till the validity of the Sponsorship Agreement, whichever is higher.
- External and Internal correspondences, process files and documentation excluding 6.j(ii) and 6.j(iii)
- Event hosting agreements / contracts
- Event hosting proposals

- Event agency vendor contracts
- Event agency work orders
- 3rd party vendor contracts
- 3rd party work orders

(ii) To be retained for period of four years

- Event Creative on electronic record
- Brand manuals

(iii) To be retained for period of one year

- Events invites branding, and collaterals
- Press Release
- News Coverage
- Non-Games correspondence with Press/Media
- Invites and generic exchanges with Sponsor

k. Employment Personnel Record

(i) To be retained permanently

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

(ii) To be retained for minimum period of five years after the employee is alive

- Original application and documents submitted by employee at the time of employment in society appointment letter, contract, performance appraisal, letter of promotion, and letter of relieving/ resignation, and copy of reference letters issued to him/her
- Indian team support staff contracts
- Contractual employee agreements

(iii) To be retained for period for four years

- Attendance & Log book
- Leave Records
- Job Posting and file of application
- Internal correspondences of HR

l. Finance

- **(i) To be retained for period of eight years or one year after completion of CAG Audit, whichever is later.**

- 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.
- Agreement along with all the correspondence in respect of sponsorship income, Grants and other receipts.
- Bank confirmations and certificates in respect of FDRs and interest earned thereon. Also the Bank statements and bank balance confirmation along with reconciliation statements if any.
- Minutes of the meetings which are related to budgets and have financial impact on the financial statements.
- All the agreements/correspondences in respect of contributions to SOAs and NSFs
- Invoices & vouchers related to acquisition and disposal of fixed assets
- All the correspondences with FIH and other Government Bodies which have financial impact on financial statements.
- All the journal vouchers, payment vouchers and invoices related to all the expenses.
- All the journal vouchers, Receipt vouchers and invoices related to the income.
- Books of Accounts in Tally or any other accounting software used by the company
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7. Document Retention Schedule

Document Retention Schedule with details of specification and classifications could be drafted and adopted with approval of the President and 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:

- a. All records in physical form are to be maintained by the Record Storage in particular department/ centralized storage of Records
- b. Electronic form of all of 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 electronic records can only be disposed off after written approval is obtained from all of three office-bearers, President, Secretary General and Treasurer in the absence of such written approval, no records can be disposed off or deleted.

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

10. E-Mail Policies:

All the staff shall use official email id provided to them by HI for official electronic communication and also always mark copy to the official HI id for all incoming and outgoing mails. Employees should avoid using official e-mail for personal purposes.

11. HOLD on Record Destruction and Deletion:

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

12. Effective Date:

This policy is approved by the Executive Board in the 65th Executive Board Meeting held on 14 August 2019.

13. Compliance:

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