

Data Retention Policy

This policy sets out what information Little Hiccups holds, how long we hold it for and when it will be deleted.

It also covers the procedure to follow regarding data requests.

- Information held by us
- How long is personal data held for?
- Where is personal data held?
- How is personal data deleted?
- Access to personal information, correction and deletion

Information Held By Us

We hold personal information about:

- Little Hiccups families, children, and young people
- Donors and financial transactions
- Trustees, employees, contractors, and volunteers
- Unsuccessful applicants
- Trusted Partnerships

We also hold information about financial transactions relating to these eg services or treatments provided, products bought, payroll information

Special Category Data Due to the nature of our work supporting children and families with additional needs and disabilities, we process special category data (specifically health and disability data). We process this data in strict compliance with Article 9 of the UK GDPR and the Data Protection Act 2018, ensuring an appropriate lawful basis and condition for processing—such as explicit consent or our legitimate activities as a not-for-profit body with appropriate safeguards.

How Long is Personal Data Held For

We aim not to hold personal data longer than necessary.

Unless requested by an individual, the following types of data will be held for the periods shown below, after which it will be securely deleted or destroyed:



TYPE OF INFORMATION	RETENTION PERIOD
Registration & Attendance Records (Standard family intake and booking forms)	Stored until the child is 18 and has received their Graduation Pack unless tied to a recorded accident, incident, or safeguarding matter (in which case the specific safeguarding/accident periods apply).
Financial transactions, invoices and supplier details	6 years from the end of the financial year to which the records relate (or longer where required by specific grant funding terms).
Employee records (including volunteers and contractors), contracts of employment, changes to terms and conditions, annual leave, training records.	While employment continues and up to 6 years after employment ends
Trustee records, contracts of employment, changes to terms and conditions, annual leave, training records, addresses	While they remain a Trustee and up to 6 years after employment ends
DBS Verification Evidence & Logs (Record of check date, reference number, verification level, and recruitment decision)	Retained for the duration of the role plus 6 years after the individual leaves Little Hiccups.
DBS Certificates & Sensitive Disclosure Details	Maximum of 6 months following the recruitment decision, after which they are securely destroyed in line with the DBS Code of Practice.
Volunteer applications (unsuccessful)	4 months after notifying unsuccessful candidates
Safeguarding Concerns, Reports & Case Records	Retained until the child turns 25 (or indefinitely/in accordance with statutory inquiry requirements where a formal investigation has occurred).
Accident & Incident Reports (Involving Children/Minors)	Retained until the child reaches age 21 (3 years post-adulthood under the statutory limitation period for personal injury claims).



Emails	One year from the end of the month in which they were received or sent unless a longer period is relevant as above. Emails to and from ex-employees or contractors will be deleted within 2 weeks of them leaving unless these form part of the employment record – see above.

Where is Personal Data Held?

Personal data is held across our secure, password-protected systems including Google Drive, our website backend/intake forms, accounting systems, and official email accounts which can be accessed only by authorised Little Hiccups Contractors and Trustees.. Trustee information such as names and addresses are also required by the Charity Commission, the Co-Operative Bank, Companies House and relevant grants.

How Is Personal Data Deleted

All personal and special category data is permanently and securely deleted once its retention period expires:

- Digital Records (Google Drive, secure cloud platforms, email servers, and website backends): Permanently erased from active and archive systems.
- Paper Records (including handwritten incident forms or physical notes): Securely cross-cut shredded or disposed of via a certified confidential waste service.

Access To Personal Information, Correction and Deletion

See our privacy notice which can also be found on our website.

All requests for access to personal information will be handled by the Marketing and Compliance Coordinator.

Responses to requests will be made within 1 calendar month.

All information relating to the individual will be compiled into a report and collected from:

- Google Drive
- Financial transactions
- Emails
- Other electronic records
- Paper records (where applicable)



Policy agreed by Trustees on:

Signed by Chairperson:

To be reviewed:



Amendments

Date	Amendment Made	By whom
15/09/2023	3 year review - no changes	MWP
18/09/2026	3-year statutory & operational review: • Added UK GDPR Article 9 Special Category Data compliance clause. • Corrected SAR response timeframe from 30 days to 1 calendar month. • Updated DBS check retention (disclosure certificates max 6 months; recruitment verification logs retained for duration of role + 6 years). • Added specific retention rules for Safeguarding Records (age 25) and Accident/Incident Reports (age 21). • Updated family intake/attendance retention to age 18 (Graduation Pack). • Clarified financial records retention as 6 years from the end of the financial year. • Updated storage and access details to reflect authorised staff/systems across cloud, email, and website intake.	MWP

