

Data Retention Policy

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Data Retention Policy

1. Purpose

This policy intends to manage the retention of information, records and data held by YMCA Derbyshire (the "Association") and assist the Association to:

- Improve its information management practices;
- Comply with current statutory, legal and regulatory requirements on retention of information and data protection;
- Implement archiving practices retaining archive records and retrieval systems;
- Minimise storage costs;
- Provide consistency for the management, archiving and disposal of information; and
- Improve operational efficiency.

2. Scope

This policy applies to all data, including but not limited to, electronic information found in emails, databases, applications and other media, and paper information found in hard copies of electronic data, files, internal memos and legal documentation. It is inclusive of information outside of the organisation stored in a cloud service and/or held on a mobile device.

This policy applies to all Association employees, board and committee members, temporary staff, contractors and agency workers who have authorised access to IT systems and premises.

This policy does not form part of any employee's contract of employment and the Association may amend it at any time.

3. Storage of Information

The Association holds a wide range of information about its services, activities, partners, employees, volunteers, residents and students. This information is held both electronically and in hard copy.

Each department is responsible for completing its own data retention schedule which describes what information is held, the retention period and who is responsible for review and disposal of information that is no longer required to be held by the Association. A list of the retention schedules across the organisation is shown at Appendix 1.

Under the Data Protection Act 2018, information that relates to identifiable or identified individuals (personal data) shall only be retained by the Association for as long as is necessary. This means that once the Association no longer requires the personal data

and any applicable statutory or regulatory retention periods have lapsed and limitation periods have been considered, information containing personal data will need to be considered for disposal on a case by case basis.

This policy should be read together with the Information Security Policy which sets out to reduce the risk of security incidents and demonstrates to employees and service users that we collect handle and store their information securely through applicable security requirements. The Data Protection Policy should also be referred to.

4. Disposal of Information

Paper information should be destroyed using the appropriate means, either through confidential waste, shredding or other forms of suitable disposal. This is particularly important when disposing of or destroying personal data. Where a third party contractor is appointed to manage the disposal of information, the Association must assess the risk to ensure that the contractor has signed a written agreement to comply with data protection legislation.

Where a Data Protection Officer deems that information requires to be held for longer than the recommended and/or legal requirement, a clear rationale must be identified. In some cases, this may relate to disputes, complaints or legal claims.

5. Responsibilities

Each service area of the organisation will be responsible for reviewing the information it holds, the purpose for holding it, ensuring it is accurate and up to date, and that information is held and disposed of responsibly. When a document has reached the end of its recommended/legal retention period, the relevant Head of Service/Director will authorise its disposal, subject to checking that the information is no longer needed.

6. Review of Policy

The Association will review the content of this policy every two years or earlier in the event that there are changes in legislation or as a result of a change in good practice.

This policy links to: Information Security Policy
 Data Protection Policy

Appendix

Retention Schedule for YMCA Derbyshire Services

Service	Lead Responsibility
Accommodation and Support Services, Health and Wellbeing, Estates and Maintenance	Kate Gillespie
Training and Education <ul style="list-style-type: none"> • Key College • YKidz 	Julia Hodder
Finance and IT	Andrew Armstrong
Human Resources	Jane Lunn
Operations and Conference Centre	Jenna Shaw
Income Generation Marketing Bid Writing	Grace Harrison
Monitoring and Evaluation	Liz Richardson

Monitoring of the Retention Schedule and contents will be undertaken by a Data Protection Officer (being either the Director of Finance or Director of HR) with quarterly reports to the Senior Leadership Team and annual reports to the Board.

