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DATA RETENTION POLICY

1. Introduction

1.1. Polymyalgia Rheumatica and Giant Cell Arteritis Scotland (known as PMR-GCA Scotland) – “the Charity” gathers personal information from individuals as well as generating some personal data, all of which is recorded in documents and records, both in hard copy and electronic form.

1.2. Examples of the types of information accumulated and generated are set out in Appendix 1 of this policy and include but are not limited to minutes of trustee meetings; AGM meetings, Group Meetings, telephone conversations and other communications such as letters and emails.

1.3. In certain circumstances it will be necessary to retain documents to meet legal requirements and for operational needs. Document retention is also required to evidence agreements or events and to preserve information.

1.4. It is however not practical or appropriate for us to retain all records. Additionally, data protection principles require information to be as up to date and accurate as possible. There are in place systems for the timely and secure disposal of documents that are no longer required.

1.5. This Data Retention Policy was adopted by the Charity on [insert date] and will be implemented on a day to day basis.

2. Roles and Responsibilities

2.1. Trustees and office bearers will adopt the retention and disposal guidance at Appendix 1 of this policy and strive to keep records up to date.

3. Retention and Disposal Policy

3.1. Decisions relating to the retention and disposal of data should be guided by: Appendix 1 – Document Retention Schedule – Guidance on the recommended and statutory minimum retention periods for specific types of documents and records.

3.2. In circumstances where the retention period for a specific document or category of documents has expired, a review should be carried out prior to disposal and consideration should be given to the method of disposal.

4. Disposal

4.1. Documents containing confidential or personal information should be disposed of either by shredding or by using confidential waste bins or sacks. Such documentation is likely to include financial details, contact lists with names and addresses and contact information.

4.2. Documents other than those containing confidential or personal information may be disposed of by recycling or binning.

4.3. Electronic communications including email, Facebook pages, twitter accounts etc and all information stored digitally should also be reviewed and if no longer required, closed and/or deleted so as to be put beyond use. This should not be done simply by archiving, which is not the same as deletion. It will often be sufficient simply to delete the information, with no intention of ever using or accessing it again, despite the fact that it may still exist in the electronic ether. Information will be deemed to be put beyond use if the Charity is not able, or will not attempt, to use it to inform any decision in respect of any individual or in a manner that affects the individual in any way and does not give any other organisation access to it.

History

Reviewed April 2018 Version v1.01 created

Appendix 1

Data Retention Schedule

This Schedule is provided as a guide to common types of documents but is not exhaustive.

RECORD	RETENTION PERIOD
Minutes of trustee meetings	6 years
Minutes of AGM meetings	20 years
Confidentiality Agreements	20 years
Complaints concerning people	100 years
Membership records	2 years
Volunteer records	Duration of placement + 6 years
Databases for mailing lists/distribution	Reviewed annually, out of date information deleted
Miscellaneous contact information	Deleted once there is no longer a requirement to hold such information
Documents relating to litigation or potential litigation	Until matter is concluded plus 6 years
Application for charitable and/or tax-exempt status	Permanent
Sales and purchase records	5 years
OSCR filings	5 years from date of filing
Records of financial donations	6 years
Expenses incurred	6 years
Annual audit reports and financial statements	Permanent
Annual plans and budgets	2 years
Bank statements, cancelled cheques, deposit slips	6 years
Cash receipts	3 years
Cheque registers	Permanent
Electronic fund transfer documents	6 years
Employee expense reports	6 years
General ledgers	Permanent
Journal entries	6 years
Invoices	6 years
Petty cash vouchers	3 years
Tax records	6 years
Filings of fees paid to professionals	6 years
Insurance claims/ applications	Permanent
Records relating to potential, or actual, legal proceedings	Conclusion of any tribunal or litigation proceedings + 6 years