



THE LIBERAL PARTY

DATA RETENTION POLICY

Introduction

This **Data Retention Policy** outlines how long various categories of personal data are retained by The Liberal Party. It should be read in conjunction with our **Privacy & Data Protection Policy**.

Personal data is any information, whether held in hard copy or electronic form, relating to an individual who can be identified, directly or indirectly, from that data. Processing is anything that is done with that information – it includes the collecting, editing, storing/holding/retaining, disclosing/sharing, viewing, recording, listening, erasing/deleting etc. of personal information.

In certain circumstances it will be necessary and appropriate to retain personal information, either in hard copy or electronic form, depending on the purposes for holding the information. However, it is not appropriate or practical for The Liberal Party to retain all records indefinitely. Notwithstanding the other provisions of this section, we will retain personal data:

- to the extent that we are required to do so by law, for example, for HMRC purposes
- if we believe that the information may be relevant to any ongoing or prospective legal proceedings
- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk)
- to support the ongoing business purposes of The Liberal Party as specified above (with due consideration for the rights and freedoms of individuals privacy)
- If we believe we have an overriding legitimate interest in order to do this. This is particularly the case for the “right to erasure”, where we maintain a minimal amount of information on our records

Retention of records

Data protection law does not set specific time limits for the retention of different types of personal information. It is up to data controllers to set their own retention periods, which will depend on how long the information is required in relation to the specified purposes for which it is held.

Suggested retention periods set out in the Schedule to this policy, and decisions relating to the retention (and disposal/erasure) of personal information should be taken with reference to the Schedule. However, Associations should also bear in mind the general rule that they must always be able to justify why they keep personal information in a form that permits the identification of individuals.

Disposal/erasure of records

Documents containing personal information should be disposed of confidentially and securely either by shredding or by using confidential waste bins or sacks. Such documents may include, but are not limited to, those containing names and contact details and financial information.

Electronic communications including email, Facebook pages, Twitter accounts etc. and all information stored digitally should also be reviewed regularly and if no longer required should be closed and/or permanently deleted. It is understood that the word “deletion” can mean different things in relation to electronic data, and that it is not always possible to erase all traces of it. The key issue is to put the data beyond use. Therefore, it will normally be sufficient simply to delete the information, with no intention of it ever being used or accessed again by anyone. In addition to deleting personal information from a live system, it should also be deleted from any back-up of the information on that system.

Retention of records for archiving, research or statistical purposes

Personal information can be kept indefinitely if held only for archiving purposes in the public interest; scientific or historical research purposes; or statistical purposes. There must be appropriate safeguards in place to protect individuals - for example, in some cases pseudonymisation may be appropriate. If retaining personal information for archiving purposes, it must not be used for any other purposes. In cases where archiving is considered appropriate the Data Controller or the Head of Communications should be consulted for advice.

DATA RETENTION SCHEDULE

RECORD

RETENTION PERIOD

CANVASSING & ELECTORAL INFORMATION

| | |
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| Political Opinions | 15 years from collection |
| Electoral Register Data | 15 years (subject to any updates received around changes of address) |

MEETINGS

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| Minutes & key documents of NEC meetings & Assemblies | Permanent |
| Minutes of other meetings | 7 years |
| Other papers for meetings | Delete once there is no longer a need to retain these |

EMAIL & TELEPHONE

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| Email & Telephone details | 12 months from opting out or no-longer being accessible |
| Re-consent Cycle for emails | 15 years from collection |
| Re-consent Cycle for telephone numbers for SMS | 5 years from collection |

EMPLOYMENT, MEMBERS & VOLUNTEERS

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| Pre-employment (of volunteers and paid workers) enquiries/applications/notes/letters/references | 6 months after completion of recruitment, unless data to be retained for a future similar opportunity, in which case 1 year (candidates to who this applies must be informed) |
| Confidentiality Agreements | 60 years |
| Safeguarding Risk Assessments | 60 years |
| Complaints concerning Officers, Candidates & Volunteers | 60 years |
| Employee records including: contracts, time records etc | Duration of employment + 7 years |
| Volunteer records | Duration of placement + 7 years |
| Databases for mailing lists/distribution | Reviewed annually - delete or correct out of date information |

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| Miscellaneous contact information | Delete once there is no longer a need to retain such information |
| Miscellaneous letters and emails | Delete the email/confidentially destroy the letter once no longer required |
| Payroll and pension payment records | Minimum, 7 years, no maximum |
| Pension and retirement records | Minimum 7 years beyond final pension payment, no maximum |

FINANCE

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| Audit and review workpapers | 7 years from the end of the period in which the audit or review was concluded |
| Financial records, including invoices and expenses payable, income records, bank statements and all supporting documentation | 7 years from end of year in which transaction made |
| Annual audit reports and financial statements | Permanent |
| Annual plans and budgets | 2 years |
| General ledgers | Permanent |
| Tax records | Minimum 7 years |
| Gift Aid Declarations | 7 years from end of year in which final claim made or until any current enquiries completed |
| Gift Aid Records | 7 years from end of year in which transaction made or until any current enquiries completed |
| Names, addresses and values of donations given to The Liberal Party | Indefinitely where we believe a legacy may be made to The Liberal Party. 7 years from the end of year for all other financial data. |
| Legacies (general) | 7 years after estate has been wound up |
| Legacies which create permanent endowment | Permanent |