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[Appendix 1 Data Retention Schedule](#)

## 1. Introduction

- 1.1 Personal data is one of Hope for Justice's corporate assets; in the course of carrying out its various functions, Hope for Justice accumulates information from individuals. Hope for Justice also generates a range of data, which is recorded in the CRM system, the case management system, spreadsheets and paper files.
- 1.2 This personal data can also be held in other different formats, examples of which include, (but are not limited to) communications such as letters, emails and attendance notes; financial information including invoices, statements and reports; legal documents such as contracts; and information relating to various types of applications.
- 1.3 For the purposes of this Policy, 'personal data' includes information in both hard copy and electronic form.
- 1.4 In certain circumstances it will be necessary to retain personal data including Special Categories (as defined by GDPR) in order to fulfil statutory or regulatory requirements and also to meet operational needs. Personal data retention may also be useful to evidence events or agreements in the case of disputes.
- 1.5 The General Data Protection Regulations ("GDPR") require that personal data which permits identification of data subjects shall be retained for no longer than is necessary for the purposes for which the personal data is processed.
- 1.6 It is important for the above reasons that Hope for Justice has in place systems for the timely and secure deletion or disposal of personal data that is no longer required for the purposes for which it is processed.

## 2. Aims and Objectives

- 2.1 The key objective of this Policy is to provide Hope for Justice with a simple framework which will govern decisions on how long personal data should be retained. In the case of personal data which is to be retained by Hope for Justice, the Policy includes guidance on the format in which it should be retained and appropriate retention periods.
- 2.2 Implementation of the Policy will ensure Hope for Justice's compliance with GDPR and the Privacy and Electronic Communications Regulations 2003 ("PECR").
- 2.3 The Policy clarifies the different roles of Hope for Justice staff in relation to the management of personal data in order that they understand their responsibilities, and who to refer to if they require clarification.

## 3. Scope

- 3.1 This Data Retention Policy applies to all personal data including Special Categories held by Hope for Justice and its external service providers who process information on Hope for Justice's behalf.

#### **4. Policy Statement**

- 4.1 Hope for Justice will ensure that personal data including special categories is not retained longer than is necessary for the purposes for which it is being processed and will retain the minimum amount of personal data that it requires to carry out the processes required to achieve its objectives.

#### **5. Retention and Deletion/Disposal Policy**

- 5.1 Decisions relating to the retention and deletion/disposal of personal data should be taken in accordance with this Policy, in particular: [Appendix 1 – Personal Data Retention Schedule](#).
- 5.2 In circumstances where a retention period of specific personal data has expired, a review should always be carried out prior to a decision being made to delete/dispose of it. This review should not be particularly time consuming and should be straightforward. If the decision to dispose of some personal data is taken, then consideration should be given to the method of disposal to be used.

#### **6. Roles and Responsibilities**

- 6.1 Departmental Managers will be responsible for determining (in accordance with this Policy) whether to retain or delete/dispose of specific personal data within the remit of their department.
- 6.2 Departmental Managers may delegate the operational aspect of this function to one or more staff within their department.
- 6.3 Departmental Managers should seek advice from the Operations Director if there is any doubt about whether personal data should be deleted or disposed of or retained.
- 6.4 Departmental Managers should ensure that the Schedule in Appendix 1 which is relevant to their service is kept up to date.

#### **7. Deletion/Disposal**

- 7.1 If a record containing personal data is to be deleted, all copies of it must be removed. In particular if a record is deleted from the CRM system, a check must be made to ensure that record is also deleted from any relevant spreadsheets, email campaign systems or other systems.
- 7.2 When an electronic record is deleted containing personal data, a record must be kept of the relevant email address. This email address is retained solely so that a check can be run to ensure the related data has been deleted should an enquiry be made by the individual whose data it is. It should not be used for any other purpose.
- 7.3 When a physical document containing personal data is disposed of, it must be shredded.

- 7.4 Records of disposal of physical documents should be maintained by each department, and should detail the document disposed of, the date and the member of staff who authorised the document's disposal.