


# Data Retention Policy

## Amendment History

| Date  |   |
|---|---|
| May 2018  | Written                                   |
|  | Signed by Miles Newton, Chair of Trustees |
| March 2019  | To be reviewed                            |
|   |   |
|   |   |

**Reviewer** Chair of Trustees

**Owner and Authorised by** Chair of Trustees and Trustee Board

## Linked Policies

- Data Protection Policy
- DBS and Rehabilitation of Offenders Policy
- Retention of DBS Information Policy
- Privacy Statements

## **Introduction**

This policy explains how long we will store information about you and how we will dispose of it. Details about our legal basis for collecting, using and storing your data (data processing) and your rights of access can be found in our Data Protection Policy.

Please note that information about you may be stored and processed under more than one category for example you may be both a volunteer and a voting member.

This policy applies to all personal data - that is information which could be used to identify you or identified as relating to you. It does not apply to data which cannot be traced back to the individual, for example anonymised statistics. It does not apply to information held solely by organisations we partner with including by the Haven Lunch Club.

## **Emails**

If information has been sent to us via email or other electronic means we will transfer the relevant information to the appropriate place and delete the emails regularly. Emails will be checked and deleted from general mailboxes at least every 6 months.

## **Text Messages**

Text messages will be deleted from staff phones at least every 6 months.

## **Telephone Record Books**

Telephone record books and informal notes will be destroyed securely after use.

## **Staff Note Books**

Staff note books will be stored securely and destroyed no more than 2 years after the date they are completed.

## **Photographs and Recordings**

Named photographs associated with records will be destroyed according to the retention period below. If you have given permission for photographs or recordings to be taken and used for publicity they will be kept indefinitely. If you ask us not to continue using photographs of you we will make every reasonable effort to destroy them.

## **Official Meetings**

The information below does not apply to official records of trustees meetings, annual general meetings and special general meetings. The personal details stored in these records will usually be limited to your name and any organisations you are associated with.

## How will Communicare store data about me and for how long?

### 1. Volunteers

| Type of information  | Storage  | Kept for   |
|--|--|--|
| Volunteer application form   | Paper version in filing cabinet<br>Information transferred to volunteer page on database                 | Application form kept 1-2 years from date of application<br>Email version no more than 6 months.   |
| Volunteer record   | On our database  | 6-7 years after you resign   |
| Volunteer record if you do not complete recruitment                                | On our database  | Up to 2 years from date status changed to 'failed recruitment'   |
| Lists of tasks you have undertaken e.g. travel log / events                        | Electronic record<br>Paper records in event folders  | Up to 3 years from the end of the year it took place   |
| Financial information e.g. bank account info for expenses                          | In our financial database  | 6 years from end of financial year recorded in   |
| Health and Safety Records  | Details of any accidents/injuries recorded related to your volunteering                                  | 3 -4 years in 'accident file' unless classed as a serious incident in which case see below   |
| Serious incidents  | In a paper file or password projected file on computer   | 10 years from year of incident. May be kept longer at description of trustees for example if needed for legal reasons.                           |
| Your contact details in other places e.g. on Communicare phones and address lists. | Appropriate method –currently gmail contacts, thunderbird email contacts, mail chimp and address labels. | Removed from these lists when you resign. (If you opt to continue receiving emails contact details will be transferred to our supporter's list.) |
| DBS – continuous consent form  | Paper version in filing cabinet  | Destroyed when you resign  |
| DBS –any positive disclosure information and risk assessment                       | In secure file in locked filing cabinet  | Kept during risk assessment process and for up to 6 months afterwards.   |
| Positive DBS risk assessment   | In secure file in locked filing cabinet  | Risk assessment kept 6-7 years after you resign  |

Identifiable information (data) passed on to volunteers and trustees, for example those helping with admin tasks, will be limited to the information needed to carry out those tasks. Volunteers and trustees will be given a copy of our 'data protection for admin tasks' guidance and reminded to keep the data safe and destroy it securely when they no longer need it, for example when the task is complete.

2. **Clients** (people we help)

If you have been referred to us by someone else and we are unable to make any contact with you or you tell us you do not want us to help you and we have not given any help we will only keep your information for 1 year.

| Type of information  | Storage   | Kept for  |
|--|---|---|
| Client referral form   | Paper version in filing cabinet<br>Information transferred to client page on database | Referral form kept 1-2 years from date of referral  |
| Client record on database  | On our database   | 6-7 years after the last date we helped you   |
| Transport Record   | Travel logs are stored on our computer  | 3 years from the end of the year the log relates to   |
| Financial information e.g. bank account info donations                             | In our financial database   | 6 years from end of financial year recorded in  |
| Health and Safety Records  | Details of any accidents/injuries recorded related to us helping you                  | 3 -4 years in 'accident file' unless classed as a serious incident in which case see below                            |
| Serious incidents  | In a paper file or password protected file on computer                                | 10 years from year of incident. May be kept longer at discretion of trustees for example if needed for legal reasons. |
| Your contact details in other places e.g. on Communicare phones and address lists. | Appropriate method –currently gmail contacts, thunderbird email address book          | Removed from these lists when we stop helping you.  |

Information about you (data) passed on to volunteers so that they can help you will be limited to the information needed to carry out those tasks. Volunteers will be regularly reminded to keep this information safe and destroy it securely when they no longer need it, for example when they stop helping you.

### 3. Employees

| Type of information  | Storage  | Kept for   |
|--|--|--|
| Application form   | Paper version in filing cabinet  | Destroyed when you resign  |
| Financial information<br>e.g. payroll, pensions                                    | In our financial database  | 6 years from end of financial year recorded in   |
| Personal Information   | Supervisor/Manager's files on computer<br><br>Paper versions                 | 6-7 years after you resign   |
| Emergency Contact Information  | In staff shared drive unless you opt out                                     | Removed when you resign  |
| Health and Safety Records  | Details of any accidents/injuries recorded related to us helping you         | 3 -4 years in 'accident file' unless classed as a serious incident in which case see below                             |
| Serious incidents  | In a paper file or password projected file on computer                       | 10 years from year of incident. May be kept longer at description of trustees for example if needed for legal reasons. |
| Your contact details in other places e.g. on Communicare phones and address lists. | Appropriate method –currently gmail contacts, thunderbird email address book | Removed from these lists when you resign   |
| DBS – continuous consent form  | Paper version in filing cabinet  | Destroyed when you resign  |
| DBS –any positive disclosure information and risk assessment                       | In secure file in locked filing cabinet                                      | Kept during risk assessment process and for 6 months afterwards.   |
| Positive DBS risk assessment   | In secure file in locked filing cabinet                                      | Risk assessment kept until 6-7 years after you resign  |
|  |  |  |

### 4. Failed applicants (employment)

| Type of information  | Storage  | Kept for   |
|--|--|--|
| Application form   | Paper version in filing cabinet<br>Email version on system | Up to 6 months after interview date (or 6 months after job offer withdrawn if withdrawn on basis of references or DBS check)<br>Email version destroyed once interviews have taken place |
| DBS –any positive disclosure information and risk assessment | In secure file in locked filing cabinet                    | Kept during risk assessment process and for 6 months afterwards.   |
| Positive DBS risk assessment                                 | In secure file in locked filing cabinet                    | 6 months after date done   |

### 5. Voting Members

| Type of information   | Storage   | Kept for  |
|---|---|---|
| Membership Form   | Paper version in filing cabinet   | 3 years   |
| Membership list – name, contact details, any organisation you represent | Electronic Version on computer  | 5 years   |
| Financial information e.g. your membership fee                          | In our financial database   | 6 years from end of financial year recorded in                |
| Your contact details in other places e.g. on address lists.             | Appropriate method – currently thunderbird email contacts, mail chimp and address labels. | Removed from these lists when you don't renew your membership |

### 6. Supporters and Donors

| Type of information   | Storage   | Kept for   |
|---|---|--|
| Contact details for specific events e.g. Tree of Light, craft fayre | Paper forms in filing cabinet<br>Emails         | No more than 3 years                                 |
| Financial information e.g. donations                                | In our financial database                       | 6 years from end of financial year recorded in       |
| Supporter email list  | Appropriate secure method –currently mail chimp | Unsubscribed when you ask us to stop contacting you. |

### 7. Referrers and next of kin information

| Type of information  | Storage                                 | Kept for   |
|--|---|--|
| Your contact details on referral forms                               | Paper forms in filing cabinet<br>Emails | Referral form kept 1-2 years from date of referral |
| Your contact details and records of interactions relating to clients | On the client record (database)         | 6-7 years after the last date we helped the client |

#### Other comments

Communicare in Southampton may keep a backup of database information in a locked filing cabinet for up to one year.