



Appendix 3A

Data Retention Procedure & Schedule

1. Introduction

The UK General Data Protection Regulation (UK GDPR) provides that organisations which process personal data must not retain that data for any longer than is *necessary* for the purposes for which the personal data are processed.

2. Purpose

This procedure details Homes for Life Housing Partnership's (HfL) approach to the retention, deletion and destruction of personal data. All HfL personnel are obliged to familiarise themselves with this policy and refer to it on an ongoing basis to ensure that its terms are implemented and complied with.

This procedure applies to all Board Members, employees, volunteers (temporary and permanent) referred to herein as 'HfL personnel'.

3. Storage of Personal Data

HfL stores personal data in a variety of ways. This includes hard copy documents, emails, digital documents stored on desktop computers, laptops, phones and other devices, data stored on our servers and in our cloud-based storage, along with data stored by third parties on our behalf.

When updating, rectifying, erasing and deleting any personal data, due care must be taken to ensure that all personal data held in all locations (including back-up storage) and in all forms is dealt with securely and to ensure that a consistent and accurate record of personal data is maintained.

4. Retention of Personal Data

Different types of personal data may need to be retained for different periods of time depending on the purposes for which the data is processed and the legal and regulatory retention requirements in relation to certain categories of data.

In determining the appropriate retention period consideration should be given to the following factors:

- the purposes for which the personal data is processed;
- the legal basis for processing that personal data;
- legal requirements for retention (particularly employment and health and safety law); and

- regulatory requirements.

An appropriate retention period should be identified for each category of personal data. Data subjects must be informed of the retention period which applies to their personal data or, if there is no fixed retention period, the criteria used to determine that period; and where the purposes for which the data is processed have changed, any new retention period.

All personal data processed by HfL shall be retained in accordance with the periods set out in the Retention Schedule appended to this document.

Personal data will be retained in accordance with the appropriate retention period and permanently deleted and/or securely destroyed in accordance with this policy. No personal data shall be destroyed or deleted other than in accordance with this policy.

5. Review and Deletion of Personal Data

A review of the personal data processed by HfL will be carried out every 2 years. During the course of this review, we will:

- Review the retention periods for each category of personal data processed and whether any alteration to these periods is required
- Identify personal data which is due for destruction and deletion
- Arrange for the secure deletion and destruction of personal data which will no longer be retained

6. Data Subject Rights

Under the UK GDPR data subjects are entitled, in certain circumstances, to require the erasure of their personal data. Any request from a data subject must be passed to the Data Protection lead.

A data subject may insist on erasure of their personal data where:

- it is no longer necessary for the purposes for which it was processed;
- where consent has been withdrawn by the data subject;
- where there is no legal basis for the processing of the data; or
- where there is a legal obligation to delete the data.

The data subject's rights to erasure are not absolute and do not apply to personal data where processing is necessary for:

- exercising the rights of freedom of expression;
- to comply with a legal obligation in the public interest or in the exercise of an official authority;
- for public health reasons;
- for archiving purposes; and
- for the establishment, exercise or defence of legal claims.

Where personal data is erased following receipt of a request by a data subject HfL will confirm in writing to the data subject that their personal data has been destroyed. Such a response shall be issued to the data subject unless it is impossible or requires disproportionate effort to do so.

Where any request for erasure is refused, HfL will advise the data subject in writing that their request has been refused and detail the reasons for refusal.

7. Monitoring and Reporting

Regular monitoring and audits will be undertaken by the Data Protection lead and/or DPO to check compliance with the law, this policy and associated procedures. Any concerns will be raised with the Data Protection lead.

8. Policy Review

This procedure will be reviewed every 3 years or when required to address any weakness in the procedure or changes in legislation or best practice.