



DATA RETENTION POLICY

1. Statement of intent

This Policy sets out how Bracknell Choral Society (BCS) will approach data retention and establishes processes to ensure that we do not hold data for longer than is necessary.

Although set out as a separate Policy, it should be considered part of the overall BCS Privacy Policy along with the Data Protection Policy.

Please note that BCS does not use Cookies on its website.

2. Responsibilities

Overall responsibility for Data Protection and Retention rests with the Trustees / Committee of BCS.

The Information Officer is the Data Protection Officer (DPO) on behalf of the Committee and will determine what data is collected, retained and how it is used. They, together with the Committee, are responsible for the secure and fair retention and use of data by BCS. Any questions relating to data retention or use of data should be directed to the Data Protection Officer.

3. Regular data review

A regular review of all data will take place to establish if BCS 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 2 years. The process is outlined below.

Data to be reviewed

- Shared data stored on third party online services (e.g. BCS Shared Google Drives)
- BCS data stored as digital documents on personal devices held by Committee members and other approved members
- Physical data stored at the homes of Committee members and other approved members

Who the review will be conducted by

The review will be conducted by the Data Protection Officer with other Committee members, to be decided 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 be given 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 we have a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

Committee members and others holding BCS data will be responsible for taking the appropriate action on the data that they hold in electronic or hard copy, including on their personal devices, and confirming that they have done so.

Criteria

The following criteria will be used to make a decision about 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 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 if 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 we have reason to 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 the 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

4. Statutory requirements

Data stored by BCS may be retained based on statutory requirements for storing data other than data protection regulations. This might include, but is not limited to:

- Gift Aid declaration records
- Details of payments made and received (e.g. in bank statements and accounting records)
- Trustee and Committee meeting minutes
- Contracts and agreements with suppliers / customers / Musical Director / Accompanist
- Biographies of soloists / musicians and other contractors
- Insurance details
- Attendance data
- Communications with members

5. Other data retention procedures

Member data

- When BCS becomes aware that a member has left the Society and all administrative tasks relating to their membership have been completed, any potentially sensitive data held on them will be deleted unless they give consent for BCS to retain their member details for future membership or marketing purposes.
- 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 2 year review.

Supporter mailing list data

- If an individual opts out of a mailing list their data will be removed as soon as is practically possible.
- All other data will be stored safely and securely and reviewed as part of the next 2 year review.

Volunteer, contractor and freelancer data

- When a volunteer, contractor or freelancer stops working with Bracknell Choral Society and all administrative tasks relating to their work have been completed, any potentially sensitive data held on them will be deleted.
- 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 2 year review.

Other data

- All other data will be included in a regular 2 year review.

6. Review

This Policy will be reviewed every 2 years by the BCS Trustees / Committee.