Village Voices - Data Retention Policy

This policy sets out how Village Voices will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary.

1) Roles and responsibilities

Village Voices is the Data Controller and will determine what data is collected, retained and how it is used. The trustees collectively are responsible for the secure and fair retention and use of data by Village Voices. The role of Data Protection Officer will be fulfilled by a named trustee, currently Ian Smith.

Any questions relating to data retention or use of data should be directed to the Data Protection Officer, who can be contacted in the first instance by email at VillageVoices@ymail.com

2) Regular Data Review

A regular review of all data will take place to establish if Village Voices 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 and no more than 27 calendar months after the last review. The first review will take place in April 2028.

Data to be reviewed

- Data stored in digital documents (e.g. spreadsheets) held on personal devices held by committee members.
- Data stored on third party online services (e.g. retail banking systems, iCloud Drive)
- Physical data stored at the homes of committee members.

Who the review will be conducted by

The review will be conducted by the Data Protection Officer with other trustees to be appointed 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.

Criteria

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

Question	Action	
	Yes	**No**
Is the data stored securely?	No action necessary.	Modify storage to achieve level of security commensurate with the risk.
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.

Statutory Requirements

Data stored by Village Voices 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 declarations records;

- Details of payments made and received (e.g. in bank statements and accounting records);
- Trustee meeting minutes;
- Contracts and agreements with suppliers/customers;
- Insurance details;
- Tax and employment records.

3) Other data retention procedures

Member data

- When a member leaves Village Voices 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.
- Unless consent has been, given data will be removed from all email distribution lists.
- All other data will be stored safely and securely and reviewed as part of the next two year review.

Mailing distribution 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 two year review.

Freelancer and Volunteer data

- When a freelancer or volunteer stops working with Village Voices 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).
- Unless consent has been given data will be removed from all email distribution lists.
- All other data will be stored safely and securely and reviewed as part of the next two year review.

Other data

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