



NORTH HERTFORDSHIRE DISTRICT COUNCIL

Retention Schedule – Place

**Active Communities
Emergency Planning
Greenspace
Leisure Management
Waste Services**

January 2020

Document Control**Retention Schedule**

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|---------------------------|--------------------------------------|
| Organisation | North Hertfordshire District Council |
| Title | Retention Schedule |
| Author | Directorate - Place |
| Filename | NHDC |
| Owners | Vaughan Watson |
| Subject | GDPR Compliance |
| Protective Marking | Unclassified |
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Revision History

| Revision Date | Version | Previous Version | Description of Revision |
|-----------------------------|----------------|-------------------------|--------------------------------|
| October 2018 | 1.0 | | New document |
| October 2019 – January 2020 | 2.0 | 1.0 | Annual review |
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Document Approvals

This document requires the following approvals:

| Sponsor Approval | Name | Date |
|-------------------------|----------------|-------------|
| | Vaughan Watson | 17/01/20 |
| | | |

Document Distribution

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1. Introduction

The Council's Approach to Data Management

In response to the requirements of the General Data Protection Regulations in particular Principle (e) storage limitation: 'You must not keep personal data for longer than you need it. You need to think about – and be able to justify – how long you keep personal data. This will depend on your purposes for holding the data. You need a policy setting standard retention periods wherever possible, to comply with documentation requirements. You should also periodically review the data you hold, and erase or anonymise it when you no longer need the data. You can keep personal data for longer if you are only keeping it for public interest archiving, scientific or historical research or statistical purposes.

This Retention Schedule provides a generic guidance on when data should be deleted once it is no longer in use.

The Retention Schedule is regularly reviewed in light of new guidance and best practice. Revisions may also be prompted by changes in legislation, formal guidance and relevant case law.

Further information on the Data Protection Act 2018 and associated legislation, the Freedom of Information Act 2005 and Environmental Information Regulations 2004 can be found on the Information Commissioner's Office (ICO) and the Department of Environment Food and Rural Affairs (DEFRA) websites:-

<https://ico.org.uk/>

<http://www.defra.gov.uk/corporate/policy/opengov/eir/guidance/index.htm>

The IT Departments Information & Asset Management has been charged with managing the Council's approach to Data Protection, Data Quality Issues, Data Sharing Agreements and Data Retention. The Information & Asset Team will review and manage the data retention practices within the authority and provide guidance on the legislative provisions that have a bearing on this work.

The introduction of the Data Protection Act 2018 brought about a fundamental shift in how local authorities, et al. approach the acquisition, storage, use and deletion of data, particularly when it contains personal information. This change in culture, from one that resulted in the hoarding of data to one that views data as both an asset and a potential liability, continues as local authorities face competing pressures as regards their duties under Data Protection legislation and those associated with freedom of information law.

3. Responsibilities of All Officers

The appropriate management of personal data is a responsibility of all employees of North Hertfordshire District Council. Accordingly, all Officers of the Customers directorate should take reasonable steps to ensure that personal and sensitive data is managed with regard to the principles of the Data Protection Act 2018 and the content of this Policy. Any breaches of this document should be report to the Service Director, Place and the Data Controller without delay.

Vaughan Watson – Service Director – Place - Vaughan.Watson@north-herts.gov.uk
Howard Crompton – Data Controller - DataController@north-herts.gov.uk

4. Review of this Document

This Policy will be reviewed on a regular basis to ensure that it reflects best practice. Revisions may also be prompted by changes in legislation, formal guidance and relevant case law.

Any operational problems experience in connection with the implementation of this policy should be direct to the Service Director, Place so that remedial options can be identified in a timely fashion.

Emergency Planning:

| Activity | Examples of Documents | Personal Data Included | Retention Period | Rationale for Retention Period | Responsible Officer |
|---|------------------------------|-------------------------------|---|---------------------------------------|----------------------------|
| Process to develop the emergency /disaster plan for the local community | Emergency plan | No | Destroy out of date documents every 3 years | Statutory function | Service Director - Place |

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| NHDC Resilience Plan & associated Response & Support Plans | Incident control room plan | No | Destroy out of date documents every 3 years | Statutory function | Service Director - Place |
| Internal Business Continuity Plans: Service & Infrastructure Plans, Business Impact Assessments | Critical functions forms | No | Destroy out of date documents every 3 years | Statutory function | Service Director - Place |
| Activities that report on all major incidents in the local community, whether the emergency plan has been invoked or not. Emergency Planning Incident Response documentation (Logbooks, emails relating to response?) | Incident records | Yes | Major Incidents - Permanent | Statutory function | Service Director - Place |
| Activities that report on all minor incidents in the local community | Emails | Yes | Minor Incidents - 7 years | | Service Director - Place |
| Business Continuity incident response documentation | Incident management team minutes | Yes | Retain 3 years | Statutory function | Service Director - Place |
| Resilience Plan Call Out List <i>(Contains personal data)</i> | Resilience Plan Call Out List | Yes | Destroy out of date documents, and review at least every six months | Statutory function | Service Director - Place |
| Correspondence relating to Emergency Plans or Business Continuity Plans | Emails | No | Retain 3 years | Statutory function | Service Director - Place |

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| Process to test the emergency/disaster plan for the local community | Test records | No | Destroy 10 years after closure <i>(Retention Schedule page 36)</i> | Statutory function | Service Director - Place |
| Training & Testing: Training records for Staff/Volunteers, Plan Testing/Exercise documentation | Training records | Yes | Retain 3 years | Statutory function | Service Director - Place |
| Financial documents: Purchase orders | Purchase orders | No | Retain 6 years (Financial regulations) | Financial Regulations | Service Director - Place |
| Stock and equipment listings | Stock lists | No | Retain 6 years | | Service Director - Place |

Greenspace:

| Activity | Examples of Documents | Personal Data Included | Retention Period | Rationale for Retention Period | Responsible Officer |
|--|---|-------------------------------|---|---|----------------------------|
| Contractual Information stored both in Hard Copy and digital including evaluation criteria's e.g. Howard Park contractors and Bancroft Redevelopment | Contract documents, emails, correspondence | No | 2 years after terms of contract have expired | Existing schedule covers Contract Management, Tender etc. | Service Director - Place |
| Public Consultation data e.g. surveys for Bancroft and Howard Park | Survey results, analysis and subsequent reports | Yes | 5 years after consultation closure | Existing schedule broadly covers Public Consultation | Service Director - Place |
| Letters to residents - Correspondence & personal information | | Yes | 6 years after administrative use is concluded | Outlined in existing Council-wide Retention | Service Director - Place |

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| | | | | schedule | |
| "Contractual information -Main contractual information (Grounds Maintenance contract e.g. John O'Connors) -Any small contracted works outside of main contract" | Contract documents, emails, schedules, programs of work, meeting minutes, variation orders, correspondence, maps and plans | No | 2 years after terms of contract have expired | Contract Management covered by main schedule | Service Director - Place |
| Locally stored HR data (recruitment/employee relations etc.) | | Yes | 6 years after employment ceases / 1 year after recruitment has been finalised | Existing schedule - Generalist HR retention schedule | Service Director - Place |
| Insurance claim files e.g. asbestos/child accident information | | Yes | Permanent | Finance - corporate | Service Director - Place |
| Health & Safety information | | Yes | Dependant on nature of incident | Corporate & legislation | Service Director - Place |
| Burials data e.g. personal information | Burial ledgers, emails, grave grants, memorial ledgers, site plans | Yes | Permanent | Statutory requirement | Service Director - Place |

Leisure Management:

| Activity | Examples of Documents | Personal Data Included | Retention Period | Rationale for Retention Period | Responsible Officer |
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| Leisure Contracts | | No | 6 years after terms of contract have expired | Contract Management covered by main schedule | Service Director - Place |

Waste Services:

| Activity | Examples of Documents | Personal Data Included | Retention Period | Rationale for Retention Period | Responsible Officer |
|--|------------------------------|-------------------------------|-----------------------------------|---------------------------------------|----------------------------|
| Waste Transfer Notices/Duty of Care Notices | | No | 2 years after action | Legislative requirement | Service Director - Place |
| Hazardous waste consignment notices (Controlled Waste) | | No | 2 years after action | Legislative requirement | Service Director - Place |
| Operational Contract Documentation | | No | 2 years after end of contract | Service requirement | Service Director - Place |
| Waste Carriers Licence (Controlled Waste) | | Yes | 6 years after action | Service requirement | Service Director - Place |
| Recycling Credit / AFM Scheme Administration | | No | 5 years after annual budget | Service requirement | Service Director - Place |
| Waste and Street cleansing contract documents | | No | 12 years after contract has ended | Corporate | Service Director - Place |
| Public convenience contract documents | | No | 12 years after contract has ended | Corporate | Service Director - Place |

Active Communities

| Activity | Examples of Documents | Personal Data Included | Retention Period | Rationale for Retention Period | Responsible Officer |
|-------------------------------------|------------------------------|-------------------------------|-------------------------|--|----------------------------|
| Healthy Hub participant information | Client Referral Form | Yes | 3 years | To cover the length of the project and in line with CSC retention period | Service Director - Place |

Directorate:

| Activity | Examples of Documents | Personal Data Included | Retention Period | Rationale for Retention Period | Responsible Officer |
|--|------------------------------|-------------------------------|---|---|----------------------------|
| Locally stored HR data (recruitment/employee relations etc.) | | Yes | 6 years after employment ceases / 1 year after recruitment has been finalised | Existing schedule - Generalist HR retention schedule (p.16 - 18) Adequate management of staffing | Service Director - Place |
| Executive Member Briefing Records | | Yes | 1 year | Looking back on any discussion to validate any actions taken. Would also be useful as an Audit | Service Director - Place |
| Partnership Board documentation | | No | 6 years | The major contracts for waste, grounds maintenance and Leisure and are | Service Director - Place |

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| | | | | normally of a confidential nature | |
| Financial records: Purchase Orders | | No | 6 years | Financial Regulations | Service Director - Place |
| CCC correspondence: Management of detailed responses on Council actions, policy or procedures. Correspondence/ Ombudsman responses | | Yes | 6 years | (Retention Schedule page 10) | Service Director - Place |
| CCC correspondence: Management of routine responses on Council actions, policy or procedures | | Yes | 2 years | (Retention Schedule page 10) | Service Director - Place |
| Corporate meeting records e.g. SMT, SMG, DMT, Team Meetings | | No | 3 years | Store in SMT folder on G drive, managed Corporately | Service Director - Place |
| Email | | Yes | Retain 3 years | Dependant on service needs, will vary on content | Service Director - Place |
| Procurement Data | | No | As per NHDC retention schedule (varied deletion date based on nature of tender) | Procurement covered by main schedule (p.14, - Legal and Contract Services) | Service Director - Place |