



Data retention policy

Introduction

This policy sets out how Durham choral Society (DCS) will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary.

It forms part of DCS Data Protection Policy.

Roles and responsibilities

DCS is the Data Controller and will determine what data is collected, retained and how it is used. The Data Protection Officer for DCS is the Membership Secretary. They, together with the committee are responsible for the secure and fair retention and use of data by DCS. 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 DCS 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 in August 2024.

Data to be reviewed

- DCS stores data on digital documents (e.g., spreadsheets) stored on personal devices held by committee members.
- Data stored on third party online services (e.g., Google Drive, Mail Chimp, online banking)
- 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.

Criteria

The following criteria will be used to make a decision about what data to keep and what to delete.

Question	Action	
	Yes	No
Is it necessary to store data on personal computers?	Continue to use	Upload to Google Drive and access from there
Is the data stored securely?	No action necessary	Update storage protocol 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/remove 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 we have 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 DCS may be retained based on 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)
- Trustee meeting minutes
- Contracts and agreements with suppliers/customers
- Insurance details
- Tax and employment records

Other data retention procedures

Member data

- When a member leaves DCS and all administrative tasks relating to their membership have been completed any potentially sensitive data held on them will be deleted – this might include bank details or medical data
- Former members can request that their contact details are removed from promotional mailing lists at any time either by contacting the Membership Secretary or by selecting the Unsubscribe option included in all messages.
- All other data will be stored safely and securely and reviewed as part of the next two-year review

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

Volunteer and freelancer data

- When a volunteer or freelancer stops working with DCS 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 or medical data
- 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.

Document History

Summer 2022	Policy developed based on Making Music template	
September 2022	Policy adopted by Committee	
September 2024	REviewed, no changes made	✓
September 2026	Scheduled review (earlier if legislation changes)	

Data retention Schedule

The Data Retention schedule is below.

Definitions for:

Archive	Deposit with Durham University Archives and Special Collections
Destroy	Shred, delete or otherwise destroy permanently
Review	Review materials for continued usefulness and then decide on archive or destroy.

Function	Activity	Vital	Retention Period as current records	Disposal method	Citations and notes
Charity Governance	Constitution	Yes	While current + 10 years	Archive	
	Standing orders	Yes	Until superseded	Archive	
	Policies - adopted	Yes	Until superseded	Archive	
	Policies under development or review	Yes	Until adopted	Archive	
Committee meetings	Agenda	Yes	5 years	Archive	
	Minutes	Yes	5 years	Archive	
AGM/EGM	AGM/EGM agenda	Yes	7 years	Archive	
	AGM/EGM minutes	Yes	7 years	Archive	
	Annual returns	Yes	7 years	Archive	Also available on Charities Commission website
	Chair's report	Yes	7 years	Archive	
	Nomination papers	Yes	2 years	Review	needs to be consistent with data protection policy

Function	Activity	Vital	Retention Period as current records	Disposal method	Citations and notes
Finance	Annual accounts	Yes	7 years	Archive	Also available on Charities Commission website
	Bank statements	Yes	7 years	Archive	Financial implications
	Concert balances	Yes	7 years	Archive	Financial implications
	Auditor's statements	Yes	7 years	Archive	Financial implications
Planning	Away days		2 years	Review	
	Working groups		2 years	Review	
	Future venue bookings		5 years	Review	
	Musical programme		5 years	Review	
People - personal data	Committee members	Yes	End of tenure + 6 years	Destroy	needs to be consistent with data protection policy
	Trustees	Yes	End of tenure + 6 years	Destroy	Records have financial implications
	Members	Yes	Last paid-up year +1 year or on request	Destroy	needs to be consistent with data protection policy

Function	Activity	Vital	Retention Period as current records	Disposal method	Citations and notes
	Friends	Yes	Last paid-up year + 1 year or on request	Destroy	needs to be consistent with data protection policy
	President and Vice Presidents	Yes	On request	Destroy	needs to be consistent with data protection policy
	Musical Team	Yes	Last year of engagement + 6 years	Destroy	needs to be consistent with data protection policy
	Orchestra members	Yes	Last year of engagement + 6 years	Destroy	needs to be consistent with data protection policy
	Soloists	Yes	Last year of engagement + 6 years	Destroy	needs to be consistent with data protection policy
Music Library	Purchased scores		Until periodic stock-take	Review	
	Commissions	Yes	In perpetuity	Do not dispose	Includes contracts, choral and orchestral scores, programme notes
	Recordings	Yes	In perpetuity	Do not dispose	
Concerts	Orchestra	Yes	Last year of engagement + 6 years	Review	Financial implications
	Soloists	Yes	Last year of engagement + 6 years	Review	Financial implications

Function	Activity	Vital	Retention Period as current records	Disposal method	Citations and notes
	Venues	Yes	Year of concert + 6 years	Review	Financial implications
	Equipment hire	Yes	Year of concert + 6 years	Review	Financial implications
	Ephemera	Yes	In perpetuity	Archive	Financial implications

Version history:

March 2018	Created based on Making Music template
September 2018	Updated: – addition of Data breach clauses
July 2022	Revised and adopted by the committee on September 2022
September 2024	Review due; reviewed July 2024 and no changes made.
Summer 2026	Scheduled review date

