Fundraising Data Retention Procedure

1. Introduction

1.1 This policy is in addition to NMITE's Record Management Policy and Retention Schedule.

1.2 By law (GDPR 2018) NMITE are required to maintain up-to-date and accurate records of individuals in our database. Personal data should be kept for no longer than is necessary to fulfil the purpose for which the data was collected (storage limitation), and we should only collect as much data as is necessary to fulfil this purpose (data minimisation).

1.3 In order to comply with GDPR we must therefore periodically review the personal data we hold and remove anything that is not strictly necessary for our purposes of processing, in line with our Privacy Policy for Donors and Supporters.

2. Data Retention schedule for Fundraising

2.1   The length of the data retention period varies according to the nature of the information that is being held, and the purpose for which it was collected.

2.2   The following schedule has been compiled in line with NMITE's Record Retention.

a)   Records documenting the management of NMITE's relationship with our donors, and records documenting donations to NMITE, will be retained for the duration of the relationship + 6 years.

b)   Records documenting the design, conduct and summary results of fundraising campaigns will be retained until the date of the last action on the campaign + 5 years.

c)   Records documenting the planning, administration and impact/results of public events, including information provided about special access requirements or dietary needs, will be retained until the date of the completion of the event + 3 years.

d)   Any research data relating to identifiable individuals, such as wealth screening, will be retained until completion of the analysis of the data.

2.3   The Companies Act 2006 states that accounting records for a public organisation should be kept for a minimum of 6 years.

2.4   The full NMITE Records Management Policy can be found in the Policy folder.

3. Frequency of data review and data cleansing

3.1   At this stage, data reviews and data cleansing should take place once per year at the beginning of the financial year (August).

3.2   Given that

a.   We have a low number of individual constituents on our database (<10,000);

b.   We do not conduct screening activities on a large scale;

c.   We do not collect sensitive personal information about data subjects,

3.3   The risk of any potential data breach having a high impact effect on our data subjects is very low.

3.4   A bi-annual review should be considered if

a.   The number of individual constituents on our database increases to 10,000;

b.   We begin to conduct screening activities on a large scale;

c.   We begin to collect sensitive personal information about data subjects.

4. Process for data review and cleansing

4.1   The following process should be overseen by NMITE's designated Database Administrator . This role currently sits within the Head of Development and Fundraising's remit.

1.   Use database to filter individual constituents by Last Gift Date;

2.   Consult Data Retention Flowchart and archive/destroy/minimise data as necessary;

3.   Screen against TPS and update communication preferences accordingly;

4.   Screen against Royal Mail Postal Address File (PAF) and update communication preferences accordingly.

We may wish to outsource activities 3 and 4 to a professional data cleansing provider.

5. Ongoing best practice

•   Donorfy performs a daily duplicate check and notifies the Fundraising Team when potential duplicate records are found which are then reviewed..

- Donorfy is synched with MailChimp, which means that if a MailChimp email bounces, or if a recipient changes their communications preferences, these details will automatically be captured on Donorfy.

- Relationship managers are responsible for maintaining the records of individuals in their caseload. If they become aware that contact details have changed, they should update these immediately.

- All Donorfy users should keep an eye out for incorrect data as part of their day to day usage. If an error is identified then it should be amended immediately, or the Database Administrator informed.

Author of Policy	*Jen Newton*
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Approval Authority	*FRC*
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Amendment Dates	*October 2023 – rollover for new academic year*
Reason for update	*Annual rollover*
Date for next review	*1ˢᵗ August 2027, or if* *a. The number of individual constituents on our database increases to 10,000;* *b. We begin to conduct screening activities on a large scale;* *c. We begin to collect sensitive personal information about data subjects.* *(Whichever is earlier)*
Related Policies, Procedures, Guidance, Forms or Templates	• *Donorfy Data Retention Flowchart* • *DPIA 2021 Donor Profiling and Wealth Screening* • *NMITE Donors and Supporters Privacy Policy* • *NMITE Records Management Policy*
Policies superseded by this Policy	*N/A*
Summary of changes made to this version	*Removed references to the Fundraising Associate and updated to appropriate post*