

# SADBURY SYMPHONY ORCHESTRA DATA RETENTION POLICY

## OVERVIEW

### Introduction

This policy sets out how Sudbury Symphony Orchestra will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary.

### Roles and responsibilities

Sudbury Symphony Orchestra is the Data Controller and will determine what data is collected, retained and how it is used. The Data Protection Officer for Sudbury Symphony Orchestra is Hilary Spivey. She, together with the committee are responsible for the secure and fair retention and use of data by Sudbury Symphony Orchestra. Any questions relating to data retention or use of data should be directed to the Data Protection Officer.

## REGULAR DATA REVIEW

A regular review of all data will take place to establish if Sudbury Symphony Orchestra 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 will take place on 8 May 2018.

### Data to be reviewed

- Sudbury Symphony Orchestra stores data in digital documents (e.g. word processing document files and spreadsheets) stored on personal devices held by committee members.
- Data stored on third party online services (e.g. Google Drive, Apple iCloud)
- Physical data stored at the homes of committee members

### Who the review will be conducted by

The review will be conducted by the Data Protection Officer with other committee members 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) and to sensitive data.
  - 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.

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## Criteria

The following criteria is used to make decisions on what data to keep and what to delete.

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage security 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 or remove the data 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 there is a 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

## Statutory Requirements

Data stored by Sudbury Symphony Orchestra may be retained based in statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

- Gift Aid declarations records
- Details of payments made and received (e.g. in bank statements and accounting records)
- Committee meeting minutes
- Contracts and agreements with suppliers/customers
- Insurance details

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### **OTHER DATA RETENTION PROCEDURES**

#### **Member data**

- When a member leaves Sudbury Symphony Orchestra and all administrative tasks relating to their membership have been completed any potentially sensitive data held on them will be deleted (e.g. bank details)
- Unless consent has been given data will be removed from all email mailing lists
- All other data will be stored safely and securely and reviewed on a two year cycle.

#### **Mailing list data**

- If an individual opts out of a mailing list their data will be removed as soon as is practically possible.
- All other data will be stored safely and securely and reviewed as part of the next two year review

#### **Conductors, leaders, extras and other third party data**

- When a conductor, leader, extra or volunteer stops working with Sudbury Symphony Orchestra and all administrative tasks relating to their work have been completed any potentially sensitive data held on them will be deleted – this might include bank details
- Unless consent has been given data will be removed from all email mailing lists
- 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.