

# Thame Town Council

## Document Retention and Disposal Policy

### 1. Introduction

- 1.1 The guidelines set out in this document support the Town Council's Data Protection Policy and assist us in compliance with the Freedom of Information Act 2000 and other associated legislation.
- 1.2 It is important that the Council has in place arrangements for the retention and disposal of documents necessary for the adequate management of services in undertaking its responsibilities. This policy sets out the minimum requirements for the retention of documents and sets out the requirements for the disposal of documents. It is important that this document be updated on a regular basis.
- 1.3 Thame Town Council will ensure that information is not kept for longer than is necessary, and will retain the minimum amount of information that it requires to carry out its function and the provision of services, whilst adhering to any legal or statutory requirements.

### 2. Aims and Objectives

- 2.1 It is recognised that up-to-date, reliable and accurate information is a vital tool to support the work that the Council does and the services provided for its residents. This document will help to:
  - ensure the retention and availability of the minimum amount of relevant information that is necessary for the Council to operate and provide services to the public
  - comply with legal and regulatory requirements, including the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004
  - save employees' time and efforts when retrieving information by reducing the amount of information that may be held unnecessarily. This will assist them as they carry out their daily duties, or if searching for information under the Freedom of Information Act
  - ensure archival records that are of historical value are appropriately retained for the benefit of future generations.

### 3. Scope

- 3.1 For the purpose of this Strategy, "documents" includes electronic and paper records.
- 3.2 Where storage is by means of paper records, originals rather than photocopies should be retained where possible.

## **4. Standards**

4.1 The Council will make every effort to ensure that it meets the following standards of good practice:

- adhere to legal requirements for the retention of information as specified in the Retention Schedule at Appendix A. This document provides a framework for good practice requirements for retaining information
- retain personal information in a locked filing cabinet within the Town Clerk's office and access to these documents will be to authorised personnel
- retain disclosure information in a locked cabinet in the Office Administration Manager's office
- appropriately dispose of information that is no longer required
- take appropriate measures to ensure that confidential and sensitive information is securely destroyed
- information about unidentifiable individuals will be permitted to be held indefinitely for historical, statistical or research purposes, e.g. Equalities data
- wherever possible, retain only one copy of personal information and that will be held in the Town Clerk's office.

## **5. Breach of Policy and Standards**

5.1 Any employee who knowingly or recklessly contravenes any instruction contained in, or following from, this Policy and Standards may, depending on the circumstances of the case, have disciplinary action, which could include dismissal, taken against them.

## **6. Roles and Responsibilities**

6.1 The Town Clerk has overall responsibility for the Policy.

6.2 The Office Administration Manager is responsible for the maintenance and operation of the policy, including ad hoc checks to ensure compliance.

6.3 Each individual officer is responsible for ensuring that the guidelines set out in this policy are adhered to and to ensure that any documents disposed of are done so in accordance with the sensitivity, i.e. whether "normal", or "confidential" waste.

## **7. Confidential Waste**

7.1 Fundamentally, any information that is required to be produced under the Freedom of Information Act or the Environmental Information Regulations, is available on the website or is open to public inspection should **not** be treated as confidential waste.

7.2 However, information that is protected by the Data Protection Act or as Confidential under the Council's constitution should be treated as confidential waste for disposal purposes.

### ***Examples of what constitutes confidential waste:***

- Exempt information contained in committee reports
- Files containing the personal data of an individual and files that predominantly relate to a particular individual or their circumstances, e.g. completed application forms and letters

- Materials given to us on a “confidential” or on a limited use basis, e.g. material provided by contractors or the police

***Examples of what does not constitute confidential waste:***

- Documents that are available to the public via the Publication Scheme on our website or by submitting an appropriate search request to council for general information
- All reports and background papers of matters taken to Committee in public session, unless specifically exempt

## **8. Disposal of Documentation**

- 8.1 Confidential waste which clearly shows any personal information or information which can be identified using the parameters in 7.2 will be shredded by a contractor at the Town Hall.
- 8.2 All information appertaining to children is to be shredded.
- 8.3 Information placed in clear recycling bags is disposed of as general paper waste for recycling purposes.

## **9. Retention**

- 9.1 Timeframes for retention of documents have been set using legislative requirements (NALC) and the Chartered Institute of Personnel and Professional Development (CIPD) guidelines.
- 9.2 Throughout the retention the conditions regarding safe storage and controlled access will remain in place.
- 9.3 Disclosure information appertaining to CRB checks must be kept securely in a locked cabinet. Only those entitled to see it in the course of their duties should have access. The security and confidentiality of all Disclosure information is closely registered under the Police Act 1997.
- 9.4 Disclosure information must not be retained for a period of more than six months and must be destroyed in a secure manner using the shredder in the main office filing area.
- 9.5 Any unauthorised employee accessing or attempting to access Disclosures or Disclosure information or personnel records will be dealt with under the Council's disciplinary procedures.

## **10. Storage and Access**

- 10.1 Disclosure information is kept separately from personnel files and in a securely lockable, non-portable cabinet with access strictly controlled and limited to the Town Clerk and the Office Administration Manager.

## **11. Handling**

- 11.1 The Council complies with s125 of the Police Act 1997, so that Disclosure information is only passed to those authorised to receive it in the course of their duties. The Council maintains a record of all those to whom Disclosures or Disclosure information

has been revealed and recognises that it is a criminal offence to pass this to anyone who is not entitled to receive it.

- 11.2 Personal information will only be available to those who are authorised officers.
- 11.3 Customer details and information will be kept up to date and reviewed annually by an authorised officer.

## **12. Usage**

- 12.1 Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's/employee's consent has been given. Disclosure information will be shared between different areas of the Council, if necessary.
- 12.2 When Disclosure information is shared with anyone other than the Town Clerk, Office Administration Manager and direct Manager, the employee must be given reason why this information is being showed.

## **13. Transfer of Records to Archival Storage**

- 13.1 Any records required for permanent storage should be discussed with the Archivist/Local History Officer at the County Record Office/Archive for further information on transfer procedures.

#### 14. Recommended Document Retention Timescales

- 14.1 The retention period should be the number of years specified **plus** the current financial period (i.e. three years plus the current period, therefore at least three years documentation will always be retained at any given point in time).
- 14.2 This list is not exhaustive. If you are unsure about any documentation, contact the Town Clerk or the Office Administration Manager for clarification.

Document	Retention Period
<b>Financial</b>	
Receipt and payment account(s)	Indefinite
Receipt books of all kinds	6 years
Bank statements, including deposit/savings accounts	Last completed audit year
Bank paying-in books	Last completed audit year
Cheque book stubs	Last completed audit year
Paid invoices	6 years
Paid cheques	6 years
VAT records	6 years
Petty cash, postage and telephone books	6 years
Salary Sheets	12 years
Investments	Indefinite
Time Sheets	Last completed audit year
<b>Personnel</b>	
Pension Records	Until individual is 65 years old
Personnel Records	7 years
<b>Corporate</b>	
Minute books	Indefinite
Scales of fees and charges	6 years
Quotations and tenders	6 years
Insurance policies	While valid
Certificates for insurance for liability for employees	40 years from date on which insurance commenced or was renewed
Title deeds, leases, agreements, contracts	Indefinite
Hall hire	1 year
Allotments register and plans	Indefinite
Parking	3 years
Complaints	3 years
Members Allowance Register	6 years
Member Filming Records of Public Meetings	6 years
<b>Health &amp; Safety</b>	
Accident Forms	25 years
Incident Forms	25 years
Risk Assessments	On going