



# The Spitfire Makers Charitable Trust

## General Data Protection Regulation Policy

### Introduction

This policy explains how we will store information about you and how we will dispose of it. Please view our Data Protection Policy for details of how we collect, use, process and store your data and your rights of access to it.

This policy applies to all personal data – that is information which could be used to identify you or identified as relating to you. It does not apply to data which cannot be traced back to an individual.

Please note that information about you may be stored and processed under more than one category. For example, you may be both a volunteer and a supporter or donor who has provided historical information.

### Emails

Information provided to us by email or other electronic means will be transferred to the appropriate place and the electronic messages will be deleted regularly. Email boxes will be checked at least every 6 months to ensure that messages have been deleted.

### Text Messages

All text messages will be reviewed and deleted every 6 months.

### Notebooks

Any notebooks used by volunteers, Project Team, Trustees and Board members which contain personal or sensitive information will be stored securely during use. Once completed the notebooks will be held indefinitely in a secure location.

### Photographs and Recordings

Named photographs associated with records will be destroyed according to the retention guidelines provided by the Information Commissioners Office. If you have given permission for photographs or recordings to be taken and used for publicity or the benefit of others i.e. historical value, they will be kept indefinitely, either by us or by an associated partner archive. If you ask us not to continue to use the photographs, we will make every reasonable effort to destroy them.

### Official Meetings

It is accepted that official records of Trustee's meetings, Annual General Meetings and Special Meetings relating to the Trust must be available for review and held indefinitely. It is not anticipated that personal data other than names and associated organisations will be included in these meetings.

## How will Spitfire Makers store data and for how long?

### 1. Volunteers

Type of Information	Storage	Kept for
Volunteer application form	Paper version in locked file cabinet. Email version printed and kept as above. Information transferred to secure database	Application form kept for 1-2 years from date of application. Email printed and then deleted within 6 months
Emergency Contact Information	Paper version in locked file cabinet. Information transferred to secure database.	All information deleted or destroyed on resignation of volunteer
Volunteer Record	Paper version in locked file cabinet	6 years after resignation of volunteer
Financial Information e.g. bank details for expenses	Paper records in locked file cabinet. Information transferred to secure financial database	6 years from end of financial year recorded in
Health & Safety records	Details of any accidents or injuries kept in locked file cabinet	3-4 years in "accident file" unless classed as a serious incident
Serious Incidents	Paper version in locked file cabinet. Electronic documentation password protected.	10 years from year of incident. May be kept longer at discretion of Trustees e.g. if needed for legal reasons
Contact details in other places – email groups etc.	Electronic equipment – laptops, mobile phones etc. to be password or pin protected	Removed from lists after resignation of volunteer. Contact details may be transferred to Supporters database if requested
DBS form and continuous consent form (if required)	Paper version in locked file cabinet	Destroyed on resignation of volunteer
DBS – positive disclosure information and risk assessment	Held in a secure file marked Private and Confidential in locked file cabinet	Kept during risk assessment process and for up to 6 months afterwards
Risk assessment for positive DBS disclosure	Held in a secure file marked Private and Confidential in locked file cabinet	Risk assessment kept for 6 years after resignation of volunteer

Identifiable information passed on to trustees or volunteers for specific tasks will be limited only to the information required to complete the task. A copy of the Confidentiality and Data Protection Policies will be provided to all with a reminder to keep the data safe and destroy it securely when no longer required.

## 2. Contractors or Employees

Type of Information	Storage	Kept for
Application form or contract documents	Paper version in locked file cabinet or electronic version in password protected file	Duration of employment contract
Financial information e.g. expense claims	Paper records in locked file cabinet. Information transferred to secure financial database	6 years from end of financial year recorded in
Personal information	Paper version in locked file cabinet or electronic version in password protected file	6 years from resignation of employee or end of contract
Emergency contact information	Paper version in locked file cabinet. Information transferred to secure database.	Deleted or destroyed on resignation or end of contract

## 3. Supporters and Donors

Type of Information	Storage	Kept for
Contact details for specific events	Paper version in locked file cabinet. Information transferred to secure database.	Deleted when requested by the supporter or Donor
Financial information e.g. donations	Paper records in locked file cabinet. Information transferred to secure financial database	6 years from end of financial year recorded in
Supporter email list	Paper version in locked file cabinet. Information transferred to secure database	Deleted when requested by the supporter
Donated historical information and consent forms	All records, paper, photographic or digital kept in locked or managed associated archive files.	Indefinitely with consent. Deleted when requested by the supporter or Donor

## 4. Back up information

Spitfire Makers will keep a backup of database information in the “Cloud” and a hard copy in a locked file cabinet.

Date	Version	Agreed/Reviewed by	Agreed/Reviewed Date
13.04.20	Draft 0.1	Board of Trustees	
09.06.20	Version 1	Agreed	Review June 2021
01.03.21	V1	Reviewed by Trustees	Agreed: review 04.22