



Document and Data Retention Policy

Scope & Objectives of the Policy

This policy sets out how data and documents, which are controlled or processed by Turtle CYP (we or us), will be managed through retention, storage, and disposal. This applies to all documents and data that Turtle CYP possess, from creation to destruction, inclusive of whether the data or documents are printed, written on paper or stored electronically/digitally. Regardless of whether the data or documents are personal, confidential, or any other type of data.

Turtle CYP's specific policy objectives are:

- To ensure compliance with the General Data Protection Regulations 2018 and the Data Protection Act 1998
- To protect Data Subject Rights
- 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 prevent unlawful or premature destruction of personal, corporate and other types of data

Policy Statement:

To promote good Records Management practices within Turtle CYP.

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To provide the comprehensive range of services that Turtle CYP delivers, the retention, storage and disposal of data will be undertaken at appropriate times, with adequate methods to meet our legislative, regulative and any other significant obligations. Turtle CYP needs to process data and use documentation to be able to provide its services. This requires information to be stored in systems that enable it to honour contracts and service agreements. Turtle CYP will only hold data and documentation for as long as required and will deploy an effective review mechanism to ensure that this works in practice. Turtle CYP will ensure compliance with all necessary regulatory and legislative requirements regarding data and document retention, storage and disposal.

Policy Details:

Types of document:

Turtle CYP processes and stores a wide range of data and documentation. This includes, but is not limited to: - Handwritten notes - E-mails - Letters and correspondence - Invoices and financial statements - Proof of identification and medical information - Memory in mobile devices, computer hardware and backup - Computer programmes - Call Recordings/voicemail - Online postings on social media platforms or websites

Retention:

This policy ensures that the periods identified in the Data and Document Retention Schedule are enforced and that documents or data are not prematurely destroyed. Documents and data will be retained in secure locations and in the appropriate format to meet its purpose. Electronic copies will be minimised to a single copy where possible, with paper documents retained for legal or contractual purposes only.

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Disposal:

Data and Documentation, whether paper or electronic, will be disposed of in line with the Schedules detailed in Turtle CYP's Data and Document Retention Schedule. Turtle CYP will take every opportunity to automate the review and disposal process. A record of document and data disposal will be retained to confirm the implementation of these guidelines. Paper copies will be confidentially and securely destroyed with a certificate of destruction where practical. Digital, electronic or hardware containing data will be disposed of in co-ordination with the IT department aligned to National Archive guidelines.

Storage:

Turtle CYP will ensure that data is stored in a way that meets the principle of "Secure by Design". Robust security protocols and safeguards will be applied regardless of storage type or location (e.g. paper, device, system). Turtle CYP will seek to store as few copies of the same documentation and data as possible. The location of data and documentation storage will comply with the GDPR.

Consent:

Where consent is required for the storage and processing of data, the withdrawal of consent will mean that data will be erased or returned. In the event that processing is solely reliant on consent, this Data Subject Right overrides this policy and Turtle CYP's Data and Document Retention Schedule.

3rd Party Data Sharing:

Turtle CYP will ensure that where data is shared with 3rd parties, they will follow Turtle CYP's Data and Document Retention Policy. This will identify where data needs to be deleted or returned by the Data Processor. This will be enforced through legally binding contracts. Where Turtle CYP are the Data Processor, we will comply with the Data Controllers Data Retention, Storage and Disposal requirements where they are aligned with our contractual, regulatory and legislative obligations. This will be defined in the pre-contract signing stage. Turtle CYP will not share personally identifiable or personal information without a legally binding contract or regulatory/legal imperative.

Images and recordings:

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Turtle CYP employees are provided with devices, where required, that contain the ability to capture and store photographic images and video recordings. Employees must ensure that photographic images and recordings are held only as long as required by Turtle CYP's Data and Document Retention Schedule. As the images or recordings may be used for publicity and reporting, photographic consent will be gained before photos are taken.

Special categories of personal data:

The GDPR identifies "Special Categories of Personal Data". These merit special protection and a significant restriction of processing. Turtle CYP will ensure that these are only gathered in line with our legal responsibilities or within the acceptable use of Special Categories of Personal Data identified within the GDPR. Where Turtle CYP collects this information for a specific purpose this will be identified on logs so that all Special Category of Personal Data is tracked, monitored and deleted after it's requirement. Turtle CYP will ensure that there are an appropriate number of logs to prevent unnecessary access to such data. This will be overseen by the Director

Exceptions:

- For personal data, there are three exceptions to this policy.
- Consent has already been mentioned as an exception to this policy under section 4.
- Where data or documentation needs to be retained for establishment or defence of legal claims.
- User discretion over temporary data or documents. This includes duplicates of originals also preliminary drafts of letters, spreadsheets, or informal notes that do not represent significant steps or decisions towards making official records.

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