



Supporting LGBTI+
Young People in Ireland

Data Retention and Erasure Policy

BeLonG To Youth Services

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Revision History

Revision	Date of Release	Purpose
Initial Draft	2014	Initial Release
V2.0	May 2018	GDPR Update
V2.1	January 2019	Designated Owners and Retention Periods Updated
V2.2	May 2021	Standard Review Cycle

Policy Statement

Belong To Youth Services (*hereinafter referred to as the "Organisation"*) recognises its responsibilities under the Data Protection Acts, and the General Data Protection Regulation, to ensure confidentiality and rights of access to information for all service users, staff, volunteers, supporters and donors.

This policy and related documents meet the standards and expectations set out by contractual and legal requirements and has been developed to meet the best practices of records management, with the direct aim of ensuring a robust and structured approach to document control and systems.

Information held for longer than is necessary carries more risk and cost and can breach data protection rules and principles. The organisation only ever keeps records and information for legitimate reasons and use, and we comply fully with Irish data protection and child protection laws.

Scope

This policy applies to all staff within the Organisation (meaning permanent, fixed term, and temporary staff, any third-party representatives or sub-contractors, agency workers, volunteers, trustee's, interns, and agents engaged with the Organisation in Ireland or overseas) and pertains to the processing of personal information. Adherence to this policy is mandatory and non-compliance could lead to disciplinary action.

General Data Protection Regulation (GDPR)

Our Data Retention Policy and processes comply fully with the GDPR's fifth Article 5 principle: -

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject (**'storage limitation'**).

Objectives

The Organisation's aims and principles in relation to Data Retention are to:

- Ensure that the Organisation conducts itself in an orderly, efficient, and accountable manner
- Realise best value through improvements in the quality and flow of information and greater coordination of records and storage systems
- Support core organisation functions and providing evidence of conduct and the appropriate maintenance of associated tools, resources and outputs to service users and 3rd parties
- Meet legislative, statutory, and regulatory requirements
- Deliver services to staff, volunteers, and stakeholders in a consistent and equitable manner
- Provide continuity in the event of a disaster
- Protect the interests of the organisation and the rights of employees, volunteers, service users and present and future stakeholders
- Ensure the safe and secure disposal of confidential data and information assets
- Ensure that records and documents are retained for the legal, contractual and regulatory period stated in accordance with each body's rules or terms.
- Ensure that no document is kept for longer than is legally or contractually allowed
- Mitigate against risks or breaches in relation to confidential information

Guidelines and Procedures

The Organisation manage records efficiently and systematically, in a manner consistent with GDPR requirements. Records will be created, maintained and retained in order to provide information about, and evidence of the Organisation's transactions, customers, employment and activities. Retention schedules will govern the period that records will be retained and can be found in the **Record Retention Periods** table at the end of this document.

It is our intention to ensure that all records and the information contained therein is:

- **Accurate** - records are always reviewed to ensure that they are a full and accurate representation of the transactions, activities or practices that they document
- **Accessible** - records are always made available and accessible when required (*with additional security permissions for select staff where applicable to the document content*)
- **Complete** - records have the content, context and structure required to allow the reconstruction of the activities, practices and transactions that they document
- **Compliant** - records always comply with any record keeping, legal, and regulatory requirements
- **Monitored** – staff, volunteer, organisation and system compliance with this Data Retention Policy is regularly monitored to ensure that the objectives and principles are being complied with at all times and that all legal and regulatory requirements are being adhered to.

Retention Period Details

For all data and records obtained, used, and stored within the Organisation, we:

- Carry out periodical reviews of the data kept, checking purpose, continued validity, accuracy, and requirement to retain
- Establish periodical reviews of data retained
- Establish and verify retention periods for the data, with special consideration given in the below areas: -
 - the requirements of the Organisation
 - the type of personal data
 - the purpose of processing
 - lawful basis for processing
 - the categories of data subjects
- Where it is not possible to define a statutory or legal retention period, as per the GDPR requirement, the organisation will identify the criteria by which the period can be determined and provide this to

the data subject on request and as part of our standard information disclosures and privacy notices

- Have processes in place to ensure that records pending audit, litigation or investigation are not destroyed or altered
- Transfer paper-based records and data to an alternative media format in instances of long retention periods (*with the lifespan of the media and the ability to migrate data where necessary always being considered*)

Designated Owners

All systems and records have Designated Information Owners (DIOs) throughout their lifecycle to ensure accountability and a tiered approach to data retention and destruction. Owners are assigned based on role, organisation area and level of access to the data required. The designated owner is recorded on the Retention Register and is fully accessible to all employees and volunteers. Data and records are never reviewed, removed, accessed or destroyed without the prior authorisation and knowledge of the designated owner.

Our information audits and registers enable us to assign classifications to all records and data, thus ensuring that we are aware of the purpose, risks, regulations and requirements for all data types.

We utilise 4 main classification types:

- **Green (Public)** - information that is freely obtained from the public and as such, is not classified as being personal or confidential or information that has been specifically prepared for public release and where personally identifiable information appears consent has been received or the data is anonymous or presented in aggregate form only and no individual is identifiable.
- **Amber (Internal)** - information that is solely for internal use and is not for public consumption, this data can be shared with pre-approved third parties where a data processing agreement is in place.
- **Red (Confidential)** - information or a system that processes information that belongs to an individual and is classed as personal under the data protection laws.
- **Purple (Highly Confidential)** - private information or systems that must be secured at the highest level and are afforded access restrictions and high user authentication.

Suspension of Record Disposal for Litigation Claims

If the organisation is served with any legal request for records or information, any employee, volunteer, or trustee becomes the subject of an audit or investigation or we are notified of the commencement of any litigation against our organisation, we will suspend the disposal of any scheduled records until we are able to determine the requirement for any such records as part of a legal requirement.

Storage and Access of Records and Data

Documents are grouped together by category and then in clear date order when stored and/or archived. Documents are always retained in a secure location, with authorised personnel being the only ones to have access. Once the retention period has elapsed, the documents are either reviewed, archived or confidentially destroyed dependant on their purpose, classification and action type.

Expiration of Retention Period

Once a record or data has reached its designated retention period date, the designated owner should refer to the retention register for the action to be taken. Not all data or records are expected to be deleted upon expiration; sometimes it is sufficient to anonymise the data in accordance with the GDPR requirements or to archive records for a further period.

Destruction and Disposal of Records and Data

All information of a confidential or sensitive nature on paper, card, or electronic media must be securely destroyed when it is no longer required. This ensures compliance with the Data Protection laws and the duty of

confidentiality we owe to our employees, volunteers, service users, donors and supporters.

Paper Records

Due to the nature of our service, the Organisation retains paper based personal information and as such, has a duty to ensure that it is disposed of in a secure, confidential and compliant manner. The Organisation utilise **Cyclone Shredding, Unit 19 North Park, Finglas, D11 HVX0, Ireland** to dispose of all paper materials. Secured shredding bins are located throughout the offices and should be utilised for secure destruction.

Electronic and IT Records and Systems

The Organisation uses numerous systems, computers and technology equipment in the running of our service. From time to time, such assets must be disposed of and due to the information held on these whilst they are active, this disposal is handled in an ethical and secure manner.

Where correspondence or memoranda that do not pertain to any documents having already be assigned a retention period, they should be deleted or shredded once the purpose and usefulness of the content ceases or at a maximum, 2 years.

Examples of correspondence and routine memoranda include (but are not limited to): -

- Internal emails
- Meeting notes and agendas
- General inquiries and replies
- Letter, notes or emails of inconsequential subject matter

Erasure

In specific circumstances, data subjects' have the right to request that their personal data is erased, however the Organisation recognise that this is not an absolute 'right to be forgotten'. Data subjects only have a right to have personal data erased and to prevent processing if one of the below conditions applies: -

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
- When the individual withdraws consent
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- The personal data must be erased in order to comply with a legal obligation
- The personal data is processed in relation to the offer of information society services to a child

Special Category (Sensitive) Data

In accordance with GDPR requirements, organisations are required to have and maintain appropriate policy documents and safeguarding measures for the retention and erasure of special categories of personal data and criminal convictions etc.

Our methods and measures for destroying and erasing data are noted in this policy and apply to all forms of records and personal data.

Compliance and Monitoring

The organisation is committed to ensuring the continued compliance with this policy and any associated legislation and undertake regular audits and monitoring of our records, their management, archiving, and retention. Designated Information Owners are tasked with ensuring the continued compliance and review of records and data within their remit.

Retention Periods

The Retention Register in this policy (page 12) contains our regulatory, statutory and business retention periods and the subsequent actions upon reaching said dates. Where no defined or legal period exists for a record, the default standard retention period is 7 years.

Retention Register

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER who
Governance Records				
Records documenting the organisation's relationships and responsibilities to statutory and/or regulatory bodies and its legal responsibilities	Permanent	Public Task	Archive	Company Secretary
Business documents, policies, procedures, strategies etc	Superseded + 6 years (<i>then reviewed for archive value purposes</i>)	Contract	Review / Archive	Operations Manager
Minutes of Directors/ Trustees meetings and subcommittees of the board	Permanent	Legal – Companies Act 2014	Archive	Company Secretary
Company Registers (Members, Directors, Conflicts of Interest)	Permanent	Legal – Companies Act 2014	Archive	Company Secretary
Annual Corporate Filings	Permanent	Legal – Companies Act 2014	Archive	Company Secretary

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER <i>who</i>
Articles of Association/ Company Constitution	Permanent	Legal – Companies Act 2014	Archive	Company Secretary
Board Policies	Permanent	Public Task	Archive	Company Secretary
Tax Exemption Documents	Permanent	Revenue Requirement	Archive	Company Secretary
Risk Register	Permanent	Public Task	Archive	Risk Officer
Reviews, analysis, compliance monitoring, quality assurance, operational performance etc	8 years	Public Task	Review / Archive	CEO
Financial Records				
Chart of Accounts	Permanent	Legal Requirement: Finance Records	Archive	Finance Manager
Fiscal Policies and Procedures	Permanent	Legal Requirement: Finance Records	Archive	Finance Manager
Audits	Permanent	Legal Requirement: Finance Records	Archive	Finance Manager

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER <i>who</i>
Financial Statements	Permanent	Legal Requirement: Finance Records	Archive	Finance Manager
General Ledger	Permanent	Legal Requirement: Finance Records	Archive	Finance Manager
Check registers/ books	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager
Expense Claims	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager
Bank Deposit Slips	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager
Cancelled Cheques	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager
Investment records (depositions, earnings, withdrawals)	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager
Invoices	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER <i>who</i>
Property/asset/equipment records	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager
Petty Cash receipts/ documents	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager
Credit card receipts/ claims	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager
Procurement Records	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager
Tax Records				
Annual tax filings for the organisation	Permanent	Legal requirement: Revenue	Archive	Finance Manager
Payroll registers	Permanent	Legal Requirement	Archive	Finance Manager
Filings of fees paid to professional contractors	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER <i>who</i>
Payroll tax withholdings	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager
Earnings records	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager
Payroll tax returns	7 years	Legal Requirement: Finance Records	Destroy under confidential conditions	Finance Manager
Personnel Records				
Employee offer letters	Permanent	Public Task	Archive	CEO
Employee Contracts	Permanent	Public Task	Archive	CEO
Performance Management Reports inc. probation management	Duration of employment + 7 years	Legal Requirement	Review, Destroy under confidential conditions	CEO
References	Duration of employment + 7 years	Legal Requirement	Review, Destroy under confidential conditions	CEO
Relevant qualification including professional registrations	Duration of employment + 7 years	Legal Requirement	Review, Destroy under confidential conditions	CEO

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER <i>who</i>
Proof of Identity (Passport, Drivers Licence etc)	1 year	Legal Requirement – National Vetting Bureau (Children and Vulnerable Persons) Act 2012	Destroy under confidential conditions	CEO
Proof of Address (utility bill etc)	1 year	Legal Requirement – National Vetting Bureau (Children and Vulnerable Persons) Act 2012	Destroy under confidential conditions	CEO
Benefits descriptions per employee	Permanent	Public Task	Archive	CEO
Pension Records	Permanent	Public Task	Archive	CEO
Employee resumes and contracts	Permanent	Public Task	Archive	CEO
Promotions, demotions, letter of reprimand, termination	Permanent	Public Task	Archive	CEO
Trade Union Agreements	10 years after ceasing to be effective	Public Task	Destroy under confidential conditions	CEO
Annual Leave Records	7 years	Legal Requirement	Destroy under confidential conditions	CEO

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER <i>who</i>
Workers' Compensation records	7 years	Legal Requirement	Destroy under confidential conditions	CEO
Maternity Leave Records	7 years	Legal Requirement	Destroy under confidential conditions	CEO
Adoptive Leave Records	7 years	Legal Requirement	Destroy under confidential conditions	CEO
Timesheets	7 years	Legal Requirement: Organisation of Working Time Act	Destroy under confidential conditions	CEO
Parental Leave Records	8 years	NERA Requirement	Destroy under confidential conditions	CEO
Force Majeure Leave Records	8 years	NERA Requirement	Destroy under confidential conditions	CEO
Carers Leave	8 years	NERA Requirement	Destroy under confidential conditions	CEO
Payslips	7 years	Legal Requirement: Revenue	Destroy under confidential conditions	Finance Manager

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER <i>who</i>
Recruitment (unsolicited applications/ CVs)	1 year	NERA Requirement	Destroy under confidential conditions	CEO
Recruitment (in response to advertisement, including all documentation of the recruitment process)	2 years (unless SLA specifies a longer time period)	NERA Requirement	Destroy under confidential conditions	CEO
Redundancy Details	7 years after employment ceases	Legal Requirement	Destroy under confidential conditions	CEO
Student Placement Records	2 years following placement <i>(keep summary information only, name and dates of service)</i>	Civil Litigation	Review, Destroy under confidential conditions	Youth Work Manager
Insurance Records				
Property Insurance Policy	Permanent	Public Task	Archive	Operations Manager
Directors and Officers Insurance Policy	Permanent	Public Task	Archive	Operations Manager

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER who
General Liability Insurance Policy	Permanent	Public Task	Archive	Operations Manager
Insurance Claims Application	Permanent	Public Task	Archive	Operations Manager
Cyber Insurance Policy	Permanent	Public Task	Archive	Operations Manager
Insurance disbursements/ denials	Permanent	Public Task	Archive	Operations Manager
Contracts				
All insurance contracts	Permanent	Public Task	Archive	Operations Manager
Employee Contracts	Permanent	Legal Requirement	Archive	CEO
Construction contracts	Permanent	Public Task	Archive	Operations Manager
Legal Correspondence	Permanent	Public Task	Archive	Operations Manager

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER who
Loan/ mortgage contracts	Permanent	Public Task	Archive	Operations Manager
Leases/ deeds	Permanent	Public Task	Archive	Operations Manager
Vendor/ Supplies Contracts	7 years after expiration	Finance Records	Review, Destroy under confidential conditions	Operations Manager
Warranties	7 years after expiration	Finance Records	Review, Destroy under confidential conditions	Operations Manager
Management Plans and Procedures				
Strategic Plans	Permanent	Public Task	Archive	Operations Manager
Operational Plans	Permanent	Public Task	Archive	Operations Manager
Vendor contacts	7 years	Financial Record	Review, Destroy under confidential conditions	Operations Manager

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER who
Disaster Recovery Plan	Permanent	Public Task	Archive	Operations Manager
Health and Safety				
Incident/Accident Report Book	10 years from date of incident if no claim made in the interim	Civil Litigation	Destroy under confidential conditions	Health and Safety Officer
Incident/Accident Investigation Reports	10 years from the date of accident if no claim made in interim	Civil Litigation	Destroy under confidential conditions	Health and Safety Officer
Accident Reports	Retain indefinitely in original form. If they contain personal data, delete personal data after 10 years and retain report only if it has precedent value.	Civil Litigation	Destroy under confidential conditions, archive documents of precedent value	Health and Safety Officer
Health and Safety Investigation Reports	10 years from dates of accident if no claim made in interim, permanent if subject to a claim	Civil Litigation	Destroy under confidential conditions	Health and Safety Officer

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER who
Routine Health and Safety Audits/Monitoring Reports/ Risk Assessments	Permanent	Civil Litigation	Archive	Health and Safety Officer
Safety Training Documentation	10 years	Civil Litigation	Destroy under confidential conditions	Health and Safety Officer
<u>Service Users Records/ Case Histories/ Youth Work Records</u>				
Help, Support, and Informational Call Logs, Website Queries	7 years	Civil Litigation	Review, of Archive Value, Anonymize, Destroy under confidential conditions	Youth Work Manager
Case Notes/ Histories (minors under 18 years of age at time of accessing service)	Retain until the data subjects 26 th Birthday ensuring that records are held of 7 years following end of service access	Civil Litigation	Review, Destroy under confidential conditions	Youth Work Manager
Case Notes/ Histories (young adult, over 18, at time of accessing service)	Retain until the data subjects 35 th Birthday	Civil Litigation	Review, Destroy under confidential conditions	Youth Work Manager
Group and Individual Attendance Records	7 years	Civil Litigation	Review, Destroy under confidential conditions	Youth Work Manager

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER who
Anonymous Statistical Information	Permanent	Public Interest	Archive	Youth Work Manager
Deceased (non-suicide) Service Users Records	8 years, following death if still an active service user at the time of passing	Child Protection Best Practice	Destroy under confidential conditions	Youth Work Manager
Deceased (suicide) Service Users Records	10 years, following death if still an active service user at the time of passing	Child Protection Best Practice	Destroy under confidential conditions	Youth Work Manager
Non-Active Service User	7 years	Civil Litigation	Destroy under confidential conditions	Youth Work Manager
Records Created under Child Care Acts	Permanent	Legal Requirement under the Child Care Act 1991	Archive	Youth Work Manager
Child Protection Records				
Child Welfare Concerns (<i>not resulting in a Child Protection report to TUSLA</i>)	Permanent	Child Protection Best Practice	Archive	Designated Liaison Person
Child Protection Reports (<i>made either to TUSLA/ Gardai</i>)	Permanent	Child Protection Best Practice	Archive	Designated Liaison Person

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER who
Allegations/ Complaints of Abuse (Regardless of outcome)	Permanent	Child Protection Best Practice	Archive	Designated Liaison Person
Training and Events				
Event/ Training Registrations	7 years	Civil Litigation	Destroy under confidential conditions	Operations Manager
Marketing/ Communications				
Marketing, Promotional Emails, Campaign Performance Reports	2 years after last action (<i>then reviewed for archive value purposes – anonymize</i>)	Consent	Review / Archive	Communications Manager
General Email Correspondence	7 Years (except where part of other records, e.g. complaints, child protection, provision of support services etc – and a longer retention period applies)	Civil Litigation	Review, Destroy under confidential conditions	Operations Manager
Photo, Video, and Audio Consent Forms	Kept for as long as the data subject to the consent is still being processed.	Evidentiary requirement for the Data Protection Commission to maintain evidence of consent to process	Destroy under confidential conditions once the data subject to the consent is destroyed/ no longer processed.	Communications Manager

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER <i>who</i>
Photographs, Video Files, Audio Recordings – used for marketing, promotional, or fundraising purposes.	7 years	Legitimate Business Interest	Review/ Archive	Communications Manager
Photographs, Video Files, Audio Recordings – of archival or public interest benefit.	Permanent	Public Interest	Archive	Communications Manager
Other/ Misc. Records				
Employee Diaries/ Notepads	7 years	Civil Litigation	Destroy under confidential conditions	Operations Manager
Phone Logs (inbound and outbound calls)	7 years	Civil Litigation	Destroy under confidential conditions	Operations Manager
Garda Vetting Records				
Garda Vetting Application Forms	1 year	Recommended by Data Protection Commissioner because of security issues.	Destroy under confidential conditions	Designated Liaison Person

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER <i>who</i>
Garda Vetting Disclosures	1 year (retain number and date only)	Recommended by Data Protection Commissioner because of security issues.	Destroy under confidential conditions Archive, number, and date in encrypted file	Designated Liaison Person
Garda Vetting Risk Assessment (successful applicants)	1 Year	Recommended by Data Protection Commissioner because of security issues.	Destroy under confidential conditions	Designated Liaison Person
Garda Vetting Risk Assessment (unsuccessful applicants)	1 year	Recommended by Data Protection Commissioner because of security issues.	Destroy under confidential conditions	Designated Liaison Person
Garda Vetting Confirmation Notices	1 year	Recommended by Data Protection Commissioner because of security issues.	Destroy under confidential conditions	Designated Liaison Person

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER <i>who</i>
Data Protection Requests and Complaints				
Data Destruction Register	Permanent	Data Protection Commission Requirement	Archive	Data Protection Team
Complaints (organisation)	7 years (other than cases still ongoing, that involved action, or that create a precedent)	Recommended by Data Protection Commissioner because of security issues.	Destroy under confidential conditions Archive precedent setting complaints	Complaints Officer
Data Protection Requests	7 years (aggregate data on number of requests archived)	Recommended by Data Protection Commissioner because of security issues.	Destroy under confidential conditions	Data Protection Team
Data Breach Records	7 years (aggregate data on number of and categories of breach)	Recommended by Data Protection Commissioner because of security issues.	Destroy under confidential conditions	Data Protection Team
Ombudsman/Information Commissioner Requests	7 years	Best practice standard as specified by the HSE	Destroy under confidential conditions	Operations Manager

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER <i>who</i>
Legal Records				
Records/ documents related to any litigation	As recommended by the organisations legal team. Review at 10-year intervals	Civil Litigation	Review, Archive, Destroy under confidential conditions	CEO
Legal Correspondence/ Advices	As recommend by the organisations legal team. Review at 10-year intervals	Civil Litigation	Review, Archive, Destroy under confidential conditions	CEO
Fundraising/ Donation Records				
Non-active donor details (non-active defined not having had any donor-initiated contact (gifts etc))	7 years	Finance Record	Destroy under confidential conditions	Fundraising Manager
Donor Credit and Debit Card Data and/or bank account details for "once-off" donations	Until reconciliation and audit is completed +7 years	Data Protection Requirement/ Finance Record	Destroy under confidential conditions	Fundraising Manager

RECORD <i>Information, data, or records</i>	RETENTION PERIOD <i>Period for keeping record and organisation notes</i>	REQUIREMENT <i>Purpose of retention</i>	ACTION <i>Destroy, archive, review, etc</i>	DESIGNATED OWNER who
Donor PPSNs (with the exception of those donations where relief is still claimable)	7 years post year of final claim.	Data Protection Requirement	Destroy under confidential conditions	Fundraising Manager
Donor Dates of Birth	Length of donor activity, Review for archival value (anonymize)	Identity validation and verification, secondary use for profiling purposes	Review, Archive	Fundraising Manager

If there is uncertainty for any specific piece of data, it is good practice to keep records for six years to cover the time limit for civil legal action. Where documents may be relevant to a contractual claim, it is recommended that these be retained for at least the corresponding 6-year limitation period.