

Data Retention Policy

1. Purpose

Global Anaesthesia Development Partnerships (GADP) is committed to retaining personal data and other organisational records only for as long as necessary to fulfil the purpose for which they were collected, to meet legal, regulatory and contractual obligations, and to support the effective operation of the charity.

This policy sets out GADP's approach to retaining, reviewing and securely disposing of records in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable legal requirements.

2. Scope

This policy applies to all records created, received or maintained by GADP in the course of its activities, whether held electronically or in paper format. This includes, but is not limited to:

- personal data
- volunteer and recruitment records
- contractor records
- governance records
- financial records
- grant documentation
- emails
- databases
- photographs and other electronic records

3. Retention principles

GADP will:

- retain records only for as long as necessary
- comply with legal and regulatory retention requirements
- store records securely throughout their retention period
- review records periodically to determine whether they should be retained or securely destroyed
- securely dispose of records that are no longer required

Where records are required for ongoing legal proceedings, investigations or regulatory purposes, they may be retained beyond the normal retention period until the matter has been concluded.

4. Responsibilities

The Chief Executive Officer has overall responsibility for ensuring this policy is implemented.

Everyone creating or managing records on behalf of GADP is responsible for ensuring that records are:

- stored securely
- retained in accordance with this policy
- disposed of securely when no longer required

5. Secure storage and disposal

During their retention period, records must be stored securely to prevent unauthorised access, loss or damage.

When records reach the end of their retention period:

- paper records containing confidential or personal information will be shredded or disposed of using confidential waste services
- electronic records will be permanently deleted where appropriate
- any destruction of records will be carried out securely and in accordance with applicable legal and regulatory requirements

6. Retention schedule

Record type	Retention period	Reason for retention	Data owner
Newsletter subscriber records	Until consent is withdrawn	To provide newsletters and updates in accordance with the individual's consent	CEO
Enquiries	2 years after the enquiry is closed	Operational record and to manage follow-up queries	CEO
Fundraising records (where personal data is held by GADP)	6 years after the final donation or fundraising activity	Accounting records and audit purposes	CEO
Conference and event attendee records	2 years after the event	Event administration and evaluation	CEO
Successful volunteer recruitment records	Duration of placement plus 6 years	Operational, safeguarding and limitation periods (Limitation Act 1980)	CEO
Volunteer references	Duration of placement plus 6 years	Operational, safeguarding and limitation periods (Limitation Act 1980)	CEO
Unsuccessful volunteer applications	12 months after recruitment process concludes	Recruitment records and Equality Act 2010 considerations	CEO

Successful independent contractor recruitment records	Duration of contract plus 6 years	Contract administration and limitation periods (Limitation Act 1980)	CEO
Unsuccessful independent contractor applications	12 months after recruitment process concludes	Recruitment records and Equality Act 2010 considerations	CEO
Independent contractor agreements and payment records	6 years after the end of the contract	Contractual records and limitation periods (Limitation Act 1980)	CEO
Purchase invoices and records of monies received and paid	6 years after end of relevant financial year	Accounting records (HMRC requirements and Limitation Act 1980)	CEO
Financial management records (e.g. budgets, management accounts and reconciliations)	Minimum 10 years	Financial governance, audit trail and organisational record	CEO
Grant documentation	Permanent	Governance, audit and organisational record	CEO
Trustee meeting minutes, AGM minutes and records of Board decisions	Permanent	Governance and organisational record	CEO
Annual accounts and trustees' annual reports	Permanent	Charities Act 2011, governance and organisational record	CEO

Retention periods represent the normal maximum period for which records will be retained. Records may be kept for longer where required by law or where necessary in connection with legal proceedings, investigations or regulatory requirements.

7. Policy review

This policy will be reviewed annually and updated as necessary to reflect changes in legislation, guidance or GADP's activities.

Approved by: Board of Trustees

Date approved: 26 July 2026

Last reviewed: July 2026

Next review due: July 2027