



## **GILLINGHAM TOWN COUNCIL**

The Town Hall, School Road, Gillingham, Dorset SP8 4QR

### **Records Management Policy and Retention Schedule**

**Revision 003 - September 2023**

#### **Introduction**

1. Gillingham Town Council is committed to meeting the principles of the General Data Protection Regulations (GDPR) made pursuant to the provisions of the Data Protection Act 2018. Article 5(1)(e) requires that:

*'Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for which the personal data are processed.'*

2. This Policy and attached retention schedule should be used as the basis for the management of personal data and more widely all data processed by Gillingham Town Council (The Council). Establishing effective Information Governance systems requires the purpose, legality and period of processing to be identified prior to undertaking the handling of any data.
3. For clarification processing refers to the capture, storage, use, transfer and disposal of data.

#### **Scope and Application**

4. All staff who handle personal data are responsible for ensuring that they are aware of this Policy. Where any concern that personal data is being handled beyond the period for which it should be, they should raise their concern with the Data Protection Officer (DPO) appointed by the Council.

5. The Town Council is responsible for ensuring that any existing system or new system has, by design, appropriate and effective measures in place for the marking or tracking of personal data from collection to its applicable date of disposal.
6. This policy applies to all records, irrespective of format. Consideration should always be made where the format may increase potential vulnerabilities. The application of the data protection principle of security will always apply (art.6(1)(f), GDPR).
7. A record may refer to any piece of information created or received and maintained by an organisation or person in the course of their business or conduct of their affairs and kept as evidence of such activity.
8. Records must be kept in such a format that they are accurate, accessible, secure and safely disposed of and appropriate safeguards must always be in place to ensure an adequate level of security is applied commensurate to the sensitivity of the record.

### **Definition of Retention Periods**

9. Defining a retention period will be determined on one of the following three factors:
  - a. Statutory requirements.
  - b. Codes of Practice and guidance published by professional bodies.
  - c. In the absence of a or b, the retention period will be determined by the needs of the Council as assessed by the DPO and approved by the Council.

### **Reviewing Retention Periods**

10. Most retention periods will remain static and will relate to legal requirements to retain data. However, retention periods based on codes of practice and guidance published by professional bodies may vary. Any changes to known retention periods should be raised with the Town Clerk and where necessary the DPO.
11. This Policy and retention schedule should be reviewed annually or where any other cause requires its immediate correction.

## **Course of Action at the end of the Retention Period**

- 12.** When a record reaches the end of its retention period in most cases it will be deleted or destroyed. However, these are not the only courses of action that can be taken, and consideration must be made to the relevance of the data for other uses.
- 13.** In most cases the requirement for further use of data will be identified prior to processing, however there may be occasion where a dataset is identified as having particular relevance to the needs of the Council.
- 14.** The following may occur to data after the period of use has expired:
  - a. Anonymisation for statistical needs.
  - b. Transfer to an appropriate archive where it is in the public interest.
  - c. Scientific or historical research purposes.
- 15.** Appropriate safeguards must be put in place to ensure that wherever personal data is used beyond its original period of retention it is done so legally and in compliance with the Data Protection Act 2018 and guidance from the Information Commissioner's Office (ICO).

## **Record Disposal**

- 16.** Systems such as Customer Relationship Management (CRM) systems that are designed to handle personal data will generally have in built settings that automatically flag or delete records once they have reached the end of their retention period. However, it is necessary to ensure that the system is effectively managed and flagged records are reviewed and deleted. Where a system may automatically delete records adequate measures such as data quality assessments must be taken to ensure that this has occurred correctly.
- 17.** When using personal data outside of a CRM a structure of storage must be created to allow for the proper control of personal data. This may be in such a way as labelling electronic or physical folders with expiry dates or using a hierarchy that indicates the date of creation.
- 18.** Physical records must be disposed of in a manner corresponding to their sensitivity. If records containing Special Category (SC) personal data are to be destroyed, they must be securely shredded in accordance with DIN66399 (replacing DIN32757-1) either 2mm strips or cross-cut.

19. Where applicable a record of destruction should be maintained. This should include the type of data or, grouping of data, the period it correlates to, date of destruction and an authorising signature.

### **Protective Marking**

20. Protective markings may be written upon documentation where it is used in physical forms. In general, the classification of documentation will relate more specifically to the handling and access that is permitted to that data. Confidential data related to employment purposes, for example, should only be accessible by HR staff or direct line managers for specific reasons.

21. Information deemed to be financially sensitive or business sensitive may for the purposes of requests made under the Freedom of Information Act be exempt and, in any case, should be handled with more caution than general data.

### **Author**

22. This document has been written by the Council's Data Protection Officer in consultation with the Town Clerk. The Council's Data Protection Officer is Sean Smythe, Information Governance Manager, i-west (part of One West) Bath and North East Somerset Council.

### **Review**

This Records Management Policy and Document Retention Schedule was presented to Finance and Policy Committee on 18<sup>th</sup> September 2023 for approval, minute no. 588j and ratified at Full Council on 25<sup>th</sup> September 2023.

Future reviews will be done either annually or when there are changes to current legislation, DPO or Town Clerk, whichever is the sooner.

### **References**

- Data Protection Act 2018. Website: [HERE](#)
- Guide to the UK General Data Protection Regulation (UK GDPR) is available from the Information Commission's Office (ICO) [HERE](#)

## Retention Schedule

Reference	Description	Legal Basis	Retention Period	Action upon Expiry	Potentially contains SC data	Protectively Marked	Notes
1 Council							
1.1 Member Administration							
1.1.1	Register of Member's addresses	Legitimate interests	Date of next election +2 years	Secure disposal	No	Not Protectively Marked	
1.1.2	Allowance Information	Income Tax (PAYE) Regulations 2003, reg 97	Not less than 3 years after the end of the tax year to which they relate	Secure disposal	No	Confidential	Currently applies to Mayoral Allowance only as councillors do not receive an allowance
1.1.3	DBS Checks	Legitimate interests	6 Months	Secure Disposal	Yes	Confidential	
1.1.4	Record of meeting attendance	Local Government Act 1972, sch.12(40)	Date of next election +2 years	Secure Disposal	No	Not Protectively Marked	
1.2 Register of Interests							
1.2.1	Register of Member's interests, gifts, hospitality, and third-party transactions	Localism Act 2011 s.29	Date of next election + 6 years	Secure Disposal	Yes	Not Protectively Marked	
1.3 Corporate Gifts							
1.3.1	Receipt of gifts	Legitimate interests	Financial year of receipt + 8 years	Secure Disposal	Yes	Not Protectively Marked	
1.4 Code of Conduct							

1.4.1	Records relating to Member's Code of Conduct	Localism Act 2011 s.28	Date of Code of Conduct + 6 years	Secure disposal	Yes	Not Protectively Marked	
1.4.2	Records relating to the investigation of complaints regarding breaches of the Member's Code of Conduct	Localism Act 2011 s.28	Date of investigation + 1 year	Secure disposal	Yes	Confidential	
1.5 Member Training							
1.5.1	Records relating to Member training	Legitimate interests	Current Year + 6 Years	Secure disposal	Yes	Not Protectively Marked	
1.6 Constitution							
1.6.1	Council Constitution (Policies and Procedures)	Legitimate interests	Until superseded	Permanent preservation	No	Not Protectively Marked	
1.7 Meetings							
1.7.1	Meeting Schedule	Legitimate interests	4 years	Permanent preservation	No	Not Protectively Marked	
1.7.2	Agendas and reports for full Council	Legitimate interests	Date of meeting + 8 years	Permanent preservation	No	Not Protectively Marked	
1.7.3	Agendas and reports for committee meetings	Legitimate interests	Date of meeting + 8 years	Permanent preservation	No	Not Protectively Marked	
1.7.4	Agendas and reports for working groups	Legitimate interests	Date of meeting + 8 years	Permanent preservation	No	Not Protectively Marked	

1.7.5	Draft minutes	Legitimate interests	Date of meeting + 8 years	Disposal	No	Not Protectively Marked	
1.7.6	Signed minutes	Local Government Act 1972 sch.12(19)	Date of meeting + 8 years	Permanent preservation	No	Not Protectively Marked	
1.7.7	Audio recordings of meetings	Legitimate interests	Until transposed	Secure disposal	No	Not Protectively Marked	
1.7.8	Minute taker notes	Legitimate interests	Until Minutes are approved by the relevant Committee as a true and accurate record and adopted by Full Council	Secure disposal	No	Not Protectively Marked	
<b>2 Accounting</b>							
<b>2.1 Budget</b>							
2.1.1	Budget setting and calculations	HMRC- Compliance Handbook Manual CH15400	Financial year + 6 years	Secure disposal	No	Not Protectively Marked	Financial sensitive
2.1.2	Approved budgets	HMRC- Compliance Handbook Manual CH15400	Financial year + 6 years	Secure disposal	No	Not Protectively Marked	Financial sensitive

2.1.3	Budget monitoring	HMRC- Compliance Handbook Manual CH15400	Financial year + 6 years	Secure disposal	No	Not Protectively Marked	Financial sensitive
2.1.4	Cashbook & account book reconciliations	HMRC- Compliance Handbook Manual CH15400	Financial year + 6 years	Secure disposal	No	Not Protectively Marked	Financial sensitive
2.2 Expenditure							
2.2.1	Paid Invoices	HMRC- Compliance Handbook Manual CH15400	Financial year + 6 years	Secure disposal	Yes	Not Protectively Marked	Financial sensitive
2.3 Income							
2.3.1	Paying in books	HMRC- Compliance Handbook Manual CH15400	Financial year + 6 years	Secure disposal	Yes	Not Protectively Marked	Financial sensitive
2.3.2	Cash receipt book	HMRC- Compliance Handbook Manual CH15400	Financial year + 6 years	Secure disposal	No	Not Protectively Marked	Financial sensitive



2.4 Payroll							
2.4.1	Payroll records	HMRC- Compliance Handbook Manual CH15400	Financial year + 6 years	Secure disposal	Yes	Confidential	Financial sensitive
2.4.2	Payroll forms	Legitimate interests	Duration of employment	Secure disposal	Yes	Confidential	Financial sensitive
2.5 Pensions							
2.5.1	Staff pension contributions records	The Retirement Benefits Schemes (Information Powers) Regulations 1995 s.15	End of scheme + 6 years	Secure disposal	Yes	Confidential	Financial sensitive
2.6 Banking							
2.6.1	Bank statements	HMRC- Compliance Handbook Manual CH15400	Financial year + 6 years	Secure disposal	Yes	Not Protectively Marked	Financial sensitive
2.6.2	Cheque stubs	HMRC- Compliance Handbook Manual CH15400	Financial year + 6 years	Secure disposal	Yes	Not Protectively Marked	Financial sensitive
2.7 Investment Management							
2.7.1	Investment records	Legitimate Interests (Audit)	Indefinitely	Permanent preservation	No	Not Protectively Marked	Financial sensitive

2.8 Annual Accounts							
2.8.1	Annual accounts closure records	Legitimate Interests (Audit)	Indefinitely	Permanent preservation	No	Not Protectively Marked	Financial sensitive
2.9 VAT							
2.9.1	VAT records	HMRC- Compliance Handbook Manual CH15400	Financial year + 6 years	Secure disposal	No	Not Protectively Marked	Financial sensitive
3 Staff Administration							
3.1 Absence							
3.1.1	Annual leave records	Limitation Act 1980 s.5	Financial year + 6 years	Secure disposal	Yes	Confidential	
3.1.2	Unpaid leave	Limitation Act 1980 s.5	Financial year + 6 years	Secure disposal	Yes	Confidential	
3.1.3	Parental leave	Limitation Act 1980 s.5	5 years from birth/adoption or 18 years if the child receives disability allowance	Secure disposal	Yes	Confidential	
3.1.4	Maternity/paternity leave	The Statutory Maternity Pay (General) Regulations 1986 s.26	Financial year + 3 years	Secure disposal	Yes	Confidential	

3.1.5	Sickness records	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
3.1.6	Statutory Sick Pay (SSP) records	The Statutory Sick Pay (General) Regulations 1982, reg 13	3 years after the end of each tax year	Secure disposal	Yes	Confidential	
3.1.7	Medical certificates	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
<b>3.2 Disciplinary Matters</b>							
3.2.1	Written warning	Legitimate interests	Date of warning + 6 months	Secure disposal	Yes	Confidential	
3.2.2	Disciplinary records	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
<b>3.3 Occupational Health</b>							
3.3.1	Work place assessment records	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
3.3.2	Health & safety training records	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
<b>3.4 Employee Information</b>							
3.4.1	Records relating to employment history	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
3.4.2	References received	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
3.4.3	Application & CV for successful candidates	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	

3.4.4	Application & CV for unsuccessful candidates	ICO Employment Practices Code para 1.7	6 months after position filled or vacancy closed	Secure disposal	Yes	Confidential	
3.4.5	Interview notes	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
3.4.6	Appraisal documentation (inc. probationary interviews, promotions & demotions)	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
3.4.7	Next of kin information	Legitimate interests	Upon cessation of employment	Secure disposal	Yes	Confidential	
3.4.8	Timesheets	The Working Time Regulations 1998, Part II	2 years after creation date	Secure disposal	Yes	Confidential	
3.4.9	Induction records	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
3.4.10	Employment contracts	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
3.4.11	Copies of identification documents	Immigration (Restrictions on Employment) Order 200, s.6	2 years after cessation of employment	Secure disposal	Yes	Confidential	
3.4.12	Job descriptions	Legitimate interests	Until superseded	Secure disposal	Yes	Confidential	
3.4.13	DBS checks	Legitimate interests	6 months after joining	Secure disposal	Yes	Confidential	

3.4.14	Right to work checks	Immigration, Asylum and Nationality Act 2006, s.15-25.	Current year + 3 years	Secure disposal	Yes	Confidential	
3.4.15	Salary information (tax & NI)	Income Tax (Pay As You Earn) Regulations 2003, reg 97	3 years after the end of each tax year	Secure disposal	Yes	Confidential	Financial sensitive
3.4.16	Records concerning a temporary worker	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
3.4.17	Redundancy records	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
<b>3.5 Training</b>							
3.5.1	Training records	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Not Protectively Marked	
3.5.2	Training certificates	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Not Protectively Marked	
3.5.3	Training evaluation	Legitimate interests	Upon cessation of employment	Secure disposal	Yes	Not Protectively Marked	
<b>3.6 Health and Safety</b>							
3.6.1	Accident reports	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995	3 years from date of accident or 3 years from 21 <sup>st</sup> birthday if under 18 at the time of the accident	Secure disposal	Yes	Confidential	

<b>4 Access to Information</b>							
<b>4.1 Freedom of Information</b>							
4.1.1	FOI Requests	Freedom of Information Act 2000	Date of requests + 3 years	Secure disposal	Yes	Not Protectively Marked	
4.1.2	FOI Responses	Freedom of Information Act 2000	Date of requests + 3 years	Secure disposal	Yes	Not Protectively Marked	
4.1.3	FOI Records log	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
<b>4.2 Subject Access Requests (SAR)</b>							
4.2.1	SARs	General Data Protection Regulations art.15	Date of requests + 3 years	Secure disposal	Yes	Not Protectively Marked	
4.2.2	SAR responses	General Data Protection Regulations art.15	Date of requests + 3 years	Secure disposal	Yes	Not Protectively Marked	
4.2.3	SAR log	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
<b>5 Communication</b>							
<b>5.1 Correspondence</b>							
5.1.1	Emails	Legitimate interests	1 Year	Secure disposal	Yes	Not Protectively Marked	
5.1.2	Messenger	Legitimate interests	1 Year	Secure disposal	Yes	Not Protectively Marked	

5.1.3	Post	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
5.1.4	Voice messages	Legitimate interests	1 month	Secure disposal	Yes	Not Protectively Marked	
<b>5.2 Publications</b>							
5.2.1	Newsletters	Legitimate interests	Permanent	Permanent preservation	Yes	Not Protectively Marked	
5.2.2	Local PR	Legitimate interests	Permanent	Permanent preservation	Yes	Not Protectively Marked	
5.2.3	Leaflets, flyers & posters	Legitimate interests	Permanent	Permanent preservation	Yes	Not Protectively Marked	
5.2.4	Website blogs	Legitimate interests	Council term	Permanent preservation	Yes	Not Protectively Marked	
<b>5.3 Social Media</b>							
5.3.1	Twitter feeds	Legitimate interests	Permanent	n/a	Yes	Not Protectively Marked	
5.3.2	Facebook posts	Legitimate interests	Permanent	n/a	Yes	Not Protectively Marked	
5.3.3	Instagram	Legitimate interests	Permanent	n/a	Yes	Not Protectively Marked	

5.4 Annual Reports							
5.4.1	Annual report	Legitimate interests	Permanent	Permanent preservation	No	Not Protectively Marked	
5.5 Transparency							
5.5.1	Council Expenditure	Local Government Transparency Code 2015	Current Council term + 4 years	Disposal	No	Not Protectively Marked	Financial sensitive
5.5.2	Grants approved	Local Government Transparency Code 2015	Current Council term + 4 years	Disposal	Yes	Not Protectively Marked	Financial sensitive
5.5.3	Fraud reporting	Local Government Transparency Code 2015	Current Council term + 4 years	Disposal	No	Not Protectively Marked	Financial/business sensitive
5.5.4	Procurement	Local Government Transparency Code 2015	Current Council term + 4 years	Disposal	No	Not Protectively Marked	Financial sensitive
6 Public Contact							
6.1 Feedback							
6.1.1	Emails	Legitimate interests	Current Council term + 4 years	Disposal	Yes	Not Protectively Marked	
6.1.2	Webforms	Legitimate interests	Current Council term + 4 years	Disposal	Yes	Not Protectively Marked	



<b>6.2 Complaints</b>							
6.2.1	Complaints	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
6.2.2	Responses	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
<b>6.3 Enquiries</b>							
6.3.1	Emails	Legitimate interests	Current Council term + 4 years	Disposal	Yes	Not Protectively Marked	
6.3.2	Webforms	Legitimate interests	Current Council term + 4 years	Disposal	Yes	Not Protectively Marked	
<b>7 Public Consultations</b>							
<b>7.1 Consultation Surveys</b>							
7.1.1	Physical surveys	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	
7.1.2	Electronic surveys	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	
<b>7.2 Consultation Responses</b>							
7.2.1	Physical responses	Legitimate interests	1 year after consultation	Secure disposal	Yes	Not Protectively Marked	
7.2.2	Electronic/online responses	Legitimate interests	1 year after consultation	Secure disposal	Yes	Not Protectively Marked	
7.2.3	Consultation reports	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	

8 Asset Management							
8.1 Licences							
8.1.1	Asset licences	Legitimate interests	Date licence ends + 4 years	Disposal	No	Not Protectively Marked	Financial/business sensitive
8.2 Asset valuation							
8.2.1	Asset register	Legitimate interests	Permanent	Permanent preservation	No	Not Protectively Marked	Financial/business sensitive
9 Information Security							
9.1 IT Security							
9.1.1	Breach log	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	Financial/business sensitive
9.1.2	Breach details	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	Financial/business sensitive
9.2 Personal Data Security							
9.2.1	Breach log	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
9.2.2	Breach records	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	

<b>10 Business Continuity</b>							
<b>10.1 Planning and incident recording</b>							
10.1.1	Business continuity plans	Legitimate interests	Permanent	Permanent preservation	No	Not Protectively Marked	Financial/business sensitive
10.1.2	Incident Log	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	Financial/business sensitive
10.1.3	Incident records	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	Financial/business sensitive
<b>11 Records Management</b>							
<b>11.1 Disposal Records</b>							
11.1.1	ICT asset disposal records	Legitimate interests	Date of disposal + 8 years	Disposal	No	Not Protectively Marked	
11.1.2	Confidential waste disposal records	Legitimate interests	Date of disposal + 8 years	Disposal	No	Not Protectively Marked	
11.1.3	Electronic disposal records	Legitimate interests	Date of disposal + 4 years	Disposal	No	Not Protectively Marked	
11.1.4	Record disposal records	Legitimate interests	Date of disposal + 8 years	Disposal	No	Not Protectively Marked	
<b>12 Civic Functions</b>							
<b>12.1 Mayoral Administration</b>							
12.1.1	Mayoral correspondence	Legitimate interests	2 years	Secure disposal	Yes	Confidential	
12.1.2	Weekly reports	Legitimate interests	2 years	Disposal	No	Not Protectively Marked	

12.1.3	Protocol	Legitimate interests	Permanent	Permanent preservation	No	Not Protectively Marked	
12.1.4	Web page data	Legitimate interests	Permanent	Permanent preservation	No	Not Protectively Marked	
12.1.5	Disabilities and allergies	Legitimate interests	End of post	Secure disposal	Yes	Not Protectively Marked	
12.1.6	Event risk assessments	Legitimate interests	Date of the event + 4 years	Disposal	No	Not Protectively Marked	
<b>12.2 Civic Engagements</b>							
12.2.1	Invitations	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
12.2.2	Online request form via website	Legitimate interests	1 year	Secure disposal	Yes	Not Protectively Marked	
12.2.3	Booking forms	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
12.2.4	Postal correspondence	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
12.2.5	Electronic correspondence	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
12.2.6	Checklist forms	Legitimate interests	Duration of Mayor's term	Disposal	No	Not Protectively Marked	

12.2.7	Civic Diary	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
12.3 Charity Fundraising Events							
12.3.1	Invitations	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
12.3.2	Booking Forms	Legitimate interests	6 months after conclusion of event	Secure disposal	Yes	Not Protectively Marked	
12.3.3	Promotion	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	
12.3.4	Correspondence with third parties and venues	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
12.3.5	Copies of third part Public Liability Insurance (PLI)	Legitimate interests	Current Council term + 4 years	Secure disposal	No	Not Protectively Marked	
12.3.6	Guest lists and invitations	Legitimate interests	6 months after conclusion of event	Secure disposal	Yes	Not Protectively Marked	
12.4 Civic Events							
12.4.1	Invitations	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
12.4.2	RSVPs	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
12.4.3	Promotion	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	

12.4.4	Programme/order of service	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	
12.4.5	Correspondence with third parties and venues	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
12.4.6	Copies of third part Public Liability Insurance (PLI)	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	
12.4.7	Guest lists & guest information	Legitimate interests	6 months after conclusion of event	Secure disposal	Yes	Not Protectively Marked	
12.5 Christmas Cards							
12.5.1	Distribution list	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
12.5.2	Address labels	Legitimate interests	1 year	Secure disposal	Yes	Not Protectively Marked	
12.6 Civic Awards							
12.6.1	Promotion	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	
12.6.2	Completed nominations	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
12.6.3	Nomination summary	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
12.6.4	PR following ceremony	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	

13 Events and Projects							
13.1 Event Planning and Delivery							
13.1.1	Planning documentation	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	Financial/business sensitive
13.1.2	Risk assessments	Legitimate interests	Date of event + 4 years	Disposal	No	Not Protectively Marked	Financial/business sensitive
13.1.3	Programme/order of service	Legitimate interests	Permanent	Permanent preservation	No	Not Protectively Marked	
13.1.4	Third party risk assessments	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	Financial/business sensitive
13.1.5	Service Level Agreements	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	Financial/business sensitive
13.1.6	Business/resident info letters	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
13.1.7	Copies of third part Public Liability Insurance (PLI)	Legitimate interests	Current Council term + 4 years	Secure disposal	No	Not Protectively Marked	Financial/business sensitive
13.1.8	Invitations	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
13.1.9	Booking forms	Legitimate interests	6 months after conclusion of event	Disposal	No	Not Protectively Marked	
13.1.10	Guest lists & guest information	Legitimate interests	6 months after conclusion of event	Secure disposal	Yes	Not Protectively Marked	

14 Partnerships							
14.1 Service Level Agreements							
14.1.1	Signed SLAs	Local Audit and Accountability Act 2014	Current Council term + 4 years	Disposal	No	Not Protectively Marked	Financial/business sensitive
15 Audit							
15.1 Internal Audit							
15.1.1	Audit Report	Local Audit and Accountability Act 2014	Current Council term + 4 years	Disposal	No	Not Protectively Marked	Financial/business sensitive
15.2 External Audit							
15.2.1	Audit submission	Local Audit and Accountability Act 2014	Permanent	Permanent preservation	No	Not Protectively Marked	Financial/business sensitive
15.2.2	Audit supporting documents	Local Audit and Accountability Act 2014	Permanent	Permanent preservation	No	Not Protectively Marked	Financial/business sensitive
15.2.3	Audit conclusion	Local Audit and Accountability Act 2014	Permanent	Permanent preservation	No	Not Protectively Marked	Financial/business sensitive
15.2.4	Audit certificate	Local Audit and Accountability Act 2014	Permanent	Permanent preservation	No	Not Protectively Marked	Financial/business sensitive
16 Media Liaison							
16.1 Press Correspondence							
16.1.1	Press releases	Legitimate interests	Current Council term + 4 years	Disposal	Yes	Not Protectively Marked	



16.1.2	Press statements	Legitimate interests	Current Council term + 4 years	Disposal	Yes	Not Protectively Marked	
<b>17 Procurement and Contracts</b>							
<b>17.1 Records of Contracts and Tenders</b>							
17.1.1	Quotes	Legitimate interests	1 year after the end of the tender process	Secure disposal	No	Not Protectively Marked	Financial/business sensitive
17.1.2	Invitation to Tender (ITT)	Limitation Act 1980 s.5	6 years after end of contract	Disposal	No	Not Protectively Marked	Financial/business sensitive
17.1.3	Unsuccessful tenders	Legitimate interests	1 year after the end of the tender process	Secure disposal	No	Not Protectively Marked	Financial/business sensitive
17.1.4	Successful tenders	Limitation Act 1980 s.5	6 years after end of contract	Secure disposal	No	Not Protectively Marked	Financial/business sensitive
17.1.5	Signed contracts	Limitation Act 1980 s.5	6 years after end of contract	Secure disposal	No	Not Protectively Marked	Financial/business sensitive
17.1.6	Contract/tender register	Legitimate interests	Permanent	Permanent preservation	No	Not Protectively Marked	Financial/business sensitive
<b>18 Insurance</b>							
<b>18.1 Insurance Policies</b>							
18.1.1	Employer's Liability and Public Liability Insurance policies	The Employers' Liability (Compulsory Insurance) Regulations 1998	Date of expiry of policy + 40 years	Disposal	No	Not Protectively Marked	Financial sensitive

18.1.2	Claims made against the Council insurance policies – personal injury	Legitimate interests	Case concluded + 4 years	Secure disposal	Yes	Not Protectively Marked	Financial sensitive
18.1.3	Register of insurance claims against the Council	Legitimate interests	Permanent	Permanent preservation	Yes	Not Protectively Marked	Financial sensitive
18.1.4	Register of claims made by the Council	Legitimate interests	Permanent	Permanent preservation	Yes	Not Protectively Marked	Financial sensitive
<b>19 Photographs</b>							
<b>19.1 Members/Staff Photographs</b>							
19.1.1	Members (ward photos)	Legitimate interests	Upon cessation of employment	Secure disposal	Yes	Not Protectively Marked	
19.1.2	Members (PR & event photos)	Legitimate interests	Permanent	Permanent preservation	Yes	Not Protectively Marked	
19.1.3	Officers (staff photo)	Legitimate interests	Upon cessation of employment	Secure disposal	Yes	Not Protectively Marked	
19.1.4	Officers (PR & event photos)	Legitimate interests	Permanent	Permanent preservation	Yes	Not Protectively Marked	
<b>19.2 Event Photographs</b>							
19.2.1	Volunteers (official & engagement/events)	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
19.2.2	Volunteers (Proof of ID/certification)	Legitimate interests	Upon cessation of employment	Secure disposal	Yes	Not Protectively Marked	

19.2.3	Civic events	Legitimate interests	Permanent	Permanent preservation	Yes	Not Protectively Marked	
19.2.4	Community events	Legitimate interests	Permanent	Permanent preservation	Yes	Not Protectively Marked	
19.2.5	Grant awards	Legitimate interests	Permanent	Permanent preservation	Yes	Not Protectively Marked	
<b>20 Consent Forms</b>							
<b>20.1 Individual Consent</b>							
20.1.1	Electronic	GDPR	Not more than 2 years after last contact	Secure disposal	Yes	Not Protectively Marked	
20.1.2	Physical	GDPR	Not more than 2 years after last contact	Secure disposal	Yes	Not Protectively Marked	
<b>21 Whistleblowing</b>							
<b>21.1 Whistleblowing Records</b>							
21.1.1	Allegation	Public interest	Date of requests + 5 years	Secure disposal	Yes	Confidential	
21.1.2	Correspondence with Whistleblower	Public interest	Date of requests + 5 years	Secure disposal	Yes	Confidential	
21.1.3	Investigation records	Public interest	Date of requests + 5 years	Secure disposal	Yes	Confidential	

22 Grants							
22.1 Grant Records							
22.1.1	Policy	HMRC- Compliance Handbook Manual CH15400	Until superseded	Disposal	No	Not Protectively Marked	Financial sensitive
22.1.2	Small grant applications	HMRC- Compliance Handbook Manual CH15400	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	Financial sensitive
22.1.3	Large grant applications	HMRC- Compliance Handbook Manual CH15400	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	Financial sensitive
22.1.4	Application summary	HMRC- Compliance Handbook Manual CH15400	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	Financial sensitive
22.1.5	Grant offer letter	HMRC- Compliance Handbook Manual CH15400	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	Financial sensitive
22.1.6	Grant rejection letter	HMRC- Compliance Handbook Manual CH15400	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	Financial sensitive

22.1.7	Grant scheme feedback request	HMRC- Compliance Handbook Manual CH15400	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	Financial sensitive
22.1.8	Grant scheme feedback response	HMRC- Compliance Handbook Manual CH15400	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	Financial sensitive
22.1.9	Grants committed log	HMRC- Compliance Handbook Manual CH15400	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	Financial sensitive
<b>23 Volunteers</b>							
<b>23.1 Mayor's Volunteers</b>							
23.1.1	Contact details	Legitimate interests	One Council term	Secure disposal	Yes	Confidential	
23.1.2	Post acceptance (Cadet)	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Confidential	
23.1.3	Nomination (Cadet)	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Confidential	
<b>23.2 Town Crier</b>							
23.2.1	Allowance information (tax & NI)	Income Tax (Pay As You Earn) Regulations 2003, reg 97	Current financial year + 3 years	Secure disposal	Yes	Confidential	
23.2.2	DBS Checks	Care Act 2014	Current year + 3 years (life of a DBS check)	Secure disposal	Yes	Confidential	

23.2.3	Application & CV for successful candidates	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
23.2.4	Application & CV for unsuccessful candidates	ICO Employment Practices Code para 1.7	6 months after post filled	Secure disposal	Yes	Confidential	
23.2.5	Interview notes	Limitation Act 1980 s.5	6 years after cessation of employment	Secure disposal	Yes	Confidential	
23.2.6	Contact details	Legitimate interests	One Council term	Secure disposal	Yes	Confidential	
<b>23.3 Traffic Marshalls</b>							
23.3.1	Contact details	Legitimate interests	One Council term	Secure disposal	Yes	Confidential	
23.3.2	Traffic management certification	Legitimate interests	Current Council term + 4 years	Secure disposal	Yes	Not Protectively Marked	
<b>24 Contacts</b>							
<b>24.1 Contact Details</b>							
24.1.1	Contacts spreadsheet	Legitimate interests	Permanent	Permanent preservation	Yes	Confidential	
24.1.2	Key contacts spreadsheet	Legitimate interests	Permanent	Permanent preservation	Yes	Confidential	
<b>25 Council Property</b>							
<b>25.1 General Properties</b>							
25.1.1	Deeds of title	Legitimate interests	Permanent	Permanent preservation	No	Not Protectively Marked	Financial/business sensitive
25.1.2	Searches and surveys	Legitimate interests	Permanent	Permanent preservation	No	Not Protectively Marked	Financial/business sensitive
25.1.3	Lease	Legitimate interests	Permanent	Permanent preservation	No	Not Protectively Marked	Financial/business sensitive

25.2 Town Centre Public Conveniences							
25.2.1	Legal documentation	Legitimate interests	Permanent	Permanent preservation	No	Not Protectively Marked	Financial/business sensitive
25.3 Allotments							
25.3.1	Records relating to allotment holder	Legitimate interests	Tenure of plot	Secure disposal	Yes	Confidential	
25.3.2	Legal documentation	Legitimate interests	Permanent	Permanent preservation	No	Not Protectively Marked	
25.3.3	Allotment policies	Legitimate interests	Until superseded	Disposal	No	Not Protectively Marked	
26 Competition							
26.1 Competition Details and Entries							
26.1.1	Competition details	Legitimate interests	Current Council term + 4 years	Disposal	No	Not Protectively Marked	
26.1.2	Entries	Legitimate interests	End of competition	Secure disposal	Yes	Confidential	
26.1.3	Parental Consent for publication	General Data Protection Regulations art.6	Permanent	Permanent preservation	Yes	Confidential	

**Signed by:**

**(The Mayor of Gillingham)**

**Date:**