Document Retention and Deletion Procedure

National Back Exchange

Responsible Person

Sarah Thornton, Chair

Author

Association's Administration Team

Contents

1. Version Control Summary

Date	Version no.	Summary of changes	Consulting group/person
November 2024	1.0	New Procedure in line with NBE becoming a Charitable Incorporated Organisation (CIO) charity number 120 2540 - 29th of March 2023.	S Thornton, Chair Association's Administration Team

2. What should we do with personal data that we no longer need?

You can either erase (delete) it or anonymise it.

You need to remember that there is a significant difference between permanently deleting personal data and taking it offline. If personal data is stored offline, this should reduce its availability and the risk of misuse or mistake. However, you are still processing personal data. You should only store it offline (rather than delete it) if you can still justify holding it. You must be prepared to respond to subject access requests for personal data stored offline, and you must still comply with all the other principles and rights.

The word 'deletion' can mean different things in relation to electronic data, and we recognise it is not always possible to delete or erase all traces of the data. The key issue is to ensure you put the data beyond use. If it is appropriate to delete personal data from a live system, you should also delete it from any back-up of the information on that system.

Alternatively, you can anonymise the data so that it is no longer "in a form which permits identification of data subjects."

Personal data that has been pseudonymised – e.g. key-coded – will usually still permit identification. Pseudonymisation can be a useful tool for compliance with other principles such **as data minimisation and security, but the storage limitation principle still applies.**

(Source: ICO)

Related Documents

GDPR Board of Trustees Guidance

GDPR Policy

Privacy Notice

National Back Exchange Data Systems Register

National Back Exchange Google Drive Folder Register

Useful Links:

Information Commissioner's Office (ICO)

management-framework-for-retention-and-transfer.pdf (nationalarchives.gov.uk)

3. NBE Data Systems

3.1 Data System: Membership Database – Glue Up

Type of information held:

Data relating to NBE memberships. See NBE Data Systems Register for more details.

How long to keep data for:

- A contact profile is to be held on the Glue Up database for up to 3 years past the date of membership expiry
- A contact profile must be deleted if a request is submitted to do so by a data subject

Reason for holding data:

- To facilitate ease of renewal for members to prevent the need for a member to register on the system again
- Record keeping for both members and NBE

How to delete data:

A report is to be completed on our membership database (Glue Up) annually to determine which contacts have memberships which expired 3 years ago from date of report. The date is to be agreed in consultation with NBE Chair. NBE admin is to manually delete contacts and/or seek advice from Glue Up on how to best delete contact data.

Who is responsible for deleting data:

Echo AM Ltd staff in consultation with Chair, as required.

3.2 Data System: Google Drive - My Drive and Shared Drive

Type of information held:

Data and documentation to support the running of the CIO and fulfil membership services. See NBE Data Systems Register for more details.

Reason for holding data:

- To facilitate the running of the CIO
- For the Board of Trustees and Echo AM Ltd to fulfil their roles and responsibilities
- To fulfil membership services as required

How long to keep data for:

Personal data should not be stored on the My Drive of any Trustee. If personal data is stored on the shared drive a risk assessment must be undertaken by the Trustee to determine if the information is genuinely required to be stored on the shared drive.

If any guidance is required, they must consult the Chair. The personal information should only be accessible to Trustees/volunteers who are required to utilise the information. When deciding how long to keep data for Trustees must consider the reason for holding the data. The following must also be considered:

- You should only keep personal data for as long as you need it. There aren't any set time limits in data protection law because it depends on your situation.
- You must think about, and be able to justify, how long you need to keep it, and this will depend on your reasons for having it.

The following principles will also inform how long data should be held for:

- Legislation governing charities and voluntary organisations;
- Reporting requirements from Charities Commission and other regulators;
- Best business practice identified within sector; and
- Responsible management of personal data.

For full guidance on CIO document retention, please refer to the following document:

management-framework-for-retention-and-transfer.pdf (nationalarchives.gov.uk)

Reason for holding data:

Must be assessed per individual document depending on function and in line with ICO guidance.

How to delete data:

When you delete data electronically with the intention of destroying it, you need to make sure it's no longer usable by you or anyone else. You shouldn't be able to still access or use the data after you've deleted it, such as through your recycle bin. Check your recycling bin on Google Drive to ensure that any deleted documents with personal information are deleted.

If you are unsure about deleting any data, please contact Chair, Sarah Thornton (chairman@nationalbackexchange.org), regarding GDPR Board of Trustees Guidance

Who is responsible for deleting data:

Board of Trustees in consultation with NBE Chair, as required

Echo AM Ltd staff in consultation with NBE Chair, as required

Data review schedule:

Quarterly - All Trustees & Echo Staff to review personal data in documents to the best of their ability – date of review must be logged centrally for record keeping – dates to be agreed at the start of each year with Chair.

Annual - All Trustees & Echo Staff to review personal data in documents to the best of their ability – date of review must be logged for record keeping

An annual Google folder register review is to take place between AGM and annual business planning meeting. Trustees stepping down from their role are responsible for the appropriate deletion of data prior to their retirement.

3.3 Email system - GMail

We archive emails after a 3-year period. Any GDPR request for removal of personal data from our systems would be honoured in a timely fashion as per ICO Data Protection Registration guidelines.

3.4 Accounting system – SAGE

Type of information held:

Information required for financial reporting and transactional history. See NBE Data Systems Register for more details.

How long to keep data for:

Receipts and payments - at least six years from the end of the last company financial year

Reason for holding data:

- Statutory filing and to calculate taxation obligations

How to delete data:

Data to be reviewed annually during Sage roll forward process. Any historical records maintained in excess of the 7 years will be reviewed and deleted if required. Sage's functions will be used to facilitate this.

Who is responsible for deleting data:

Echo staff in consultation with NBE Chair and Finance Director

Data review schedule:

Annually - Echo Staff to review personal data on system annually. Date of review must be logged centrally for record keeping – dates to be agreed at the start of each year with Echo Management team, in consultation with Chair, as required

3.5 Payment system - Stripe

Type of information held:

Information required for recording transactions, reconciliation, accounting, and financial reporting. See NBE Data Systems Register for more details.

How long to keep data for:

Stripe will generally keep Personal Data for a period of five or more years from the end of the business relationship, or the date of the last transaction, whichever is later - Stripe Privacy Center

Reason for holding data:

- To record transactions, to enable reconciliation, reporting and to fulfil refunds.

How to delete data:

- Stripe are responsible for deleting data - Stripe Privacy Center

Who is responsible for deleting data:

See above

Data review schedule:

Not applicable

3.6 Payment system – Square

Type of information held:

formation required for recording transactions, reconciliation, accounting, and financial reporting. See NBE Data Systems Register for more details.

How long to keep data for:

Receipts and payments - at least six years from the end of the last company financial year

Reason for holding data:

- records of commercial or informational value to the organisation

How to delete data:

- Square are responsible for deleting data

Who is responsible for deleting data:

See above

Data review schedule:

Not applicable

3.7 Echo Shared Network - Office 365

Type of information held:

Data and documentation to support the running of the CIO and fulfil membership services. See NBE Data Systems Register for more details.

If personal data is stored on Office 365 a risk assessment must be undertaken by Echo staff to determine if the information is genuinely required to be stored in this area to co – ordinate required activities. If any guidance is required, they must consult the Chair, Sarah Thornton. The personal information should only be accessible to those who are required to utilise it. When deciding how long to keep data for Echo staff must consider the reason for holding the data. The following must also be considered:

- You should only keep personal data for as long as you need it. There aren't any set time limits in data protection law because it depends on your situation.
- You must think about, and be able to justify, how long you need to keep it, and this will depend on your reasons for having it.

The following principles will also inform how long data should be held for:

- Legislation governing charities and voluntary organisations;
- Reporting requirements from Charities Commission and other regulators;
- Best business practice identified within sector; and
- Responsible management of personal data.

For full guidance on CIO retention, please refer to the following document:

management-framework-for-retention-and-transfer.pdf (nationalarchives.gov.uk)

Reason for holding data:

Must be assessed per individual document depending on function and in line with ICO guidance

How to delete data:

When you delete data electronically with the intention of destroying it, you need to make sure it's no longer usable by you or anyone else. You shouldn't be able to still access or use the data after you've deleted it, such as through the recycle bin. Ensure that any deleted documents containing personal information are permanently removed by checking both the first and second stage recycling bins.

If you are unsure about deleting any data, please contact Chair, (chairman@nationalbackexchange.org) and/or Echo Management Team.

Who is responsible for deleting data:

Echo staff in consultation with NBE Chair, Sarah Thornton

Data review schedule:

Quarterly - All Trustees & Echo Staff to review personal data in documents to the best of their ability – date of review must be logged centrally for record keeping – dates to be agreed at the start of each year with Echo Management team.

3.8 Conference Booking System – Symphony

Type of information held:

See NBE Data Systems Register.

How long to keep data for:

5 years post - event

Reason for holding data:

- Post – event administration
- Legitimate interest
- Marketing

How to delete data:

Event would be deleted from Symphony.

Who is responsible for deleting data:

Echo staff

Data review schedule:

Annually - Echo Staff to review personal data on system annually. Date of review must be logged centrally for record keeping – dates to be agreed at the start of each year with Echo Management team, in consultation with Chair, as required.

3.9 Conference Booking System – Cvent

Type of information held:

See NBE Data Systems register.

How long to keep data for:

1 year post event.

Reason for holding data:

To facilitate attendees booking sessions for conference, accessing the conference programme and networking.

Attendees can access the app post event for their own reference and CPD information.

Who is responsible for deleting data:

Echo Staff.

Data review schedule:

Annually - Echo Staff to review personal data on system annually. Date of review must be logged centrally for record keeping – dates to be agreed at the start of each year with Echo Management team, in consultation with Chair, as required.

3.10 Online Events System – Zoom Webinar

Type of information held:

Name and email address in order to administer event details and post – event information.

How long to keep data for:

6 months post - event

Reason for holding data:

For post – event administration

How to delete:

Logging into Zoom account and manually deleting. Zoom webinar auto deletes webinar details also after 6 months.

Who is responsible for deleting data:

Echo staff

Data review schedule:

Annually - Echo Staff to review personal data on system annually. Date of review must be logged centrally for record keeping – dates to be agreed at the start of each year with Echo Management team, in consultation with Chair, as required.

4. Policy Review

This policy will be reviewed by the Chair, Vice Chair, or designates of the National Board of Trustees every 2 years from the date of publication or earlier depending on legal requirements, best practices, national guidelines, or organisational changes.

5. Audit – Monitoring Process

Monitoring process	Requirements
Who	• National Back Exchange Chair • Association's Administration Team
How	• The Association’s Administration Team will monitor and update the policy in consultation with the Chair of NBE, ensuring compliance with legal requirements, adherence to best practices, alignment with national guidelines, and adaptation to organisational changes.
Presented to	• Board of Trustees
Monitored by	• Sarah Thornton, Chair • Kerry Kemp, Vice Chair • Mary Muir, Publications Director • Association's Administration Team
Completion / Exception report to	• Extraordinary circumstances beyond the control of National Back Exchange and/or Association's Administration Team