



## DATA RETENTION POLICY

YOR Local Medical Committee Limited ('**YORLMC Ltd**') is the brand name for Bradford & Airedale and North Yorkshire Local Medical Committees. It is the professional voice for all NHS GPs and practice teams across the areas of North Yorkshire & York and Bradford, Airedale, Wharfedale & Craven. YORLMC Ltd is a gateway to pastoral support and provides personal and totally confidential support for GPs and practices in difficulty or experiencing major change. It also provides personal advice and support for practices on a wide range of issues.

In accordance with the principles of the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) ("UK GDPR"), the Data Protection Act 2018 and any other relevant legislation, regulation, code of practice or guidance which now govern how Local Medical Committees use personal data, we will only use any information that you provide and we will comply with standard retention periods wherever possible.

Specifically, YORLMC Ltd:

- will not keep personal data for longer than needed
- will consider and be able to justify, how long to keep personal data. This will depend on the purpose that data is held
- will periodically review the data it holds, and erase or anonymise it when it is no longer needed
- will carefully consider any challenges to its retention of data. Individuals have a right to erasure if YORLMC Ltd no longer needs the data
- will retain personal data for longer if it is only keeping it for public interest archiving, scientific or historical research, or statistical purposes

January 2021

Category of data held:	Consideration	Period of retention
GP Constituents/practice contacts	Article 5(1)(e) of the UK GDPR states:  '1. Personal data shall be:  (e) kept in a form which permits identification of data subjects for no longer than is necessary for the	Delete personal contact details when notified of leaving unless there is a legitimate reason to retain some or all of it longer, such as in connection with a fitness to practice investigation or complaint or for archiving purposes.

	purposes for which the personal data are processed;...'	
Individuals working within organisations	<p>Article 5(1)(e) of the UK GDPR states:</p> <p>'1. Personal data shall be:</p> <p>(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;...'</p>	Delete contact details
Staff		<p>Recruitment records shall not be kept for longer than 6 months unless there is a legitimate reason for keeping them longer.</p> <p>It's recommended that personal information of employees, including contact details, appraisals and reviews be kept for at 6 years following their departure.</p> <p>Many employee records contain sensitive information so it is essential to ensure they are disposed of correctly, this may include the cross shredding of paper records and the secure disposable of hard drives, which should be destroyed rather than formatted.</p> <p>Employees' financial information should be retained for at 7 years as HMRC can go back 6 years and 364 days.</p>
Election data		1 year from the date of the election result
Data Processors		Article 5 (e) of the UK GDPR states personal data shall be kept for no longer than is necessary for the purposes for which it is being processed.

		YORLMC Ltd will review its arrangements with all its data processors when the working relationship comes to an end and ensure personal data is securely disposed of, if and when it is no longer necessary.
Accounts		6 years from the end of the financial year to which the records relate.
Minutes/correspondence		Shall be disposed of when no longer necessary.

<b>Date</b>	<b>Author</b>	<b>Document History</b>
Feb 2019	Corporate Affairs Team, YORLMC Ltd	Approved by Board, YORLMC Ltd
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