

Data Retention Policy – Starter Template (Charity)

Organisation Name: [Insert Charity Name]

Version: 1.0

Approved by: [Board / Trustees]

Date Approved: [DD/MM/YYYY]

Next Review Date: [DD/MM/YYYY]

1. Purpose

This Data Retention Policy sets out how long [Organisation Name] retains personal data and the principles that guide the review, archiving, anonymisation, and deletion of that data.

The policy ensures that personal data is:

- Not kept longer than necessary
 - Retained only for clear and lawful purposes
 - Managed in line with data protection legislation and best practice
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2. Scope

This policy applies to:

- All personal data held by the organisation
 - All staff, trustees, volunteers, contractors, and suppliers
 - All formats, including digital systems, spreadsheets, email, backups, and paper records
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3. Principles

We retain personal data in line with the following principles:

- Retention periods are linked to purpose, not convenience
- Different types of supporters require different retention approaches
- Data is reviewed regularly and not left to accumulate indefinitely
- Where possible, data is anonymised rather than retained in identifiable form
- Destruction of data is secure and auditable

4. Roles and Responsibilities

- **Board / Trustees:** Oversight and approval of this policy
 - **Senior Management:** Ensure the policy is implemented and resourced
 - **Data Protection Lead:** Owns retention schedules and oversees deletion
 - **All Staff and Volunteers:** Follow retention guidance and flag data that may no longer be required
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5. Retention Periods – Supporter Data (Best Practice Guidance)

Retention periods begin from the **last meaningful interaction** unless otherwise stated.

Supporter Types and Suggested Retention Periods

Supporter Type	Examples	Suggested Retention Period	Rationale
One-off / Individual Givers	Single donations, event gifts	6 years after last donation	HMRC and financial audit requirements
Regular Givers	Direct Debits, recurring donations	6 years after final payment	Financial records + reasonable supporter relationship
Major Donors	High-value gifts, relationship-managed donors	6–7 years after last meaningful engagement	Longer stewardship cycle and audit needs
Legacy Pledgers (Known)	Individuals who have notified the charity of a legacy intention	Until legacy realised or 6 years after last contact	Long-term relationship with low contact frequency
Legacy Prospects (Unconfirmed)	Inferred or researched prospects	2–3 years from last engagement	Higher risk; purpose must remain clear
Community Fundraisers	Challenge events, peer-to-peer fundraising	3–6 years after last activity	Stewardship balanced with relevance

Campaigners / Advocates	Petition sign-ups, activism	2–3 years after last interaction	Engagement relevance declines quickly
Volunteers	Active volunteers	Duration of volunteering + 3 years	Safeguarding and duty of care
Inactive Supporters	No engagement across any channel	2 years then anonymise	Data minimisation and risk reduction

6. Other Common Charity Data Types

Data Type	Suggested Retention Period
Gift Aid Declarations	6 years after last claim
Financial Transaction Records	6–7 years
Beneficiary Case Records	As defined by safeguarding / service needs (often 6–7 years after last contact)
Complaints Records	6 years
Marketing Preferences & Consent Logs	As long as consent is relied upon + audit period
Training Records	Duration of role + 3 years

7. Review and Archiving

- Data must be reviewed periodically to confirm it is still required
 - Where operational need has ended, data should be anonymised where possible
 - Archived data must remain secure and access-controlled
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8. Destruction and Disposal

When retention periods expire:

- Digital records are securely deleted
- Paper records are shredded or confidentially destroyed

- Destruction activities are logged where appropriate
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9. Exceptions

In some circumstances, data may be retained longer than stated, including:

- Legal claims or disputes
- Safeguarding investigations
- Contractual obligations

Any exceptions must be documented and approved by the Data Protection Lead.

10. Review of this Policy

This policy is reviewed at least annually and updated to reflect changes in legislation, guidance, or organisational practice.