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**NORTH HERTFORDSHIRE DISTRICT COUNCIL**

**Customers**

**LOCAL RETENTION SCHEDULE**

**Revenues & Benefits**

**IT**

**Careline**

**Customer Services**

**VERSION 1.3**

**July 2019**

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| **Version** | **Author** | **Date** | **Changes** |
| 1.0 | IT Business and Information Compliance Manager | July 2018 | New Act - Data Protection 2018 |
| 1.1 | IT Business and Information Compliance Manager | December 2018 | CCTV retention date |
| 1.2 | IT Business and Information Compliance Manager | January 2019 | CCTV retention date |
| 1.3 | IT Business and Information Compliance Manager | July 2019 | CCTV retention date |

1. **Introduction**
2. **The Council’s Approach to Data Management**

In response to the requirements of the Data Protection Act 2018 in particular Principle 5, “not to keep data any longer than necessary”, 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:-

<http://www.ico.gov.uk>

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

The IT Department’s Information & Asset Management Team manages 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 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 the 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 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 Retention Schedule should be reported to the Data Controller without delay.

1. **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 Head of Service so that remedial options can be identified in a timely fashion.

1. **Data Retention and the Revenues, Benefits and Systems & Technical Teams**

The Benefit Team deal with the administration and payment of Housing Benefit and Council Tax Reduction.

The Revenues Team deal with the administration and collection of all the Councils Debts. Primarily Council Tax and Business Rates.

The Systems and Technical Teams include the Cashiering function.

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| **Activity** | **Examples of Documents** | **Personal Data Included** | **Retention Period** | **Rationale for Retention Period** | **Responsible Officer** |
| Annual billing & year end working papers | System generated reports & BOXI reports | Yes | Retain current year plus previous year then destroy | Audit Requirement | Service Director - Customers |
| BACS amendments & output | System generated reports | Yes | Destroy after 6 years | Financial Requirement | Service Director - Customers |
| Cash posting reports | System generated reports | Yes | Destroy after 6 years | Financial Requirement | Service Director - Customers |
| Committal hearing lists & Liability Order Hearing Lists | System generated reports | Yes | Destroy on or before 12 years | Have to be able to prove orders are granted, recovery can go back this far | Service Director - Customers |
| Completion notices | System generated letters | Yes | Destroy after 6 years | Held on I@W for as long as the case is LIVE | Service Director - Customers |
| Council Tax correspondence, | Letters, emails, forms (online and manual) | Yes | Destroy after 6 years | Held on I@W for as long as the case is LIVE | Service Director - Customers |
| Daily financial controls | System generated reports | Yes | Retain current financial year plus previous year then destroy | Financial Requirement | Service Director - Customers |
| Daily recovery reports | System generated reports | Yes | Destroyed after each day | Notification of changes to accounts to Enforcement Agents | Service Director - Customers |
| Direct debit reports | System generated reports | Yes | Destroy after 6 years | Financial Requirement | Service Director - Customers |
| Housing Benefit application forms, Correspondence and other related documents | Letters, emails, forms (online and manual) | Yes | Destroy after 6 years | Held on I@W for as long as the case is LIVE | Service Director - Customers |
| Landlord Schedules | System generated reports | Yes | Destroy after 6 years | Financial Requirement | Service Director - Customers |
| Refund reports | BOXI report | Yes | destroyed the day after report is run | To enable refunds to be authorised on the NG system | Service Director - Customers |
| Reports to Valuation Office | System generated | Yes | Destroy after 10 years | Held on I@W for as long as the case is LIVE | Service Director - Customers |
| Write offs | System generated | Yes | Destroy after 6 years | Financial Requirement | Service Director - Customers |
| Year end accounts & reports | System generated | Yes | Destroy after 6 years |  | Service Director - Customers |
| Year end controls | System generated | No | Destroy after 6 years |  | Service Director - Customers |

**IT Services**

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| **Activity** | **Example of Document** | **Personal Data Included** | **Retention Period** | **Rationale for Retention Period** | **Responsible Officer** |
| The activity whereby standards, authorities, restraints and verifications are introduced and maintained to manage information effectively. | Classification Schemes  Registers  Indexes  Authorised Lists of File Headings | No | Permanent. |  | Service Director - Customers |
| Use of CCTV | District Council Offices CCTV | Images only | Stored for 60 days | Maximum capacity for Data Storage | Service Director - Customers |
| Hitchin Museum / Town Hall |  | Stored for 30 days | Maximum capacity for Data storage |
| Unit 3 Works Road |  | Stored for 90 days | Maximum capacity for Data storage |
| Public space CCTV | CCTV Images Service Managed by [Hertfordshire CCTV Partnership](http://www.hertfordshirecctv.co.uk/) | Images only | Destroy after 30 days | Maximum capacity for Data storage | Service Director - Customers |

**Careline**

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| **Activity** | **Examples of Documents** | **Personal Data Included** | **Retention Period** | **Rationale for Retention Period** | **Responsible Officer** |
| Careline records on Answerlink system. | CRM dataset | Yes | Archive after 3 years. | |  | | --- | | Limitation Act 1980  Normal limitation rules (which mean that an individual can claim for negligently caused personal injury up to 3 years after, or deliberately caused personal injury up to 6 years after the event) are postponed until a child reaches 18 years of age | | Service Director - Customers |
| Careline records held as PDF documents regarding Adults  processed through Answerlink. | Client Transactional Documents | Yes | Delete after 7 years | |  | | --- | | Limitation Act 1980  Normal limitation rules (which mean that an individual can claim for negligently caused personal injury up to 3 years after, or deliberately caused personal injury up to 6 years after the event) are postponed until a child reaches 18 years of age | | Service Director - Customers |
| Voice recordings |  | Yes | Delete after 12 months | To give reasonable time for a coroner to investigate. To comply with the Investigatory Powers Act 2016. | Service Director - Customers |
| Careline records held as PDF documents regarding Children  processed through Answerlink | Client Transactional Documents | Yes | Delete after child reaches age of 21 | |  | | --- | | Limitation Act1980  Normal limitation rules (which mean that an individual can claim for negligently caused personal injury up to 3 years after, or deliberately caused personal injury up to 6 years after the event) are postponed until a child reaches 18 years of age | | Service Director - Customers |
| Careline VAT exemption forms |  | Yes | Shred immediately after scanning onto PNC | Scanned | Service Director - Customers |
| Careline VAT exemption PDF forms | HMRC VAT Exemption Form | Yes | Delete 7 years after termination. | The default standard retention period for HMRC records is 6 years plus current, otherwise known as 6 years + 1. This is defined as 6 years after the last entry in a record followed by first review and/or destruction to be carried out in the additional current (+ 1) accounting year. | Service Director - Customers |
| Careline Paper Clients records |  | Yes | Shred after scanning | Scanned | Service Director - Customers |
| Careline PDF scan of client paperwork | Client Set-up Documents and Contract | Yes | Delete 7 years after termination of contract | The default standard retention period for HMRC records is 6 years plus current, otherwise known as 6 years + 1. This is defined as 6 years after the last entry in a record followed by first review and/or destruction to be carried out in the additional current (+ 1) accounting year. | Service Director - Customers |

**Customer Services**

**Data Retention and the Customer Services Team**

The Customer Services (CSC) team deal with incoming enquiries regarding a wide range of services across a range of channels, including; telephone, email, post and social media. Enquiries are recorded on the corporate CRM system and dependant on the enquiry type it will be recorded as a quick call (not recorded against an individual) an interaction or a case both of which relate to an individual or organisation.

The CSC also deal with the administration of allotments, including the allocation of plots, invoicing and termination of tenancies, as well as the Councils 3Cs (Comments, compliments and complaints) process which can include liaison with the Local Government Ombudsman (LGO) if a complaint is escalated to the LGO.

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| **Activity** | **Examples of Documents** | **Personal Data Included** | **Retention Period** | **Rationale for Retention Period** | **Responsible Officer** |
| 3Cs comments, compliments and complaints data held on the CRM |  | Yes | 3 years | For management of long standing or recurring complaints. LGO may request history of a complaint beyond a year | Service Director - Customers |
| 3Cs performance reports for committee | Reports on Councils website | No high level data only | Retain permanently | History of performance and learning from customer feedback | Service Director - Customers |
| Allotments Data | Data held on Colony  Copies of tenancy agreements | Yes | Destroy after one year of tenancy end | Reasonable time to allow for any queries after the end of tenancy | Service Director - Customers |
| Complaints which have been escalated to the Local Government Ombudsman  (LGO) | Electronic record held on the CRM  Hard copy files  Ombudsman mailbox | Yes | 3 years | History of LGO decisions to inform complaint handling improvements | Service Director - Customers |
| General enquiry and case related information held on the CRM relating to an individual or organisation, including: | Interaction notes  Cases  Call backs | Yes | Destroy after 3 years (on an annual basis) |  | Service Director - Customers |
| Project Documentation relating to procurement of a contract |  | No – business data only | Refer to corporate schedule for contract management retention dependant on type of contract award. |  | Service Director - Customers |