

BLOOMSBURY FESTIVAL: DATA RETENTION POLICY

A vital part of Bloomsbury Festival’s Data Protection Policy and practice is that personal data is retained for appropriate periods of time – neither too long nor too short.

The following data retention schedule has been created inline with GDPR legislation, for which the Information Commissioners Office does not provide a guide on how long personal data can be stored and processed for, rather it states: ‘personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes’.

This schedule below gives an indication of the kind of personal data which Bloomsbury Festival will retain and for how long. The schedule below outlines the maximum period for retention. If there is no need to keep personal data that long, then it will be disposed of securely. Some categories of data (*) may be anonymised after the retention timescale and still processed.

DATE SCHEDULE IMPLEMENTATION

Bloomsbury Festival is small charitable organisation. We have implemented a ‘data cycle’ to work inline with our tax year. Data will be destroyed or archived at the completion of each tax year as per the schedule below, unless it is to be retained for legal or contractual reasons.

DATA RETENTION SCHEDULE

Category	Data form	Retention Timescale (years)	Action following retention	Complies with
Finance	Annual accounts	Permanent	Permanent	GDPR: legal
	Monthly statements	Current tax year + 5	Destroy	GDPR / Company Policy
	Staff expenses	Current tax year + 5	Destroy	GDPR / Company Policy
	Invoices (include freelance staff fees)	Current tax year + 5	Destroy	GDPR / Company Policy
	Orders	Current tax year + 5	Destroy	GDPR / Company Policy
	Purchase records	Current tax year + 5	Destroy	GDPR / Company Policy
HR	Current freelance staff details	Retain	See below	Company Policy
	Former freelance staff details	Current tax year + 5	Destroy	GDPR / Company Policy
	Appraisals / reviews	Current tax year + 1	Destroy	GDPR / Company Policy

	Disciplinary records	Current tax year + 1	Destroy	GDPR / Company Policy
	Grievance records	Current tax year + 1	Destroy	GDPR / Company Policy
	CVs	Current tax year + 3	Destroy	GDPR / Company Policy
	Maternity/paternity request	Current tax year + 5	Destroy	GDPR / Company Policy
	Personnel files	Current tax year + 5	Destroy	GDPR / Company Policy
	Training records	Current tax year + 5	Destroy	GDPR / Company Policy
	Redundancy details	Current tax year + 5	Destroy	GDPR / Company Policy
	Successful job applications	Current tax year + 3	Destroy	GDPR / Company Policy
	Unsuccessful job applications	Current tax year + 3	Destroy	GDPR / Company Policy
	Successful commission applications	Current tax year + 3	Destroy	GDPR / Company Policy
	Unsuccessful commission applications	Current tax year + 3	Destroy	GDPR / Company Policy
	Interview notes	Current tax year + 1	Destroy	GDPR / Company Policy
	Active contractor bank details	Retain	See below	GDPR / Company Policy
	Not active bank details	Current tax year + 5	Destroy	GDPR / Company Policy
H & S	Health & safety reports and records	Retain	Archive	GDPR: legal / Company Policy
	Risk assessments	Retain	Archive	GDPR: legal / Company Policy
	Accident book	Retain	Archive	GDPR: legal / Company Policy
	Safety training records	Retain	Archive	GDPR: legal / Company Policy
	Fire certificates	Retain	Archive	GDPR: legal / Company Policy
	Fire risk assessments and plans	Retain	Archive	GDPR: legal / Company Policy
	Fire log	Retain	Archive	GDPR: legal / Company Policy
Insurance	Insurance policy and claims	Retain	Archive	GDPR: legal / Company Policy
Building / Business	Building plans	Retain	Archive	GDPR: legal / Company Policy
	Waste disposal plans and docs	Retain	Archive	GDPR: legal / Company Policy
	Business plans	Retain	Archive	GDPR: legal / Company Policy

	Lease information	Retain	Archive	GDPR: legal / Company Policy
Marketing Materials	Flyers, brochures, leaflets	Retain	Archive	GDPR: legal / Company Policy
	Press cuttings	Retain	Archive	GDPR: legal / Company Policy
	Website archive	Retain	Archive	GDPR: legal / Company Policy
Marketing data	Direct Marketing: e-newsletter	Current tax year + 2*	Destroy	GDPR: Consent / Company Policy
Feedback*	Audience feedback forms	Current tax year + 10	Anonymised	GDPR: Consent / Company Policy
Board & SMT	Minutes	Retain	Archive	GDPR: legal / Company Policy
	Board papers	Retain	Archive	GDPR: legal / Company Policy

NB: E-newsletter data will be kept for 'current tax year + 2' only if the subscription has not been active: Bloomsbury Festival is able to monitor who opens and clicks on emails, if neither of these actions have been taken by an individual after 'current tax year + 2' their subscription data will be destroyed.

DATA STORAGE, RETENTION, ACCESS AND ERASURE

Bloomsbury Festival will never share your data. The data we hold about you is in your control. It easy to access, amend or erase, where Bloomsbury Festival is not required to keep it by law/contract. You can do so by emailing Kate@bloomsburytheatre.org.uk