



Adopted by Full Council on: 12 March 2024

Review Date: March 2025 and as new data is created

Author: Town Clerk

Version: One

## **DATA 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
Email Correspondence	Up to one year
Employee records at Kingswood Town Council	End of employment date plus seven years
Job Application records at Kingswood Town Council	Unsuccessful application – date of application and 6 months Successful application – end of employment plus seven years
Car use for business records	Until the employee leaves the council
Finance – bought ledger, sales ledger, online banking, payroll, pensions, expenses claims	Seven years
Accident Book	Adults: Date of incident plus seven years Children under 18 years: Date of birth plus twenty five years
Community Donations Scheme	The date of award plus one year
Third party contractors	Up to six years from the date that records were created
Electoral Register	Until a new or updated electoral register is received
General Enquiry Records	Two weeks from when the enquiry was received
Poster and leaflet distribution list	The date the leaflets were distributed plus one year
Planning – Consultation records	One year from application