

DanceSyndrome Retention Procedure

1. Scope

The retention requirements of this procedure apply to all records held by DanceSyndrome, whether in electronic or hardcopy format.

2. Responsibilities

Employees in the following roles are responsible for adhering to the following GDPR requirements:

<u>Role</u>	<u>Responsibility</u>
DPO (Project Co-ordinator)	To ensure that the collection, retention and destruction of all personal data by DanceSyndrome is carried out according to the requirements of the GDPR.
Managing Director/Trustees	To ensure that all financial records, including accounting and tax records are retained.
Managing Director/Project Co-ordinator	To ensure that all HR records are retained.
Project Co-ordinator	To ensure that all Health and Safety records are retained.
Project Co-ordinator	To ensure that all relevant statutory and regulatory records are retained (with the exception of the aforementioned records listed above).
Managing Director/Project Co-ordinator	To ensure that all personal data is stored according to this procedure.
Managing Director/Project Co-ordinator	To ensure that personal data records that are retained are added to business continuity and disaster recovery protocols.

3. Procedure

The DPO is required to maintain a schedule of all personal data items held by DanceSyndrome, recording the following information:

- Record name;
- Record type;
- Original owner of personal data;
- Data classification;

Office address:

DanceSyndrome
C/O Pathway Associates
Suite 2, Waterside,
St James Court West,
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BB5 1NA

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Registered in England and Wales
Social Enterprise
and company limited by guarantee
Company No: 8402154

- Storage date;
- Retention period required;
- Planned date of destruction; and
- Any additional information such as passwords and cryptographic keys and other means to access data.

4. Electronic storage

In relation to storing electronic data, DanceSyndrome agrees not to exceed 90% of the manufacturer recommended storage life. The Project Co-ordinator and Managing Director shall be responsible for maintaining a schedule of all storage media used by DanceSyndrome and their expected shelf life, including the date on which the storage media is due to reach 90% of its expected shelf life.

Once storage media reaches the 90% mark, the Project Co-ordinator is responsible for duplicating the data onto a new storage media.

The Project Co-ordinator is also responsible for destroying personal data that has reached the end of its retention period and must do so within 30 days. All records that have been destroyed must be listed in a schedule setting out how each type of record was destroyed, by reference to classification and media.

Electronic media stored in portable or removable media must be destroyed according to Disposal of Removable Storage Media Policy.

5. Procedure for accessing stored data

DanceSyndrome shall only access stored data with the full agreement of the Board of Trustees.

6. Document owner

The DPO is the owner of this policy document and must ensure that it is periodically reviewed according to the review requirements contained herein.

The latest version of this policy document is available to all employees of DanceSyndrome on the policies section of our the website.

This policy document was approved by DanceSyndrome's Board of Trustees and is issued by the Chairperson on a version controlled basis.

Date of implementation: April 2018

Date of next review: November 2018



Signed:

Sue Blackwell, Acting Chair – DanceSyndrome – 20.04.2018

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