

Data Retention Policy

1. INTRODUCTION

- 1.1. The main aim of this policy is to enable Ageing Better to manage our records effectively and in compliance with data protection and other regulation. As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.
- 1.2. Ageing Better is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.
- 1.3. The table below sets out the main categories of information that we hold, the length of time that we intend to hold them, and the reason for this.
- 1.4. For information, Appendix 1 sets out the legal requirements for certain categories of document. Where we have decided to keep information longer than the statutory requirement, this has been explained in the table at appendix 1.
- 1.5. Section 2 of this policy sets out the destruction procedure for documents at the end of their retention period. The Director of Operations & Finance shall be responsible for ensuring that this is carried out appropriately, and any questions regarding this policy should be referred to them.
- 1.6. If a document or information is reaching the end of its stated retention period, but you are of the view that it should be kept longer, please refer to the Director of Operations & Finance, who will make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.

2. DELETION OF DOCUMENTS

- 2.1. When a document is at the end of its retention period, it should be dealt with in accordance with this policy.

Confidential waste

- 2.2. This should be made available for collection in the confidential waste bins or sacks located around the office.
- 2.3. Anything that contains personal information should be treated as confidential.

- 2.4. Where deleting electronically, please refer to Officer Co-Ordinator to ensure that this is carried out effectively.

Other documentation

- 2.5. Other documentation can be deleted or placed in recycling bins where appropriate.

Automatic deletion

- 2.6. Certain information will be automatically archived by the computer systems, details of which are set out below. Should you want to retrieve any information, or prevent this happening in a particular circumstance, please contact the Director of Operations & Finance.

Individual responsibility

- 2.7. Much of the retention and deletion of documents will be automatic, but when faced with a decision about an individual document, you should ask yourself the following:

- 2.7.1. Has the information come to the end of its useful life?

- 2.7.2. Is there a legal requirement to keep this information or document for a set period? (Refer to the Appendix for more information)

- 2.7.3. Would the information be likely to be needed in the case of any legal proceedings? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)

- 2.7.4. Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?

- 2.7.5. Is the document of historic or statistical significance?

- 2.8. If the decision is made to keep the document, this should be referred to the Director of Operations & Finance and reasons given.

Communication

3. All staff.

Monitoring and review

4. This policy must be reviewed annually by the Director of Operations & Finance and/or amended in accordance any legislation and guidelines when such changes come into force.

Links to other policies

- Data Protection Policy
- Privacy policy

- Privacy notice staff

APPENDIX 1

Data Retention register

	Film/Photography and other forms of media of individuals	Mailing list	Evaluation Associates
Responsible department	Comms	Comms	Evidence
Is there a legitimate reason for the processing of this data? If yes, please give details. If no, consent will be required.	Yes, this information is used to promote Ageing Better's brand	Yes, this information is used to keep our supporters and stakeholders up to date on our work.	Yes, to assess an individual's ability to carry out work on behalf of Ageing Better
Is consent required?	Yes	Yes, people request to join the mailing list.	Yes
How is consent obtained?	Via AB Consent Form. Hard copy signed by subject, details stored on password protected spreadsheet and cross-referenced to scanned PDF copy of Consent Form.	Action: 1. New email sign-up web form (by Manifesto TBC) with explicit opt-ins for 3 e-alerts: AB News, Events, R& Policy 2. AB to create 3 separate lists for 3 e-alerts. 3. Users unsubscribe (or update details via link in e-alert footer)	Through contract
How long is the data	3 years	Until people unsubscribe from	For two years after the last piece of

to be kept for?		list.	work undertaken
How is it kept? Hard, soft or both	Currently both. Hard copies to be scanned and migrated to PDF/hard copies destroyed.	Soft. Hosted with U.S. based email service provider (currently MailChimp which is GDPR-compliant)	Can be both but preferably soft
Why is it kept?	(a) To validate consent has been granted. (b) Ensure requests for information and/or requests to remove images, videos case studies can be tracked over time.	This is permission-based marketing. Kept until subscriber withdraws permission.	In case we have to follow up on work carried out. For future work
How should it be deleted?	Permanently	Permanently	Permanently
Back ups	Permanently removed from back ups	Permanently removed from back ups	Permanently removed from back ups
	Successful ITTs	Unsuccessful ITTs	Contacts- general
Responsible department	Ops	Ops	Ops
Is there a legitimate reason for the processing of this data? If yes, please give details. If no, consent will be required.	Yes, to assess an individual's or organisation's ability to carry out work on behalf of Ageing Better	Yes, to assess an individual's or organisation's ability to carry out work on behalf of Ageing Better	Limitation Act 1980
Is consent required?	Yes	Yes	Yes
How is consent obtained?	Part of the ITT T & Cs	Part of the ITT T &Cs	Included in the contract
How long is the data to be kept for?	For two years after the last piece of work	For one year after award of contract	Length of contract plus 6 ears

	undertaken	process	
How is it kept? Hard, soft or both	Both	Soft	Both
Why is it kept?	In case we have to follow up on work carried out. For future work	In case we have to follow up on work carried out. For future work	Legislation
How should it be deleted?	Permanently	Permanently	Permanently
Back ups	Permanently removed from back ups	Permanently removed from back ups	Permanently removed from back ups
	External consultants and agency staff	Financial information	Employee data
Responsible department	Ops	Ops	Ops
Is there a legitimate reason for the processing of this data? If yes, please give details. If no, consent will be required.	Yes, to assess an individual's ability to carry out work on behalf of Ageing Better	Yes. To manage the financial activities of Ageing Better, safeguard its assets and be compliant with HMRC	Yes. To ensure Ageing Better is compliant with employment law, Right to Work legislation, HMRC, provision of Emergency Contact Details.
Is consent required?	Yes	No	Yes
How is consent obtained?	Through contract	N/A	Through contract
How long is the data to be kept for?	For two years after the last piece of work undertaken	6 years in accordance with HMRC	6 years in accordance with HMRC. Whilst this may be shortened for employment law purposes the 6 years is required for PAYE purposes.
How is it kept? Hard, soft or both	Can be both but preferably soft	Can be both but preferably soft	Can be both but preferably soft

Why is it kept?	In case we must follow up on work carried out. For future work	Compliance with HMRC	Compliance with statutory bodies
How should it be deleted?	Permanently	Permanently	Permanently
Back ups	Permanently removed from back ups	Permanently removed from back ups	Permanently removed from back ups
	Unsuccessful job applicant data	Trustee & Co-optee Data	
Responsible department	Ops	CEO	
Is there a legitimate reason for the processing of this data? If yes, please give details. If no, consent will be required.	Yes. To ensure Ageing Better is compliant with Employment Law	Yes. To ensure Ageing Better is compliant with its statutory bodies	
Is consent required?	Yes	Yes	
How is consent obtained?	If appointable but not appointed obtain consent for six months for appeal and consideration of other jobs.	Through recruitment process	
How long is the data to be kept for?	6 months for where consent is not given, 1 year where consent is given	Life of the company	
How is it kept? Hard, soft or both	Both	Both	
Why is it kept?	Compliance with employment law and protection against ET and potential contact re future job	To ensure the Trust is compliant with its statutory bodies	

	opportunities		
How should it be deleted?	Permanently	Permanently	
Back ups	Permanently	Permanently	

Document control

What date was this policy last approved?	September 2017
Who was the approving body/postholder?	Director of Ops and Finance
When was this policy implemented?	April 2018
What is the version number?	2.0
What version or policy does this one supersede?	1
What consultation was undertaken when writing this policy? (key names and departments)	CEO and SMT
What is the date of review? (Maximum 2 years from last approval date)	March 2020
Which department does this policy originate from?	Operations
Who is the lead manager	Sharon Daley
Who is the author/contact person (if different from above)?	