

UKCP Document Retention Policy

Scope

This policy applies to all staff and volunteers of UKCP.

Background

This policy is designed to ensure that documents are being stored and kept only for as long as is necessary. UKCP needs to retain documents for a number of reasons:

- Operational administrative purposes
- To demonstrate compliance with the law
- For regulatory and governance functions.
- Historical value

Data storage

It is important to have a regular overview of where personal data is stored in your department. This may include:

- Own servers
- Third party servers
- Email accounts
- Desktop
- Employee-owned devices (BYOD)
- Backup storage
- Paper files (where they form part of a filing system)

This list is not exhaustive.

Data Retention period

Generally personal data should only be retained for as long as is necessary. The retention periods can differ based on the type of data processed.

Some documents can be automatically destroyed after an agreed specified period.

Other documents will need to be reviewed at agreed intervals to determine if the document should be archived, destroyed or retained for a further period. When a decision is made the reasons must be stated and if appropriate a new review date agreed.

Legal requirements apply and could affect the retention of records including:

- The General Data Protection Regulation

- The Limitation Act 1980
- The Human Rights Act 1998
- The Equality Act 2010

In the absence of any legal requirements, personal data may only be retained for as long as is necessary for the purpose of processing. This means that the deletion of personal data should be considered when for example the data subject has withdrawn consent to processing or the data is no longer up to date. Exceptions may apply to processing for historical, statistical or scientific purposes.

After the end of a retention period of personal data, the information may not have to be completely erased if the data is anonymised. This can apply to research projects.

Roles and Responsibilities

The Data Protection Lead (DPL) will work with the Data Protection Champions to ensure that there is consistency in the retention and disposal of documents. Each Champion is responsible for ensuring that practices and systems in their areas comply with this policy and with related UKCP requirements.

All staff are accountable to their managers for compliance with this policy. All staff have a responsibility to manage document retention in their areas in a manner that is consistent with the retention schedule.

Review

This policy will be reviewed annually.