

Data Retention Policy

Version history

Version	Date Adopted	Facilitator	Note
1.0			

Document controls

Action	Responsibility
Approval of document	Secretariat and Plenary
Implementation	Secretariat, Plenary, Staff and Supervisory Working Group, Members
Review	Secretariat
Date of next review	

1. Purpose and Scope

1.1 Purpose

The purpose of this Data Retention Policy is to ensure that personal data and key organisational records held by South Dublin County Public Participation Network (SDC PPN) are kept only for as long as necessary and are securely deleted or anonymised when no longer required.

This policy supports compliance with data protection law, good governance practice, accountability for public funding, and transparency.

1.2 Scope

This policy applies to:

- personal data processed by SDC PPN
- key organisational records, including governance, financial and compliance records

It applies to all systems and formats in which data is held, including electronic systems, cloud storage, email and paper records.

This policy operates alongside the SDC PPN Data Protection Policy (Privacy Notice), the Data Management Policy, the Financial Controls Policy and other relevant governance documents.

2. Principles for Data Retention

SDC PPN follows these principles when retaining and managing data:

- data is kept only where there is a clear and lawful reason to do so
- data is retained for no longer than necessary
- data is accurate, relevant and kept up to date
- data is stored securely and protected against unauthorised access
- data is securely deleted or anonymised when it is no longer required
- retention decisions are proportionate and documented

Further information on data protection principles is available from the Data Protection Commission at <https://www.dataprotection.ie>.

3. Roles and Responsibilities

3.1 Secretariat

The Secretariat has governance oversight responsibility for data retention. This includes:

- approving this policy and any updates
- ensuring appropriate oversight of compliance
- receiving reports or summaries where required for governance purposes

The Secretariat does not have direct access to operational systems such as CRM platforms, staff devices or Microsoft storage.

3.2 PPN Staff

PPN staff are responsible for the day-to-day application of this policy. This includes:

- managing records and data held in systems used by the PPN
- applying retention periods correctly
- ensuring data is archived, deleted or anonymised in line with this policy
- liaising with data processors as required

3.3 Volunteer Network

The Volunteer Network acts as a data processor on behalf of SDC PPN and manages the back-end administration and technical operation of Salesforce CRM.

The Volunteer Network applies retention, deletion or anonymisation actions in line with documented instructions from SDC PPN and does not determine retention periods.

3.4 Host Organisation

The Host Organisation does not have access to SDC PPN operational systems such as Salesforce, staff laptops or Microsoft storage.

Its role in data retention is limited to records it processes on behalf of SDC PPN, such as:

- financial records
- payroll-related records
- accounting documentation

These records are retained and deleted in line with agreed instructions and legal requirements.

4. Retention Periods

SDC PPN applies a default retention period of seven years for governance, financial and compliance records, unless a shorter period is clearly appropriate.

Retention periods may vary depending on the type of record, legal requirements and operational need.

4.1 Retention Schedule

Record Type	Retention Period	Reason
Governance records (constitutions, policies, minutes, elections)	7 years	Governance accountability and audit
Financial records (invoices, expense claims, budgets, reports)	7 years	Audit and public funding requirements
Contracts, MOUs and agreements	7 years after expiry	Legal and governance purposes
Complaints and disciplinary records	7 years after closure	Fair process and accountability
CRM – member groups	Active + 7 years after deregistration	Participation history and governance
CRM – group contacts	Active + 7 years	Engagement and accountability
CRM – representatives	Term of role + 7 years	Representation records
Routine correspondence and emails	Up to 3 years	Operational need only
Training and event records	7 years	Reporting and accountability
Website submissions and enquiries	Up to 3 years	Communications management

Retention periods may be adjusted where required by law or funding conditions.

5. Secure Deletion and Disposal

When data reaches the end of its retention period, it is:

- securely deleted, or
- anonymised where appropriate to allow non-identifiable statistical or historical information to be retained

Secure deletion and anonymisation are carried out in a way that prevents recovery of personal data. Where feasible, deletion or anonymisation actions are documented.

6. Exceptional Circumstances

In certain situations, data may need to be retained for longer than the standard retention period. These exceptional circumstances may include:

- ongoing complaints or investigations
- legal claims or disputes
- audit or funding reviews
- statutory or regulatory requirements

Any extended retention must be:

- clearly justified
- documented
- limited to the minimum period necessary
- reviewed regularly

7. Review and Compliance

This policy is reviewed as required, including where there are changes to legislation, funding arrangements, systems or governance structures.

All persons involved in handling data on behalf of SDC PPN are expected to comply with this policy. Any concerns regarding data retention should be raised with PPN staff.

Related Policies and Guidance

Data Protection Commission – Guidance on Data Retention

<https://www.dataprotection.ie>

Glossary (Plain English)

Anonymisation

Removing personal identifiers so data can no longer be linked to an individual.

CRM

Customer Relationship Management system used to manage member and contact information.

Data Processor

An organisation that processes personal data on behalf of the Data Controller.

South Dublin County PPN Data Retention Policy

Data Controller

The organisation that decides why and how personal data is processed. SDC PPN is the Data Controller.

Personal Data

Information that identifies or relates to an identifiable individual.