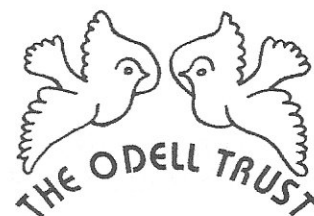


The Odell Trust (Reg. Charity)

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Data Retention Policy

Policy Statement

The purpose of this Policy is to ensure that necessary records and documents of The Odell Trust are adequately protected and maintained and to ensure that records that are no longer needed by The Odell Trust or are no value are destroyed at the proper time. This Policy is also for the purpose of aiding employees of The Odell Trust in understanding their obligations in retaining electronic documents – including email, web files, text files, sound and video files, PDF documents and all Microsoft Office or other formatted files.

The Policy represents The Odell Trust's procedure regarding the retention and disposal of records and disposal of electronic documents.

Administration

Attached as Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical records of The Odell Trust and the retention and disposal of electronic documents. We will make modifications to the Record Retention Schedule from time to time to ensure that it follows legislation and includes the appropriate document and record categories for The Odell Trust; monitor legislation affecting record retention; annually review the record retention and disposal program; and monitor compliance with this Policy.

In addition, any retained information can only be used for the purpose for which it is stored. This is compliant with the Data Protection Act 2018 incorporating principles of the General Data Protection Regulation (GDPR).

Suspension of Record Disposal in Event of Legal Proceedings or Claims

There are certain occasions when information needs to be preserved beyond any limits set out in the Policy. The Policy must be suspended relating to a specific member or document and the information retained beyond the period specified in The Odell Trust's Data Retention Schedule in the following circumstances:

When legal proceedings or a regulatory or similar investigation or obligation to produce information are known to be likely, threatened or actual.

When a crime is suspected or detected.

When information is relevant to a company in liquidation or receivership, where a debt is due to The Odell Trust.



Information is considered by the owning unit to be of potential historical importance and this has been confirmed by the Administrator.

In the case of possible or actual legal proceedings, investigations or crimes occurring, the type of information that needs to be retained relates to any that will help or harm The Odell Trust or the other side's case or liability or amount involved.

If there is any doubt over whether legal proceedings, an investigation or a crime could occur, or what information is relevant or material in these circumstances, the Manager should be contacted and legal advice sought.

The Manager shall take such steps as is necessary to promptly inform all staff of the suspension in the further disposal of documents.

Security of Personal Information

The Odell Trust will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal data.

The Odell Trust will store all personal information on our secure (password and firewall protected) server.

Amendments

The Odell Trust may update this policy from annually by publishing a new version.

Applicability

This policy applies to all physical records generated during The Odell Trust's operation, including both original documents and reproductions. It also applies to the electronic documents described above.

Signed 
Ann Masters
Chairman

Date 4 - 06 - 2018

Ref No. P032 v1.0

Review Date