
ICE Ilfracombe operates in partnership with Ilfracombe Academy and local churches. When our workers/volunteers are working within Ilfracombe Academy or local churches or organisations, that organisation's own data protection policy will apply. ICE Ilfracombe Data Protection Policy applies only to activities organised and carried out by ICE Ilfracombe workers/volunteers specifically for ICE Ilfracombe, such as the Delta Club, and not under the auspices of Ilfracombe Academy or local churches or other organisations.

The term 'worker' applies to both employees and volunteers.

1. Data protection principles

From 25 May 2018 the General Data Protection Regulation (GDPR) replaced the Data Protection Act 1998 across the UK. In line with the GDPR, the following information sets out data protection principles to which ICE Ilfracombe is working.

- Personal data shall be processed fairly and lawfully.
- Personal data shall be held only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or purposes.
- Personal data shall be adequate, relevant and not excessive in relation to the purpose for which it is processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose.
- Personal data shall be processed in accordance with the rights of data subject under the Data Protection Act.
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of the data.

2. Data retention

Why retain information?

In practice, it means that ICE Ilfracombe will need to:

- review the length of time we keep personal data
- consider the purpose or purposes we hold the information for in deciding whether (and for how long) to retain it
- securely delete information that is no longer needed for this purpose or these purposes
- update, archive or securely delete information if it goes out of date.

Duration of retention

Retention of safeguarding information is crucial to maintaining a transparent approach on the part of the organisation, both to assist in any future investigations and also to protect reputation. With regards to all other information and data of a non-safeguarding nature, we should demonstrate evidence of giving adequate reasons to retain and safe keep such relevant information. The default standard retention period for most organisations is 6 years plus the current year to allow for a review and/or disposal to be carried out within that year.

Storage

Any personal and sensitive information needs to be kept securely in a locked filing cabinet in a place where access is limited to known/designated people. Alternatively, documents can be scanned onto a computer where the information is password protected, backed up, where the password is regularly changed and where access is limited to known people.

Record of retention

ICE Ilfracombe will keep a **Data Asset Register** that captures details of all the data we hold within the organisation. For **Safeguarding Record Retention** see **DPP Annex 1**.

Some useful principles to keep in mind when looking at data retention are:

- Does the data have any historic value (heritage) associated with the organisation?
- Does it have any safeguarding value? (i.e. potentially assist in future investigations/enquiries)
- Has explicit consent been given for retaining the information (particularly personal/sensitive data i.e. names, addresses, photographs or any other identifying information)?
- If the data has been identified for longer term retention, can it be transferred into a different format i.e. paper files to electronic copies.
- Do you need to seek legal advice or speak to your insurance company regarding data retention?

Destruction and disposal

Documents should be shredded and destruction of both electronic and paper copies should be carried out at the same time.

Signed John Roles

Chair ICE Ilfracombe Trustees

Date 17 November 2020

Reviewed _____