

# HIGH HALDEN PARISH COUNCIL

## Policy: Data Protection and Document Retention

### 1. Scope and General Provisions

- This policy applies to all Councillors and staff and should be read in conjunction with the Council's Privacy policy.
- This policy applies to all personal data processed by the Parish Council.
- The Council shall register with the Information Commissioner's Office as an organisation that processes personal data.
- The Council may hold personal data about its employees, residents, suppliers and other individuals for a variety of Council purposes.
- This policy sets out how we seek to protect personal data and ensure that Councillors and Officers understand the rules governing their use of personal data to which they have access in the course of their work.
- This policy requires that the Council ensures that the Data Protection Officer (DPO) be consulted before any significant new data processing activity is initiated to ensure that relevant compliance steps are addressed.

### 2. Data protection and processing principles

The Council is committed to processing data in accordance with its responsibilities under the GDPR and specifically:

- processed lawfully, fairly and in a transparent manner in relation to individuals so as not to unduly prejudice the individual's privacy;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage

### 3. Complaints or Breaches

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Council shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO if required.

The Privacy Policy outlines the process to be applied for complaints, information can be obtained from the Clerk or is available on the website.

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## 4. Document Retention

This section details the minimum retention time required for Council documents before disposal in order for the council to comply with the Freedom of Information Act 2000 Publication Scheme. Where variable times are indicated the Council will review storage after the minimum period has elapsed.

The Council shall retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each case, taking into account the reasons that the personal data was obtained.

<b>Document</b>	<b>Minimum Period</b>	<b>Reason</b>
<b>MINUTES</b>		
Approved minutes	Indefinite	Archive
Draft/rough/notes of minutes taken at meetings	Until minutes are approved	Resolution review
<b>FINANCE</b>		
Receipt and Payment Accounts	Current year plus 6 years	Archive
Paid invoices	6 years	VAT
VAT records	6 years	VAT
Bank Statements	Last completed audit year	Audit
Paying in books	Last completed audit year	Audit
Cheque stubs	Last completed audit year	Audit
<b>INSURANCE</b>		
Insurance policies	2 years	Management
Certificates of Employers' Liability Insurance	40 years	Limitation period
<b>OTHER</b>		
Quotations and tenders	12 years /indefinite	Statute of Limitations
Title deeds, leases, agreements, contracts	Indefinite	Audit, Management
Routine correspondence, emails		Retain as long as useful

### Planning Applications

All planning applications and relevant decision notices are available at Ashford Borough Council. There is no requirement to retain duplicates locally. All Parish Council recommendations in connection with these applications are recorded in the Council minutes and are retained indefinitely. Correspondence received in connection with applications will be retained as stated below

### Members Declarations of acceptance

Members register of interests' book - Term of Office which is normally 4 years

**Complaints:** retained until completed then archived where situations dictate.

**Disposal procedures:** all documents that are no longer required for administrative reasons should be shredded and disposed of.