# Newlife the Charity for Disabled Children Privacy information

We, Newlife the Charity for Disabled Children are the 'controllers' of the information which we collect about you ('personal data'). Throughout this notice we will use the term 'process' which covers most things that can be done with personal data, including collection, storage and destruction of that data. Being controllers of your personal data, we are responsible for it, and this notice explains why and how we process it, as well as your data rights, including the right to access it and to object to its processing.

We are a registered charity with registration number 1170125 and our contact details are:

Address:	Newlife Charity for Disabled Children,
	Newlife Centre, Hemlock Way, Cannock
Email:	info@newlifecharity.co.uk
Telephone number:	01543 462777

Questions or concerns about how we process personal data should be sent to our Data Protection Officer, Stephen Morgan, who can be contacted on <a href="mailto:smorgan@newlifecharity.co.uk">smorgan@newlifecharity.co.uk</a> or 01543 462777. Extension number 2037.

We hold various categories of personal data for a number of reasons. We collect this data either from you or from third parties who provide it to us. This data can include your contact details, your health information, and information about your requirements. Information about your health is considered to be a 'special category' of personal data under data protection law, as is information about racial and ethnic origin, information about religious beliefs, biometric data and genetic data, among others. Data protection law requires that we satisfy additional conditions if we process sensitive personal data.

We are committed to protecting your personal data, whether it is sensitive or not, and we only process data if we need to for a specific purpose, as explained below.

## Purposes for which we process personal data

The following table lists the purposes for which we process personal data as well as the legal justification under data protection law which we rely on to process that data. The general purpose is for our charity to be able to continue to deliver its services and achieve its objectives.

Purpose	Legal justification
<b>Campaigning</b> – to give children and families a voice. Newlife uses personal	Explicit Consent (special category) – to use children's/family personal information we
information from children we have helped,	will seek consent.
to demonstrate issues that families face	
every day.	
Working with local statutory bodies - We	We share information with local statutory
look to work with professionals and relevant	bodies on the basis of pursuing legitimate
health and local authorities when we	interests. We believe this to be in the best
believe that they have an obligation to	interests of the child and family to get
provide the child with the equipment that is	equipment funded by the authority where

needed. In many cases, once an authority is aware of the child's needs they will fund the equipment needed and be aware of the wider needs of the child and family.	appropriate and possible, and allowing Newlife to help more children in need. In so far as the information includes special categories of data (health data), we share this on the basis that it is necessary for the provision of health or social care, and the processing is carried out under the responsibility of health professionals.
Nurse Helpline – Callers can remain anonymous, or choose to give their name/contact details. The purpose is to give information, support and care to families of disabled and terminally ill children through either phone calls, emails or nurse chat via our website.	Explicit consent (special category) - we will verbally ask families, who pass on personal data, that they give permission for Newlife to store the data on a database that is viewed by internal staff only to give Newlife staff the ability to respond to the needs of a child quickly when they arise. Also if the triage team take the call, there is often a need to take information that they can then pass to professional nurses for a call back. Information is processed by nurses for the provision of health or social care. Legal Obligation – If a safeguarding issue is highlighted then we will pass on concerns to relevant authorities including social workers and child protection teams.
Equipment services – Newlife provides equipment either as a grant or a loan through its many unique services. Equipment has the power to change children's lives. To provide the equipment, Newlife needs to collect personal/health data to assess the child's needs and to ensure that appropriate equipment is provided at the pace required. These services include: • Equipment Grant Service • Emergency Equipment Loan Service • Play Therapy Pod Service • Comfort Capsule Service	<ul> <li>Legitimate Interests - Contact details including addresses are passed to third parties who deliver the equipment on behalf of Newlife to ensure that the families receive the approved equipment they applied for.</li> <li>Consent – We seek consent for the following: <ol> <li>For families to receive information about Newlife's services.</li> <li>For a photo of the child to be provided and used to help us demonstrate the impact of Newlife's services through media and to allow us to thank donors and show them the difference they have made.</li> </ol> </li> <li>To ask families if they will allow a fundraiser to contact them regarding supporting the charity either through volunteering or fundraising.</li> <li>Explicit consent (special category) – We seek explicit consent for the following:</li> </ul>

	<ol> <li>To allow Newlife to pass details to a member of the Media team to contact the family regarding writing an appeal to raise awareness and funds for the equipment required through local and possibly national press.</li> <li>To allow Newlife to pass on personal and some health information to fundraising donors and supporters (anybody who has donated to Newlife) to demonstrate the impact of equipment provision.</li> <li>To allow Newlife staff to contact the family to get feedback on the services and equipment provided.</li> <li>Legitimate Interest of not for profit body</li> <li>We share information with local statutory bodies on the basis of pursuing legitimate interests. We believe that in some cases this is in the best interests of the child and family to get equipment funded by the authority.</li> <li>All data provided will be stored on a secure database, with limited access internally. We will only share this data with other persons externally if we are legally obliged to do so, if we have consent, or to enable us to deliver the equipment requested.</li> </ol>
Communications	
Website - to demonstrate Newlife's purpose and impact to supporters, families, donors, stakeholders, volunteers etc.	Explicit consent (special category) - to use children and families personal and health data to demonstrate need (when appealing for fundraising support) and to demonstrate impact. We seek separate permission from any
<b>Social Media -</b> to communicate privately and publically as required. To provide up-to date information to demonstrate Newlife's impact and purpose.	data subject who is featured on the website. Legitimate Interests – Newlife requires personal information (including contact details) to <u>respond</u> to any enquiries/requests etc. We will ensure that private messages sent to us via social media are responded to in private.
	Explicit Consent – We will seek consent if we want to post on social media regarding any data subject's personal/health data.

Marketing emails – where individuals have expressed an interest in receiving information about the work of the charity, its services and how to support Newlife, we will email them electronic newsletters and updates where applicable.	Consent – We will only email individuals who have given opt-in consent to allow us to send information and updates. Each department will seek verbal or written consent prior to any action taken.
Corporate Services	
Managing stock donor relationships – We receive stock from hundreds of stock donors including high street stores, manufacturers, supermarkets, designer labels etc. We co-ordinate stock donations, arrange collection through external transport companies and manage the relationships with the donors sending them updates and we are legally obliged to send	Legal – we are legally obliged to process data that enables us to send the 'duty of care' letter annually to report on how we have used the stock they have donated. We store company data on our stock relationship database. Contract – we contact and store data that relates to the collection and management of
them annually a 'duty of care' letter.	stock in line with the donor requirements.
	Consent – we will seek consent if we are publicising the relationship with the donor in any external publication, website, and correspondence.
Facilities	
Health & Safety & Risk assessments – When a member of the public, member of staff or volunteer are involved in an accident we will complete an accident form (or near miss form if applicable) to collect relevant data. We will also complete risk assessments for above categories when required (e.g. pregnancy, health issues raised through a doctors fit-note/return to work etc.)	Legal – we are required to complete an accident form/near miss form when an incident occurs. We are required if the incident is serious to contact the Health Safety Executive (HSE) and RIDDOR. Explicit Consent – we will seek consent from the individual to obtain a fit note where appropriate and to facilitate the right working conditions and/or return to work. This data will only be processed by the People team and Facilities team who complete Health & Safety assessments and the relevant manager.
<b>CCTV</b> – We have CCTV for security purposes within our stores. Signs are up within all stores explaining their purpose.	Legal – we only store CCTV images for 28 days. We share these with the police when requested to do so or if a criminal act has occurred within any of our stores.
<b>Contracts –</b> We set-up a number of service contracts to provide services to Newlife including cleaning, Gas/electric, post, waste disposal, gardening/window cleaning services, deliveries of stock and supplies. We have a designated contact for each and set-up a contract to manage what is expected	Legitimate Interest – It is in Newlife's and the contractors best interests to have a direct contact for each contractor. We will add in conditions to the contracts to ensure that all contractors are GDPR compliant where they are processing data as part of the contract.
Finance	
Banking and tracking of income - We bank and track all income that is donated or raised on behalf of Newlife. This includes online giving, giving through	Legal – we have a duty to ensure all financial records are available to audit purposes annually. We also are legally obliged to retain all financial records for at

third parties (such as Just Giving) and all donations received either by hand, by post, or direct to our bank account. We track all donations received via internal spreadsheets and ensure all restricted income is used for the purpose intended. We input all donors onto SAGE database and if relevant onto Raisers Edge, a fundraising relationship database.	least six years in case of inspection by HMRC.
Managing expenditure and invoices – We track all expenditure that is spent on behalf of Newlife. We have an internal control system (including use of purchase orders) to authorise payment. We also have a 'four eyes' approach for senior management to authorise cheques/online payments. All expenditure is logged on SAGE database.	Legal – we have a duty to ensure all financial records are available to audit purposes annually. We also are legally obliged to retain all financial records for at least six years in case of inspection by HMRC.
Payroll and Any Other Expenditure (AOEs) While it is the People Team who co- ordinate payroll with an external payroll facilitator, on the amount to be paid, finance are securely emailed the report from the facilitator and then upload this for online payment which is signed off by executive team members.	Legal – we have a duty to ensure all financial records are available to audit purposes annually. We are also legally obliged to retain all financial records for at least six years in case of inspection by HMRC.
Fundraising	
Donor Acquisition – all those who express an interest to support Newlife. We manage all data related to individuals who are interested in how they can help Newlife through fundraising (offers of support). These are logged on our fundraising relationship database; Raisers Edge. All events, sponsorship forms, and fundraising activity information and data are manged within the Fundraising department and stored on Raisers Edge. Once funds are raised or donated these are banked, tracked through internal spreadsheets and databases.	Consent - we won't contact the donor/fundraiser to give them more information about the work of Newlife without their consent. To allow us to process expressions of interest to support Newlife, we do store data on our fundraising relationship database, Raisers Edge.
Donor Retention – all those who have raised funds or donated to Newlife. We do notify all donors/fundraisers to let them know we have received their funds and if they are restricted we comply with legislation that states we need to inform them where their restricted donations have been spent. We log all donors' data on our fundraising relationship database.	Legal - we have a duty to ensure all financial records are available to audit purposes annually. We are also legally obliged to retain all financial records for at least six years in case of inspection by HMRC. We will not process data outside of this requirement without the consent of the data subject. To allow us to process donations/funds raised and ongoing support

	for Newlife we do store data on our fundraising relationship database, Raisers Edge. Consent - we won't contact the donor/fundraiser to give them more information about the work of Newlife without their consent.
<b>Newlife Local</b> - This can be found on our main website at <u>www.newlifecharity.co.uk/local</u> . The map on the website breaks down data into 104 counties with each county having their own page giving figures and examples of the local need. Included could be family stories of children who have been helped and appeals to help raise funding for children in	Explicit Consent – we will not feature any family stories/appeals for funds without the explicit consent from the child or family. Consent is required from the family via our equipment applications forms before the Media team can speak to a family. Consent is then also sought by the media team to feature the story.
need. We also include 'fundraising heroes' stories which highlight the efforts of local people in the county in raising funds for disabled and terminally ill children. Finally we include any press coverage for the county within the page.	Consent – we will not feature personal data from any individual who has donated or raised funds for Newlife without their consent. This will be sought from the Fundraising team.
Governance/Compliance and Administration	
<b>Incoming/outgoing post –</b> We receive and send out mail daily. Mail sent in is opened securely within an open office environment and date stamped before being processed and sent to the relevant individual/department.	Legitimate Interests – we process the mail that is sent to us and it is opened securely and is then forwarded to the intended recipient only. All sent mail, is collected directly by Royal Mail.
<b>Trustees personal details –</b> We receive, process and store personal details of our trustees including contact details and biographical information so that we can contact where appropriate and share information when it is pertinent to do so.	Legitimate Interests – we need to process details of all mentioned to arrange meetings, send papers/information and contact when required. Consent – we will not share personal data with others without the consent of the data subject unless there is a legal obligation or duty.
Correspondence from any data subject including complaints, requests, or any matter related to a data subject's rights. A data subject has rights in relation to how we process and store their personal data. Any requests or complaints in reference to the above will be processed in line with Newlife's data protection policy.	Legal – we have a duty to ensure that the rights of a data subject are met and to ensure that we are in all cases fairly and lawfully processing data. We also have a legal duty to investigate all complaints that relate to an unlawful activity. Legitimate Interests – if we receive
We also receive complaints or requests for	requests for information or a complaint we will look to either meet the request or

information that do not relate to the processing of data, but our day to day	investigate the complaint in line with our complaints procedure. This is in the
activity as a charitable incorporated	interests of the data subject
organisation.	
<b>Surveys –</b> To ensure that Newlife is providing an exceptional service and that the equipment provided continues to meet the needs of the disabled child and their family, we look to contact some families via phone or email once the equipment has been provided to get feedback and ask	Explicit consent – we will only contact the family to complete the survey if they have given us consent to do so. This is done through the equipment application forms.
questions related to their experiences and views on issues facing their child and family. This is usually done within six	
family. This is usually done within six months of the equipment being provided.	
I.T	
<b>Emails –</b> While emails are assigned to personal individual users, the I.T team has access to all accounts. They routinely check to ensure these have not been compromised/hacked and to maintain where necessary.	Contract – Employees are required to ensure I.T can access and service email accounts as and when required
Infrastructure – To facilitate and support	Legal obligation/duty under data protection
the day to day running of the organisation, the I.T team can access information relating to all processing of data referred to within this privacy notice.	legislation to ensure security – to ensure that data is not hacked or accidentally or deliberately lost/deleted/misused the I.T team support the processing of all data
Media Team	
To contact data subjects - We do ask those who benefit from our services, including families of disabled children and medical researchers whether they would be happy to speak to a member of our Media team. We can also ask other data subjects affiliated with Newlife if they are willing to speak to the Media team, including; volunteers, fundraisers, customers, stock donors and staff.	Consent/Explicit consent – our Media team will not contact data subjects regarding potential press activity without the consent of the data subject. This will be sought by the department that the data subject has given data to.
To share personal details with press.	Explicit Consent – we will not share personal details with press for a media story or other purpose without the consent of the data subject.
Medical Research	
<b>Contact details of researchers –</b> We process and store email addresses of those researchers who want to be emailed details of our research application process each year. This information is not shared with any other party.	Consent – we only email details to researchers using email addresses provided after consent has been given by the data subject.

<b>Research application process –</b> Newlife funds medical research as part of our charitable aims. Our Research grants look into what is causing and what could prevent devastating birth defects from occurring and ultimately aims to fund research that can provide treatments. Researchers can apply for funding through our application process, our full grants (up to £120k) are peer reviewed and then authorised by trustees. Our start-up grants (up to £15k) are reviewed and authorised by our Medical Director and another trustee.	Contract – To process any application, we need personal details of the applicant, including contact details and a C.V. This is processed by our Research Administration team, our Medical Director and then forwarded to the Medical Panel and trustees for decisions on which applications to fund. We would not share this data with anyone else without the consent of the data subject unless there is a legal obligation or duty.
<b>Medical Panel –</b> Our Medical Panel evaluate and score the full research grant applications received for each year. We store personal data including contacts for each member of the panel to enable us to contact them and pay any travel expenses necessary.	Consent – we store data on the agreement of each panel member. We will not share this with anyone else without the consent of the data subject unless there is a legal obligation or duty.
People Team	
<b>Candidates/Employees/ex-employees -</b> We receive applications for vacant posts within the charity. These are scored against a matrix and interviewed before a decision is made on the successful candidate. The employee's personal data is then processed and stored within a secure database. Any unsuccessful candidate's personal data is deleted after six months of a decision being made.	Contract – For candidates/employees, we need to collect personal data to facilitate decision making, to contact the candidate or employee and to ensure a level of service is provided (e.g. all medical requirements are met).
Volunteers - We receive application forms for volunteer posts within the charity. These are reviewed and interviews are done by the volunteer manager and/or the People team before an appointment is made. Volunteer's personal data is secured on a secure database.	Legitimate Interests. Newlife requires personal details to facilitate volunteering. Volunteering for Newlife is beneficial for those who agree to volunteer and it helps Newlife too.
<b>Payroll -</b> Newlife uses a third party payroll specialist to manage our payroll. All timesheets are inputted onto a secure database and sent securely to our payroll provider. After they have completed payroll the details are sent securely to our Finance team who	Contract – To ensure that staff are paid in line with their contract, we need personal data on where payment should be directed to.
administer payment via BACs once checked and authorised.	Legitimate Interests – we share data with our third party payroll provider to ensure an efficient process for all our staff
	Legal - we have a duty to ensure all financial records are available for audit

Pension -	purposes. We are also legally obliged to retain all financial records for at least six years in case of inspection by HMRC. We will not process data outside of this requirement.
Newlife uses a third party pension specialist to manage pensions for staff who have opted in.	Consent – staff are given the option to opt- in to a work based pension. If they opt-in a deduction is made from their four-weekly salary and Newlife as an organisation also make a four-weekly contribution. Pension Information is emailed to the Newlife People team from our payroll provider. This data is processed and stored in Newlife's pension file on our server and then uploaded to our external pension provider; Peoples Pension.
Medical cash plan - Newlife provides a health cash benefit through a medical cash plan to selected staff based on banding and long service.	Consent – Staff complete a form which is emailed by the People team to Medicash. Once enrolled any claims are managed by Medicash. The employee will liaise directly with them.
Attachment of Earnings (AOEs) - Newlife is approached by external organisations such as councils and housing associations to deduct mortgage or rent payments directly from an individual's salary.	Consent – These payments are only ever authorised and deducted after consent has been given by the member of staff.
Retail	
Customer membership - Customer membership is voluntary in all stores except for the Cannock Superstore (which is mandatory due to the conditions of the Superstore lease). We require some personal data to set-up a new membership and the new member is presented with a card which is presented when they purchase items at the till.	Contract (for Cannock Superstore only) - To shop in the Superstore it is a condition of the lease of the property that all customers have to be a member. Therefore all customers sign up to receive a Style Card which requires some personal data. This is renewed annually and costs £2 per person each year. The customer presents their Style Card at the tills every time they want to make a purchase. If customers want to be informed about special events being held then they give consent verbally when becoming a member and is recorded on the EPOS database. This allows the Newlife Marketing team to contact them. Members can unsubscribe from emails and change preferences if they wish.
	Consent – For all other stores, it is not compulsory to have a Style Card to shop in the stores. Customers who choose to have a style card provide personal data so that we can contact them to make them aware

	of special events held within each store.
	Each customer pays £2 for each Style Card
	and this is renewed annually.
Complaints -	
A customer complaint can be made verbally to staff present, can be made by phone, email or through a written letter.	Legitimate Interests – We will look to respond to all complaints made in line with our complaints procedure. All complaints will receive an outcome within 30 days unless an extension is required. In this case the complainant will be informed. We use an internal database called Freshdesk to monitor and record all customer complaints.
Accidents -	
When a member of the public, member of	Legal – we are required to complete an
staff or volunteer are involved in an	accident form/near miss form when an
accident we will complete an accident form	incident occurs. We are required if the
(or near miss form if applicable) to collect	incident is serious to contact the Health
relevant data.	Safety Executive (HSE) and RIDDOR.
Online sales -	
Newlife has an eBay account to sell some	Legitimate Interests – To send the items for
items.	delivery, we require customer postal details.
Warehouse	
Delivery of Play Therapy Pods (on behalf of Care Services Team)	Legitimate Interests – to enable Newlife to
To deliver Play Therapy Pods to families	provide the service requested by the family
with disabled children, the Warehouse team	we need to share personal data with third
arrange deliveries with external couriers.	party couriers to deliver the equipment.
These deliveries are recorded on a Google	
live sheet which is shared with external	
couriers. Once the delivery has been made	
the data is taken off/no longer visible to the	
courier.	

Some personal data which we process is required for us to be able to enter into or perform a contract with you. This has been specified above. If we do not process that information we would not be able to provide the services that Newlife offers.

The list above is not necessarily exhaustive and there may be other purposes for which we collect and use your data. We will inform you about such additional purposes when we collect the data or soon after if we collect it from a third party.

#### Personal data received from third parties

The following is a list of the personal data which we receive from third parties.

Data	Source
We receive personal data and Health data	This comes in via our equipment grant and
from Professionals who support equipment	loan application forms or via phone calls
grant or loan applications.	with professionals to facilitate the

	application process.
Equipment suppliers and professionals assess the specific piece of equipment needed and provide Newlife with a quote.	This comes in via email, phone or by the post to facilitate the application process
Attachment of Earnings (AoE's) from local councils etc	Newlife is approached by external organisations such as councils and housing associations to deduct mortgage or rent payments directly from an individual's salary. We only do this with the consent of the individual.

## Recipient of personal data which we process

We may, on occasion, share personal data with third parties. These can be contractors acting on our behalf, or separate data controllers in which case we will only share the data if we are permitted to do so by law.

Recipients	Personal data we may share
	Pay Academy are our third party pay
Pay Academy	providers. They process our payroll for us
	so receive financial data, names and
	contact details. They ensure a smooth and
	efficient process occurs for our staff.
Medicash – Medical cash plans.	Newlife provides a benefit to employees in
	the form of a medical cash plan. Initial
	employee contact details are provided and
	the employee then registers and providers
	personal data with our provider.
People's Pension. Newlife uses a third party	People's Pension are our third party
pension specialist to manage pensions for	pension providers. We share financial data,
staff who have opted in.	contact details of the individual to facilitate
	an efficient service
The Detective Agency manages/hosts the	When data subjects give consent to provide
Newlife website	personal data that they agree can go on our
	website, we share this data to facilitate this
EDOS avetama provida the equipment and	process. The Names and contact details provided by
EPOS systems provide the equipment and back systems for our customer membership	our customers are stored on the EPOS
and tills within all stores	systems.
Specialist Disability Equipment providers	Newlife uses specialist equipment providers
	to provide the equipment needed by
	disabled and terminally ill children. These
	providers receive personal data sent by a
	family to Newlife, so they can ensure the
	child receives the right piece of equipment
	and then deliver the equipment. They
	require contact details, health information
	and addresses to provide this service.
We look to work with professionals and	We can share information with local
relevant health and local authorities when	statutory bodies on the basis of pursuing

we believe that they have an obligation to provide the child with the equipment that is needed.	legitimate interests. We believe this to be in the best interests of the child and family to get equipment funded by their authority.
RIDDOR/HSE	If a serious accident occurs on any sites which we operate in, we have a legal duty to report this.
Cross Products. Newlife uses a third party to create and manage our internal databases which hold personal data.	Our provider accesses, repairs and develops our databases when required. Personal data is only viewed when required to facilitate the above.

### Transfers of personal data outside the European Union

We endeavour to only store personal data in and transfer it to jurisdictions where it will afforded an adequate level of protection or when we are able to provide appropriate safeguards and ensure that your rights as a data subject can be enforced.

Some jurisdictions are considered by the European Commission to afford an adequate level of protection in which case no additional safeguards need to be put in place for the data to be transferred there.

## **Records Retention Schedule**

### **Retention Policy Statement**

The retention schedule complies with statutory, legal and governance best practice requirements. Newlife endeavours not to keep data longer than is necessary. Data that is no longer required is deleted including both hard data and electronic data. The retention schedule is reviewed across the organisation annual, and updated as required.

Department	Name of Document	Medium	Maximum Retention Period	Notes
Care Services	Nurse Service contact form	Electronic/paper	7 years	Industry guidelines recommend that all data
	Nurse Helpline Triage form	Electronic/paper	7 years	related to Health records should be kept for 7 years
	Equipment Grant application form	Electronic/paper	7 years	
	Photo	Electronic/paper	7 years	
	Equipment Grant assessment and scoring form	Electronic/paper	7 years	
	Equipment Grant Offer Letter	Electronic/paper	7 years	
	Supplier Ordering form	Electronic/paper	7 years	
	Emergency Equipment Loan application form	Electronic/paper	7 years	
	Emergency Equipment Loan Interview sheet	Electronic/paper	7 years	
	Emergency Equipment Loan verbal agreement	Electronic/paper	7 years	
	Emergency Equipment Loan Authorisation form	Electronic/paper	7 years	
	Emergency Equipment Loan Equipment agreement form	Electronic/paper	7 years	
	Emergency Equipment Loan Order Confirmation form	Electronic/paper	7 years	
	Play Therapy Pod Application form	Electronic/paper	7 years	

	Play Therapy Pod Offer Letter	Electronic/paper	7 years	
	Play Therapy Pod Authorisation form	Electronic/paper	7 years	
Campaigns	Letters/Briefings to MP's/Clinical Commissioning Groups/Local Authorities and schools	Electronic/paper	7 years	Industry guidelines recommend that all data
	Confidential Intervention records	Electronic/paper	7 years	related to Health records should be kept for 7 years
	Multi Agency Safeguarding Hub referrals	Electronic/paper	7 years	
	Database Records	Electronic/paper	7 years	
Medical Research	All Medical Research application forms	Electronic/paper	Successful applicants for 7 years, unsuccessful applicants for 6 months	
	All C.Vs for Research applicants	Electronic/paper	Successful applicants for 7 years, unsuccessful applicants for 6 months	
	List of all emails who want to receive research information	Electronic/paper	Consent is given by individual and retained for length of period agreed by researcher	
	Medical Panel scoring record	Electronic/paper	3 years	
	Summary sheet of all applications received for Medical Panel	Electronic/paper	3 years	
	Start-up research grant approval forms	Electronic/paper	7 years	
	All Medical Research Offer letters	Electronic/paper	7 years	
	Acceptance/decline forms for all grants	Electronic/paper	7 years	
	All queries for each research grant	Electronic/paper	7 years	

	Database records for each research grant	Electronic/paper	7 years	
Fundraising	Direct Donation forms (cash/cheque)	Electronic/paper	7 years	We are legally obliged to keep financial records/VAT forms for at least 6 years
	Retrospective Donation forms (via bank)	Electronic/paper	7 years	We are legally obliged to keep financial records/VAT forms for at least 6 years
	Online Donation forms	Electronic/paper	7 years	We are legally obliged to keep financial records/VAT forms for at least 6 years
	Donor Stewardship letters	Electronic/paper	7 years	
	Grand draw raffle tickets	Electronic/paper	7 years	We are legally obliged to keep financial records/VAT forms for at least 6 years
	Sponsor forms	Electronic/paper	7 years	We are legally obliged to keep financial records/VAT forms for at least 6 years
	Material order forms	Electronic/paper	7 years	
	Online express emails	Electronic	7 years	
	'Don't be a stranger' Opt- in forms	Electronic/paper	7 years	
	Donor records on Raisers Edge relationship database	Electronic	7 years	We are legally obliged to keep financial records/VAT forms for at least 6 years
	Consent forms for events and volunteering	Electronic/paper	7 years	
Communications and Marketing	Customer Surveys	Electronic/paper	3 years	

	Staff images	Electronic	Length of	
	Stan intages		employment	
<u> </u>	Marketing data on	Electronic	Consent is	
	those who opt-in to		given by	
	regular contact		individual and	
	regular contact		retained for	
			length of period	
			agreed by data	
			subject	
	Images and data	Electronic	Consent is	
	for website		given by	
			individual and	
			retained for	
			length of period	
			agreed by data	
			subject	
Facilities	Drivers	Electronic/paper	Length of	
	Licence/passport		Length of employment	
	information of staff		employment	
	CCTV images	Electronic	28 days	
<u> </u>	Accident and	Electronic/paper	7 years	Industry
	Investigation forms		, youro	guidelines
	invoorigation ionno			recommend that
				all data
	Remedial Risk	Electronic/paper	7 years	related to Health
	Assessment forms		, youro	records should
				be kept for 7
				years
	Near-miss and	Electronic/paper	7 years	
	dangerous incident			
	forms			
	Any RIDDOR/HSE	Electronic/paper	7 years	
	referrals			
	DSE Assessments	Paper	7 years	
<b>F</b> :	Direct D		7	
Finance	Direct Donation	Electronic/paper	7 years	We are legally
	forms			obliged to keep
	(cash/cheque)			financial
				records/VAT
				forms for at least
	Retrospective	Electronic/paper	7 years	6 years
	Donation forms (via		r yours	
	bank)			
<u> </u>	Online Donation	Electronic	7 years	
	forms			
	Expense forms	Electronic/paper	7 years	]
	Business mile	Electronic/paper	7 years	
	claim forms			
	Private mile	Electronic/paper	7 years	
	declaration forms			
	BACS request and	Electronic	7 years	1

	confirmation forms			]
	New supplier forms	Electronic/paper	7 years	-
	Monthly Credit Card Statements	Electronic/paper	7 years	
	Audit reports and minutes	Electronic/paper	10 years	Meetings and resolutions involving board of directors/trustees should be kept for 10 years
Governance & administration	Complaints log	Electronic/paper	3 years	
	Medical Directors Contract	Electronic/paper	3 years	
	Family Surveys	Electronic/paper	3 years	
	Medical Panel details	Electronic	Updated annually	
	Trustee information	Electronic	Length of trustee service	
	All Data subject request forms	Electronic/paper	3 years	
	Visitor logs and non-disclosure forms	Electronic/paper	3 years	
	Post books	Paper	3 years	
	Trustee minutes	Electronic/paper	10 years	Meetings and resolutions involving board of directors/trustees should be kept for 10 years
	Dhata af d'a shiad		Ormanatia	
Media team	Photos of disabled children/families	Electronic/paper	Consent is given by individual and retained for length of period agreed by data subject	
	Press releases with family stories sent to journalists	Electronic/paper	Consent is given by individual and retained for length of period agreed by data subject	
	Family stories to feed into donor reports	Electronic/paper	Consent is given by individual and retained for length of period	

			agreed by data subject	
	Feature articles sent to Journalists	Electronic/paper	Consent is given by individual and retained for length of period agreed by data subject	
People Team	Application forms for potential employees and volunteers	Electronic/paper	6 years	Legally obliged to keep employment contracts for 6 years after leaving
	Interview notes	Electronic/paper	6 years for successful candidates 6 Months if not successful	
	New Starter forms	Electronic/paper	6 years of leaving	
	P45 forms	Electronic/paper	6 years of leaving	
	Induction paperwork	Electronic/paper	6 years of leaving	
	Required information forms	Electronic/paper	6 years of leaving	
	Pension Opt-in forms/letters	Electronic/paper	6 years of leaving	
	Car permits	Electronic/paper	6 years of leaving	
	Offer of employment letters	Electronic/paper	6 years of leaving	
	Photocopy of Passport	Electronic/paper	6 years of leaving	
	Staff I.D photo	Electronic/paper	6 years of leaving	
	Medicash benefit forms	Electronic/paper	6 years of leaving	
	Policy agreement forms	Electronic/paper	6 years of leaving	
	Probation reviews	Electronic/paper	6 years of leaving	
	Absence request forms	Electronic/paper	6 years of leaving	
	Training request and verification forms	Electronic/paper	6 years of leaving	
	Personal Development Review Forms (PDR's)	Electronic/paper	6 years of leaving	

	Disciplinary actions	Electronic/paper		
	Disciplinary actions	Electronic/paper	Upon expiry 6 years of	
	Investigations, file notes and	Electronic/paper	leaving	
	Grievances		leaving	
	Personality	Electronic/paper	6 years of	
	Profiling results	Electionic/paper	leaving	
	References	Electronic/paper	6 years of	
	Kelerences		leaving	
	Doctors notes	Electronic/paper	6 years of	
	Doctors notes		leaving	
	Change of details	Electronic/paper	6 years of	
	forms for staff &		leaving	
	volunteers		loaving	
	General	Electronic/paper	6 years of	
	correspondence		leaving	
	Certificates and	Electronic/paper	6 years of	
	awards		leaving	
	Volunteer enquiry	Electronic/paper	6 years of	
	forms		leaving	
	Volunteer	Electronic/paper	6 years of	
	agreements		leaving	
	People Team	Electronic/paper	6 years of	
	database entries		leaving	
			-	
Corporate	Duty of Care	Electronic/paper	3 years	
Services	statements			
	Duty of Care	Electronic/paper	3 years	
	Letters			
	Interim reports	Electronic/paper	3 years	
	Thank you letters	Electronic/paper	3 years	
	Confidential	Electronic/paper	3 years	
	Corporate Contact			
	forms			
	Supplier Control	Electronic/paper	3 years of no	
	Database		longer	
			supporting	
			Newlife	
	Contact details of	Electronic/paper	Consent is	
	donors and		given by	
	potential donors		individual and	
			retained for	
			length of period	
			agreed by data	
<u> </u>			subject	
Sales	Customer details	Electronic/paper	Consent is	
Jaics	including contact	Electronic/paper	given by	
	information. This		individual and	
	only applies to		retained for	
	style card		length of period	
	members.		agreed by data	
			subject	
	EBay customer	Electronic/paper	7 years	We are legally
	information		,	obliged to keep
	Information			

	financial records/VAT
	forms for at least
	6 years

We are required by law not to process personal data for longer than is necessary for the purpose for which we process it. Some retention periods are based on legal requirements while others take into account practical needs to keep the data.

Once the applicable retention period expires, unless we are legally required to retain the data or there are important and justifiable reasons why we should keep it, we will securely delete the data.

### Your rights

Under data protection law you are afforded various rights as a data subject. These include the right to:

- access your personal data which we hold;
- request us to rectify inaccurate data or, in some cases depending on the purpose of the processing, data which is outdated or incomplete;
- in certain cases, such as when the data is no longer required or its processing can no longer be justified, require us to erase your personal data;
- restrict the processing of your data;
- object to certain data processing, such as data processing for marketing purposes or when the data processing is based on legitimate or public interests and we do not have compelling legitimate grounds to continue the processing;
- Data portability, which means that if we process data by automated means and on the basis of your consent or contractual necessity, you can obtain a copy of your data in a commonly used electronic form.

There are various conditions and limitations which apply to the above rights and not all of them may apply in all circumstances. For example, if we need to process your personal data to perform a contract with you, you may not ask us to delete that data.

You also have a right to withdraw consent, at any time, when we process data on the basis of your consent, in which case we will cease to process that data. However, this does not affect the validity of anything which we would have done before you withdraw consent.

More information about your rights can be obtained from our Data Protection Officer who can be contacted on <a href="mailto:smorgan@newlifecharity.co.uk">smorgan@newlifecharity.co.uk</a> or 01543 462777. Extension number 2037. Please contact our Data Protection Officer if you wish to exercise your rights.

You may lodge a complaint with the Information Commissioner's Office on https://ico.org.uk.