



## Data Retention Policy

### 1. Introduction

The Friends of Winchester Cathedral (the Friends) we collect, hold, store data and information and this policy provides a framework of retention and disposal of categories of information and documents.

### 2. Scope of Policy

This policy applies to all records created, received or maintained by the Friends in the course of carrying out its functions. Records are defined as all those documents which facilitate the business carried out by the Friends and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

### 3. Responsibilities

The Trustees of the Friends are responsible for agreeing, reviewing and ensuring compliance of the Data Retention Policy. The Director of the Friends has responsibility for implementation and application of the policy.

### 4. Safe Disposal of Records

#### a) Hard Copy Records

Where records have been identified for destruction, they should be disposed of in an appropriate way. All records containing personal information, or sensitive policy information, should be shredded before disposal using a crosscut shredder. Any other records should be bundled up and disposed of to a wastepaper merchant or disposed of in other appropriate ways. Records should not be placed in refuse or recycling bins or skips. Where appropriate, there are companies who can provide confidential waste bins or bags and other services which can be purchased to ensure that records are disposed of in an appropriate way.

#### b) Electronic Records

Records should be deleted from databases using the appropriate method for the software, ensuring it is permanently deleted and not stored in an archive or recycle bin. Files should also be deleted from archive and recycle bins. Care must also be taken to ascertain that such records have been removed from any backup systems, cloud storage and hard drives.

### 5. Retention Schedule

The retention periods for personal data and other data and records held by the Friends are set out below.

Some documents such as minutes may be retained for the historical record.

	Record	Explanation (as applicable)	Retention period	Responsible
1	Data held on individual members of the Friends	We will keep your data while you are a member and until such time that we do not believe that your membership is likely to be renewed. We also retain your data to comply with any statutory requirements (see 2 below)	3 months after a member has informed us of their wish to no longer be a member of the Friends subject to 2 below. 3 months after the membership renewal date, if no response to further contact, subject to 2 below	Director
2	Gift Aid	HMRC require retention of records of gift aided items for a specified period	6 years after the accounting period to which the claim relates	Director
3	Photographs and videos	Photographs and videos will form part of the permanent record of the work of the Friends. Individual members may withdraw consent	Permanent Records may be deposited with the Hampshire County Record Office	Director
4	Financial Records	The Charity Commission specifies that charities must keep accounting records for at least 6 years from the end of the financial year in which they are made. The annual report is an integral part of the accounts, and as such should be retained with accounts of this period	6 years after the accounting period to which the claim relates	Director
5	Payroll records	HMRC requirement	3 years from end of tax year to which they relate	Director
6	Staffing and Recruitment (including volunteers)	Records are kept in compliance with statutory provisions in employment legislation. Certain tribunal claims can be made 6 years after termination and this is the adopted default retention period	6 months for recruitment paperwork including application forms, CVs, interview notes for applicants not appointed 6 years from date of termination for employees/volunteers	Director
7	Minutes and papers for meetings of the Trustees including committees	Documents retained for audit and historic record	Permanent Records may be deposited with the Hampshire County Record Office	Director

8	Other documents	Some funders may require the retention of complete records of financial and other project documentation for audit purposes	As required by the grant making body	Director
9	Health and Safety	Accident report record Risk Assessments	3 years from date of last entry Permanent	Director
10	Insurance	Employers Liability Insurance Other Insurances	Permanent	Director
11	Recycle Bins, Download folders and deleted emails	Data protection compliance	Cleared monthly	Director