

The Cathedral of the Holy Trinity
Founded c.1030
Christ Church Cathedral
Christchurch Place,
D08 TF98, Ireland

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welcome@christchurch.ie
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Christ Church Cathedral Data Retention & Destruction Policy

Introduction

Christ Church Cathedral (referred to as 'we', 'us', 'our') is committed to complying with the requirements of the General Data Protection Regulation (GDPR) and the relevant legislation, namely the Data Protection Acts of 1988-2018. These rules state that data must be processed in a fair manner and retained for no longer than is necessary.

Purpose

The purpose of this document is to detail our retention periods and the criteria used to determine them, including destruction practices.

Scope

The scope of this policy covers all Christ Church Cathedral related data about their parishioners, visitors, employees, board members, volunteers, corporate clients, suppliers and visitors, stored on organisation owned, leased, and otherwise provided systems and media, regardless of location, and processed on both paper and electronic format. This Policy refers to both personal and sensitive data (henceforth equally referred to as 'personal data' unless otherwise stated).

Electronic formatted personal data will include personal data that can identify individuals in audio or visual devices, platforms and software. The safe destruction of hardware containing personal data (e.g., PCs, laptops, phones, printers, scanners and fax machines) is also covered by this policy.

This policy should be read in conjunction with the associated Data Protection Policies.

Storage and Destruction of Records

Christ Church Cathedral undertakes to store personal data in a safe and secure manner.

Storage

- Electronic records must be saved into the appropriate repository in line with internal procedures. They should not be unnecessarily duplicated or stored on local PC's. These measures are in place to ensure security, back up, accessibility, retention and destruction can be facilitated.
- Physical records required for day-to-day use should be stored neatly in the appropriate cupboard, filing cabinet or desk drawers. Personal data should only be stored in lockable storage units. Sensitive data should be stored in locked cabinets with limited access (i.e. number of keys and access is strictly limited).



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- Employees should always adhere to a clean desk clear screen policy, including during the working day. Documents that are not required for day-to-day operations should be filed in a secure location.

Destruction

Data destruction is a critical component of a data retention policy. When the retention timeframe expires, the organisation must securely destroy the data covered by this policy unless there is some lawful basis, including legitimate interest, to retain the data beyond the date specified in the Data Retention Schedule.

The rights of data subjects to enforce their rights as part of data protection legislation is not strictly affected by this policy. This policy should only act as a supporting reference in any decisions to be made in relation to data subject's rights.

General Guidance for Destruction

- **Hard copy files:** to be destroyed by confidential shredding or by using the services of an approved confidential waste disposal firm.
- **Electronic files:** to be purged or deleted or anonymised from all relevant systems.
- **Data stored in other media:** to be deleted or destroyed or anonymised in a safe and confidential manner to ensure the content is not disclosed.

It is the responsibility of each department to manage the destruction of records in line with this policy.

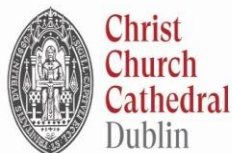
Confidential Waste Disposal.

Where the services of a confidential waste disposal firm are used, they will provide Christ Church Cathedral with a certificate of destruction. Each department will store this certificate as proof of destruction. Christ Church Cathedral will also ensure the necessary contract/SLA is in place. Christ Church Cathedral will also ensure that a data processing agreement is in place where they are using the services of a data processor (e.g., storage or shredding company).

Destruction of paper files

Care must be taken to ensure paper files that contain personal data and special category data are disposed of in a confidential manner. Such files should never be placed in general or recycling bins.

Destruction of electronic records



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All electronic files should be deleted in line with Christ Church Cathedral's data retention schedule. Electronic files include but are not limited to: databases, email system, files/folders on main operating system, etc).

Register of records destroyed after retention period.

Records which have reached their official retention period, should be reviewed under the criteria issued by the Christ Church Cathedral to check if they should be destroyed. If records are to be disposed of, it is vital to do this in a way which maintains the confidentiality of the records. Best practice suggests, a register of records destroyed and/or a certificate of destruction should be maintained as proof that the record no longer exists. The register (see appendix 3) should show:

- Reference for file (file number, etc)
- Former location of file
- Date of destruction
- Who gave the authority to destroy the records

Retention Timelines

Christ Church Cathedral processes and stores the following categories of data from corporate clients, visitors, parishioners, employees, volunteers, board members and suppliers. A summary is as follows:

Type	Retention period
Corporate client data	Indefinitely
Visitor data	Indefinitely
Parishioners	Indefinitely (Exception: 7 years for financial data - e.g., donation envelope details)
HR data	End of employment plus 7 years
Recruitment data	Unsuccessful applicants 12-18 months from end of recruitment campaign
Volunteer data	End of volunteering plus 7 years
Board member data	Store in perpetuity
Supplier data	End of relationship plus 6 years
Financial data	Documents related to personal data will be held for current year plus 6 years
Health & Safety data	10 years



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This list serves only as an indicative guide as circumstances may require, in some cases, for personal data to be held for differing periods of time. A full list of retention timelines is indicated in **Christ Church Cathedral's Data Retention Schedule** and in the Records of Processing Activity (ROPA) document.

Our position will always be guided by our legislative requirements, the principle of data protection on retaining data for no longer than necessary and the wishes of the individuals that we hold personal data on.

Retention of Encrypted Data

If any information retained under this policy is stored in an encrypted format, considerations must be taken for secure storage of the encryption keys. Encryption keys must be retained for as long as the data that the keys decrypt is retained.

Exceptions

Certain data held by the Christ Church Cathedral may be relevant to current or potential litigation, government investigation, audit or other events and should not be destroyed in line with the existing retention schedule.

If a data subject feels that certain data should not be destroyed, they should identify the data to the Co-Ordinator, (or any member of staff) so that an exception to the policy can be considered.

Where there is a requirement to hold data for longer than the retention timeline indicated in the data retention schedule, the Co-Ordinator will ensure that the reason is documented in a secure folder and that there is controlled access to this folder. Reasons should include an assessment of necessity to hold such data. The Co-Ordinator can also use the secure/legal hold option on the IT system. For more information on how to use this system contact IT Support.

Data Retention Schedule

The data retention schedule is listed in a separate document.

Enforcement

All data handlers working with Christ Church Cathedral should adhere to this policy. Violations may result in disciplinary action, which may include suspension, restriction of access, or more severe penalties up to and including termination of employment or contract.

Questions & Complaints

Queries and complaints in connection with the processing of personal data can be forwarded to the Co-Ordinator - see Appendix 1 for contact details.



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A data subject has the right to make a complaint to the Data Protection Commission if they are unhappy with the processing of their personal data. Details of how to lodge a complaint can be found on the Data Protection Commission’s website (www.dataprotection.ie).

Document Reviews

This policy will be reviewed and updated annually or more frequently, if necessary, to ensure that any changes are properly reflected in the policy.

Version Control

Name of Document	Data Retention Policy	Last Reviewed	-
Version Number	V1	Next Review	February 2025
Date Issued	February 2024	Document Owner	HR Manager

Document History

Date	Current Version	Details of update	New Version	Completed by:

Appendix 1: Contact details for data retention queries

Name	Human Resources Manager
Tel	01 677 8099
Email	hr@christchurch.ie

Appendix 3: Record of Destruction
