



DATA PROTECTION

Data Retention Policy



JULY 12, 2021

FULL GOSPEL MISSION

Vale Road, St Sampson, Guernsey, GY2 4DP

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DATA RETENTION POLICY

Registered Charity Number: CH131

Data Protection Authority Registration Number: DPA6714

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purpose we collected it for including the purposes of satisfying any legal, pastoral, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some instances, we are required by law to keep information for a specific period.

In some circumstances you can ask us to delete your data: see our Data Privacy Policy.

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1. Introduction

- 1.1. Full Gospel Mission gathers personal information from individuals and external organisations as well as generating a wide range of personal data, all of which is recorded in documents and records, both in hard copy and electronic form.
- 1.2. Examples of the types of information accumulated and generated are set out in Appendix 1 of this policy and include but are not limited to minutes of leadership meetings; membership; baptismal information; marriage information; employment records; contact details and communications such as letters and emails.
- 1.3. In certain circumstances it will be necessary to retain documents to meet legal requirements and for operational needs. Document retention is also required to evidence agreements or events and to preserve information.
- 1.4. It is however not practical or appropriate for Full Gospel Mission to retain all records. Additionally, data protection principles require information to be as up to date and accurate as possible. It is therefore important that we have in place systems for the timely and secure disposal of documents that are no longer required.
- 1.5. This Data Retention Policy was adopted by the Full Gospel Mission on 12th July 2021 and will be implemented on a day to day basis.

2. Roles and Responsibilities

- 2.1. Full Gospel Mission Leaders, Trustees, and those involved with safeguarding will adopt the retention and disposal guidance at Appendix 1 of this policy and strive to keep records up to date.
- 2.2. Advice will be obtained from the relevant States of Guernsey Department if there is uncertainty about legal requirement retention periods.

3. Retention and Disposal Policy

- 3.1. Decisions relating to the retention and disposal of data should be guided by:
 - 3.1.1. Appendix 1 – Document Retention Schedule – Guidance on the recommended and statutory minimum retention periods for specific types of documents and records.

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3.1.2. Appendix 2 – Quick Guide to document retention.

3.2. In circumstances where the retention period for a specific document or category of documents has expired, a review should be carried out prior to disposal and consideration should be given to the method of disposal.

4. Disposal

4.1. Documents containing confidential or personal information should be disposed of either by shredding or by using confidential waste bins or sacks. Such documentation is likely to include financial details, contact lists with names and addresses and pastoral information.

4.2. Documents other than those containing confidential or personal information may be disposed of by recycling or binning.

4.3. Electronic communications including email, text, Facebook pages, Messenger accounts etc and all information stored digitally should also be reviewed and if no longer required, closed and/or deleted so as to be put beyond use. This should not be done simply by archiving, which is not the same as deletion. It will often be sufficient simply to delete the information, with no intention of ever using or accessing it again, despite the fact that it may still exist in the electronic ether. Information will be deemed to be put beyond use if the Full Gospel Mission is not able, or will not attempt, to use it to inform any decision in respect of any individual or in a manner that affects the individual in any way and does not give any other organisation access to it.

4.4. Deletion can also be effected by using one of the following methods of disposal:-

- Using secure deletion software which can overwrite data;
- Using the function of “restore to factory settings” (where information is not stored in a removeable format);
- Sending the device to a specialist who will securely delete the data.

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Appendix 1

Data Retention Schedule

This Schedule is provided as a guide to common types of documents but is not exhaustive.

NOTE: There may be an historic interest in the Full Gospel Mission's records. If you think that archiving other records is preferable to destruction, you should contact the Full Gospel Mission, and we will organise archiving where appropriate.

Avoid retaining information if there is no reason for doing so.

RECORD	RETENTION PERIOD
Minutes of meetings	6 years
Assembly meetings	50 years
Pre-employment 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)
Safeguarding Service confirmation of advice, emails, letters	100 years
Confidentiality Agreements	100 years
Safeguarding Service Risk Assessments	100 years
Complaints concerning people	100 years

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Congregational Register	100 years
Employee records including: contracts, time records etc	Duration of employment + 6 years
Volunteer records	Duration of placement + 6 years
Databases for mailing lists/distribution	Reviewed annually, delete out of date information
Miscellaneous contact information	Delete once there is no longer a requirement to hold such information
Arranged accommodation/placements (e.g. overseas visitors)	3 years following end of event/placement
Documents relating to litigation or potential litigation	Until matter is concluded plus 6 years
Hazardous material exposures	30 years
Injury and Illness Incident Reports	5 years
Pension plans and retirement records	Permanent
Salary schedules; ranges for each job description	2 years
Payroll Records	Minimum, 6 years. No maximum
Contracts	6 years following expiration
Construction documents	Permanent
Fixed Asset Records	Permanent
Application for charitable and/or tax-exempt status	Permanent

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Sales and purchase records	5 years
Resolutions	Permanent
Audit and review workpapers	5 years from the end of the period in which the audit or review was concluded
Guernsey Register of Charities filings	5 years from date of filing
Records of financial donations	6 years
Accounts Payable and Receivables ledgers and schedules	6 years
Annual audit reports and financial statements	Permanent
Annual plans and budgets	2 years
Bank statements, cancelled cheques, deposit slips	Minimum of 6 years
Business expense records	6 years
Cash receipts	3 years
Cheque registers	Permanent
Employee Expense Reports	6 years
Employee expense reports	6 years
General ledgers	Permanent

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Journal Entries	6 years
Invoices	6 years
Petty Cash Vouchers	3 years
Tax records	Minimum 6 years
Filings of fees paid to professionals	6 years
Environmental studies	Permanent
Insurance claims/ applications	Permanent
Insurance disbursements and denials	Permanent
Insurance contracts and policies	Permanent
Leases	6 years after expiration
Real estate documents (including loan and mortgage contracts, title deeds)	Permanent
Warranties	Duration of warranty + 6 years
Records relating to potential, or actual, legal proceedings	Conclusion of any tribunal or litigation proceedings + 6 years

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Appendix 2

General guidance for documents **NOT** included in the retention schedule.

On-going business use is subjective, but generally refers to documents still required for on-going projects, or documents that may still need to be referred to for on-going activities.

