



Derbyshire Outdoor
Education Service

PUBLIC



Derbyshire County Council

Outdoor Education Service Retention of Documents Policy



Retention Sources			
Code	Retention Source	Expiry/review date	
Sch	Schools Retention Policy	May 2020	
Fin	Finance Retention Policy	May 2020	
HS	Health & Safety Retention Policy	Mar 2020	
MA	Mgt & Admin Retention Policy	Mar 2020	
HR	Human Resource Retention Policy	Aug 2019	
OES	Outdoor Education Service	May 2020	

GDPR	
Code:	The lawful bases for processing are set out in Article 6 of the GDPR
Con	(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
Tract	(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
LO	(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
VI	(d) Vital interests: the processing is necessary to protect someone's life.
PT	(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
LI	(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)
NA	Not Applicable



Version History				
Version	Date	Detail	Author	Approval Officer

Introduction

The on-going development of retention schedules is part of the commitment to good record keeping under the Authority's Corporate Records Management Policy. It provides consistent guidance on how long records within *the Council* should be retained. In some situations the length of time the records are retained may vary due to the specific circumstances relating to the documents concerned, in particular the integrity of records which pre-date this guidance cannot be assured. In addition to the time periods specified, the Data Protection/Freedom of Information Officer and Corporate Records Manager will continue to liaise with and advise colleagues in relation to their record keeping requirements.

Retention periods have been assigned after consideration of legal requirements, good practice guidance and the business needs of the Department. The Schedule is designed to ensure that information is kept as long as necessary, whilst addressing compliance with the Data Protection Act 1998 and the General Data Protection Regulations 2018. The retention periods within the schedule apply to information in all formats and should be applied consistently regardless of whether the information is held manually or electronically. When storing information in electronic format, only approved applications should be used to ensure long-term accessibility of information. Any records containing personal data or confidential information (i.e. a record containing basic personal data, such as name, address, contact details, date of birth or similar) should be disposed of in accordance with the Authority's guidance on disposing of confidential waste. When retention periods for records have expired documents should be reviewed in accordance with this guidance, with a view to disposal. If it is believed that there is justification to retain the data for longer, the Departmental Data Protection/Freedom of Information Officer and Corporate Records Manager must be expressly involved in that decision.

Standard Operating Procedures

Some records do not need to be kept at all. Standard Operating Procedures (SOP) define all records which staff may routinely destroy in the normal course of business. However, the retention/disposal schedule must still contain references and instructions concerning them.

SOP usually applies to information that is duplicated, unimportant, or of only short term transactional or operational value. Examples include:

- 'with compliments' slips
- catalogues and trade journals
- reports from third parties circulated for information



- journals of professional bodies or organisations
- telephone message slips
- non-acceptance of invitations
- trivial electronic mail messages or notes that are not related to Authority business
- requests for standard information such as location maps, plans, contact details, opening hours or promotional material
- out-of-date distribution lists/staff directories
- minutes circulated for information
- diaries (where the content is transferred into other electronic systems) not required as evidence
- Notebooks (where the content is transferred into other electronic systems) not required as evidence

(Note, this is not an exhaustive list)

Duplicated and superseded material such as official stationery, manuals, drafts, forms, address books and reference copies of DCC annual reports may be destroyed under SOP. Electronic copies of documents where a hard copy has been printed and filed, and thermal paper facsimiles after making and filing a photocopy, are also covered by SOP and may be destroyed

SOP should not be applied to records or information that can be used as evidence– to prove that something happened or that a decision was reached. Examples include: staff meeting minutes, public consultation papers or any record that has made a significant contribution to the discussion of the business being conducted should be captured as a record and have a retention period assigned.

Glossary of Terms:

Closure: when a record ceases to be 'current' – this can be the when a set of minutes are formally agreed, or when a Help Desk incident is formally closed. Many retention periods are triggered after the 'closure' of a record

Disposal: the processes associated with the end of a records lifecycle, they will typically include destruction of the records or transfer of the records to Derbyshire Record Office for permanent preservation

Destroy: the destruction of the records by shredding/ incinerating/ through DCC process

Deletion: the removal of online records

Record: the recorded evidence about an activity

Additional Information:

Records Disposal Policy and Procedures:

http://www.derbyshire.gov.uk/working_for_us/data/how_to_dispose_of_confidential_information_safely/default.asp

Additional Retention Schedules (including HR, Management and Administration, Property, Procurement):

http://www.derbyshire.gov.uk/working_for_us/data/how_to_dispose_of_confidential_information_safely/records_retention_schedules/default.asp

***For further information about the contents of this retention schedule, or for records management generally contact
Records Management on records.management@derbyshire.gov.uk or on ext. 39203***



Code	Description of Records	Retention Action	Disposal Actions/examples	GDPR Code	Rationale / Comments
Financial Provision Management					
FIN 1.06	The process of managing budgets, income, and expenditure	6 years plus current	Estimates Costings Income Investments Loans Funding bids Reporting Reconciliations	LO	Local Government Act 2003
FIN 1.07	The process of managing and administering re-charges	6 years plus current			Business requirement
FIN 1.08	The process involved in managing debts owed to the authority	6 years from clearance of debt/closure	Deposits Ledger Debtor Accounts Income posting slips and tabulations	LO	Business requirement
Financial Transaction Management					
FIN 2.01		10 years	Full Bank Statements	LI	Business requirement
FIN 2.01		3 months	Card payment Slips		Business requirement
FIN 2.01	The process of managing the banking transaction of the authority	6 years plus current	Bank Reconciliations Bank paying in books/slips	LI	Business requirement <i>Please note that card details written down prior to entry into a financial system should be disposed of once input.;</i>



Code	Description of Records	Retention Action	Disposal Actions/examples	GDPR Code	Rationale / Comments
			Records of cancelled cheques Cheque books and counterfoils		
FIN 2.02	Activities involved in the payment for goods and services by the authority. Includes expenses claims and honorariums.	6 years plus current	Credit Notes Creditor Invoices Delivery Notes Imprest documentation Cheque List Expense Claims Invoices	LI	Business requirement
	Taxation				
FIN 3.01	The process of administering VAT payments and claims	6 years plus current			The Value Added Tax Act 1994 (Sch, 11, para 6) HMRC internal guidance manual.
	Risk Management and Insurance				
	Insuring against risk				
FIN 6.01	Employers Liability Certificates	40 years from expiry of policy: Held by DCC	Employers Liability Certificates	NA	Business requirement Employers Liability (Compulsory Insurance) Act 1969



Code	Description of Records	Retention Action	Disposal Actions/examples	GDPR Code	Rationale / Comments
					Employers Liability (Compulsory Insurance Regulations 1998)
FIN 6.02	Motor Vehicle Insurance Policies and Certificates	40 years from expiry of policy Held By DCC	Motor Vehicle Insurance Policies Motor Vehicle Insurance Certificates	NA	Business requirement
	Internal Auditing				
FIN 10.01	The process of undertaking an audit investigation	6 years from closure of investigation/report	Audit Reports		Common Practice

Code	Description of Records	Retention Action	Disposal Actions/examples	GDPR Code	Rationale / Comments
	Centre Management				
OES	Critical Incident Plan	Review yearly; update changes to personnel	Delete names/contact information	LI	
Sch 3.2	Staff Meeting Minutes	5 years	Paper/Elec	LI	Common practice
MA 2.3.3	Policy Documents	While policy is in operation	Archive Elec when policy is no longer in operation	NA	Common practice

Code	Description of Records	Retention Action	Disposal Actions/examples	GDPR Code	Rationale / Comments
Student/Client Course Records					
OES	Day Book	6 years	Paper destroy	LI	In line with sch logbook retention. Serious incident recorded in the incident book
HS10	Incident Book / First Aid Book (no major accident)	25years from date of birth of pupil/s involved in the incident	Paper destroy	LI	
HS10	Incident book / First Aid Book (major accident)	25years from date of birth of pupil/s involved in the incident	Paper destroy	LO	Limitations Act 1980
Sch 7.8	Administration of non-routine medication (epipen, invasive drugs)	25years from date of birth of pupil	Paper Destroy	LO	Business decision
OES	Consent forms (no major accident)	6 years	Paper destroy	LI	
Sch 7.3	Consent forms (major accident)	25years from date of birth of pupil/s involved in the incident	Paper destroy	LO	Limitations Act 1980
HS06	Records created to run centre activities, including risk assessments an operating procedures (no - major incident)	7 years			Common Practice

OES	Records create to run centre activities, including risk assessments an operating procedures (major incident)	25 years	Electronic copy deletion	LI	25years covers from date of birth of pupil/s involved in an incident or not. Young people of a young age may attend open days / parties etc.
OES	Course file/ activity programme/school contact	7 years	Paper destroy		

Code	Description of Records	Retention Action	Disposal Actions/examples	GDPR Code	Rationale / Comments
Personnel Records					
HR 1.03	Staff personnel files	25 years after employment	Paper destroy	LI	Staff working with children / vulnerable adults HR requirement
HR.602	Interview notes for successful candidates	Retain add to personnel file		LI	Common Practice
HR 6.01	Interview notes for unsuccessful candidates	6 months for successful candidate in post	Paper/elec destroy	LI	Common practice
HR 3.01-3.03	Leave, Absence, Working time, Travel	6 years	Paper/elec destroy	LI	
Sch 6.9	Staff MyPlan	5 years	Paper/elec destroy	LI	Common practice
	Written warning/ final written warning (if no following action is required)	1 year	Paper/elec destroy	LI	DCC Disciplinary Procedure Jan 2018
OES	Contact information: emergency contact sheets	Amend after employee leaves	Paper/elec destroy	LI	
OES	Contact information: phones	Amend after employee leaves	Delete	LI	



HS09	Staff Accident/Incident Records	7 years	Destroy	LI	Common Practice
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Code	Description of Records	Retention Action	Disposal Actions/examples	GDPR Code	Rationale / Comments
Health & Safety					
HS03	Records for monitoring Asbestos	40 years	Destroy	NA	Control of substances Hazardous to Health Regs 202
HS06	Fire Logbook Record.	7 years	Destroy	NA	Common Practice
OES	Health & Safety monitoring sheets	7 years		NA	
HS01	Activity Equipment PPE inspection data	7 years	Destroy Elec	NA	
HS01	Rope Course Inspections (internal): weekly checks, 6 monthly inspection	7 years	Paper Destroy	NA	
HS01	Rope Course Inspections (external) Yearly	7 years	Paper/Elec Destroy	Tract	
HS04	Record of monitoring radiation	50 years		NA	Ionising Radiation Regs 1985 (related to caving, under consultation with Caving Association 2018)
HS05/07	Safe systems & Permits to work	7 years	Paper/Elec Destroy	NA	
HS11	COSHH record sheet	7 years		NA	

Code	Description of Records	Retention Action	Disposal Actions/examples	GDPR Code	Rationale / Comments
	Property				
OES	Landlord's Maintenance Schedule Record Sheet/Book and associated content. Gas, Elec, Fire etc.	7 years	Destroy	Tract	Common Practice

Code	Description of Records	Retention Action	Disposal Actions/examples	GDPR Code	Rationale / Comments
	Marketing/ Social Media				
OES	Prospective customer details (organisations/Businesses)	Contact details and details of conversation/email sent to the individual/company are archived as evidence of when they were last contacted and so this can be tweaked for similar companies	Deletion	LI	Details have been obtained from the public domain such as on the Internet or on business cards and are stored in an Excel contacts sheet and emails stored on the server as well as email addresses stored in gov.delivery email system
OES	Social media contacts	We don't store any information about followers/people we are	N/A	LI	Platforms that we have official accounts through have privacy notices built in to ensure



		following or anyone who has interacted with a post anywhere away from the social media platform or Crowd Control HQ other than to keep a record of the amount of followers and recent activity that is used on a monthly feedback report that is circulated internally and put on display in public areas at Lea Green Centre such as a screenshot of a 5 star Facebook review			they're compliant. Audiences give clear and transparent consent through likes or follows and can stop by unliking or unfollowing so there is no challenge to gain consent. We are unable to do any targeted campaigns such as Facebook advertising through Crowd Control HQ account management
OES	Social media photos and videos	Archived - these are saved from the social media platforms with other photos on the server for future use	Deletion if requested	Con (if required)	If the image is on an open social media account that isn't set to private it is already in the public domain for people to see and is re-posted through that platform without gaining consent, the image is credited if it needs to be. Consent to use an image is gained through contacting the individual via their social media account if we want to use it on the website, in e-newsletters and for print
OES	General photos and videos	Archived - these are saved with other photos on the server for future use	Deletion if requested	Con	Consent is confirmed via email or writing (such as a letter from a school accompanying a disc or hard copy portfolio of images) and this is stored on



					the server along with the photos/videos. Any hardcopy photos or discs are stored securely in room 126 at Lea Green Centre. Photos are stored with the group name/date of visit attached to the file
OES	Mailing list subscription via: website sign ups / hard copy sign-up sheets at events / email requests to us	Deleted – hard copy sign-up sheets are shredded and email requests to sign up to a mailing list are deleted once contacts are stored electronically Archived – stored on server in an Excel contact sheet, in gov.delivery and in the admin area of the website if the individual signed up this way	Deleted if requested (user is able to unsubscribe or they can email us to request removal from a mailing list)	Con	At events consent is specifically asked for in relation to what we will be emailing the individual about and individuals have to complete a hard copy form to opt-in to e-newsletters. All e-newsletters have an unsubscribe link on them for people to opt-out of communications at any stage. E-newsletters are the only form of marketing to our current database
OES	Feedback forms (hard copies)	Hard copy archived for 5 years and feedback from it stored electronically on the server in relation to school/group name only. Email address stored in an Excel contact sheet and in gov.delivery if we add the individual to a mailing list	Destroy	Con	On hard copy feedback forms we ask if people want to opt-out from future communications from us and if this is not ticked, the user is added to a mailing list relevant to their booking.
OES	Surveys and competitions	Deleted after recorded	Deleted	Con	Personal information such as an email address or postal address is collected when we



					carry out a survey or run a competition so we can contact the person if they have won. These details are only kept for a short period of time after the survey or competition has run and no individuals are subscribed to a mailing list unless they specifically opted in when competing the survey or competition
OES	Cookies and Google Analytics	N/A	N/A	Li	<p>Cookies are used across all service websites to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.</p> <p>Individuals can choose to have their computer warn them each time a cookie is being sent, or can choose to turn off all cookies via browser settings. Like most websites, if cookies are turned off, some of the website services may not function properly.</p> <p>Our websites use Google Analytics to analyse how our visitors use our websites so that we can improve them for future visitors.</p>



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