



Independent Doctors Federation Data Retention Policy

This Policy sets out the obligations of The Independent Doctors Federation, a company registered in England under number 2695506 whose registered office is at Haslers, Old Station Road, Loughton IG10 4PL (“the Company”) regarding retention of personal data collected, held, and processed by the Company in accordance with EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

The GDPR also addresses “special category” personal data (also known as “sensitive” personal data). Such data includes, but is not necessarily limited to, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation.

Under the GDPR, personal data shall be kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. In certain cases, personal data may be stored for longer periods where that data is to be processed for archiving purposes that are in the public interest, for scientific or historical research, or for statistical purposes (subject to the implementation of the appropriate technical and organisational measures required by the GDPR to protect that data).

In addition, the GDPR includes the right to erasure or “the right to be forgotten”. Data subjects have the right to have their personal data erased (and to prevent the processing of that personal data) in the following circumstances:

- Where the personal data is no longer required for the purpose for which it was originally collected or processed (see above)
- When the data subject withdraws their consent
- When the data subject objects to the processing of their personal data and the Company has no overriding legitimate interest
- When the personal data is processed unlawfully (i.e. in breach of the GDPR)
- When the personal data has to be erased to comply with a legal obligation or
- Where the personal data is processed for the provision of information society services to a child.

This Policy sets out the type(s) of personal data held by the Company, the period(s) for which that personal data is to be retained, the criteria for establishing and reviewing such period(s), and when and how it is to be deleted or otherwise disposed of.

For further information on other aspects of data protection and compliance with the GDPR, please refer to the Company’s Data Protection Policy.

Aims and Objectives

The primary aim of this Policy is to set out limits for the retention of personal data and to ensure that those limits, as well as further data subjects' rights to erasure, are complied with. By extension, this Policy aims to ensure that the Company complies fully with its obligations and the rights of data subjects under the GDPR.

In addition to safeguarding the rights of data subjects under the GDPR, by ensuring that excessive amounts of data are not retained by the Company, this Policy also aims to improve the speed and efficiency of managing data.

Scope

This Policy applies to all personal data held by the Company and by third-party data processors processing personal data on the Company's behalf.

- Personal data, as held by the Company is stored in the following ways and in the following locations:
- The Company's servers, located in Memset's Maidenhead Data Centre
- Laptop computers provided by the Company to its employees

Data Disposal

Upon the expiry of the data retention periods set out below in Part 7 of this Policy, or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise disposed of as follows:

- Personal data stored electronically (including any and all backups thereof) shall be deleted
- Special category personal data stored electronically (including any and all backups thereof) shall be deleted securely
- Personal data stored in hardcopy form shall be shredded
- Special category personal data stored in hardcopy form shall be shredded

Data Retention

As stated above, and as required by law, the Company shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed.

Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed), as set out below.

When establishing and/or reviewing retention periods, the following shall be taken into account:

- The objectives and requirements of the Company
- The type of personal data in question
- The purpose(s) for which the data in question is collected, held, and processed
- The Company's legal basis for collecting, holding, and processing that data
- The category or categories of data subject to whom the data relates

If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.

Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Company to do so (whether in response to a request by a data subject or otherwise).

In limited circumstances, it may also be necessary to retain personal data for longer periods where such retention is for archiving purposes that are in the public interest, for scientific or historical research purposes, or for statistical purposes. All such retention will be subject to the implementation of appropriate technical and organisational measures to protect the rights and freedoms of data subjects, as required by the GDPR.

Data Reference	Type of Data	Purpose of Data	Review Period	Retention Period or Criteria	Comments
Current member	Overall member record	Membership administration and financial requirement	Annual	Continuous during membership	
Pre-Application	Overall member record	Membership administration	Annual	2 years from initial registration	
Pending member	Overall member record	Membership administration and financial requirement	Annual	8 years from date of membership application fee payment	
Archived member	Overall member record	Membership administration and financial requirement	Annual	15 years from being archived	
Post membership	All member information other than the fields specified below	Membership administration and financial requirement	Annual	5 years	Archived for 5 years post membership
Current corporate member	Overall corporate sponsor record	Verification of membership and financial requirement	Annual	Continuous during membership	
Pending corporate member	Overall member record	Membership administration	Annual	2 years from initial registration	
Archived corporate member	Overall member record	Membership administration	Annual	8 years	
Post corporate membership	All member information other than the fields specified below	Membership administration and financial requirement	Annual	5 years	Archived for 5 years
Appraisal record	Appraisal details	Details of appraisal and meeting financial requirements	Annual	10 years	Archived for 10 years post appraisal
Designated body record	Record of revalidation	GMC requirement and financial requirement	Annual	15 years	Archived for 15 years post revalidation recommendation date
Records of GMC concerns	Record of incidents relating to warnings, undertakings and conditions	Designated body requirement	Annual	8 years	Archived for 8 years post closure of concern.
Local concerns	Record of Appraisal Action concerns, local concerns and other concerns	Designated body requirement	Annual	8 years	Archived for 8 years post closure of concern.

Fitness to practise record	Record of GMC fitness to practice referrals and proceedings	Designated body requirement	Annual	8 years	Archived for 10 years post closure of record
Complaint record	Documentation relating to patient complaint	Designated body requirement	Annual	10 years	
Events Records (members and corporate members)	Dates and event type, booking and attendee details	CPD verification and meeting financial requirements	Annual	8 years	Archived for 8 years
Message board	Information for members	Communication to membership	Annual	6 months from message expiry	
Discussion forum	Members comments	Membership communication channel	Annual	2 years from date of last comment within discussion thread	
Invoices and payments (members and corporate members)	Invoices, receipts, credit notes, refunds	Meeting financial requirements	Annual	8 years from invoice creation date	
System generated email log (members and corporate members)	Details of emails sent	Communication to members and corporate members	Annual	3 years from date of email	