

Sports Traider Charity

# GDPR Policy & Procedures

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## Data Retention Policy

### Introduction

This policy applies to all personal data held by Sports Traider Charity, electronic and other devices as well as hard copy documents stored or held on or off-site.

Under the Data Protection Act 1998 ("DPA") we are obliged to ensure that personal data (data which relates to a living individual (the data subject) who can be identified from those data) processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. Under the new GDPR, 'Personal data' now also covers IP addresses, cookies, IDs and location information.

'Sensitive personal data' (called 'Special Categories' under GDPR) will now also include biometric and genetic data.

This means that we need to:

- Review the length of time Sports Traider Charity keeps personal data;
- Consider the purpose(s) we hold the information for in deciding whether and how long we need to retain it;
- Securely delete information that is no longer needed for the purpose(s) it is held; and
- Up-date, archive or securely delete information if it goes out of date.

Important factors to consider in setting how long we need to retain personal data are:

- The longer we keep it the more likely it will be that it is out of date and inaccurate;
- We are still obliged to keep it securely even if it is out of date;
- We will need to disclose the information in the event of a subject access request from the data subject; and
- The practice of holding excessive data may result in adverse performance of the system.

## What Needs Protection

Data protection relates to the security of every aspect of the processing of personal data. Records can be both electronic and physical:

- Electronic Records can be databases, files, scanned documents, e-mails, audio, photographs etc.
- Physical Records include paper documents, correspondence, forms and reports.

The following key rules apply to Information Retention Records:

- Records must be retained where they have a necessary business purpose and to meet regulatory, funding and legal requirements. Records outside of these boundaries must be securely deleted.
- Only authorised people can access, alter, disclose personal data, and these people must be acting within the scope of their authority.
- All records in all physical and electronic locations must be deleted when outside of their retention period, this includes Sports Traider Charity records held by third parties, unless a new requirement to retain the record is known.
- At the point of contract, retention and deletion requirements must be included in the contract

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with a third party and at the end of any contract record retention and deletion must be considered and actioned.

## Provision of Data to Third Parties

Where we provide personal data to third parties to provide services through outsourcing we must ensure that we have contractual arrangements which ensure that the data will be deleted when it is no longer necessary to retain it for the purpose(s) for which it was collated. The DPA stipulates that where processing of personal data is carried out by a data processor on behalf of a data controller (Sports Traider Charity), the data controller is not to be regarded as complying with the seventh principle unless the processing is carried out under a contract which is made or evidenced in writing, and under which the data processor is to act only on instructions from the data controller, and the contract requires the data processor to comply with obligations equivalent to those imposed on a data controller.

## Secure Storage and Destruction of Personal Data

Personal data will be sent and received electronically (soft copy) and by post (hard copy).

Where possible, personal data (including e-mails) should only be held on the applicable management system and staff should avoid storing soft copies on network drives/e-mail accounts or hard copies in lockable filing cabinets/desk drawers unless it is required for evidential purposes, for example, complaints. Personal data should not be held on local drives of laptops or desktops or on portable storage devices, but where it is necessary to do so, such data must be deleted as soon as possible.

If it is necessary to store soft copies of personal data on a network drive, the electronic file in question should only be saved to a suitably secure folder on a nominated drive so that only those individuals who need to view the file are able to do so.

## Sports Traider Charity Document Retention Schedule

This document is intended to work alongside the Sports Traider Charity Schedule which provides specific requirements as to the various operational areas that we are involved in.

## General

- All data stored on personal and shared drives needs to be regularly reviewed and deleted or encrypted where applicable. (See 'Secure Storage and Destruction of Personal Data' above)
- We are also obliged to regularly review this Data Retention Policy to ensure we are not storing personal data for either too long or deleting it prematurely.
- Any data that is held on our systems must be available for disclosure in the event of a subject access request.
- All staff are obliged to observe a clear desk policy and all hard copy data must be stored securely in locked rooms, drawers and/or cabinets. Archiving must be detailed and controlled and only approved suppliers must be used when archiving off-site.
- Data deleted from local drives of desktop/laptop computers must be deleted securely by deletion of the file to the recycle bin and then emptying of the recycle bin immediately.

**Appendix 1 – Sports Traider Charity Schedule**

AREA	LEGAL/ REGULATORY RETENTION PERIOD	AGREED RETENTION PERIOD	TRIGGER  (Event which prompts start of Retention Period)	ACTION DATE	ACTION	LEGISLATION / GUIDANCE
Volunteering	"A reasonable amount of time"	2 years	Volunteer leaves to go to another setting	July/August annually	Delete from database/ Shred hard copies	DPA