

**Policy Title**

Information and Data Retention Policy

**Policy Owner**

Nicky Nelson

**Owning Dept**

Legal

**Last Updated**

01/10/2022

**Next Review Date**

01/02/2026

**Reason for Policy**

To outline the RNLI's approach to the management and retention of information and the standards it will adopt to ensure secure disposal of information in line with relevant legislation and business need.

**Objective of Policy**

To set out minimum standards and best practice requirements adopted by the RNLI to ensure that it meets the needs of the organisation and the obligations of the relevant legislation.

The key objective of this Policy is to provide the organisation with a simple framework which will govern decisions on whether a particular piece of information should be retained or disposed of.

**Applicability**

This policy applies to all permanent and temporary employees, volunteers and contractors who have access to, or reason to otherwise process personal data on behalf of the RNLI.

It applies across all RNLI locations in the United Kingdom, Republic of Ireland, Channel Islands and the Isle of Man. This policy also applies to all processing undertaken by any wholly owned subsidiary company of the RNLI.

**Roles**

**Data Protection Officer - DPO**

The DPO is responsible for advising the organisation, its staff and volunteers of their data protection responsibilities and ensuring the organisation manages personal data lawfully. The DPO reports directly to the Executive Team on RNLI's data protection risk and compliance status.

**Accountable Data Executive**

The Accountable Data Executive (at Director level) is ultimately accountable for the legal, ethical and effective use of defined data entities which are assigned to them. In addition, they are accountable for all processes consuming data within their business stream.

**Data Owner**

Appointed by the Accountable Data Executive, the Data Owner has delegated accountability for governing the collection, use and management of data within a defined data set or within a specific process.

**Version:** 2.0

**Last Reviewed:** 01/02/23

**Author:** Tina McGoldrick

**Job Title:** Data Protection Officer

**RNLI Classification:** Protected

**Disclaimer:** The content of this document is considered 'Protected' in line with the RNLI classifications. Print only when required, and appropriate protection must be applied if printed.

**Data Manager**

The Data Manager is appointed by, supports and deputises for the Data Owner. They are responsible for the day-to-day operation and management of processes involving (creating, updating, utilising, removing, etc.) data.

**Data Steward**

The Data Steward supports the understanding, embedding and operation of the Data Governance principles and other initiatives within the department they represent.

**Policy**

The RNLI has a duty to comply with legal requirements and best practice guidelines in relation to the retention and secure disposal of both paper and electronically stored information.

**Retention Periods**

Our retention periods are driven by business need and relevant legislation. If there is no legally defined retention period for information, it is the responsibility of the relevant Data Owner (with input from the Data Protection team) to determine an appropriate retention period to ensure it is kept for the appropriate length of time.

The Retention Schedule appended lists the different types of information held by the organisation and the retention periods that apply to each, as well as how each should be stored and disposed of.

Any additions or amendments to the schedule must be sent to the Data Protection team and signed off by the relevant Data Owner.

**Information Management**

Not all information has a long-term value and therefore it is important all departments undertake regular housekeeping. Below are examples of information that should be regularly reviewed:

- Drafts -Draft documents lose value and can become obsolete once a final version has been published. However, on some occasions where significant changes have taken place, a draft may be retained to show how the final decision was made.
- Emails - Outlook has an automated retention policy that retains emails for either 2 years or 7 years dependent on your role. It is important that relevant emails are saved to shared spaces, to provide evidence of decisions made or action taken. Once a conversation has reached a significant point, any earlier emails from this chain should be deleted.
- Duplicates – We should not retain any duplications. Duplications can lead to multiple versions of information which can cause confusion.

Housekeeping should be done on a regular basis. It is up to each team to decide a schedule for housekeeping, based on the type and volume of information they generate. Data Owners must ensure housekeeping is undertaken at appropriate intervals and should include all

**Version:** 2.0

**Last Reviewed:** 01/02/23

**Author:** Tina McGoldrick

**Job Title:** Data Protection Officer

**RNLI Classification:** Protected

**Disclaimer:** The content of this document is considered 'Protected' in line with the RNLI classifications. Print only when required, and appropriate protection must be applied if printed.

information a team stores, paper or digital, regardless of the system it is held on. This includes personal drives and desktops.

Any information held within the RNLI's information management repository tool (Microsoft SharePoint Online) must have been stored with the appropriate metadata to allow data audits to be undertaken.

### **Destruction**

When records are no longer required by the organisation **and do not have heritage value** they should be securely destroyed as follows:

- Paper records should be placed into the confidential waste bins at the RNLI support centre or regional base and shredded at other locations.
- Documents and information stored in RNLI or third-party software or applications must be deleted
- All copies of information, physical and electronic should be destroyed at the same time.
- Information cannot be considered to have been destroyed unless all copies have been destroyed

### **Heritage Preservation**

Documents marked on the Retention Schedule for heritage preservation must be clearly marked and must not be destroyed. Contact the Heritage team to organise transfer of the information when appropriate.

### **Legal Hold**

A legal hold is the process of ring-fencing information relating to particular legal proceedings. If a legal hold is in place all relevant material must be preserved. If you are unsure whether information is under a legal hold, contact the Legal team for advice.

When information falls under a legal hold it should be clearly marked as such so it is not accidentally included in any scheduled destruction. Once the matter is concluded all information held should be reviewed by the Legal team to determine how long it should then be retained for.

## **Reference Documents**

- RNLI Retention Schedule

## **Related Policies, Procedures & Guidance**

- Data and Information Governance Policy
- Information Security Policy
- Acceptable Use Policy
- RNLI Privacy Policy

**Version:** 2.0

**Last Reviewed:** 01/02/23

**Author:** Tina McGoldrick

**Job Title:** Data Protection Officer

**RNLI Classification:** Protected

**Disclaimer:** The content of this document is considered 'Protected' in line with the RNLI classifications. Print only when required, and appropriate protection must be applied if printed.