



CHIPPENHAM  
TOWN COUNCIL

Improving the quality of town life

# Records Management Policy

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Author: Head of Finance and Administration

Responsibility: Strategy and Resources Committee

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# 1 Change Control

This Policy was created in	September 2018
Council Staff were consulted on this document and it was accepted on	
It was ratified by the Council on	
Renewal data	August 2019, however this Policy should be considered a dynamic document and may be amended more frequently
This version is	Version 1.0
It replaces	No previous version
It is necessary to comply with	Data Protection Act 2018  General Data Protection Regulation 2016

## 2 Definitions

Data Protection Act 2018 ("DPA")	The law on data protection in the UK
General Data Protection Regulation ("GDPR")	A new law on data protection that came into force on 25 May 2018 throughout Europe
Data Controller	A person or organisation that handles and processes personal data and determines the way such data should be processed
Personal Data	Any information from which a living individual can be identified
Sensitive Personal Data	Any Personal Data which includes further information as defined in the DPA. Further information includes (i) racial or ethnic origin; (ii) political opinions; (iii) religious beliefs; (iv) membership of a trade union; (v) physical or mental health or condition; (vi) sexual life or preferences; (vii) information about any criminal offence or court proceedings related to a criminal offence
Information Commissioner's Office ("ICO")	The statutory regulator of the DPA and the GDPR
Privacy Notice	A description of Personal Data held by the Council, along with details of purpose, retention and other information about how the Council will handle the Personal Data
Data Subject	As defined in the DPA and the GDPR. The Data Subject is the person who the Personal Data is about, or who is identified by the Personal Data

## 3 Mission Statement

Chippenham Town Council ("the Council") is a town council representing the local community, delivering services to meet local needs and improving the quality of town life for all.

In order to make this happen, the Council collects and uses Personal Data about residents, staff, volunteers, councillors and other individuals who all play their part in being part of the community. This information is gathered in order to enable the Council to provide a rich and broad service. In addition, there may be a legal requirement to use information for the purpose of sharing it with other organisations. In some cases, the Council must collect information to ensure that it complies with statutory obligations.

The Council holds large amounts of personal and sensitive data. It is responsible for safeguarding the data it holds and is legally bound under the GDPR to ensure the security and confidentiality of personal information processed. These responsibilities extend to other organisations working on behalf of the Council.

### 3.1 Purpose

This Policy is intended to ensure that Personal Data is dealt with correctly and securely and disposed of in accordance with the DPA, GDPR and other related legislation. It will apply to information regardless of how it is collected, and irrespective of whether it is held in paper files or electronically.

Everyone involved with the collection, processing and disclosure of Personal Data will be aware of their duties and responsibilities by adhering to these guidelines.

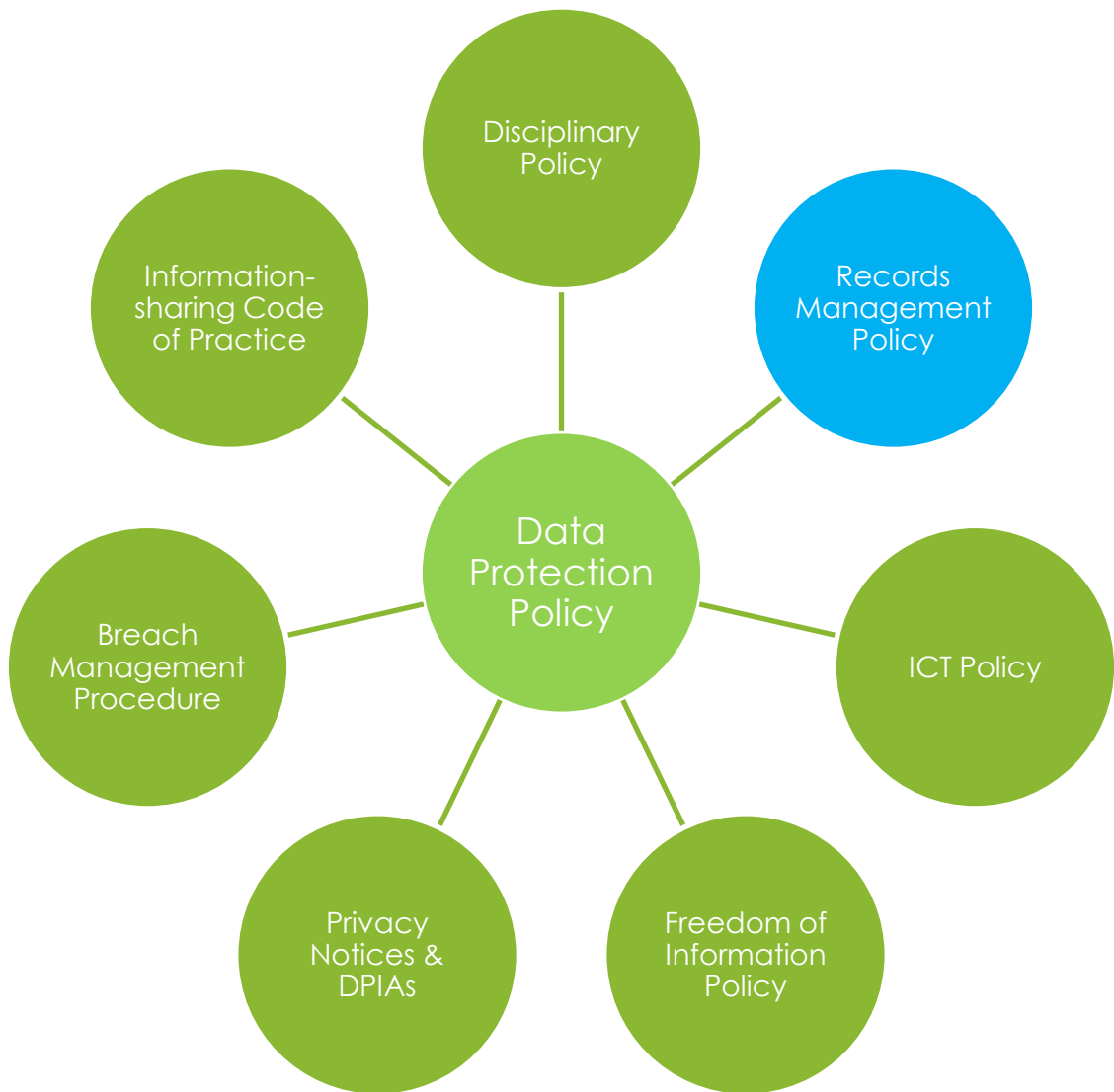
This Policy is part of the Council's suite of policies designed to ensure that the Council is compliant with the DPA and GDPR in all aspects of its work where Personal Data is handled.

The spidergram in the next section shows how this Policy interacts with those other policies.

Staff and councillors are expected to adhere to the principles and spirit of this Policy to protect Personal Data belonging to our residents, friends of the Council and members of staff. Anyone found to have breached this Policy may find that the Council will invoke the Disciplinary Procedure.

This Policy has been approved by the elected members of the Council, and is evidence of the commitment the Council makes to safeguarding Personal Data.

## 4 Spidergram of Policies



## 5 Data Protection Principles

The GDPR establishes enforceable principles that must be adhered to at all times:

1. Personal Data must be lawfully and fairly processed, in a transparent manner
2. Personal Data shall be obtained only for specified and explicit purposes
3. Personal Data shall be adequate, relevant and not excessive
4. Personal Data shall be accurate and kept up to date
5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose or those purposes
6. Personal data shall be kept secure and protected by appropriate technical and organisational measures
7. A data controller must be able to demonstrate compliance with these principles

It is in relation to Principle 5 that a Records Management Policy is necessary.

However, managing records properly has a number of additional benefits to the Council. These include the following:

- To establish legal rights or defend legal claims
- As part of a corporate document management system
- Assigns role-based responsibilities
- Safeguards confidential and proprietary information, helping the Council to reduce and manage operational and reputational risk
- Helps the Council to make informed decisions

This Policy sets principles around how the Council will store records and at Appendix 1, the processing activities are listed against the recommended or statutory retention periods.

## 6 Records Management Principles

### What is Records Management?

There are many definitions of Records Management, as it means different things to different types of organisation. For the Council's purposes, it means the management of records with a view primarily to complying with data protection legislation.

### What are "records"?

Records are information, in any format whether written or electronic, that is held by or stored within the Council, which supports and provides evidence of activities and transactions of the Council.

### Establishing the "core record"

Frequently multiple copies of the same record will exist in users' mailboxes or files. This Policy applies only to the core or *master* record. It is important that only the core record is retained so that at the appropriate destruction date, the officer responsible for destroying the record is aware of where the core record is held so as to properly destroy or delete it.

### Authenticity

Records must be authentic, usable and have integrity. If the core record does not have these properties then it cannot be relied upon as a proper record and an alternative record must be located to exist as the core record. If no alternative record exists then the core record should be retained but with a clear explanation of what has happened to it.

### Availability

Arrangements must be made for the continuity and availability of the core record both whilst it is in operational use, but also during IT infrastructure changes. This includes storing the record in a secure IT system, or in an environment with physical security, and integrity. Systems for storage should also ensure effective retrieval of the records.

### Ownership

All records must be attributed to an owner, by name and designation. This is to ensure that in future where the officer no longer works for the Council, the record can be passed to a successor in the same or similar post.

### Exceptions

The default position is that the record must be destroyed or deleted on the destruction date. However there may be strong reasons to retain the record for a longer period:

- A legal claim is ongoing
- A review has meant there is a need to set a different destruction date
- The record has historical value in which case it must be transferred to an archive
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## **7 Training & Development**

The Council is committed to ensuring the staff adopt the highest standards in relation to the processing and handling of Personal Data.

All existing staff will be trained within 6 months of the dissemination of this Policy.

New staff (and councillors) will be trained as part of their induction within 3 months of their joining the Council and being able to access Personal Data.

Staff will be re-trained according to their needs against the tide of new guidance and legislation. It is anticipated that this will usually be annually.

No member of staff will have access to any Personal Data unless they have read this Policy first.

## 8 Further Information

Any person reading this Policy requiring further information or assistance is invited to contact the Council's Data Protection Officer at [dpo@chippenham.gov.uk](mailto:dpo@chippenham.gov.uk).

Where any person has a complaint about the way the Council has handled their Personal Data or that of their child's, they may address their concern in writing to the Chief Executive.

For further information about the DPA, GDPR and its application, the Information Commissioner's Office has a wealth of information on its website – [www.ico.org.uk](http://www.ico.org.uk)

## Annex 1 – Retention Periods

Process	Retention period
External football organisation lists at Stanley Park	7 years
Football enquiries at Stanley Park	For 6 years for over 18s from last contact with client For 25 years from date of birth of minor (under 18)
Visitors book at Stanley Park	For 1 year from date of entry
Room bookings at Chippenham Town Hall, the Museum and Stanley Park	7 years
Chippenham images at Chippenham Museum	indefinitely
Collections (gifts) at Chippenham Museum	indefinitely
Collections (loans) at Chippenham Museum	Period of loan + 3 years
Crediting names to collections at Chippenham Museum	until the item is no longer displayed
Enquiries at Chippenham Museum	18 months from receiving the initial enquiry
Friends of Chippenham Museum	3 years from the date the records were first created
Oral history at Chippenham Museum	indefinitely
Private event lists at Chippenham Museum	3 years from the date the records were first created
Public event lists at the Museum	Information is deleted on completion of the event
Visitors comments book records at Chippenham Museum	indefinitely
Volunteers at Chippenham Museum	For 7 years from the date of the booking
Finance (Bought Ledger, Sales Ledger, Credit Card purchases, On-line banking, Payroll)	7 years
Event applications at John Coles Park	For 1 year from the date of the booking
Memorial bench & tree applications at John Coles Park	7 years
Images taken of individuals in Chippenham area	From the date the image was received by us + 1 year
Images of public crowds in Chippenham area	From the date the image was received by us + 1 year
Civic award records at Chippenham Town Council	Once the winner of the award is selected, all other nominations are removed within 6 months.
Civic event records at Chippenham Town Council	For 3 years from the date the records were first created, or from when consent was last provided, whichever is later.

Mayor's cadet applications at Chippenham Town Council	For 1 year after the cadet has completed his or her assignment.
Public meeting records at Chippenham Town Council	Once the minutes are sent the personal data is removed.
Xmas cards distribution lists at Chippenham Town Council	From the date the data was received by us + 1 year
3rd party acts & performer records at Chippenham Town Council	For 6 years from the date the records were first created
Box office marketing lists at Chippenham Town Council	For 3 years from the date the records were first created, or from when consent was lasted provided, whichever is later.
Box office ticket records at Chippenham Town Council	For 7 years from the date of the booking
Event tickets waiting list at Chippenham Town Council	Information is deleted on completion of the event
3rd party events ticket sale records at Chippenham Town Council	Once Chippenham receive payment from the event organisers + 3 months
Bus ticket sale records at Chippenham Town Council	Once Chippenham receive commission payment from the bus organisations + 3 months
General enquiry records at Chippenham Town Council	2 weeks from when the details were recorded
Posters & leaflets distribution lists at Chippenham Town Council	The date when the posters are removed / leaflets have been distributed + 1 year
Visitor records at Chippenham Town Council	2 weeks from when the details were recorded
Allotment records at Chippenham Town Council	Contracts are destroyed once the Allotment letting period ends + 6 years
Band concert lists at Chippenham Town Council	For up to 6 years from the date the records were first created
Car Park at Chippenham Town Council	Once the permit expires
Community donation records at Chippenham Town Council	The date of the closing deadline + 1 year
Electoral register at Chippenham Town Council	Until a new or updated Electoral Register is received.
Seasonal scheme records at Chippenham Town Council	For up to 6 years from the date the records were first created
Apprenticeship records at Chippenham Town Council	unsuccessful application - date of application + 6 months successful application - end of apprenticeship + 7 years
ATCM lists at Chippenham Town Council	until the projects are completed
Car use for business records at Chippenham Town Council	Until the individual leaves the council.
Work experience records at Chippenham Town Council	unsuccessful application - immediately destroyed successful application - period of work experience
Community distribution lists at Chippenham Town Council	until the projects are completed

3rd party contractor lists at Chippenham Town Council	For up to 6 years from the date the records were first created
Burial records at Chippenham Cemetery	indefinitely
Grave Transfer records at Chippenham Cemetery	indefinitely
Planning - consultation records at Chippenham Town Council	1 year from application
Planning - freight request applications at Chippenham Town Council	2 years from application
Planning - waiting restriction applications at Chippenham Town Council	2 years from application
Accident Record Book at Chippenham Town Council	Adults: Date of incident + 7 years Children (under 18): Date of Birth + 25 years
Property letting records at Chippenham Town Council	Until contract expires + 6 years
CCTV images at Chippenham Town Council	Footage retained for 30 days
Job application records at Chippenham Town Council	unsuccessful application - date of application + 6 months successful application - end of employment date + 7 years
Employee records at Chippenham Town Council	end of employment date + 7 years