

## Data Storage and Retention Policy

### Introduction

Children's Parliament is committed to retaining personal data for no longer than is necessary for the purpose for which it was obtained or to comply with legal and regulatory requirements.

This Policy sets out time limits for retaining various types of personal data held by Children's Parliament and clear procedures for disposing of personal data.

We reserve the right to amend this Data storage and Retention Policy from time to time without prior notice. Data subjects will be advised of any amendments via the Contact Us section of the Children's Parliament website, where this Data Storage and Retention Policy is publicly available.

For any child working as a Member of Children's Parliament (MCP) a consent form is collected on an annual basis. After a consent form is submitted it is the responsibility of the parent or carer to provide an update if there is a change of consent, or on the information contained in the consent form.

If Children's Parliament are working with a whole class or whole school, in the school setting, then a consent form will be received from the school.

We will always comply with the General Data Protection Regulation (GDPR) when dealing with personal data. Further details on the GDPR can be found at the website for the Information Commissioner [www.ico.org.uk](http://www.ico.org.uk). We will be the data controller of any personal data we hold.

This policy also covers the right of any individual to require the erasure of their personal data (also known as "the right to be forgotten").

In addition to this policy, we have a Website Privacy Policy and a Data Protection Policy, both are available on request from Children's Parliament.

### What is personal data and in what form is it held by Children's Parliament?

Personal data is any data from which it is possible to identify an individual. It includes any expression of opinion about an individual and any indication of the intentions of any other person in respect of the individual. It includes electronic records, emails and photographs as well as letters and paper records.

Children's Parliament holds personal data in the following forms:

- Paper records and electronic copies including;

- agreements and correspondence with parents and carers,
- contracts and paper files for staff,
- consent forms and correspondence related to children and schools involved in our projects.
- details for our Unfearties and other newsletter mailing lists.
- Nominations for awards.
- personal data of individuals who apply for jobs at Children's Parliament.
- Invitees to Children's Parliament events.
- The Children's Parliament IT network and other electronic systems, including email, spreadsheets and word processing applications.
- Storage devices including USB sticks, CDs and DVDs.
- Video recording.

### **How does Children's Parliament protect personal data?**

Children's Parliament has implemented working practices and guidelines to ensure that personal data is not stolen or lost or unlawfully accessed and to ensure that it is not shared with third parties without the consent of the individual to whom it relates.

We use a recognised secure mailing list provider (MailChimp) to manage our Newsletters . More information about their data processing practices can be found at:

<https://mailchimp.com/about/security/>

We use a recognised secure provider (Typeform) to manage data submitted for surveys and questions, including consent forms. More information about their data processing practices can be found at: <https://help.typeform.com/hc/en-us/articles/360029259552-Security-at-Typeform>

### **How long will Children's Parliament retain personal data?**

Children's Parliament will retain personal data for no longer than is necessary for the purposes for which the data was collected or to fulfil its legal obligations.

A number of factors have been taken into account in determining the time limits for retaining personal data, including:

- Children's Parliament needs to retain files for children after they have left our programmes in order to respond to requests for references or other information from schools, universities, colleges and other organisations or from employers. Retaining files for a child for a period of seven years after a child has left a Children's Parliament programme, or until a child reaches the age of 25, whichever the sooner, allows Children's Parliament to provide this information and is not excessive.
- Child Protection files for children who have been the subject of a referral or a multi-agency plan, or other related issues or concerns will be kept for a period of 25 years from the date the child leaves the Children's Parliament programmes in case of future interventions, investigations, inquiries or litigation, or in case children wish to access this information later in life.

- Children's Parliament will keep photos, videos and artwork to document the history of Children's Parliament and enable publications to draw on the history and work of Children's Parliament.
  - Unless the child or their parent or carer have requested otherwise Children's Parliament will use images and videos of the children, to raise awareness of the work of Children's Parliament including marketing and promotional purposes.
  - In communication with the Children's Parliament community including communications with our Unfearties and with staff and trustees of Children's Parliament.
  - On the Children's Parliament website and on a range of social media e.g. Twitter, Instagram and Facebook. Such images would not be accompanied by the child's full name, but may include their first name, the school or the region/city in which the child resides.
  - On internal displays, within the offices of Children's Parliament.
  - As videos and video montages at celebration events for projects and the work of Children's Parliament
  - In reports of the project both electronic and paper copies.
- While the focus of Children's Parliaments work is children, there are times that we may take and use photographs of adults, including staff and volunteers, teachers, parents or carers to raise awareness of the work of Children's Parliament including marketing and promotional purposes. If an adult does not wish their photo to be taken, then they should speak to the Project Lead from Children's Parliament.
- Children's Parliament needs to retain applications for employment and related information, including CVs and references, for individuals who did not join Children's Parliament staff, in case they reapply for vacancies in the future and in order to defend claims that it had acted unlawfully in not offering employment. Children's Parliament will retain this information for six months after the date of the latest application.
- HMRC require all organisations to keep financial records for a period of six years. To avoid any confusion about when the six years starts and finishes, Children's Parliament retains all financial records, including billing records and staff and payroll records for a period of seven years.
- The time limit for lodging claims for breach of contract is six years. Again, to avoid any confusion, Children's Parliament will keep all information that might be subject to a claim for a period of seven years.
- Statutory time limits for most health and safety related incidents, including accident reports and exposure to many hazardous substances range from four years to seven years from the date of the incident.

### Table of retention periods

The following table sets out the periods for which Children's Parliament will retain certain types of personal data. These retention periods will apply in most cases, but in certain circumstances Children's Parliament may retain personal data for longer periods, for example where there is still the possibility of legal action. In these limited circumstances Children's Parliament will document its reasons for retaining personal data beyond the relevant retention period.



| Type of Personal Data   | Retention Period   |
|---|--|
| Children's files and any other detailed information on Children's Parliament participants, including data held in electronic files and the Children's Parliament IT systems | 7 years from the date the child left the Children's Parliament programme or reaches the age of 25, whichever is the sooner.<br><br>At the end of the 7-year period the information for each child will be summarised into project they were involved with key achievements and highlights and stored on the Children's Parliament information system. Other detailed information will be securely disposed of. |
| Summary information on former Children's Parliament members   | Retained indefinitely, unless the individual requests their data to be erased.   |
| Child Protection files for children who have been the subject of a referral or multi-agency plan or related issues or concerns  | 25 years from the date the child left the Children's Parliament programme  |
| Staff, HR and Payroll records   | 7 years from the date the employee left Children's Parliament  |
| Applications for employment and related information, including CVs and references, for individuals who did not join Children's Parliament                                   | Six months after the date of the latest application.   |
| Health and Safety Accident and Near Miss Reports, investigations and other health and safety reports.   | 7 years from the date of the accident or incident.   |
| Photographs   | Retained in line with the guidance above.  |
| Unfearties, self-submission and other Newsletters   | Consent given through subscription or sign in. Consent is reviewed every two years.  |
| Unfearties Unsung Heroes  | Information held for six months. No public communication without approval from the "Unsung Hero"   |

## Secure disposal of documents and deletion of data

At the end of the retention period, or in response to a request from an individual for their personal data to be erased (see below), information will be deleted or disposed of in a secure manner:

- Paper records containing personal data will either be shredded or disposed of by approved confidential waste handlers.
- Personal data held on USB sticks, CDs or other storage media will be erased or destroyed by employees with the appropriate level of authority and access or by approved confidential waste handlers.
- Personal data contained in electronic databases, spreadsheets, word processing or other files will be deleted by a member of staff with the appropriate level of authority and access.
- Personal data held on the Children's Parliament IT system will be deleted by a member of staff with the appropriate level of authority and access.

## The right to erasure – also known as “the right to be forgotten”

Individuals have the right to have their personal data erased if:

- Their personal data is no longer necessary for the purpose for which Children's Parliament originally collected or processed the data.
- If Children's Parliament is relying on their consent as its lawful basis for holding the data, and the individual withdraws their consent.
- If Children's Parliament is relying on legitimate interests as its basis for processing and there is no overriding legitimate interest to continue this processing
- If Children's Parliament is processing their personal data for direct marketing purposes and the individual objects to that processing.

Requests for erasure must be submitted in writing and clearly state the individual's name, including any former names, and their current or previous relationship with Children's Parliament in a way which allows their data to be identified.

On receiving a request for erasure, Children's Parliament will respond without undue delay and within one month of receiving the request. Before responding Children's Parliament will take steps to confirm the identity of the sender to ensure that the request is genuine.

Children's Parliament will respond to confirm either:

That all personal data relating to the individual has been securely disposed of or erased.

That all or some of the data has not been erased, giving reasons for why we have not complied with the request.

## How to Contact Us

If you have any questions, comments or requests regarding this Privacy Policy please contact:

If you have any further queries or complaints regarding data protection, please contact the designated Data Protection Officer (DPO) who is

David Sweetman  
Head of Operations

Children's Parliament, Summerhall, Edinburgh EH9 1PL David@childrensparliament.org.uk

## Complaints

If you are not satisfied with the way that we have handled any of your requests or questions relating to our use of your personal data then you can contact the Information Commissioner's Office at [www.ico.org.uk/concerns](https://www.ico.org.uk/concerns) or phone 0303 123 1113.

The Information Commissioner's Office is the statutory body responsible for overseeing data protection legislation and law in the United Kingdom.