



# The D'Oyly Carte Charitable Trust

## GDPR, Document Retention and Destruction Policy 2025

### Purpose

The purpose of this Policy is to ensure that necessary records and documents of The D'Oyly Carte Charitable Trust are adequately protected and maintained, and to ensure that records that are no longer needed, or are of no value, are discarded at the proper time.

### Policy

This Policy represents The D'Oyly Carte Charitable Trust's policy regarding the retention and disposal of records and the retention and disposal of electronic documents.

### GDPR Compliance

The D'Oyly Carte Charitable Trust is committed to complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We only collect and retain personal data where it is necessary to administer our grant-making activities, and we do not collect special category data. Personal data held includes only the contact details (name, email, phone number) of applicants acting on behalf of registered charities, and the bank account details of organisations for the purpose of grant payments. All data is handled securely, used only for its intended purpose, and is not retained for longer than necessary.

Individuals have the right to request access to their personal data, request corrections, and request erasure where applicable. Data subjects can exercise their rights by contacting [info@doylycartecharitabletrust.org](mailto:info@doylycartecharitabletrust.org).

Bank details are stored securely and only used for the purpose of making grant payments to the organisation, not individuals. Proof of bank details (e.g. bank statements) is retained only as long as necessary for validation and audit purposes.

Destruction of documents, whether physical or electronic, will be carried out securely and in accordance with this policy.

### Administration

Attached at Appendix 1 is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical records of The D'Oyly Carte Charitable Trust and the retention and disposal of electronic documents. The Clerk to Trustees is the officer in charge of the administration of this Policy in co-operation with its agents, The Trust Partnership, and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed.

### Applicability

This Policy applies to all physical and electronic records generated in the course of The D'Oyly Carte Charitable Trust's operations, including both original documents and reproductions.

This Policy was approved by the Trustees of The D'Oyly Carte Charitable Trust on: 8<sup>th</sup> July 2025

Signed Andrew Wimble, Chair of Trustees

Review Date:



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### APPENDIX 1– Document Retention Schedule

DOCUMENT	RETENTION PERIOD	REASON FOR RETENTION
<b>Accounting and Finance</b>		
Cash book/record of payments made/ledgers/invoices/petty cash records	6 years from the end of the financial year in which the transaction was made	Companies Act/Charities Act
Invoices for capital items	10 years	Companies Act/Charities Act
Bank paying in counterfoils/Bank Statements/Remittance advices/correspondence re grants/bank reconciliations	6 years from the end of the financial year in which the transaction was made	Companies Act/Charities Act
Receipts cash book	10 years	Companies Act/Charities Act
Bank verification documents (e.g. official bank statement) submitted for the purpose of verifying grantee bank accounts	6 years from the end of the financial year in which the transaction was made	Data Protection Act / Financial audit requirements / Fraud prevention and due diligence (UK GDPR Article 5(1)(e))
<b>Employee/Personnel</b>		
Payroll documentation (currently n/a)	6 years plus current year	Companies Act/ Charities Act/Taxes Management Act
<b>Insurance Documents</b>		
Policies	3 years after lapse	Data Protection Act
Claims correspondence	3 years after settlement	Data Protection Act
Employer's Liability insurance certificate (currently n/a)	40 years	Employers' Liability (Compulsory Insurance) Regulations 1998
Accident reports and relevant correspondence	3 years after settlement	Companies Act/ Charities Act/Data Protection Act
<b>Trustee/director minutes or meetings or decisions</b>	Permanently	Companies Act/ Charities Act/Data Protection Act
<b>Annual Accounts</b>	Permanently	Companies Act/ Charities Act/Data Protection Act
<b>Investment Certificates</b> (held by Investment Managers)	Permanently	Companies Act/ Charities Act
<b>Investment Ledger/Fixed Assets Register</b>	Permanently	Companies Act/ Charities Act
<b>Contracts</b>	6 years after expiry or termination of the contract. (If the contract is executed as a deed (e.g. KCL Chair) the limitation period is 12 years.)	Limitations Act 1980 (6 years is generally the time limit within which proceedings founded on contract may be brought.)
<b>Grant Records</b>	7 years after completion of grant period	Companies Act/Charities Act/ Data Protection Act
<b>Trustee/Director Declarations</b>	7 years	Companies Act/Charities Act/ Data Protection Act



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