

## Data Retention Policy

Version:	4
Date:	January 2021
Reviewed By:	Main Al-Najjar
Reason for Review:	Review
Next Review:	January 2022

### Introduction

This **Data Retention Policy** outlines how long various categories of personal data are retained by 3 Spirit Enterprise UK Ltd (3SpiritUK). It should be read in conjunction with our **Data Protection Policy** and **Privacy Policy**, copies of both of which are available on our website. 3 Spirit Enterprise UK Ltd (3SpiritUK) processes various types of personal information, also called personal data. Personal data is any information, whether held in hard copy or electronic form, relating to an individual who can be identified, directly or indirectly, from that data. Processing is anything that is done with that information – it includes the collecting, editing, storing/holding/retaining, disclosing/sharing, viewing, recording, listening, erasing/deleting etc. of personal information. Personal information may be retained by 3 Spirit Enterprise UK Ltd (3SpiritUK) in various ways and places – these include, but are not limited to, minutes of meetings; employment contracts; training; newsletters; consultancy; website; social media etc.

In certain circumstances it will be necessary and appropriate to retain personal information, either in hard copy or electronic form, depending on the purposes for holding the information. However, it is not appropriate or practical for 3 Spirit Enterprise UK Ltd (3SpiritUK) to retain all records indefinitely. Records should only be retained in accordance with data protection principles, which require that personal information is limited to what is relevant and necessary, is accurate, and is kept in a form which permits identification of individuals for no longer than is necessary for the purposes for which it was obtained. Ensuring that personal information is erased or anonymised when no longer required will reduce the risk of it becoming irrelevant, excessive, inaccurate or out of date, and the risk of it being processed in error. It is therefore important that 3 Spirit Enterprise UK Ltd have in place systems for the timely and secure disposal of documents that are no longer required or that they are no longer entitled to retain. It is permissible to retain personal information beyond when it is required for the original purposes, if such further retention is only for public interest archiving, scientific or historical research, or statistical purposes. Any personal data that 3 Spirit Enterprise UK Ltd (3SpiritUK) need to keep for public interest archiving etc. should be clearly identified by them.

### Retention of Records

Data protection law does not set specific time limits for the retention of different types of personal information. It is up to data controllers to set their own retention periods, which will depend on how long the information is required in relation to the specified purposes for which it is held. Suggested retention periods set out in the Schedule to this policy, and decisions relating to the retention (and disposal/erasure) of personal information should be taken with reference to the Schedule. However, 3 Spirit Enterprise UK Ltd (3SpiritUK) should also bear in mind the general rule that they must always be able to justify why they keep personal information in a form that permits the identification of individuals.

In all cases where the retention period recommended in the Schedule for specific types or items of personal information has expired, a review should be carried out prior to disposal, and consideration should be given as to the most appropriate method of secure erasure or disposal.

## Disposal/erasure of Records

Documents containing personal information should be disposed of confidentially and securely either by shredding or by using confidential waste bins or sacks. Such documents may include, but are not limited to, those containing names and contact details, health-related information, information relating to pastoral matters and financial information.

Electronic communications including email, Facebook pages, twitter accounts etc. and all information stored digitally should also be reviewed regularly and if no longer required should be closed and/or permanently deleted. It is understood that the word “deletion” can mean different things in relation to electronic data, and that it is not always possible to erase all traces of it. The key issue is to put the data beyond use. Therefore, it will normally be sufficient simply to delete the information, with no intention of it ever being used or accessed again by anyone. In addition to deleting personal information from a live system, it should also be deleted from any back-up of the information on that system. 3 Spirit Enterprise UK Ltd (3SpiritUK) use a third-party organisation for the permanent disposal of electronic and hardcopy data and devices.

## Retention of Records for Archiving, Research or Statistical Purposes

Personal information can be kept indefinitely if held only for archiving purposes in the public interest; scientific or historical research purposes; or statistical purposes. There must be appropriate safeguards in place to protect individuals - for example, in some cases pseudonymisation may be appropriate. If retaining personal information for archiving purposes, it must not be used for any other purposes.

## Data Retention Schedule

<u>Record</u>	<u>Retention Period</u>
<b>MEETINGS</b>	
Minutes of meetings	6 years
Papers for meetings, including agendas and reports	Delete once there is no longer a need to retain these
<b>EMPLOYMENT, MEMBERS &amp; VOLUNTEERS</b>	
Pre-employment (of volunteers and paid workers) enquiries/applications/notes/letters/references	6 months after completion of recruitment (unless data to be retained for a future similar opportunity, in which case 1 year)
Complaints concerning people	100 years
Employee records including: contracts, time records etc.	Duration of employment + 6 years
Volunteer records	Duration of placement + 6 years
Databases for mailing lists/distribution	Reviewed annually - delete or correct out of date information
Miscellaneous contact information	Delete once there is no longer a need to retain such information
Miscellaneous letters and emails	Delete the email/confidentially destroy the letter once no longer required

Payroll and pension payment records	Minimum, 6 years, no maximum
Pension and retirement records	Minimum 6 years beyond final pension payment, no maximum
<b>PROPERTY &amp; LEGAL</b>	
Environmental studies	Permanent
Insurance claims/ applications	Permanent
Insurance disbursements and denials	Permanent
Insurance contracts and policies	Permanent
Leases	6 years after expiration
Property & land documents (including loan and mortgage contracts, title deeds)	Permanent
Warranties	Duration of warranty + 6 years
Documents relating to legal proceedings, potential or actual	Final settlement of matter or conclusion of any formal proceedings + 6 years
Injury and Illness Incident Reports (RIDDOR)	5 years
Construction documents	Permanent
Fixed Asset Records	Permanent
Application for charitable and/or tax-exempt status	Permanent
Sales and purchase records	10 years
Contracts	6 years following expiration
<b>FINANCE</b>	
Audit and review workpapers	6 years from the end of the period in which the audit or review was concluded
Financial records, including invoices and expenses payable, income records, bank statements and all supporting documentation	6 years from end of year in which transaction made
Annual audit reports and financial statements	Permanent
Annual plans and budgets	2 years
General ledgers	Permanent
Tax records	Minimum 6 years
Legacies (general)	6 years after estate has been wound up