

Data Retention Policy

Introduction

Chippenham 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.

Scope

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

Review Statement

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.

Equality

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.

Retention

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

APPENDIX B gives a detailed breakdown of timescales for the retention of various types of information.

Disposal

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 on what should be deemed as confidential waste is detailed in APPENDIX A.

Monitoring and Compliance

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 Corporate Management Team.

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.

What is Confidential Waste?

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:

(1) 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.

(2) 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.

(3) Any record* which details business/commercially sensitive information such as

- Information which Chippenham 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 B

Chippenham Town Council 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 Chippenham Town Hall, and Stanley Park	For 1 year from date of entry
Room bookings at Chippenham Town Hall, the Museum and Stanley Park	Date of last booking + 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 and Monkton Park	Date of last booking + 7 years
Memorial bench & tree applications at John Coles Park	10 years
Images taken of individuals in Chippenham area	Indefinitely. Published photos can be removed on request
Images of public crowds in Chippenham area	Indefinitely. Published photos can be removed on request
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 lasted 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 7 years from the date of the last booking
Box office ticket records at Chippenham Town Council	For 7 years from the date of the last 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	For 7 years from the date of the last booking
Bus ticket sale records at Chippenham Town Council	Once Chippenham receive commission payment from the bus organisations + 6 months
General enquiry records at Chippenham Town Council	2 weeks from when the details were recorded
The Report-it system	Records retained for the period that customers are registered, records deleted upon de-registration
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 months from when the details were recorded
Allotment records at Chippenham Town Council	Managed by the Allotment Society
Band concert lists at Chippenham Town Council	For 7 years from the date of the last booking
Car Park at Chippenham Town Council	Once the permit expires
Grants records at Chippenham Town Council	The date of the closing deadline + 3 years
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 7 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
Car use for business records at Chippenham Town Council	Until the individual leaves the council + 7 years
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 7 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	3 years from application
Planning - freight request applications at Chippenham Town Council	3 years from application
Planning - waiting restriction applications at Chippenham Town Council	3 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 + 7 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
Email correspondence	Up to 5 years