

Escape Arts Data Retention Policy

1. Definitions

Retention	The continued storage of personal data for a length of time
Destruction	The process of destroying data, either electronic or hard copy, to ensure it is unreadable and cannot be accessed or used again
Personal Information or Personal Data	This term refers to information that relates to an identified or identifiable individual, such as a name or contact details, as defined in UK GDPR Act (2021). Escape Arts stores personal information as defined here of all beneficiaries, volunteers, trustees and staff. For more information, see Escape Arts GDPR Policy

2. Statement of Policy

Escape Arts is committed to processing data in accordance with its responsibilities under UK GDPR (2021). This policy outlines and confirms the length of time we will retain business records and our procedures for destroying physical records containing this data to ensure this is done with no risk of this information being leaked. Any breaches of this policy may lead to disciplinary action.

3. Scope of Policy

This policy applies to all individuals who will encounter personal information in their role with Escape Arts, including but not limited to employees, volunteers, contractors (such as artists) and trustees. This policy applies to all personal information processed by Escape Arts. The Executive Team (CEO/Deputy CEO) take responsibility for the Charity's ongoing compliance with this policy & implementing this across the team.

4. Data Retention Schedule

Financial Records

Data Recorded	Retention Period
Payroll Records	6 years from end of financial year
Annual Accounts	Permanent
Audits	Permanent
Financial Statements (such as those submitted for legal requirements)	Permanent
Invoices	6 years from end of financial year
Bills and Expenses	6 years from end of financial year, unless it is a fixed asset

Bills for Fixed Assets with a 6+ Year Lifetime	Until end of financial year for the expected lifetime period
Credit Card Purchases and Donations (iZettle & SumUp)	6 years from end of financial year
Funding Applications	6 years from end of financial year
Membership Payments	6 years from end of financial year
Employee Bank Details	Duration of employment

Governance Records

Data Recorded	Retention Period
Board Meeting Minutes, Agendas & Papers	10 years after the date of the meeting
AGM Minutes, Agendas & Papers	10 years after the date of the meeting
Annual Report	Permanent
Signed Contracts	Permanent
Complaints	6 years following resolution of complaint
Safeguarding Reports	A minimum of 6 years to be agreed with the Board of Trustees on a case-by-case basis, depending on the seriousness of the safeguarding concern and whether the individual is still engaged with the organisation
Trustee, Chair, Vice-Chair and Board Member Details	Names and posts are permanently retained; other details are removed on resignation
Trustee and Board Member Applications	Up to the end of their appointment. Unsuccessful applications are removed up to 3 months after interviews have taken place.
AGM Proxy Votes	1 year after AGM took place
Membership Applications	For the duration of the membership and a further 12 months following the end of the membership. The Membership Register is updated annually.

HR Records

Data Recorded	Retention Period
Employee Name, Roles & Dates of Contracts	6 years following the end of the employment
Employee Personal Details including Contact Details, National Insurance Number, Bank Details, Date of Birth and Gender	Duration of employment
Annual Leave Records	The end of the financial year after the end of their employment

Job History including Contracts, Pay and Pension History, Pension Estimates, Resignation Letters	Duration of employment, 6 years following the Employee leaving the organisation
Health & Safety Records	6 years
Risk Assessments	Duration of the project the risk assessment refers to, 6 years following this
Statutory Records including Parental Leave, Redundancy, Payment Calculations	6 years following the end of employment
Disciplinary Records, Appeals or Other Legal Proceedings	Duration of employment, 6 years following the Employee leaving the organisation
Freelance/Artist Records	Two years following the end of their contract
Recruitment Records – CVs, Cover Letters & Application Forms	Removed up to 3 months after interviews take place

Digital Records

Data Recorded	Retention Period
Email Inbox	6 years after year end for emails with attachments containing personal information, subject to exemptions: <ul style="list-style-type: none"> • Any email sent to the generic info@escapearts.org.uk, which are deleted 3 years after year end • Emails containing registration, application or booking forms, which are deleted 2 years after year end
Staff Microsoft Accounts	For the duration of employment. At the end of employment, staff Microsoft accounts are archived and closed down 12 months after the staff member has left the organisation.
Recycling Bin	30 days
Downloads	30 days
Deleted Emails Folder	30 days
Spam Emails Folder	30 days
SharePoint Folders	Reviewed quarterly, but documents containing personal information deleted in line with Inbox retention. Folders containing Registration Forms will be reviewed every two years to allow for information to be updated/removed.
Onedrive Folders	Reviewed quarterly, but documents containing personal information deleted in line with Inbox retention
Third Party Applications, such as WhatsApp and Facebook (messages and photos)	Data is reviewed every two years.

Upshot CRM System (Including beneficiary, volunteer, staff & trustee Registration Forms)	Reviewed annually
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Please note that this list is not exhaustive, any further forms of personal data not listed here will follow the correct procedures as determined by Escape Arts CEO/Deputy CEO.

5. Implementation

The Management Team (CEO/Deputy CEO), supported by the Board of Trustees, has specific responsibility for the effective implementation of this policy and we expect all people covered in the scope of this policy to abide by its principles and help to ensure compliance with the UK GDPR Act, which is its objective.

To implement this policy, Retention Reviews will be undertaken annually by the relevant employees, led by the Deputy CEO, to ensure that no personal information or business records are retained no longer than what is outlined in this policy. The Deputy CEO will create a log that records the Retention Reviews, making note of what is removed, how is removed, when it was removed and why it was removed. This ensures compliance with UK GDPR by having a record that confirms Escape Arts policy that no personal data is stored for any longer than absolutely necessary.

6. Monitoring/Review

The Deputy CEO will ensure that the Retention Review Record is kept updated and will implement further reviews of data retention throughout each year where necessary. This policy will be reviewed every two years to ensure its effective implementation.

The Deputy CEO will report any data breaches and how they were dealt with to the Board of Trustees on an annual basis.

Agreed and adopted by the Board of Trustees – Date: January 2026

To be reviewed every two years unless there are any changes to the law.

Next date for review – Date: January 2028