

Data Retention and Erasure Policy



1. Scope and Objectives

This policy sets out how data and documents, which are controlled or processed by Active Norfolk will be managed through retention, storage and disposal.

This applies to all documents and data that we possess, from creation to destruction, inclusive of whether the data or documents are in paper form or stored electronically/digitally.

Our specific policy objectives are:

- To ensure compliance with the UK General Data Protection Regulation 2021
- To prevent the storage of documents or data longer than is lawfully required
- To ensure that retention schedules are consistent with what is stated when the data is gathered
- To protect Data Subject Rights
- To employ best practice records management

2. Policy Statement

To provide the range of services that we deliver, the retention, storage and disposal of data will be undertaken at appropriate times, with adequate methods to meet our legal obligations.

We process data and use documentation to be able to provide our services. This requires information to be stored in systems that enable data to be collected, analysed, and reported upon. We will only hold data and documentation for as long as required and will conduct an annual review to ensure that this works in practice.

We will ensure compliance with Norfolk County Council policies and procedures regarding data and document retention, storage and disposal.

3. Roles and Responsibilities

The **Nominations Sub-Committee** are responsible for:

- Annually approving the review of Active Norfolk's data and document retention policy

The **Marketing Communications Officer** is responsible for:

- conducting organisation data audit; completing Record of Processing Activities
- monitoring the adherence to policy through annual reporting to the Nominations & Governance Committee

Data Owners are responsible for:

- ensuring data and documents are managed in line with the data retention policy
- ensuring data and documents are disposed of, and that disposal is appropriate for the type of data

Data Owners and their remits are detailed in the table below:

Data Owner Role	Remit
Project Officer – Place	Active Workplace surveys, challenges, events
Insight & Evaluation Officer	Insight, Evaluation, Surveys
Marketing Communications Officer & Digital Specialist	Website, Newsletters, Corporate Communications
Partnerships Officer – School Games	School Games
Partnerships Officer - Bikeability	Bikeability
HAF Co-ordinator	Big Norfolk Holiday Fun
Senior Partnerships Officer – Mental Health	Mental Health physical activity programmes
Project Officer – Health	Physical Activity Training & Active NoW
Sport Welfare Officer	Clubs & NGBs
Senior Partnerships Officer – Inclusion	Disability projects, BAME projects
Project Officer - Place	Place Partnerships, (King’s Lynn, Gt Yarmouth)
Active Communities Officers	Community Organisations & partners

All **employees** are responsible for:

- working in accordance with data and document retention policies, procedures and schedule.

4. Policy Details

4.1. TYPES OF DOCUMENT

We process and store a select range of data and documentation. This includes, but is not limited to:

- E-mails
- Paper forms
- Invoices and financial statements
- Documents in computer hardware
- Case studies and testimonials
- Photographs and video footage
- Database listings

4.2. RETENTION

This policy ensures that personal information, documents or data are not held for longer than required. Data will be retained in secure locations and in the appropriate format to meet its purpose.

The key points in this retention policy include:

- We retain personal information for the length of the programme or project for which it was collected, up to a maximum of 5 years. When personal information is no longer needed for these purposes, it will be securely deleted or anonymised for statistical reporting.
- If we need to use personal information for evaluation or reporting purposes, that information will

be anonymised and aggregated. The information will continue to be used in a summarised and anonymised form for any statistical reporting.

- Electronic information will be minimised to a single copy where possible and is stored electronically on our secure network only.
- Paper documents containing personal data are retained securely in a locked drawer until input into electronic format, or for up to 5 years in line with the provisions of this policy, then confidentially destroyed.
- Where photo/video consent forms are provided, they will be held securely until annually renewed, or for a period of up to 5 years (2 years for children or vulnerable adults) in line with the provisions of this policy.
- Where photo and video consent are given, footage is stored on Active Norfolk's secure network, and retained for up to 5 years (2 years for children and vulnerable adults) in line with the provisions of this policy.

4.3. DISPOSAL

Personal data and documentation, whether paper or electronic, will be securely deleted or anonymised in line with the provisions of this policy.

4.4. STORAGE

We will seek to store as few copies of the same documentation and data as possible.

We will ensure that data is stored in a way that meets the principle of "Secure by Design". Security safeguards will be applied regardless of storage type or location (e.g. paper, device, system), and in line with Norfolk County Council requirements.

4.5. CONSENT

Where consent is required for the storage and processing of data, the withdrawal of consent will mean that data will be erased. Individuals can request their personal data be withdrawn at any time.

4.6. 3RD PARTY DATA SHARING

We will ensure that where data is shared with 3rd parties, they will follow this Data Retention and Erasure Policy. This will identify if data needs to be deleted by the Data Processor and outline safe handling requirements in line with Norfolk County Council policy.

We will not share personally identifiable or personal information without a legally binding contract or regulatory/legal imperative. We will not share personal information without consent.

4.7. IMAGES AND RECORDINGS

We sometimes need to gather photographic images/videos and to collect case studies and testimonials to demonstrate impact.

A photo/video consent form is required before any images or recordings may be used in any form of media.

Employees must ensure that photographic images and recordings are held only as long as outlined in this policy.

4.8. SPECIAL CATEGORIES OF PERSONAL DATA

The GDPR identifies “Special Categories of Personal Data”. These merit special protection and a significant restriction of processing.

We will ensure that these are only gathered as stipulated by funding requirements (e.g., Sport England) or within the acceptable use of Special Categories of Personal Data identified within the GDPR.

Where we collect this information for a specific purpose this will be identified on the Record of Processing Activity (ROPA) so that all Special Category of Personal Data is tracked, monitored and deleted after it’s requirement.

5. Considerations

UK General Data Protection Regulation 2021
UK Data Protection Act 2018

6. Monitoring, Reviews and Evaluation

The policy will be monitored bi-annually by the Marketing Communications Officer.

The Record of Processing Activity will be reviewed annually by the Marketing Communications Officer, which will be updated by means of an internal data audit.

A bi-annual report to the Nominations & Governance Board Sub-Committee will identify the compliance status for retention, storage and disposal.

7. Associated Documents and Procedures

Active Norfolk Privacy Policy
Active Norfolk Retention Schedules
Active Norfolk Online Safety Policy

Revision date	Reviewed by	Board approval	Date of Board approval
1 st March 2023	C Avery	Approved	Q3 March 2023
25 th Nov 2025	K Tuck / S Keeping	Approved	11 th December 2025