



Street Paws – Data Retention Policy

Lead responsibility:	Street Paws Chair Person
Approved by:	Street Paws Trustees
Operational from:	June 2018
Review due:	June 2019
Legal framework:	Data Protection Act 2018 General Data Protection Regulations 2018 Safeguarding Vulnerable Groups Act 2006

1. Introduction

This policy sets out how Street Paws will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary. It forms part of Street Paws' Data Protection Policy.

2. Roles and Responsibilities

Street Paws is the Data Controller and will determine what data is collected, retained and how it is used. The Data Protection Officer for the Organisation is the Chair Person, Michelle Southern. Michelle, together with the trustees are responsible for the secure and fair retention and use of data by the organisation. Any questions relating to data retention or use of data should be directed to the Data Protection Officer.

3. Regular Data Review

A regular review of all data will take place to establish if Street Paws 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 took place on 23rd May 2018.

Data to be reviewed

- Street Paws stores data on digital documents (e.g. spreadsheets) stored on computers held by trustees and Regional Coordinators.
- Physical data stored at the homes of trustees and Regional Coordinators.
- Contact details stored on the mobile phones of trustees and Regional Coordinators.

Who the review will be conducted by

The review will be conducted by the Data Protection Officer with others to be decided on 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).
 - 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 make a decision about what data to keep and what to delete:

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with Data Protection Policy
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

4. Statutory Requirements

Data stored by Street Paws 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
- PayPal donor lists
- Details of payments made and received (e.g. in bank statements and accounting records)
- Trustee meeting minutes
- Contracts and agreements with suppliers/contractors
- Petlog microchip database pet owner details
- Insurance details

5. Other data retention procedures

Member/volunteer and contractor data

- When a member/volunteer leaves Street Paws and all administrative tasks relating to their engagement have been completed any potentially sensitive data held on them will be deleted.
- All other data will be stored safely and securely and reviewed as part of the next two year review.

Other data

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