

## 1. Introduction

This policy outlines Saving Faces' approach to Copyright and Trademark legislation and details the process of record retention.

Data retention refers to the length of time data will be actively retained by Saving Faces before it is destroyed, archived or anonymised.

Saving Faces' data retention schedules sets out the period of time that categories of data held by the charity will normally be kept. Presenting retention periods in a schedule format and on the basis of applicable legal or regulatory requirements, recognises good practice, provides a systematic, accountable and transparent approach to data management and compliance.

Importantly, in terms of the personal data we hold, our data retention schedules support Saving Faces to monitor and maintain compliance with the storage limitation principle under the General Data Protection Regulation (GDPR). The storage limitation principle states that we must not keep data longer than necessary for the purposes for which it was collected.

## 2. Scope

This policy applies to all staff, volunteers, Trustees, interns, contractors and third parties who carry out work on behalf of Saving Faces. It covers all records created, received, maintained and held, in all formats, by staff in the course of carrying out their responsibilities. Records are defined as documents, regardless of format, which facilitate the operations and business of Saving Faces and which are thereafter retained for a set period to provide evidence of its activities and transactions.

## 3. Responsibilities

- 3.1 All Employees/Staff of Saving Faces have specific compliance responsibilities.
- 3.2 The Office Manager is responsible for software and system audits.
- 3.3 The Data Protection Officer (DPO) is responsible for retention of records.
- 3.4 The DPO may delegate the responsibility of retention to records, to another qualified member of staff with regard to a specific project.

## 4. Procedure

- 4.1 Legal, statutory and other requirements – general
  - 4.1.1 The DPO retains a list of applicable statutory and regulatory requirements relevant to the company's information systems. Annually, the Office Manager reviews this list, updating as appropriate and ensuring that any activities undertaken do not contravene any of the regulations and statutes prevailing.
  - 4.1.2 Saving Faces will protect its own, and other parties', intellectual property through control over access to information and the proper licensing of information and software.
  - 4.1.3 Saving Faces ensures that it has licences for all proprietary software that is installed on Saving Faces information assets and maintains and monitors a software license register.

# COMPLIANCE AND RETENTION OF RECORDS

## Document Control

Reference: DSP DOC 01-1.2.1h

Issue No: 2.1

Issue Date: 10/02/2023

Page: 2 of 4

- 4.1.4 Saving Faces staff should seek professional advice with regard to intellectual property rights.

## 5. Copyright

- 5.1 Copying (including duplicating and any other variant of the copying concept) of anything (whether document, digital asset, software, or anything else) other than in line with UK copyright law is explicitly forbidden.
- 5.2 Software and other third-party copyrighted items may only be obtained through legitimate suppliers, and only on the basis that the software or copyright license terms will be complied with, including as to numbers of users/basis of sale, etc. Saving Faces will maintain a software and copyright asset register together with copies of software licenses, etc. From time to time, internal audits will be carried out to ensure no unlicensed software has been installed and that the maximum number of user licences has not been exceeded.
- 5.3 Saving Faces copyright ownership of documents (including, drawings, charts, etc., owned or originated by Saving Faces, or contributed to or originated by third parties under contract to Saving Faces, including contractors, teleworkers and Employees/Staff during their employment) should be established through contracts.
- 5.4 Saving Faces copyright ownership of software (including code, code contributions, applications, etc., owned or originated by Saving Faces, or contributed to or originated by third parties under contract to Saving Faces, including contractors, teleworkers and staff during their employment) should be established through contracts.
- 5.5 Saving Faces will ensure that it complies with all legal requirements relating to copyright.
- 5.6 Any use of unlicensed and improperly obtained software or unauthorised use of proprietary information whether belonging to Saving Faces or a third party is strictly prohibited and will be treated as a serious disciplinary breach.

## 6. Trademarks

- 6.1 Management will identify where it is appropriate for Saving Faces to register trademarks.
- 6.2 All trademarks, whether or not registered, are listed and these will be managed by the Officer Manager.
- 6.3 The Officer Manager will take appropriate action, including legal action where necessary, to protect its trademarks from infringement.

## 7. Data protection and privacy

See the Data Protection and Confidentiality Policy.

## 8. Record retention

- 8.1 The required retention periods, by record type, are below:

Record type	Retention period	Responsible
Backup data	6 years	Administrator

Saving Faces

# COMPLIANCE AND RETENTION OF RECORDS

## Document Control

Reference: DSP DOC 01-1.2.1h

Issue No: 2.1

Issue Date: 10/02/2023

Page: 3 of 4

Record type	Retention period	Responsible
Finance data (donors/supporters/fundraisers/tax records)	6 years	Administrator
HR records (employees/job applicants/trustees/SF funded individuals/patrons)	6 years	Administrator
Property lease documents	6 years	Administrator
Third-party contracts and agreements	6 years	Administrator
Expert Patient Helpline data	6 years	Research Project Manager
Research and audit records	20 years	Research Project Manager
Incident documents	6 years	Data Protection Officer (DPO)
Internal audit records	6 years	Data Protection Officer (DPO)

- 8.2 The DPO is responsible for the charity to contact donors, supporters, fundraisers and expert patients within 6 months before the date of the expiry period, to ask if the contact wants to remain on our database. If the contact would like to be removed from our databases, the data must be removed.
- 8.3 The DPO is responsible for the destroying of data except when the responsibility has been delegated to a qualified member of staff to comply with access control policies and procedures. Destruction must be completed within 90 days of the planned retention period.

## 9. Document Owner and Approval

The Data Protection Officer (DPO) is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the DSP Toolkit.

This procedure was approved by the CEO and is issued on a version controlled basis under their signature.

<b>Name</b>	Iain Hutchison
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# COMPLIANCE AND RETENTION OF RECORDS


## Document Control

Reference: DSP DOC 01-1.2.1h

Issue No: 2.1

Issue Date: 10/02/2023

Page: 4 of 4

<b>Signature</b>	
<b>Approval Date</b>	10/02/2023
<b>Review Date</b>	23/06/2023

## Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	CEO	23/06/2021
2	SM review, addition of Introduction, amendments to Scope	SM	23/06/2022
2.1	Clarified that the DPO can delegate the responsibility of retention and destruction of records to another qualified member of staff. Corrected 4.1.4 - removed training of intellectual property rights and modified to seek advice instead.	Fran Ridout	10/02/2023

