|  |  |
| --- | --- |
| A black and white drawing of a snake  Description automatically generated with low confidence | **Streatham Choral Society****Founded 1921****Registered Charity No. 802195**  |

**DATA RETENTION POLICY**

**Key details**

|  |  |
| --- | --- |
| **Effective date** | 2014 |
| **Date of last review** | February 2023 |
| **Reviewed by** | Martin Gresty (Secretary)Carol Harrison (Treasurer) |
| **Approved by Committee** | March 2023 |
| **Next review date** | February 2024 |

**Introduction**

This policy sets out how Streatham Choral Society will approach data retention and establishes processes to ensure data is not held for longer than is necessary.

It forms part of Streatham Choral Society’s Data Protection Policy.

**Roles and responsibilities**

Streatham Choral Society is the Data Controller and will determine which data is collected, retained and how it is used. The Data Protection Officer for Streatham Choral Society is normally the Secretary, who together with the Committee, who are also the Trustees of the Society, is responsible for the secure and fair retention and use of data by the Society. Any questions relating to data retention or use of data should be directed to the Secretary (via streathamchoral@gmail.com).

**Regular data review**

A regular review of all data will take place to establish if Streatham Choral Society still has good reason to keep and use the data held at the time of the review. As a general rule a data review will be held every two years.

Data to be reviewed:

* Data stored on digital documents (e.g. spreadsheets) stored on personal devices held by committee members.
* Data stored on third party online services (e.g. Google Drive, Mail Chimp).
* Physical data stored at the homes of Committee members.

**Who the review will be conducted by**

The review will be conducted by the Secretary, who is the Data Protection Officer, with other Committee members to be decided on at the time of the review.

**How data will be deleted:**

Physical data will be destroyed safely and securely, including shredding.

All reasonable and practical efforts will be made to remove data stored digitally.

* Priority will begiven to any instances where data is stored in active lists (e.g. where it could be used) and to sensitive data.
* Where deleting the data would mean deleting other data that has a valid and lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

**Criteria**

The following criteria will be used to decide what data to keep and what to delete:

|  |  |
| --- | --- |
| **Question** | **Action** |
|  | **Yes** | **No** |
| Is the data stored securely? | No action necessary | Update storage protocol in line with the data protection policy |
| Does the original reason for having the data still apply? | Continue to use | Delete or remove data |
| Is the data being used for its original intention? | Continue to use | Either delete/remove or record lawful basis for use and get consent as necessary. |
| Is there a statutory requirement to keep the data? | Keep the data at least until the statutory minimum no longer applies. | Delete or remove the data unless there is reason or keep the data under other criteria. |
| Is the data accurate? | Continue to use | Ask the subject to confirm/update details |
| Where appropriate, do we have consent to use this data. This consent could be implied by previous use and engagement by the individual. | Continue to use | Get consent |
| Can the data be anonymised? | Anonymise data | Continue to use |

**Statutory requirements**

Data stored by Streatham Choral Society may be retained based on statutory requirements of storing data other than data regulations. This might include but is not limited to:

* Gift Aid declarations;
* details of payments made and received (e.g. in bank statements and accounting records);
* trustee meeting minutes;
* contracts and agreements with suppliers/customers; and
* insurance details.

**Other data retention procedures**

**Member data**

* When a member leaves Streatham Choral Society and all administrative tasks relating to their membership have been completed any potentially sensitive data held on them will be deleted – this might include bank details or medical data.
* Unless consent has been given, data will be removed from all email mailing lists.
* All other data will be stored safely and securely and reviewed as part of the next two-year review.
* Each registration form is kept for a period of one year (in practice, this means three full terms following the date of registration). After this time your form will be disposed of via confidential waste.
* Once a member has left the choir, membership data is held for a period of one year (in practice, this means three full terms following the date of your last attendance). After this period data will be archived. Choir members are asked if they wish to be added to the Friends of Streatham Choral Society email list, for the purpose of sending details of future Streatham Choral Society activity. Former members are added to this list only with their consent .and may unsubscribe from this list at any point.

**Mailing list data**

* If an individual opts out of a mailing list, then their data will be removed as soon as is practicably possible.
* All other data will be stored safely and securely and reviewed as part of the next two-year review.

**Volunteer and freelancer data**

* When a volunteer or freelancer stops working with Streatham Choral Society and all administrative tasks relating to their work have been completed, any potentially sensitive data held on them will be deleted – this might include bank details or medical data.
* Unless consent has been given, data will be removed from all email mailing lists. All other data will be stored safely and securely and reviewed as part of the next two-year review.

**Other data**

All other data will be included in a regular two-year review.