

# ATE Data Retention Policy

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## **Introduction**

According to the General Data Protection Regulations (GDPR) there is no specific minimum or maximum period of time for retaining personal data.

‘Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes’.

How long ATE will keep personal data depends on the purpose for which it was obtained and its nature.

## **Types of data held by ATE**

ATE holds the following information:

### **Customer details**

- Database records
- Booking Forms
- Children’s record cards including medical forms
- Accident and incident forms
- Surgery records

### **Staff details**

- Database records
- Monitor record cards AD Portfolios
- DBS
- Employment

### **Accounts information**

- Accounting records
- Paper based accounts from Superweek Directors

### **Laptops and Smart Phones**

## **Data Retention Policy**

Because of the amount and sensitivity of the information we hold there is a formal Data Retention Policy. For each type of information that we hold there is a time limit for retaining that type of data and a procedure for removing it securely when that limit is exceeded.

### **Customer details**

#### **Database records**

We will retain customer data until a child reaches the age of 18; this allows us to share information about volunteering and employment opportunities and to follow up on any reported incidents. We will contact all customers when a child reaches 16 and can no longer attend a Superweek, giving them the opportunity request that we remove all personal data we hold about their child from our records.

Keeping historical information as to which holidays were attended and what discounts were applied is necessary for evaluating sales trends and will not become out of date. This information can be stored if it has been anonymised.

All other information, including contact details, can only be retained if the individual has been contacted and requested to remain on the database.

#### **Booking forms**

Once processed, website booking forms are automatically deleted from the website. When hard copies of booking forms are received, details are entered into the database and hard copies disposed of in confidential waste. The same process is used for electronic booking forms.

#### **Children's record cards including medical forms**

These are kept for a year after the Superweek. This is acceptable as there is sometimes a need to re-use information. Sometimes with late bookings the previous record card is needed as the update does not arrive in time for the Director's advance planning. (It comes in the suitcase with the child). Any digital versions of medical forms will be deleted at the end of the summer season.

#### **Accident/Incident forms**

Claims can be made against organisations after a considerable period of time and ATE is within its rights to keep accident/incident forms in case they are needed as evidence. ATE's insurers require such documents to be retained for 25 years. Accident/incident forms will be archived in a secure filing cabinet in the office, or in secure cloud storage.

#### **Surgery records**

As above claims can be made against organisations after a considerable period of time and ATE is within its rights to store these records in case they are needed at a later date. ATE's insurers require such documents to be retained for 25 years. Surgery records will be archived in a secure filing cabinet in the office, or in secure cloud storage.

## **Staff details**

### **Database records**

Once staff members and volunteers leave ATE, unless they specifically request to remain involved with ATE as a 'friend', their personal details will be deleted from the database.

The staff team will be reviewed annually each autumn and anyone who has not worked for, or made contact with, the organisation within the previous 2 years will be removed from staff lists. At this point staff will be contacted and invited to 'opt in' to receiving further information and remaining a 'friend' if they are not currently able to work. Any who do not opt in will be deleted completely from the staff database under their 'right to be forgotten'.

### **Monitor record cards and AD portfolios**

These will be disposed of in confidential waste as soon as a staff member is removed from staff lists. Monitor record cards will be disposed of in confidential waste even if the person requests to remain as a 'friend'.

### **DBS**

DBS numbers are kept on the staff database and on an excel spreadsheet (SCR) stored on the office PC. The Single Central Record (SCR) contains only name, date of birth and DBS number and awarding organisation along with the date of issue. This is needed for the organisation to be able to track when a DBS needs to be renewed. In order to get a DBS certain key documents are required. If these are photocopied for temporary use they are disposed of in confidential waste as soon as the application for DBS has been completed. At no time should any copy of a document such as a passport, birth certificate or utility bill be retained by ATE. If there is a brief period in which it is retained it must at all times be kept in a locked cupboard and inaccessible to anyone other than authorised employees.

### **Employment**

ATE collects all the information it needs from employees to ensure it is complying with employment legislation. This includes evidence of the right to work in the UK and compliance with HMRC requirements in connection with the operation of National Insurance, PAYE and student loan deductions from employees' pay. We are required to retain this information for the duration of an employee's period of employment, and for a minimum of six years after their employment ceases. This information is also recorded within ATE's payroll system (operated within its accounting system, currently supplied by Xero).

As ATE makes all of its payments electronically, it also collects information concerning employees' bank account, both for the payment of wages and salaries and the reimbursement of expenses. Although this is collected when it is first required, it is only retained within ATE's on-line banking system with HSBC. This system is protected both by user name and password, and with a further requirement to provide an access number from a personalised unit held by banking

signatories. This information will be deleted once it is no longer required, but, in any case, it is automatically deleted by the Bank if it has remained unused for a period of 12 months.

## **Accounts information**

### **Accounting records**

As it moves towards a paperless office, ATE stores much of the accounting data and paperwork electronically, either by way of scanned documentation, or by transcribing information relating to its financial partners into its accounting system. The scanned documents are held within Xero, attached to the appropriate transactions. Copies are also retained as back up (in the event that we cease our relationship with Xero). The legal requirement (governed by the Statute of Limitations) requires this data to be stored for a minimum of six years.

### **Paper based accounts from Superweeks, etc.**

ATE is required to keep all paper-based accounting information for six years, as this information supports the accounts. This information does not contain personal data. This information is securely filed on an annual basis after the accounts for the year end have been finalised, with the contents of the files containing the oldest set of information being disposed of in confidential waste.

## **Laptops and Smart Phones**

There are times when laptops or smart phones will be used by ATE staff to access information from secure cloud storage or encrypted memory sticks. No data will be saved or retained on a personal computer or a smart phone. All devices used to access encrypted **must** be password protected and must be set to time out quickly when not in use.

Child information for the Superweek will be provided to the director in encrypted form on a memory stick or via secure cloud storage. This must **not** be downloaded onto the laptop but used from the memory stick or within the browser. The memory stick must be stored with care and returned safely to the ATE office immediately after the Superweek. The ATE office will delete the data from the memory stick immediately upon its return. The director will not retain any information beyond the end of the Superweek.

## **Privacy Policy**

From September 2018 ATE will have a clear statement on its website and booking forms to communicate to customers what their personal information will be used for and how long it will be kept.

It will be made clear that no details will be passed to third parties.