



## Data Retention Policy

### Introduction

A vital part of Flamingo Chicks Privacy Notice and practice is that personal data is retained for the appropriate period of time – neither too long nor too short. It is Flamingo Chicks policy to retain all information only for as long as specified in the Data Retention Schedule (see below).

### 1. Retention periods

Flamingo Chicks will keep some forms of information for longer than others. Information should not be kept indefinitely, unless there are specific requirements. In line with GDPR information should not be kept longer than is necessary. The date retention schedule gives a breakdown of timescales for the retention of various types of information and an overview is below:

#### 1.1 Staff and volunteers

We will retain historical data for 25 years from the termination date on anyone engaged in a position of trust (i.e. staff member or volunteer). This data will not be processed for any purposes but will be stored safely as part of our safeguarding responsibilities.

#### 1.2 Participant in our classes

Personal details for child participants will be archived after they cease to be involved and deleted after their 26th birthday unless there is a specific reason to retain it for longer (for example if they become a participant of our adult dance classes – Flamingo Dance). Personal data for all other participants and individuals (aged over 18) will be archived once their involvement ceases and deleted after six years unless there is a specific reason to retain it for longer.

#### 1.3 Supporters of our work

Personal data for all supporters of our work (corporate or individual) will be archived once their involvement ceases and deleted after six years unless there is a specific reason to retain it for longer.

### 2. Retraction of consent

If data is being processed under the lawful basis of consent and an individual retracts their consent for their data to be held or processed Flamingo Chicks will follow a twostep process:

1. Contact them via phone or email to confirm the request to retract was made intentionally and not a system error (if using an online third party such as mail chimp).
2. If intended retraction of consent then action will be taken to remove the individual and all their personal data from corresponding database with note of when consent was retracted.

Function description	Retention Action	Example of records
<b>Freelancers, volunteers and employees</b>		
All personnel administration. This will include info such as: Name, DOB, Date of appointment, Work history details, Position/designation, Titles & dates held	Permanent	Freelancer / staff register
The process of administering freelancers who don't work with children to ensure that entitlements & obligations are in accordance with agreed contract requirements	7 years from date of leaving	Contract Records of qualifications Letter of appointment (or email) DBS records References Performance records
All records relating to staff and volunteers who work with children to ensure that entitlements & obligations are in accordance with agreed contract requirements	Termination + 25 years	Any child protection records Any incident or accident reporting information Contract Records of qualifications Letter of appointment (or email) DBS records References Performance records
Occupational health records for staff and/or volunteers	Termination + 25 years	Health questionnaire Medical clearance Adjustment to work place Restrictions Recommendations
Processing of disciplinary and grievances investigations	Warnings Involving Children – Placed on personal file permanently	
DBS checks	Do not hold copies of certificates. Info retained is the date of issue; the name	

	of the subject; the type of disclosure; the position for which the disclosure was requested; the unique reference number.	
<b>Third parties</b>		
Contracts and MOUs – third party suppliers and or settings (including schools/hospices/hospitals/community centres)	Destroy five years after contract expired	Taster workshop MOUs School MOUs Contracts
<b>Administration records</b>		
Payroll	Required by HMRC for up to 6 Years  Required for Pensions queries indefinitely	
Insurance arrangements	All files retained indefinitely	Insurance policy documents Insurance claim documents
Banking	Retained for 6 years	Bank statements
Budget Preparation, Setting and Monitoring	Kept for the current year, year of audit plus 2	
Accident reporting	Date of incident + 7 years	Accident reporting forms
Risk assessments	7 years	
Annual Statement of Accounts	7 years	
<b>Class records</b>		
Participants in Flamingo Chicks classes (children's records) - including Names, medical information and accident record books pertaining to the children	Until the child reaches the age of 21 - or until the child reaches the age of 26 for child protection records	Information from sign up forms
Participants in Hatching Chicks	6 years from the date of last engagement with Flamingo Chicks	

**Supporter records**

Supporters / those interested in our work including parents, carers.

6 years from the date of last engagement with Flamingo Chicks