



Retention and destruction policy for data relating to Audiences and Supporters

1. Document Control

1.1 Change record

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Retention and destruction policy

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1 Purpose

This policy aims to set out the Charity's stance on the appropriate retention and destruction of records containing personal data belonging to Gresham College's audiences Friends and supporters.

It is also intended to be a key tool toward demonstrating compliance measures to regulators and may be regarded by them as a top layer document and therefore comprises part of our layered approach to documenting practices in this area.

2 Scope

2.1 As a UK established organisation, this policy applies to all our retention and destruction of personal data regardless of where in the world that processing may take place.

This is an external policy, and it applies to all employees, workers and any other internal persons who may have responsibility for the retention and deletion of documents or records containing personal data.

The policy should be read in conjunction with our Privacy Policy.

The document may be shared with third parties, contractors and other self-employed persons who will be asked to comply with the policy. Where the organisation undertakes the services of a third party, that party will be required to make adequate assurances to the data controller and/or processor that their own processing is compliant with current applicable data protection laws.

2.2 This policy is not contractual but aims to set out how we normally deal with such issues.

3 Definitions

3.1 Anonymised

The identification of a data subject has been prevented irreversibly.

3.2 Generalised

Broad or non-specific information. Examples include age ranges etc.

3.3 Recipient

A natural person or organisation to whom personal data is disclosed or made available to. A recipient is not necessarily a third party with who the Charity has professional dealings.

3.4 Personal data (personal information)

Any 'data' relating to a 'data subject' who can be directly or indirectly identified by reference to a piece of data. This includes a name, identification number, location data or online identifier. It may be an identifier that relates to physical, physiological, genetic, mental, economic, cultural or social identity. It may also apply to data that has been pseudonymised.

3.5 Pseudonymised

The direct identification of a data subject has been prevented.

4 Retention

4.1 Why we retain personal data

The Charity only retains personal data it really needs. This data should always be relevant and necessary for a clear purpose.

Records are kept about audiences, Friends and supporters of Gresham College for a broad range of processing activities. The most common categories include:

Contact details

- Contracts and gift agreements

4.1.1 Records are kept about donors, audiences and other external stakeholders for a broad range of processing activities. The most common categories include:

- Records created by or on behalf of the Charity in their duties for the Charity.
- Hard copy and electronic records including internet sites, databases, emails, films and videos.

4.1.3 We may also retain certain information in line with our IT Policy on monitoring. For example, where there is alleged misuse of Charity working time, internet, e-mail, etc we may review and retain any evidence of misuse.

4.2 Maintaining accuracy

4.2.1 All personal data retained by us must be accurate and where necessary kept up to date.

4.2.2 Members of staff will be responsible in keeping the personal details we hold on stakeholders up to date. This includes any information that may change, such as: address, contact number, name etc. Any updates such as these should be updated without delay.

4.2.3 Every reasonable step to rectify or erase inaccurate or misleading personal data must be taken without delay.

4.2.4 When personal data is received from a source other than the data subject, reasonable steps should be taken to verify the authenticity of the source and the information. An example of this includes checking charity details on an individual's public LinkedIn profile.

4.2.5 If retaining records for longer than the indicative periods in the retention schedule should also ensure that they maintain a sufficient audit trail that justifies their decision.

- Responsibility for archiving and disposing of records lies with the Data Protection Officer who will oversee the secure storage and retrieval of archived records, ensuring they are accessible when needed while also being adequately protected against unauthorised access or loss.
- Will establish procedures for the secure and permanent disposal of records once they have reached the end of their retention period or are no longer needed for legitimate business purposes.

4.3 Confidentiality and integrity

4.3.1 Where feasible the personal data retained is generalised, pseudonymised or anonymised.

4.3.2 All personal data must be stored in a manner that ensures appropriate security of the personal data by using appropriate measures. At the very least, it must always be protected against unauthorised or unlawful access and processing, and against accidental loss, destruction or damage.

4.3.3 New methods of retention are assessed using a cost-benefit method. This is to ensure that any intrusion on privacy or potential adverse consequences of the methods are kept to a justified minimum.

4.3.4 The Charity may record any inaccuracies that are updated, particularly in the event of an error. It may be necessary to understand the reason for the correction or to refer to the historical information. An example of this may include any minutes of meetings that are contested and amended due to differing recollections. In any event, the retention of the historical information will always be retained in a manner that is justified and does not mislead a recipient.

5 Destruction

5.1 When personal data should be removed

The Charity prohibits a 'save-everything' approach purely for the sake of record keeping.

5.1.1 No personal data should ever be kept in a form which permits identification of a data subject for longer than is necessary to achieve the purpose for which it was collected.

5.1.2 As soon as there is no legal basis upon which the retention of personal data can be justified, it must be removed without delay.

Retention periods must always be kept to a minimum. Regard will be given to the needs of the business so that the proper running of the business, its interests and the management of staff shall not be significantly compromised.

5.2 How personal data should be removed, returned, deleted or destroyed

5.2.1 When removing, returning, deleting or destroying any personal data, every reasonable and affordable step is taken to ensure it is done in a manner which is secure and ensures privacy; thereby keeping the risk of theft, loss or interception to an absolute minimum.

5.2.2 Appropriate and proper tools and processes must always be used.

5.2.3 If personal data can be anonymised, then where possible, identifying data must not be collected in the first place. If certain personal data is no longer required for the purpose and it becomes possible to anonymise data for any further purposes (e.g. reporting) then data is removed or deleted securely. Care must be taken to ensure that:

- Duplications are identified.
- Historical versions are identified (e.g. in computer history).
- Versions held in backup files or servers are identified.

- All identified versions that are no longer required are deleted securely and irrevocably.

5.2.4 If personal data can be pseudonymised, then care must be taken to ensure that:

- Duplications are identified.
- Historical versions are identified (e.g. in computer history).
- Versions held in backup files or servers are identified.
- Only a justifiable number of historical copies are retained and that any copies which may be deleted or removed are done so securely. Access to retained copies should be restricted to only those who absolutely always require access. Additional occasional access may be granted to others when and only for as long as access is required.

On instruction from the Controller, any personal data held on behalf of an audience, Friend or supporter of Gresham College for whom we act as a processor, must be returned to the relevant individual without undue delay.

5.2.5 When returning or sending any personal data, it must be moved in a way which is secure and ensures privacy; such that the risk of theft, loss or interception is kept to a minimum. It must also be returned in a commonly used format. For example, an encrypted e-mail containing a pdf file. Reasonable steps should be taken to verify the identity of the recipient. For example, two forms of communication may be used such as making a telephone call to the recipient ahead of sending the information to a known e-mail address.

5.2.6 When deleting any personal data every effort must be made to identify any duplications of the data and to delete it securely. This includes historical versions and versions held in backup files or servers.

5.2.7 If it is necessary to destroy personal data or delete it irrevocably, then professional advice must be sought for example from an IT specialist. The Controller must be notified of any intentions such as this to oversee the process.

5.2.8 If personal data is ever removed, deleted or destroyed accidentally or without authorisation of the Controller, it must be reported in accordance with the 'Breach and incident reporting' procedure.

5.2.9 On occasion it may be necessary to retain evidence of the removal, deletion or destruction of personal data, particularly when the data subject has requested information regarding the erasure or has asserted the right to be forgotten.

5.2.10 If we receive a request to have personal data erased or forgotten in accordance with a data subjects statutory right, then we may need to inform any recipients of that data so that the recipient may make steps to remove, return, delete or destroy the data as appropriate.

6 Set Retention Periods

6.1 Retention chart – explanatory notes

Figure 1 demonstrates the Charity's usual retention periods for certain records relating to data subjects.

6.1.1 Anyone who has responsibility for the maintenance and retention of these records is required to adhere to the retention periods listed.

6.1.2 The retention periods listed are the minimum length of time the record must be held for.

6.1.3 Many of the retention periods set out in figure 1 incorporate statutory requirements or professional practice rationales. Therefore, retention periods for these documents are mandatory.

6.1.4 Records should be removed at the point in time stated unless instructed otherwise.

6.1.5 In relation to Figure 1, any retention of records that exceeds the retention period stated must only be done so in an exceptional circumstance and where there is lawful justification. Authorisation must be sought from the Data Controller

6.2 Retention chart - figure 1

Data Retention Schedule

	<p>Our business need will determine the length of time for which personal information will be retained.</p> <p>Information connected to donations will be retained until seven full financial years have elapsed since a donors' last gift and seven full financial years have elapsed from our notification of their death (in line with our gift aid retention).</p>	
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Audiences, Friend and supporters' Personal Information	<p>Thereafter all data relating to the data subject will be deleted or anonymised.</p> <p>Supporter data held in third party platforms will be retained until seven full financial year has elapsed since a donors' last gift.</p> <p>Exceptions: The name and address of people who ask not to be mailed will be kept for as long as necessary to ensure that they are not mailed again.</p> <p>The records of Donors who have expressed an interest in leaving a gift in their Will to the Charity will be retained until they expressly state that they will not be leaving such a gift or until seven full financial years have elapsed from our notification of their death. This will enable us to identify the correlation between expressions of interest and subsequent actions.</p> <p>Information required for the purpose of legacy administration will be retained until seven full financial years have elapsed since the full Legacy gift has been received.</p>	<p>Head of Fundraising and Engagement, Executive Assistant, Data Protection Officer</p>
Financial Information – including: records of banking transactions, tax records, audits.	<p>Retention period ranges from between six years to ten years from the end of the Financial Year in which the transaction was made, in line with regulations.</p>	<p>Head of Finance</p>
Gift Aid records	<p>Retention of record for seven years after the end of the financial year in which the final transaction from the donor took place. If the individual is still an active donor, the record/declaration of eligibility for Gift Aid will be retained for the lifetime of their giving.</p>	<p>Head of Finance, Head of Fundraising and Engagement</p>

Details of Injuries or Accident Reports/Records	Six years from time of accident occurring	Events and Officer Administrator
Case studies (stories of beneficiaries) that are not in the public domain	From five years after consent expires	Head of Fundraising and Engagement
Annual accounts and annual review	Permanently	Executive Director
Annual accounts and annual review	Six years for general records (and permanently for records relating to hazardous materials)	Head of Finance, Accounts and Facilities Manager
Contracts with customers and suppliers	Seven years after expiry of termination of the contract	Accounts and Facilities Manager

7 Related policies and documents

- Privacy Policy
- Complaints process
- Fundraising Promise
- Gift Acceptance Policy
- Social media policy
- The above list is not exhaustive.

8 Further information

Any queries or comments about this policy should be addressed to the Executive Director.

9 Policy owner

This policy is owned and maintained by the Executive Director.