



Adopted by Full Council on: 12 March 2024

Review Date: March 2025 and as new data is created

Author: Town Clerk

Version: One

## **DATA AND RECORDS RETENTION POLICY**

### **1.0 Introduction**

1.1 Kingswood Town Council issues this policy to meet the requirements incumbent upon them under the GDPR and the Data Protection Act 2018 for the handling of personal data in its role as a data controller.

### **2.0 Scope**

2.1 This policy applies to all employees of Kingswood Town Council including contract, agency and temporary staff, volunteers and employees of partner organisations working for Kingswood Town Council.

### **3.0 Review Statement**

3.1 This policy has been prepared considering prevailing legislation and recognised good practice. New legislation requirements or changes in current legislation may necessitate the review of this document. The Council will continue to review this policy on a regular basis.

### **4.0 Equality**

4.1 In putting the policy into practice, no aspect will discriminate on the grounds of race, sex, sexual orientation, gender reassignment, age, religion, politics, marital status, disability, union membership, or any other grounds likely to place any particular employee at a disadvantage.

### **5.0 Retention**

5.1 In line with the GDPR and the Data Protection Act 2018, Kingswood Town Council will keep some forms of information for longer than others. Information will not be kept indefinitely unless there are specific requirements.

5.2 Appendix A gives a detailed breakdown of timescales for the retention of various types of information.

### **6.0 Disposal**

6.1 When data is no longer required it should be appropriately destroyed. The Council will either use an accredited confidential waste disposal provider, or it will shred the information to using a cross-cut shredder. Information stored electronically will be deleted. Information on what should be deemed as confidential waste is detailed in APPENDIX A.

## **7.0 Monitoring and Compliance**

7.1 Compliance with this policy shall be monitored through a review process. This will be agreed with the Data Protection Officer, and compliance will be reported to the town council.

7.2 Should it be found that this policy has not been complied with, or if an intentional breach of the policy has taken place, the organisation, in consultation with senior management, shall have full authority to take the immediate steps considered necessary, including disciplinary action.

## **8.0 What is Confidential Waste?**

8.1 A record can be in any format including paper, post it notes, disks, CD's, tapes, posters etc. Waste that should be disposed of confidentially includes:

a. Any record which details personal information which:

- Relates to and identifies a living person
- Could help someone identify a person when used with other information
- Is an expression of opinion about an individual
- Indicates our intentions towards an individual

E.g. Name, Address, Date of Birth, Email, Phone numbers, Location data, IP addresses.

b. Any record\* which details special categories of personal data including

- Racial and/or Ethnic Origin
- Political Opinions
- Religious Beliefs (or other beliefs of a similar nature)
- Trade Union membership
- Biometric Information e.g. Photos
- Mental or Physical Health condition
- Sexual life and Orientation
- Criminal Records (actual or suspected)

E.g. Safeguarding, Accident/First Aid, Equalities information, Legal records.

c. Any record\* which details business/commercially sensitive information such as

- Information which Kingswood Town Council would be affected by any loss of, or unauthorised access to. E.g. Contracts, opinions on service delivery, tender information.

If you have any doubt, then please treat the information as Confidential.

## APPENDIX

### KINGSWOOD TOWN COUNCIL RETENTION PERIODS

Process	Retention Period
<b>EMPLOYMENT</b>	
Employee records at Kingswood Town Council, including contracts of employment	End of employment date plus seven years
Staff Appraisals	End of employment date plus seven years
Staff disciplinary and grievance files	End of employment date plus seven years
Job Application records at Kingswood Town Council, including references	Unsuccessful application – date of application and 6 months Successful application – end of employment plus seven years
Staff Payroll information, including pension information	Seven Years
<b>FINANCE</b>	
Income and Expenditure Accounts	Indefinite
Bank Statements	One year after completed year end audit
Cheque book stubs	One year after completed year end audit
Paid Invoices	Seven years
Paid Cheques	Seven Years
VAT records	Indefinite
<b>INSURANCE</b>	
Insurance Policies	Six years after policy end
Certificates of Insurance against liability for employees	Six years after policy end
Certificate of Public Liability	Six years after policy end
<b>HEALTH AND SAFETY</b>	
Accident Book	Adults: Date of incident plus seven years Children under 18 years: Date of birth plus twenty five years
Risk Assessments	Three years
<b>GENERAL MANAGEMENT</b>	
Community Donations Scheme	The date of award plus one year
Councillor Contact Details	Duration of Membership
Third party contractors and contract	Six years from the date that records were created
Electoral Register	Until a new or updated electoral register is received
General Enquiry Records including emails	Two weeks from when the enquiry was received or end of useful life
Poster and leaflet distribution list	The date the leaflets were distributed plus one year
GDPR Compliance and ICO certificate	Five years
<b>MEETINGS</b>	
Planning – Consultation records	One year from application
Minutes of council meeting	Indefinite
Minutes of Committee meetings	Indefinite