Example 2.2.2 - Data disposal protocol

*Note: This is a real example of a draft protocol, never finalised.*

**Data Retention Policy for Housing and Accommodation programme Slovakia (Draft)**

The data of the people have been collected, stored, and used by IFRC/SRC for the purpose of eligibility determination and providing assistance to the displaced people from Ukraine. Data has been collected during various processes indicated below;

1. **Registration:** During registration biodata, name, ID, expiry date, contact number, status, address at place of origin, and current address. Number of family members, sex and age, Disability, and employment status. This includes the information of registrants who were not eligible for the assistance.
2. **Enrolment and agreement:** during enrolment, a tripartite agreement is signed between the landlord, homeowner/company, Slovak Red Cross, and head of household (displaced, hosted, or Slovak family) this agreement contains the information regarding the host family or tenant and contains names, bank information including IBAN, ID number, expiry date, home address. Copy of rental contract and copy of the tripartite agreement. This also contains the name ID and expiry of ID of the Tenant family.
3. **Housing verification:** this contains the pictures of the accommodation.

Note: all this information is stored on the electronic platform.

As per IFRC Data retention guidelines, Finance has its own policies to retain transaction data, therefore, the programme team set the below guidelines for the retention of the data required for programme purposes.

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of beneficiaries** | **Type of data** | **Retention duration** | **Purpose of retention** |
| People who registered but were not eligible for assistance | Biodata, vulnerability, scores | Bio Data will be removed after 3 months of confirmation of ineligibility.  Vulnerability scoring linked to Shelter ID will be retained for 6 months after the closure of the programme | To verify that eligibility was determined based on the programme criteria. |
| People who were eligible but rejected due to non-responsiveness. | Biodata, vulnerability, scores | Bio Data will be removed after 3 months of confirmation of ineligibility.  Vulnerability scoring linked to Shelter ID will be retained for 6 months after the closure of the programme | To verify that eligibility was determined based on the programme criteria. |
| People who enrolled and received shelter assistance for xxx months. | Biodata, vulnerability, scores, agreements, Bank details, pictures of the apartments | All the data will be retained for 6 months after the closure of the programme. | * To verify that eligibility was determined based on the programme criteria. * Beneficiaries received the correct payments for an agreed duration (For reconciliation,). * Complaint handling etc * For internal and external audits |