

Binfield Parish Council – Data Audit	Date of Audit	05/02/2024	Appendix to the Data Retention, Transfer and Disposal Policy			
	Audit Carried out by	RFO	Minute No:	150.1	Date of approval	12/03/2024
	Audit approved by	Parish Council			Date of next Audit/Review	Feb-25

Contents	Data containing Sensitive Records	Page 1
	Data containing Personal Records	Pages 2 and 3
	Documents - no personal/sensitive data	Page 4
	Documents from legal matters, negligence and other torts	Page 4
	Documents relating to Halls, Centres & Recreation Grounds**	Page 5
	** currently not managed by BPC	

Sensitive Records								
What do we have?	What do we do with it?	Lawful Basis?	Other usage?	Have we sought explicit consent?	How do we keep it up to date?	How long will we retain data	How will we dispose of data	Actions carried out / next action
Employees– Personal and sensitive information required for HR and payroll purposes	Advise Boyett Mayes, Accountants, who run the payroll including tax and pension	compliance with legal obligation	No	N/A	Monthly contact to advise any changes to information or to supply with timesheets and advise any changes to hours, eg overtime	12 years	confidential disposal	
Employees- Medical Information	Recording absence from work is usually verbal; longer term will be recorded in a) exchange of emails b) follow up with one to one meeting which may include exchange of medical records/evidence	contractual necessity	No	N/A	Current employees should (as part of their contractual obligation) keep their employer up to date with any change in their wellbeing which may necessitate a H&S review or is likely to affect their work/ability	12 years	confidential disposal	Absence policy adopted April 22; review data held annually and dispose when 12 years old
Employees – employment issues	May be involved in either a grievance or disciplinary process and evidence collected to inform the process.	compliance with legal obligation	No	N/A	Any data collected should be archived within 3 months of the resolution of a disciplinary or grievance process; employee archived information should only be available to the Clerk and/or the Staffing Committee.	12 years	confidential disposal	Grievance & Disciplinary policies adopted January 24;
Employee - time sheets	Transfer data to the payroll company, analyse for trends/spot issues	Payroll and Management	No	N/A	each employee updates by the end of the last working day of each month	3 years + current	Bin	old timesheets deleted.
Legal – insurance claims- appellant details	Hold the information in electronic and hard copy during period of claim; evidence may be collect to support or refute a claim.	compliance with legal obligation	No	N/A	Add any new information that comes to light.	20 years	confidential disposal	
Accident records	Hold the information in electronic and hard copy during period of claim; evidence may be collect to support or refute a claim.	Potential Claim	No	N/A		20 years	confidential disposal	
Councillor records	Declaration of Interests forms kept and sent to BFC for publication on their website	Compliance with legal obligation	Yes - passed to BFC	N/A	Declarations of Interest form amended or confirmed annually at Annual Council meeting in May.	Current 4 years + Prv 4 Years	confidential disposal	

Personal Records								
What do we have?	What do we do with it?	Lawful Basis?	Other usage?	Have we sought explicit consent?	How do we keep it up to date?	How long will we retain data	How will we dispose of data	Actions carried out / next action
Minutes	electronic draft copies, followed by signed copies, then uploaded onto website	statutory requirement	No	No	n/a	Indefinite	NA	To be sent periodically to the Records Office
Agendas	electronic draft copies, followed by signed copies, then uploaded onto website	statutory requirement	No	No	n/a	5 years	paper shredded, website displays 3 years of data, older copies held electronically.	Old paper copies recycled
Councillors – personal contact details (name, address, telephone numbers and email addresses)	Personal information is published on the BPC website and a list circulated to Councillors and staff.	Compliance with legal obligation	general ongoing exchanges of emails (agendas, minutes, updates)	No	Councillors advise if there is any change to their contact details such as address or phone numbers. All Councillors may change after the 4 yearly election cycle. If a Councillor resigns we remove data from the website and delete electronic record.	current 4 year term + prv 4 year term	paper shredded, website only current	Data policy statement added to all forms of data capture
Allotment Holders – names, addresses, phone numbers and email addresses	Personal information is kept to advise allotment holders of certain information (eg skip delivery times) and to collect annual rent. This also includes plans of plots	Contractual necessity, Audit, Management	No	No	An annual agreement is signed asking for latest information	Indefinite	N/A	Request consent for ongoing contact; amend allotment rules to state ongoing contact/storage of data is required
Allotment Waiting List - names, addresses, phone numbers and email addresses	Personal information is held in an electronic file only accessed by staff. Residents who ask to go on the list are advised that it may be some years before an allotment becomes available and they are encouraged to periodically check in if they wish to know how they are progressing	statutory requirement	No	No	Each year we often see allotment waiting lists become allotment holders	current list only (updated with each addition/deletion and reviewed every October)	Electronic records deleted only current retained	Prepare a standard email response to go to all those who add their names to the list advising what data we hold, how we store it and how they can contact us to ask for their data to be removed (and therefore they will be removed from the waiting list)
Resident correspondence - can be email, telephone call, letter or social media post	in order to resolve queries we may approach 3rd parties, eg BFC or a Councillor to be able to respond to the originator appropriately. Currently inbound emails are archived	None beyond resolution of first query	Transferred to a 3rd party, eg the Borough or a utility company	No	If consent is not given no data will be retained or transferred. If consent is given data will be stored in Outlook (as a contact) and only accessed by staff (not Councillors). All resident contact records should be clearly marked as such and consent for ongoing retention indicated. Once every 12 months this consent should be revalidated.	disposed when resolved	paper binned, electronic deleted	
Community group/organisation or business correspondence - can be email, telephone call, letter or social media	in order to resolve queries we may approach 3rd parties, eg BFC or a Councillor to be able to respond to the originator appropriately. Currently inbound emails are archived	None beyond resolution of first query	Could be shared with a 3rd party, eg the Borough or a utility company	No	If consent is not given no data will be retained or transferred. If consent is given data will be stored in Outlook (as a contact) and only accessed by staff (not Councillors). All resident contact records should be clearly marked as such and consent for ongoing retention indicated. Once every 12 months this consent should be revalidated.	disposed when irrelevant	paper binned, electronic deleted	
Electoral Register – full list with monthly updates	Password protected electronic document	Compliance with legal obligation	No	No	Electoral Services of BFBC updates changes monthly via encrypted email	current register only	Electronic records deleted only current retained	When register is updated we delete previous versions and update password
Grant Recipients – list of contact details and application forms if supplied	Used to process grant applications and advise next opportunity. In-house use only – no sensitive information included in report	Contractual necessity	No	No	Bi-annual contact	6 years + current	confidential disposal	
Suppliers & Contractors	Use contact info to seek quotes and manage ongoing activity ; contact details are held in both email (Outlook) and finance package (Edge) with only staff allowed access	Contractual necessity	No	No	Annual review of all contact information in Edge, delete records of companies we are no longer using	6 years + current	confidential disposal	
Volunteers – contact details	A record of any volunteer that has been involved in an activity, eg DoE students, marshals, litter pickers	None beyond specific activity	No	No	Collect new details with each volunteer activity rather than revisit old.	dispose of post event	paper binned, electronic deleted	

Planning applicant names & addresses	Download planning apps to review planning apps in meetings	compliance with legal obligation	shared with Councillors	No	Documents accessed from the Borough website	online list kept indefinitely	paper binned	
Consultation responses – following requests about events or plans	Retain for duration of consultation topic/activity	Compliance with legal obligation	No	No	Personal information not retained. Anonymised information is retained.	6 years + current	Bin	

**Documents (without personal or sensitive data)**

What do we have?	What do we do with it?	Lawful Basis?	Other usage?	Have we sought explicit consent?	How do we keep it up to date?	How long will we retain data	How will we dispose of data	Actions carried out / next action
Scales of fees and charges	N/A							
Receipt and payment Accounts	Retain electronic records (using Edge Software)	Yes	No	N/A	N/A	10 years	confidential disposal	
Receipt books of all kinds	store in a locked drawer in parish office		No	N/A	N/A	6 years + current	confidential disposal	
Bank Statements including deposit/saving accounts	File electronic copy in Parish Office, carry out bank reconciliation	Yes	No	N/A	N/A	6 years + current	Confidential disposal	
bank paying in books	Stored in Parish Office	Yes	No	N/A	N/A	6 years + current	confidential disposal	
Cheque book stubs	Stored in Parish Office	Yes	No	N/A	N/A	6 years + current	confidential disposal	
Quotatons & Tenders	Stored in Parish Office	Yes - Limitation A	No	N/A	N/A	6 years + current	confidential disposal	
Information from other bodies, eg circulars, NALC news etc	Review and then dispose	N/A	No	N/A	N/A	Dispose	Bin	
Local, historical information	Store securely, with index	N/A	May be shared with other bodies	N/A	N/A	Indefinitely	N/A	
<b>Documents from legal matters, negligence and other torts - Governed by the Limitations Act 1980 (as amended)</b>								
Leases	Stored in Parish Office	Yes	No	N/A		12 years	confidential disposal	
Sums recoverable by statute	Stored in Parish Office	Yes	No	N/A		6 years	confidential disposal	
Personal Injury	Stored in Parish Office	Yes	No	N/A		3 years	confidential disposal	
To recover land	Stored in Parish Office	Yes	No	N/A		12 years	confidential disposal	
Rent	Stored in Parish Office	Yes	No	N/A		6 years	confidential disposal	
Breach of Trust	Stored in Parish Office	Yes	No	N/A		Not specified	confidential disposal	
Trust Deeds	Stored in Parish Office	Yes	No	N/A		indefinite		
Contract	Stored in Parish Office	Yes	No	N/A		6 years	confidential disposal	
Negligence	Stored in Parish Office	Yes	No	N/A		6 years	confidential disposal	
Defamation	Stored in Parish Office	Yes	No	N/A		1 year	confidential disposal	

Halls, Centres & Recreation Grounds

What do we have?	What do we do with it?	Lawful Basis?	Other usage?	Have we sought explicit consent?	How do we keep it up to date?	How long will we retain data	How will we dispose of data	Next Action
Application to hire a hall/room/recreation facility	Stored electronically	YES - VAT	No	N/A		6 years + current	deleted	
Invoices for hire of a hall/room/recreation facility	Stored electronically	YES - VAT	NO	N/A		6 years + current	deleted	
Lettings Diaries	Stored electronically	YES - VAT	NO	N/A		6 years + current	deleted	
Terms & Conditions	Stored electronically	Yes Management	NO	N/A		6 years + current	deleted	