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# Data Retention Policy

**Approved by the Board: 15 March 2018**  
**Review Date: April 2020**  
**Version: 4**

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## **Data Retention Policy**

### **1. Purpose**

This policy intends to manage the retention of information held by YMCA Derbyshire (YMCAD) and assist the organisation 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 employees of YMCAD.

### **3. Storage of Information**

YMCAD holds a wide range of information about its services, activities, partners, employees, volunteers, residents, students and children. 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 organisation. A list of the retentions schedules across the organisation is shown at Appendix 1.

Under the General Data Protection Regulations (EU) 2016/679 and the Data Protection legislation, information that relates to identifiable or identified individuals (personal data) shall only be retained by YMCAD for as long as is necessary. This means that once YMCAD 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.

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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 or destroying personal data. Where a third party contractor is appointed to manage the disposal of information, YMCAD must assess the risk to ensure that the contractor has signed a written agreement to comply with the Data Protection Legislation.

Where the 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 of 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 check that the information is no longer needed.

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This policy links to:                      Information Security Policy  
    Data Protection Policy

**Retention Schedule for YMCA Derbyshire Services**

<b>Service</b>	<b>Lead Responsibility</b>
Accommodation, Health and Wellbeing, Facilities and Estates	Kate Gillespie
Training and Education, Hospitality	Julia Hodder
Family Work	Jane Lunn
Finance and IT	Andrew Armstrong
Human Resources	Jane Lunn
Fundraising and Marketing	Sarah Crane
Monitoring and Evaluation	Liz Richardson
Bid Writing	Tina Boddington

Monitoring of the Retention Schedule and contents will be undertaken by the Data Protection Officer (Director of Finance/ Director of HR) with quarterly reports to Board and SLT.