



Retention of Data Policy using the Harlequin Database

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South Central Ambulance Charity – Retention of Data Using the Harlequin Database

1. Introduction & Purpose

South Central Ambulance Charity and the Community Engagement and Training Department of South Central Ambulance Service NHS Foundation Trust use the Harlequin CRM database to record information about Charity donors and supporters and volunteers who support our work including all Community First Responders. There is a data sharing agreement in place between the two organisations and this is therefore a combined policy covering all aspects of data retention associated with the Harlequin database.

South Central Ambulance Charity is a member of the Institute of Fundraising (IoF) and is committed to following the Fundraising Regulator Code of Practice. In the maintenance and recording of data we follow the guidelines issued by the Information Commissioners Office (ICO).

Full details of how South Central Ambulance Charity and SCAS use the Harlequin CRM database, how we gain, record and change consent and how we access and use subject data is detailed in the Charity's policy on the use of the Harlequin database.

This policy defines the principles, time periods, mechanisms and responsibilities for South Central Ambulance Charity's retention of person data for supporters and volunteers.

2. Definition and Scope of Personal Records and Data

South Central Ambulance Charity and the Community Engagement & Training Team (CET) at SCAS use the Harlequin CRM database to record data of volunteers and supporters. Only personal information that is necessary to process volunteer activity or to process communications and recording of donations from supporters is recorded. No unnecessary sensitive data is recorded and consent for recording and retaining of data including mailing preferences is recorded.

- 2.1 Volunteers in the context of this policy and the records and data held by the Charity are defined as any individual who gives their time on a voluntary basis to support the Charity and/or SCAS. Primarily this refers to the c1000 Community First Responders currently actively volunteering for the organisation but also includes a small number of Charity volunteers
- 2.2 Supporters in the context of this policy and the records and data held by the Charity are defined as any individual who makes a donation, requests our newsletter or expresses an interest in supporting the Charity.
- 2.3 Volunteers personal data will be added to the database at the point of initial enquiry and will be regularly updated to include their application forms, references and DBS reports. It will also record their initial training, all subsequent requalification details and their driving license and personal vehicle documents for those volunteers using their own vehicle while responding.
- 2.4 Supporters will be added to the database when they initially engage with the Charity either to make a donation or to find out more about our work. Information that is available in the public domain, is sometimes recorded in order to tailor appeals and communications.

3. Legislative and Regulatory Framework

- 3.1 The Data Protection Act 1998 and the General Data Protection Regulation requires that volunteer and supporter records should only be retained for as long as is necessary.
- 3.2 The Data Protection Act 1998 and the General Data Protection Regulation also requires that personal data should be accurate and up to date. Volunteers are asked to regularly update the CET team to ensure their personal data is up to date. Supporter data is

reviewed every four years and supporters asked to reconfirm the information held is up to date.

3. Principles for the Management and Retention of Data

3.1 Management and Retention of Data for Volunteers

- 3.1.1 Records are retained in full, including training, requalification, vehicle and driving license information, application forms, references and DBS reports.
- 3.1.2 The timeframe for retaining personal data is indefinitely for active volunteers for whom retaining their information is necessary for the carrying out of our business and the safety and security of our volunteers, staff and patients.
- 3.1.3 When a volunteer becomes inactive their information will be retained for audit and reporting purposes for four years. At the start of this period, volunteers will be contacted and asked to consent to receiving communications from the Charity in order that we can continue to inform them about our work. Volunteers becoming inactive will also be informed that their data will continue to be held on the database for four years for audit and reporting processes.
- 3.1.4 Volunteers who become inactive will no longer receive any internal communication.
- 3.1.5 After a period of four years, individual data will be deleted unless consent has been received or an individual has become actively engaged with SCAS or the Charity in a voluntary capacity.
- 3.1.6 Volunteers who withhold their consent to have their personal data recorded on the database will be informed that without such information being recorded SCAS will be unable to deploy them in an active capacity. Volunteers are able to withhold their consent to the use of the personal data in order to send out newsletters, information etc. This request will be recorded on the database and acted on. Volunteers will however, continue to receive information related to the role as a CFR which is essential to carry out their role.

3.2 Management and Retention of Data for Supporters

- 3.2.1 Individuals who consent to receiving information from the Charity will have their data retained for an initial period of four years. They will receive tailored communication according to their recorded mailing preferences. After a period of four years their consent agreement will be renewed. If consent is not then given their data will be suppressed on the database. They will not receive any communication and only their name will be visible to all but the system administrator. If over the next four years there is no further engagement from the supporter their data will be deleted from the system.
- 3.2.2 Supporters who do not consent to further engagement with the Charity will still have their data recorded if they give a donation to the Charity. Their record will however, be immediately suppressed. If a donation has been received their data will not be permanently deleted until after seven years to protect the integrity of our financial donation records.
- 3.2.2 After a period of seven years the data will be permanently deleted from the database.

- 3.2.3 Supporters who have completed a gift aid declaration and against whose donation the Charity has claimed gift aid from HMRC then the record must be kept for at least six years for HMRC audit purposes. It is essential the Charity is able to evidence a clear link between the donor, their gift aid declaration and the donation.
- 3.2.4 Supporters are able to unsubscribe and/or change their preferences at any time and these requests will be updated on the database. An automatic unsubscribe button is present on all newsletters.
- 3.3 Data is only shared between South Central Ambulance Charity and SCAS through the shared use of the Harlequin database and due to our volunteers being managed jointly by the CET Team and the Charity. A data sharing agreement is in place to support this activity.
- 3.4 Data will on occasions be shared with a third party for example to screen data against bereavement and gone away registers. The third party, will on these occasions be acting as our agent and the Charity will remain the data controller. The third party will be contracted to adhere to the Charity and SCAS's data retention and security policies as well as the Data Protection Act 1998 and the General Data Protection Regulation.
- 3.5 Data is received by the Charity from organisations such as MailChimp, Just Giving and Unity Lottery. These organisations gain consent from data subjects to pass data on to the Charity and only pass on information where individuals have given consent. Contracts are in place to support this activity.

4. Roles and Responsibilities

- 4.1 The Charity CEO is the information owner for all data recorded on the Charity's Harlequin database.
- 4.2 The Head of Operations – Community, Engagement and Training is responsible for all volunteer Community First Responder data on the system.
- 4.3 SCAS's Information Governance department supports the Charity in ensuring that records are maintained according to legislation and best practice and also ensure that all users of the system are compliant with SCAS's Information Governance Training.

5. Related Policies

- 5.1 South Central Ambulance Charity Privacy Policy – www.sca-charity.org.uk
- 5.2 South Central Ambulance Service NHS Foundation Trust Privacy Policy – www.scas.nhs.uk