

## **Cobseo – The Confederation of Service Charities**

### **Data Retention Policy**

#### **Introduction**

This Data Retention Policy will enable the Confederation to comply with the requirements of data protection legislation. Furthermore, this policy will enable the Confederation to manage and track documents and assist in providing openness and transparency to the public.

The Data Retention Policy is required to support the organised creation, retrieval, appropriate storage and preservation of the Confederation's essential records. In addition, it is essential to support the appropriate disposal of documents with no continuing business, legal or historical significance.

The period for records to be kept will depend on several factors, including:

- Legal requirements
- Storage costs
- The Confederation's need to access the document
- Historical value

#### **Scope of the Policy**

This policy encompasses the records created by the Confederation and staff in their duties for the Confederation, records received by any member of staff in the Confederation including hard copy and/or electronic records.

#### **Data Protection**

This policy will ensure that the Confederation is complying with applicable data protection legislation, which requires that we do not retain personal data for longer than is necessary.

To comply with the principles of data protection legislation, the Confederation must:

- Limit the data processed to what is necessary and required for purpose
- Only keep information for as long as there is a business need
- Keep records secure, whether electronic or paper
- Ensure records are retrievable and easily traced
- Allow a person access to information held about them, should they request it

It follows that the Confederation must:

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Destroy papers and electronic data for which there is no continuing business need and send papers that cannot be destroyed to archive for as short a time as possible

Keep data secure while it remains in any office

Keep track of where information is stored

Continue to apply these good practices to avoid stockpiling papers in the future

#### **Policy**

The Confederation will retain records for up to seven years after last contact with Members, employees (unless stated otherwise in the Confederation's HR policies), and service provider or business contacts.

All records created by the Confederation belong to the Confederation. This includes any rights or copyright in the context, except where specifically provided under copyright legislation.

All records received on behalf of the Confederation as part of its business will be its property, which may be disposed of or released as the Confederation sees fit or as required by law.

Originators' and owners' rights will be fully respected in accordance with legislation.

Responsibility for depositing and disposing of archive records lies with the Director of Operations and it is their responsibility to ensure that complete and accurate records are retained in line with legislative requirements and agreed best practice.

Responsibility for managing and tracking records lies with the Director of Operations who will determine if a file is no longer required for current business usage, which can then be added to the archive. The Director of Operations may choose to retain records for longer than the suggested 7 years if, for example, they consider records to be of significant historical value or if the issue they are concerned with remains live.