

Borough Council of
**King's Lynn &
West Norfolk**



Audit Committee

Agenda

Monday, 12th November, 2018

immediately following the training session for the Committee commencing at
5.00 pm (approximately 5.45 pm)

in the

**Council Chamber
Town Hall
Saturday Market Place
King's Lynn**



King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX
Telephone: 01553 616200
Fax: 01553 691663

2 November 2018

Dear Member

Audit Committee

You are invited to attend a meeting of the above-mentioned Panel which will be held on **Monday, 12th November, 2018 immediately following the training session for the Committee commencing at 5.00 pm (approximately 5.45 pm)** in the **Council Chamber, Town Hall, Saturday Market Place, King's Lynn PE30 5DQ** to discuss the business shown below.

Yours sincerely

Chief Executive

AGENDA

1. Apologies

2. Minutes (Pages 4 - 6)

To approve the minutes from the Audit Committee held on 17 September 2018.

3. Declarations of Interest

Please indicate if there are any interests which should be declared. A declaration of an interest should indicate the nature of the interest (if not already declared on the Register of Interests) and the agenda item to which it relates. If a disclosable pecuniary interest is declared, the Member should withdraw from the room whilst the matter is discussed.

These declarations apply to all Members present, whether the Member is part of the meeting, attending to speak as a local Member on any item or simply observing the meeting from the public seating area.

4. Urgent Business Under Standing Order 7

To consider any business which, by reason of special circumstances, the Chairman proposed to accept as urgent under Section 100(b)(4)(b) of the

Local Government Act 1972.

5. Members Present Pursuant to Standing Order 34

Members wishing to speak pursuant to Standing Order 34 should inform the Chairman of their intention to do so and on what items they wish to be heard before the meeting commences. Any Member attending the meeting under Standing Order 34 will only be permitted to speak on those items which have been previously notified to the Chairman

6. Chairman's Correspondence (if any)

7. Training - Business Rates Retention

8. Business Continuity Annual Update (Pages 7 - 10)

9. Corporate Risk Register Monitoring Report (Pages 11 - 17)

10. Risk Management Policy and Strategy Review (Pages 18 - 48)

11. Record Retention and Disposal Policy Review (Pages 49 - 92)

12. Internal Audit Half Year Progress Report (Pages 93 - 101)

13. Committee Work Programme 2018/2019 (Pages 102 - 105)

To note the Committee's Work Programme for 2018/2019.

14. Date of Next Meeting

To note that the next meeting of the Audit Committee will take place on 28 January 2019 at 5 pm in the Council Chamber, Town Hall, Saturday Market Place, King's Lynn.

To:

Audit Committee: Mrs J Collingham, J Collop, S Dark, P Kunes, C Manning, G Middleton (Chairman), D Pope, T Smith and T Tilbrook (Deputy Chair)

Portfolio Holders:

Item 8: Councillor B Long, Leader
Items 9, 10, 11 & 12: Councillor P Hodson, Performance

Officers

Lorraine Gore – Executive Director (Finance) and Deputy Chief Executive
Ged Greaves – Senior Policy and Performance Officer
Kathy Woodward – Shared Audit Manager

BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK

AUDIT COMMITTEE

Minutes from the Meeting of the Audit Committee held on Monday, 17th September, 2018 at 5.00 pm in the Council Chamber, Town Hall, Saturday Market Place, King's Lynn PE30 5DQ

PRESENT: Councillor G Middleton (Chairman)
Councillors Mrs J Collingham, S Dark, P Kunes, C Manning, D Pope, T Smith
and T Tilbrook (Vice-Chairman)

Officers:

Lorraine Gore, Executive Director
Kathy Woodward, Shared Audit Manager
Ged Greaves, Senior Policy and Performance Manager

A30 **APOLOGIES**

Apologies for absence were received from Councillors J Collop and B Long.

A31 **MINUTES**

The minutes of the meeting held on 30 July 2018 were agreed as a correct record and signed by the Chairman, subject to the following amendment:

Councillor Tilbrook commented that the page numbers in the draft Statement of Accounts received by the Committee did not correlate with the final document and made it difficult for Members to follow and identify the changes made. The approach for 2018/2019 audit agreed to be based on draft document and racked changes to auditor ISA 260 report.

A32 **DECLARATIONS OF INTEREST**

There were no declarations of interest.

A33 **URGENT BUSINESS UNDER STANDING ORDER 7**

There was no urgent business.

A34 **MEMBERS PRESENT PURSUANT TO STANDING ORDER 34**

There were no Members present under Standing Order 34.

A35 **CHAIRMAN'S CORRESPONDENCE**

The Chairman, Councillor Middleton outlined the reason why the Annual Audit Letter for year ended 31 March 2018 was being considered at this meeting.

A36 **ANNUAL AUDIT LETTER FOR YEAR ENDED 31 MARCH 2018**

The Executive Director – Finance presented the Annual Audit Letter for the year ended 31 March 2018.

The Committee's attention was drawn to the following sections of the report:

- Executive Summary, which detailed the results and conclusions on the significant areas of the audit process.
- Purpose and Responsibilities.
- Financial Statement Audit.
- Value for Money.
- Other Reporting Issues.
- Audit Fees – it was highlighted that the final fee for the Housing Benefit Subsidy Certification would be confirmed upon completion by the 30 November 2018 deadline and would therefore be reported in the annual grant certification report.

The Executive Director – Finance responded to questions relating to:

- Final Audit Fees to be discussed and negotiated with Ernst and Young.
- Written Recommendation set out on page 57 of the Agenda. The Executive Director undertook to liaise with Ernst and Young to amend the recommendation.
- Leases – The Council would need to review its leases based on changes to IFRS 16. The Committee was advised that the required work had already commenced.
- The Borough Council's appointment of Auditors for the main accounts.
- The tender process for the appointment of Auditors for the West Norfolk Housing Company and West Norfolk Property Company.
- The audit approach undertaken by Ernst and Young.

RESOLVED: The Audit Committee received and noted the Annual Audit Letter for year ending 31 March 2018.

A37 **COMMITTEE WORK PROGRAMME 2018/2019**

The Committee noted the work programme for 2018/2019.

A38 **DATE OF NEXT MEETING**

The next meeting of the Audit Committee would be held on 12 November 2018 at 5 pm in the Council Chamber, Town Hall, Saturday Market Place, King's Lynn.

The meeting closed at 5.17 pm

POLICY REVIEW AND DEVELOPMENT PANEL REPORT

REPORT TO:	Audit Committee		
DATE:	12 November 2018		
TITLE:	Business Continuity – annual update		
TYPE OF REPORT:	Monitoring		
PORTFOLIO(S):	Leader		
REPORT AUTHOR:	Ged Greaves, Senior Policy and Performance Officer		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	No

REPORT SUMMARY/COVER PAGE

PURPOSE OF REPORT/SUMMARY:
The report outlines the current position of the council's business continuity arrangements, summarises progress made since the last update in November 2017 and describes work that is planned to be undertaken over the coming months.
KEY ISSUES:
The council has a responsibility as a Category 1 responder under the Civil Contingencies Act 2004 to develop and maintain plans to ensure that, as far as is reasonably practicable, key services can continue to be performed in the event of a disruption or emergency.
OPTIONS CONSIDERED:
Not applicable; the council must have plans in place under the Civil Contingencies Act 2004.
RECOMMENDATIONS:
The Audit Committee are asked to <ol style="list-style-type: none"> 1. review progress made and endorse the approach being taken to the council's business continuity arrangements and 2. confirm whether annual updates on the topic are required.
REASONS FOR RECOMMENDATIONS:
To ensure that members are kept informed about the council's business continuity arrangements.

REPORT DETAIL**1.0 Background**

1.1 The Civil Contingencies Act 2004 places a duty on Category 1 responders (as defined by the act and which includes all local authorities) to develop and maintain plans for the purpose of ensuring that, so far as is reasonably practicable, if an emergency occurs they are able to continue to perform their key services / critical activities. This means that, in the event of a disruption or emergency, the council must have plans available to ensure that it can mobilise the functions it needs to:

- deal with any emergency
- ensure that the impact of the emergency on the council's day-to-day activities is kept to a minimum, and

- ensure that, so far as possible, vital services for the community can be maintained at appropriate levels.
- 1.2 Business continuity management in the authority is based around a framework of documents as shown below:



1.3 The responsible officer for business continuity in this authority is the Executive Director, Environment and Planning. He is assisted by a group of officers from across the council – the Business Continuity Corporate Officer Group. Implementing business continuity is the responsibility of the council's Management Team. However, all members of staff have a responsibility to be aware of the plans that affect their service area and their role following invocation of any business continuity plan.

2.0 Current position

2.1 Critical activities are those services that protect life and safety, or are considered essential to support such activity and are considered critical to restore and deliver in the event of a disruption or emergency. The council's critical activities are:

- CIC – response to customer contacts
- Corporate Communications – including website
- CCTV responsive functions control room
- Emergency Planning – response to recovery and incidents
- Homelessness
- ICT – to support other teams
- Incident Management Team – Executive Directors and support staff
- Personnel – for staff contact details (not normal business)
- Property Services – for building access/maintenance (not normal business)
- Electoral Services – if during a critical time
- Env Health – Food Safety / Health & Safety– if during an incident
- Env Health – Environmental Quality – if during an incident

2.2 A risk assessment has been undertaken to identify the potential threats to the critical activities. A 'threat card' is in place for each of the threats to guide the Incident Management Team in their consideration of response. The currently agreed

threats to the critical activities are listed below. The threat cards were updated in April 2018 and include:

- Loss of Staff
- Loss of ICT
- Loss of King's Court
- Fuel Shortage

2.3 The Council's business continuity policy was agreed in 2017 by the Chief Executive under delegated powers and will be reviewed in 2019.

3.0 Progress since last report in November 2017

3.1 Activities undertaken by the corporate officer group since November 2017 are shown below:

- Metis 17 table top exercise was undertaken with key staff.
- People and Places Task and Finish Group reported on comprehensive information to identify staff numbers, alternative sites and IT requirements in the event that Kings Court is unavailable. This resulted in a Work Area Recovery plan for King's Court.
- Establishment of an IT Infrastructure Task and Finish group to ensure the IT network is resilient should the King's Court Work Area Recovery plan be invoked.
- High level 'business impact assessment' undertaken – this was a review of all business activity against a set of criteria to confirm in which order services should be recovered in the event of a disruption.
- Out of Hours Contact Card details revised and circulated.
- Annual review of critical activities and key threats. This resulted in the technical team within Property Services being added as a Critical Activity, and the streamlining of documents that make up the council's business continuity plans.
- All critical and non-critical bronze plans reviewed and published.
- Peer review of critical bronze plans.
- Briefing sessions have been held for exercise Metis18 to inform key staff on the council's business continuity incident response plan.
- Continued monitoring of staff who have completed the BC e-learning, introduced for Metis 14.

3.2 Periodic updates on business continuity have been published in Internal Affairs and the Members Bulletin that remind staff and members of the importance of business continuity and how to access the council's business continuity portal following an incident.

4.0 Forward work plan

4.1 The corporate officer group has a work plan in place for the next 12 months. Our planning and exercise programme is based upon the agreed threats. Work to be undertaken includes:

- Progressing actions agreed by Management Team following exercise Metis 18.
- Reviewing live incidents after the event and ensuring the lessons learnt are implemented in future planning.
- Planning for exercise Metis 19.

- Reviewing the borough council's Incident Response Plan, which following the streamlining exercise, now contains all threat cards.
- Reviewing bronze level business continuity plans.

5.0 Conclusion

5.1 The council's business continuity arrangements are aligned to the principles of ISO22301 – which aims to minimise the impact of disruptive incidents. Business continuity is not a static process; it is therefore important that, as the nature of the organisation changes, our business continuity arrangements reflect the changes.

6.0 Recommendation

6.1 The Audit Committee are asked to note progress made, endorse the approach being taken to the council's business continuity arrangements and confirm that annual updates are required.

7.0 Corporate Priorities

Not applicable, statutory requirement

8.0 Policy Implications

None. Policy last reviewed in 2017, next update due 2019.

9.0 Financial Implications

None

10.0 Personnel Implications

None

11.0 Statutory Considerations

11.1 The Council is a Category 1 responder under the Civil Contingencies Act 2004 and therefore has a duty to develop and maintain plans of this nature.

12.0 Equality Opportunity Considerations

None

13.0 Risk Management Implications

13.1 Business Continuity arrangements are included on the Council's risk register.

14.0 Declarations of Interest / Dispensations Granted

None

Background Papers

Business Continuity Policy Statement and Strategy
Civil Contingencies Act 2004
ISO22301 Business Continuity Management Standard

POLICY REVIEW AND DEVELOPMENT PANEL REPORT

REPORT TO:	Audit Committee		
DATE:	12 November 2018		
TITLE:	Corporate Risk Monitoring Report October 2018		
TYPE OF REPORT:	Monitoring		
PORTFOLIO(S):	Performance		
REPORT AUTHOR:	Ged Greaves, Senior Policy and Performance Officer		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	No

REPORT SUMMARY/COVER PAGE

PURPOSE OF REPORT/SUMMARY:
This report presents the changes to the Corporate Risk Register since the last monitoring report in May 2018. It gives details of the risks falling into the 'Very High' category and the associated work being progressed to mitigate the effects.
KEY ISSUES:
It is proposed to remove 1 risk from the register and add 1 new risk. Following the review, the risk scores for 3 entries have been proposed to change.
OPTIONS CONSIDERED:
Not applicable
RECOMMENDATIONS:
Members are requested to consider the contents of the Corporate Risk Register and confirm agreement with Management Team's assessment of the risks to the Corporate Objectives.
REASONS FOR RECOMMENDATIONS:
In order to ensure the Council meets its statutory obligations to ensure that it has 'effective arrangements in place for the management of risk'.

REPORT DETAIL**1. Introduction**

- 1.1 The Risk Management Policy and Risk Management Strategy were presented to the Audit Committee in February 2016 and approved by Cabinet on 1st March 2016.
- 1.2 The Terms of Reference for the Audit Committee include responsibility for monitoring the management of risk. To this end, the Committee receives reports on a half-yearly basis on the position of the Corporate Risk Register, with the last one being presented in May 2018.

- 1.3 Each risk on the register is scored in terms of Impact and Likelihood, according to criteria defined within the Corporate Risk Strategy. The broad definitions and risk matrix are attached for reference in Appendix 2.
- 1.4 The Corporate Risk Register is reviewed by the Executive Directors on a 6-monthly basis. Any existing entries on the register are considered for changes to the nature of the risk, progress to be reported and any adjustments to the risk scores. Risks that are no longer relevant are removed and new risks considered in the context of current circumstances are added. The risk reference numbers are not reallocated when risks are removed from the register, to enable the history to be maintained.
- 1.5 A summary of the changes to the Corporate Risk Register since the last monitoring report are detailed in section 2 below. Details of the 'Very High' risks are given in Appendix 1 together with a list of the 'High' risks.
- 1.6 The full Corporate Risk Register, as agreed by Management Team, has been provided to the Audit Committee in hard copy, for reference.

2. Changes to the Corporate Risk Register

- 2.1 The Risk Management Policy states that to 'ensure it is effective, risk management needs to be aligned with corporate aims, objectives and priorities'. As such the format of the risk register is ordered to reflect the priorities as contained in the Corporate Business Plan. This makes the link between the priorities and the management of associated risks clearer.
- 2.2 Apart from small changes made from a fresh review of the content and updates on progress for various entries, the main changes since May 2018 are listed below.

2.3 Risk proposed to be removed:

It is proposed to remove one risk from the register, from Priority 3.

Risk 3.4a – Waste and Recycling Contract

A potential fee dispute with Kier has been resolved.

2.4 Proposed new risks:

One new risk has been added to the register:

2.8 – Accelerated Construction Programme

Management Team has agreed to with the inclusion of this risk on the register given the financial and service implications arising from the delivery of this externally funded programme. Negotiations are ongoing with Homes England regarding contracts and supporting performance framework. Proposed risk score: Impact – Major; Likelihood – Possible. This is "amber" on the RAG rating.

2.5 Risk rating amendments

The risk rating scores for two entries on the register have been changed for this update:

Increased Risk Score

Risk 1.25 – Provision of leisure services

In August 2018, Cabinet considered future options. A special Cabinet meeting in October confirmed the future delivery model of leisure services. The review and transition process to the new arrangements temporarily elevate vulnerabilities. It is proposed to increase the Likelihood score from Possible to Likely. The risk would change from “green” to “amber” on the RAG rating.

Decreased Risk Score

Risk 1.13 – VAT Trust arrangements

As a result of ongoing mitigation, the risk assessment score has been maintained for several years. Consideration of the new leisure services delivery model signals a significant reduction to the vulnerabilities arising from the current VAT position. The Impact score is therefore proposed to be reduced from “Moderate” to “Minor” as the financial impact is unlikely to exceed 2.5% of the budget. The risk would change from “green” to “white” on the RAG rating.

Risk 1.22 - Revenues and Benefits software tender

Following completion of the procurement process, the software implementation is progressing broadly to plan. The Likelihood score is therefore proposed to be reduced from “Possible” to “Unlikely”. The risk remains “green” on the RAG rating.

3. Conclusion

- 3.1 The Corporate Risk Register continues to be actively monitored by Management Team on a periodic basis.

4.0 Corporate Priorities

- 4.1 The Corporate Risk Register is aligned with the Corporate Priorities and displayed under the 6 ‘Priority’ headings.

5.0 Policy Implications

- 5.1 None

6.0 Financial Implications

- 6.1 The Corporate Risk Register is a document designed to assist Senior Management to identify and manage any financial implications identified through normal operations.

7.0 Personnel Implications

- 7.1 None

8.0 Statutory Considerations

- 8.1 Account and Audit Regulations 2015 - s3(c). The Council must ensure that it has 'effective arrangements for the management of risk'.

9.0 Equality Opportunity Considerations

9.1 None

10.0 Risk Management Implications

10.1 The Council has in place a Risk Management Policy (last adopted in March 2016) and an associated Risk Management Strategy.

10.2 The Corporate Risk Register records high level risks which pose a threat or opportunity to the Council's objectives. It is a tool used by the Chief Executive and the Executive Directors (Management Team) to help manage risk within the Authority and is a key document within the governance controls applied within the Council.

11.0 Recommendations

11.1 Members are requested to:

- a) consider the contents of the risk register;
- b) confirm agreement with Management Team's assessment that:
 - i. Removes risk 3.4a – Waste and Recycling Contract
 - ii. Adds a new risk 2.8 – Accelerated Construction Programme
 - iii. Increases the risk score for 1.25 – Provision of leisure services
 - iv. Decreases the risk scores for 1.13 – VAT Trust arrangements and Risk 1.22 - Revenues and Benefits software tender

12.0 Declarations of Interest / Dispensations Granted

12.1 None

Background Papers

October 2018 Corporate Risk Register

Previous Corporate Risk Registers

Risk Management Policy and Strategy – approved in March 2016

CORPORATE RISK REGISTER MONITORING REPORT
OCTOBER 2018

Risk name: Business Rates	Responsible Director: Finance Services (s151 Officer)
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Ref	Description	Mitigation	Progress
1.16	<p>The risk is that:</p> <p>The financial plan may be adversely affected as a result of substantial events that affect the Business Rates due to the Council. Such events may be appeals being agreed leading to substantial Rateable Value reductions; reliefs being granted; failure to grow the business rate tax base or closure of a large business; and uncertainty relating to the 100% retention of Business Rates in future.</p>	<p>Reserves created for measurable risks and membership of the Norfolk Business Rates Pool.</p> <p>Continue to monitor potential areas of risk and work with LGA where possible.</p> <p>Continue working with major businesses to reduce the possibility of closure.</p> <p>VOA has changed its appeal process - now check, challenge and appeal.</p>	<p>A contingent liability has been noted in the Statement of Accounts in respect of the possible backdating of business rates to the QE hospital following advice they have received regarding their possible charitable status - this is a situation raised across the country and we await further information.</p> <p>Membership of the Business Rates Pool provides some provision to offset some of the impact, should it occur. Reserves have been created to provide some funding protection from the impact on business rates income in the event of the closure of major businesses.</p> <p>The movement in the overall business rates position is monitored on a monthly basis. The Council has responded to consultation on 100% retention arrangements and the s151 Officer has attended workshops. The MHCLG has invited applications for 100% business rates retention for pilots for 2018/2019, but the Norfolk submission was unsuccessful. Further bid expected for 2019/20.</p> <p>NHS Foundation Trusts have initiated legal action and the Council has contributed to the LGA's response. Progress with the legal case is being monitored. Impact assessment of local economy exposure to potential risks arising from Brexit being prepared.</p>

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Risk Score:		
Impact	Extreme	5
Likelihood	Possible	3
Total score		15

Risks categorized as 'High Risk' (Score 10-12)

- 1.10 - Fraud and Corruption
- 1.12 - Financial Plan
- 1.24 - Financial Ledger software replacement
- 1.25 – Provision of leisure services
- 2.3 - Major housing developments
- 2.4 – 5 year land supply and housing delivery
- 2.5 - Housing Market
- 2.6 - Strategic Land and Property Acquisition
- 2.8 – Accelerated Construction Programme
- 3.1 - Emergency Response (External)
- 3.5 - Health and Safety
- 4.2 - THi 2 Application to the Heritage Lottery Fund

CORPORATE RISK REGISTER MONITORING REPORT
OCTOBER 2018

After October 2018 review

LIKELIHOOD	5 Almost Certain	(Green)	(Orange)	(Red)	(Red)	(Red)
	4 Likely		(Green)	(Orange) 1.25, 2.4, 2.5	(Red)	(Red)
	3 Possible		(Green) 3.6, 3.8	(Green) 1.2, 1.3, 1.9, 1.17, 1.19, 1.23, 2.7, 3.3, 3.7, 4.1, 6.1	(Orange) 1.10, 1.12, 1.24, 2.3, 2.6, 2.8, 3.1, 3.5, 4.2	(Red) 1.16
	2 Unlikely		1.13	(Green) 1.7, 1.11, 1.21, 1.22, 3.2	(Green) 1.1, 1.4, 1.8, 1.15, 2.1, 2.2, 3.4b	(Orange)
	1 Rare					(Green)
		1 Insignificant	2 Minor	3 Moderate	4 Major	5 Extreme
	IMPACT					

Risk Category	How the Risk should be managed
Very High Risk (15 – 25) (Red)	Immediate action required. Senior Management must be involved.
High Risk (10 – 12) (Orange)	Senior Management attention needed and management responsibility specified.
Medium Risk (5 – 9) (Green)	Manage by specific monitoring or response procedures. Responsibility to be allocated by Management Team to a named Service Manager.
Low Risk (1 – 4) (White)	Manage by routine procedures, unlikely to need specific or significant application of resources.

CORPORATE RISK REGISTER MONITORING REPORT
OCTOBER 2018

POLICY REVIEW AND DEVELOPMENT PANEL REPORT

REPORT TO:	Audit Committee		
DATE:	12 November 2018		
TITLE:	Risk Management Policy and Strategy review		
TYPE OF REPORT:	Review		
PORTFOLIO(S):	Performance		
REPORT AUTHOR:	Ged Greaves, Senior Policy and Performance Officer		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	No

REPORT SUMMARY/COVER PAGE

PURPOSE OF REPORT/SUMMARY:
<p>The council's risk management policy and strategy are due to be refreshed in March 2019. This report introduces a draft framework and seeks members' comments. A final version will be presented to the committee in January 2019 to take forward to Cabinet in March 2019.</p>
KEY ISSUES:
<p>The policy (Appendix A) states the council's commitment to managing risk in a positive manner. It is recognised that in order to achieve the council's objectives it is necessary to take risks and that these need to be identified, understood and managed accordingly.</p> <p>The risk appetite is defined in the policy as 'open' which means that the council is 'prepared to consider all delivery options and select those with the highest probability of productive outcomes, even when there are elevated levels of associated risk'.</p> <p>The strategy (Appendix B) describes the approach to be carried out in practice. It explains how risks will be identified, analysed, managed and monitored. The strategy sets out criteria to be used for deciding the potential impact of a risk and the appropriate levels of action to be taken for the different risk categories.</p> <p>The strategy has been updated to reflect changes in staffing and practice that have taken place since the review in 2016.</p> <p>An Internal Audit review of risk management is underway. Liaison is taking place with the lead auditor and it is hoped that the report will be signed off in time for consideration within the final version of the policy and strategy.</p>
OPTIONS CONSIDERED:
<p>These are detailed in the report.</p>
RECOMMENDATIONS:
<p>Members are requested to consider the draft.</p>
REASONS FOR RECOMMENDATIONS:
<p>In order to ensure the Council meets its statutory obligations to ensure that it has 'effective arrangements in place for the management of risk'.</p>

CORPORATE RISK REGISTER MONITORING REPORT
OCTOBER 2018

1. Background

- 1.1 The Risk Management Policy and Strategy are reviewed every three years and the current versions were approved by Cabinet in March 2016. The policy and strategy framework are therefore due to be reviewed by March 2019
- 1.2 Responsibility for the coordinating the corporate risk register and the risk management framework transferred from Internal Audit to Personnel, Policy and Performance in 2017.
- 1.3 An Internal Audit review of the council’s approach to risk management is underway with the final report not yet agreed. Audit Committee will be requested to endorse the risk management framework prior to approval at Cabinet in March 2019. To allow sufficient time for the committee to consider the draft framework, a proposed policy (Appendix A) and strategy (Appendix B) are attached.

2. Facts/Issues

- 2.1 There is no specific “standard” set for risk management in local government and the council’s approach is based on sector best practice including the International Standard in Risk Management ISO: 31000 and guidance from organisations such as Alarm (Association of Local Authority Risk Managers), the Public Sector Risk Management Association, and the Institute of Risk Management.

3. Proposals

3.1 Internal Audit review

- 3.1.1 Internal Audit are conducting an Assurance Review of Risk Management, the objective of the audit is to review the systems and controls in place within risk management, to ensure they are operating adequately, effectively and efficiently.
- 3.1.2 This is the first time that risk management has been audited. Under previous arrangements, Internal Audit were responsible for risk management and an external review would have been required to avoid conflicts of interest.
- 3.1.3 If the audit report is finalized during the next few months this could be reflected in the final framework that will be presented to Audit Committee in January 2019. I have liaised with the auditor in drafting the refreshed policy and strategy to try and align the two processes.

3.2 Risk appetite

- 3.2.1 The council’s risk appetite is set out in the risk management policy and strategy and is approved by Cabinet. This was last considered during the policy and strategy refresh in January 2016. At that time, “open” was selected as the most appropriate rating from the following options:

Averse	Prepared to accept only the very lowest levels of risk, with the preference being for ultra-safe delivery options, while recognising that these will have little or no potential for reward/return.
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CORPORATE RISK REGISTER MONITORING REPORT
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Cautious	Willing to accept some low risks, while maintaining an overall preference for safe delivery options despite the probability of these having mostly restricted potential for reward/return.
Moderate	Tending always towards exposure to only modest levels of risk in order to achieve acceptable, but possibly unambitious outcomes.
Open	Prepared to consider all delivery options and select those with the highest probability of productive outcomes, even when there are elevated levels of associated risk.
Hungry	Eager to seek original/creative/pioneering delivery options and to accept the associated substantial risk levels in order to secure successful outcomes and meaningful reward/return.

3.2.2 It is recognised that a certain amount of risk is inherent in all of our activities and that it can be a positive driver in the development of the services we provide and our approach to investment. In order to mitigate ongoing financial challenges, the council's approach includes a cost reduction programme, a capital and investment strategy and consideration of different delivery models. It is proposed to continue with the current appetite of "open".

3.2.3 To facilitate the delivery of the proposed risk appetite, the risk management strategy sets out an approach for risks that are assessed as 'high' or 'very high' i.e. above a tolerable level. These are those risks that fall within the orange and red sections of the matrix.

3.3 Risk scores

3.3.1 Our current approach to the corporate risk register includes a single risk score which reflects the level of the risk taking into account current mitigation measures – the residual risk. This score is calculated by multiplying "likelihood" and "impact".

3.3.2 Research has identified that other councils include an inherent and a target risk score.

3.3.3 The inherent risk score takes no account of the controls the council has in place or can put in place to manage the identified risk. This is not included in our risk register but can be added.

3.3.4 The target risk score reflects the view of what the desired risk score should be after controls are put in place and reflects the risk tolerance of the council. This assists ongoing management of risks as it provides an indication of the direction of travel.

3.3.5 It is proposed to include inherent and target risk scores in the risk management framework.

3.4 Risk matrix

3.4.1 A risk matrix is used to evaluate the risks so that there is an understanding of the exposure faced by the council, which in turn influences the type of response we choose and if we decide to treat the risk, the level of treatment that should be applied to manage/reduce/prevent the risk from occurring.

CORPORATE RISK REGISTER MONITORING REPORT
OCTOBER 2018

3.4.2 The council uses a risk matrix, based upon common practice in the public sector. It is based upon a 5x5 matrix of likelihood and impact. Likelihood represents the probability of an event taking place. The likelihood of events are categorised into five broad headings: rare, unlikely, possible, likely and almost certain. Impact represents the expected disruption to the council. These are categorised as: insignificant, minor, moderate, major and extreme.

3.4.3 Some councils have adopted a 4x4 matrix. Every form of risk matrix has its advantages and disadvantages and there is no “one size fits all” approach. Compared with a 4x4 matrix, the council’s current approach will provide more granularity as to the level of risk. This is useful for prioritizing risks and developing mitigation measures.

3.4.5 It is proposed to continue with the current 5x5 matrix.

3.5 Risk criteria

3.5.1 The criteria to be used for deciding the potential impact of a risk were revised in 2016. The last review introduced new criteria for ‘impact on service’ and ‘legal and statutory’. The criteria are:

- Impact on service
- Personal safety
- Financial loss
- Legal and regulatory
- Corporate objective
- Environmental impact
- Reputation

3.5.2 The values for the ‘financial loss’ criteria were extended to include a percentage of budget as well as a fixed value. This was to enable the criteria to be applied to service and project risks as well as the corporate risks.

3.5.3 It is proposed to continue with the current impact criteria.

3.6 Risk management policy and strategy scope

3.6.1 Our current risk management framework refers to risks in the following areas:

- Corporate
- Directorate
- Service
- Operational
- Section
- Projects

3.6.2 Risk management is also undertaken in other aspects of our activities including:

- *Health and safety* - A significant risk for the council and is covered by our Health, Safety and General Welfare Policy.

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- *Tackling fraud and corruption* – This is an increasing area of council activity. Internal Audit will be developing a Fraud and Corruption Risk Register. This will support the mitigation measures for the current corporate risk.

3.6.3 The current policy or strategy do not currently reference or define the control environment for all of the areas in 3.6.1 and 3.6.2 above. These are included in the draft framework.

3.7 Strategic risks

3.7.1 The Corporate Risk Register includes over 40 risks spanning the breadth of the council's activities. These are assigned to executive directors who are responsible for monitoring and reviewing the risks and ensuring appropriate mitigation measures are in place.

3.7.2 Some councils use an alternative framework which categorises risk using terms such as strategic, corporate and operational:

Category	Key characteristics
<p><i>Strategic</i></p> <p>An event or occurrence that would cause the council to be unable to operate or provide key services leading to a significant adverse effect on public wellbeing.</p>	<ul style="list-style-type: none"> • Directly affecting the future direction of the council's business plan and key objectives. • Identified by senior management team and heads of service with the assistance of corporate governance roles such as policy and internal audit. • Typically between 8 and 12 risks in total.
<p><i>Corporate</i></p> <p>An event or occurrence that would lead to a significant adverse effect on the council's ability to provide important public services</p>	<ul style="list-style-type: none"> • Directly linked to the critical activities, services and programmes carried out in order to facilitate the delivery of the council's business plan. • Identified by heads of service, project managers, officers, partnership leads, internal / external audit, members.
<p><i>Operational</i></p> <p>An event or occurrence arising from inadequate or failed internal processes, people and systems, or from external events leading to an adverse impact on service provision.</p>	<ul style="list-style-type: none"> • Directly linked to the activities, services and projects carried out in order to facilitate the delivery of the council's business plan. • Identified by heads of service, project managers, officers, partnership leads, internal and external Audit, members. • Influence the day-to-day or project activities of the Council

3.7.3 Analysis of the current Corporate Risk Register shows how our current risks relate to the framework in 3.7.2 above:

Category	Examples from our current Corporate Risk Register
Strategic	1.1 Business continuity 1.12 Financial Plan

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An event or occurrence that would cause the council to be unable to operate or provide key services leading to a significant adverse effect on public wellbeing.	3.1 Emergency response
Corporate An event or occurrence that would lead to a significant adverse effect on the council's ability to provide important public services	1.3 Reputation management 1.7 Loss of ICT 1.8 ICT back up failure 1.19 Cyber security attack 1.23 GDPR 1.26 Fire compartmentalization 2.3 Major housing developments 2.7 Strategic land and property acquisition 3.4b Procurement of new Waste and Recycling contract
Operational An event or occurrence arising from inadequate or failed internal processes, people and systems, or from external events leading to an adverse impact on service provision.	1.22 Revenues and Benefits software tender

3.7.4 Discussions with Management Team have highlighted opportunities to refocus and group related risks to form strategic risks. An example is set out below:

Potential strategic risk	new	Risk description	Related Corporate Risk Register item
Financial sustainability		Ineffective management of finances leading to lack of financial resilience as government funding reduces and demand increases	1.2 Cost Reduction programme 1.11 VAT 1.12 Financial Plan 1.13 VAT Trust arrangements 1.15 Pension fund 1.16 Business rates

3.7.5 Other examples are shown below:

Potential strategic risk	new	Risk description	Related Corporate Risk Register item
Major programmes and projects		Impact on the delivery of council services due to the failure of major programmes and projects. A major programme or project being any activity that can cause significant financial, legal, reputational or compliance issues or prevent the council from delivering a strategic priority or key objective.	1.4 Due diligence/Capacity and business planning for major schemes 1.22 Revenues and Benefits software tender 1.25 Provision of leisure services 2.3 Major housing developments 3.4b Procurement of new Waste and Recycling contract 2.8 Accelerated Construction Programme

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Facilitating and enabling growth	The inability of the council to facilitate and enable the market to deliver the council's growth agenda. This failure may reduce investment in infrastructure, inward investment, job opportunities, new housing and commercial development therefore impacting on communities and businesses.	2.1 Local employment 2.2 Empty retail properties/town centre decline 2.4 5 year land supply 2.5 Housing market 2.6 Strategic land and property acquisition 2.7 West Winch/North Runcton Strategic Growth Area 4.1 Improvements to heritage buildings 4.2 THi2 Application to the Heritage Lottery Fund
Sustainable communities	The risk of various communities within feeling excluded, disengaged or being unable to access available services and opportunities including, rural, deprived, minority and vulnerable communities and local businesses etc. Services and opportunities to include health and wellbeing, early intervention and prevention.	3.2 Community relations 3.6 Modern slavery 3.7 Homelessness Reduction Act 2017 3.8 New regulations regarding HMOs 6.1 Conflicting aims (with partners)
Continuity of service	The council's ability to effectively respond to a major emergency and maintain that response without affecting essential day to day service delivery. The risk is to both the council as a business continuity issue and to our vulnerable communities.	1.1 Business continuity 1.26 Fire compartmentalization 3.1 Emergency response (external)
Corporate Governance	The risk of failures in systems of governance within the council, within council owned/influenced organisations and partnerships and other collaboration arrangements, leading to governance issues, fraud and corruption, failures in management systems, poor policy and decision making.	1.4 Due diligence 1.10 Fraud and corruption 1.23 GDPR 1.24 Financial Ledger software replacement
Data management and security	Deliberate or unintentional loss/disclosure of personal, sensitive, confidential or	1.7 Loss of ICT 1.8 ICT failure of back up 1.17 Cyber security attack

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	business critical information or breach of information governance legislation.	
Reputation management	The risk that the council's reputation is damaged by major service failure, failure to respond to a significant incident(s), governance issues, dispute with a key partner, failure to deliver corporate business plan.	1.3 Reputation management 3.3 Council reputation
Transformational change	Ensuring that the council, its members and its workforce have the skills, resources, ability and capacity to adequately respond to current and future organisational change meaning the council is able to deliver its services in the most efficient and effective manner.	1.9 Capacity 1.17 Channel shift 1.21 Pay policy

3.7.6 This creates a schedule of potential strategic risks with related corporate and operational risks. Some councils manage these types of risks with periodic meetings, say quarterly or six monthly, chaired by the strategic risk owner with input from corporate and operational risk owners and officers tasked with delivering mitigation measures.

3.7.7 Management Team were supportive of a move towards the concept of strategic risks and reviews and this has been incorporated into the draft framework.

3.8 Risk management of projects

3.8.1 The current risk management strategy refers to roles and responsibilities. Project managers are identified and references are made to project risk registers. The onus is on project managers to notify relevant Executive Directors of significant risks and review risks on an annual basis. These may be escalated into the corporate risk register.

3.8.2 Property Services are in the process of setting up a risk register for each capital project using a consistent format.

3.8.3 Practice has overtaken the current policy and strategy and the draft framework seeks to address this gap.

3.9 Service area risks

3.9.1 The current risk management strategy refers to roles and responsibilities. Service managers are identified and references are made to operational risks. The onus is on

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service managers to notify relevant Executive Directors of significant risks and review risks on an annual basis. These may be escalated into the corporate risk register.

3.9.2 Some councils integrate service area risks within their annual service plans. Management Team are supportive of adopting that practice and this has been incorporated into the draft framework.

3.10 Risk and management roles

3.10.1 The refresh of the policy and strategy presents an opportunity to consider management responsibilities for different types of risk. The model used in some councils is:

<i>Risk type</i>	<i>Lead officer</i>
Strategic	Executive tier
Corporate	Executive tier and senior managers
Operational/service	Senior managers
Project	Senior managers
Fraud and corruption	Internal Audit and senior managers

3.10.2 If the move towards strategic risks is endorsed the council's framework will be amended accordingly.

3.11 Report templates

3.11.1 The final element of the council's approach to risk management is inclusion of risk within the templates for reports to members.

3.11.2 This is not reflected within the current policy or strategy and this has been incorporated into the draft framework. .

3.12 Risk management training

3.12.1 Once finalised, the refreshed policy and strategy will be deployed using a combination of training, briefings and internal communications to direct officers and members to key documents and guidance.

4.0 Corporate Priorities

4.1 The risk management process supports the delivery of corporate priorities.

5.0 Policy Implications

5.1 The report seeks to refresh existing policy and strategy.

6.0 Financial Implications

6.1 None.

7.0 Personnel Implications

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7.1 None.

8.0 Statutory Considerations

8.1 Account and Audit Regulations 2015 - s3(c). The Council must ensure that it has 'effective arrangements for the management of risk'.

9.0 Equality Opportunity Considerations

9.1 None

10.0 Risk Management Implications

10.1 The Council has in place a Risk Management Policy (last adopted in March 2016) and an associated Risk Management Strategy.

10.2 The Corporate Risk Register records high level risks which pose a threat or opportunity to the Council's objectives. It is a tool used by the Chief Executive and the Executive Directors (Management Team) to help manage risk within the Authority and is a key document within the governance controls applied within the Council.

11.0 Recommendations

11.1 Members are requested to consider the contents of the draft policy and strategy and make comment.

12.0 Declarations of Interest / Dispensations Granted

12.1 None

Background Papers

October 2018 Corporate Risk Register

Previous Corporate Risk Registers

Risk Management Policy and Strategy – approved in March 2016



Draft Risk Management Policy

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1. Introduction

- 1.1 Given the wide range of activities undertaken by the council, we face a wide variety of risks including physical risks to people or property, financial loss, failure of service delivery, corporate governance and damage to reputation.
- 1.2 Effective risk management is a key tool in assisting the council to manage uncertainty in order to enable it to better achieve its corporate business plan. Risk management is intended to be a planned and systematic approach to the identification, assessment and management of the risks facing the council. It is essential that steps are taken to effectively manage those risks. Risk management supports innovative solutions as it carefully considers the benefits, alongside the risks, that may occur.
- 1.3 Insurance is a traditional way of protecting against some risks. However, not all risks can be insured against and other approaches are needed. Insurance has a direct cost and given financial challenges facing local government action taken to reduce risks can help minimise premiums and disruption to services.

2. Definitions

- 2.1 Risk can be defined as *‘an uncertain event or set of events which, should it occur, will have an effect upon the achievement of objectives’*.
- 2.2 Risk management can be defined as *‘the process of identifying risks, evaluating their potential consequences and determining the most effective methods of controlling or responding to them’*.
- 2.3 Risk appetite is *‘the amount of risk that an organisation is willing to seek or accept in the pursuit of its long-term objectives’*.

3. Policy statement

- 3.1 It is the council’s policy to proactively identify, understand, manage and review the risks involved in service delivery and associated with our plans and strategies, so as to encourage responsible and informed decision making.
- 3.2 The council’s business plan sets out its objectives. The risk management approach described in this policy is key to identifying, assessing, mitigating, managing and reviewing risks to the achievement of the council’s objectives.
- 3.3 This policy will be reviewed every three years to ensure it remains relevant to the needs of the council. The next review date is March 2022.

4. Scope

- 4.1 The policy covers risks that could prevent the achievement of the council's corporate business plan. It does not cover health, safety and general welfare related risks and responsibilities which follow from legislation such as the Health and Safety at Work Act 1974. This is covered by the council's Health, Safety and General Welfare Policy.

5. Aims

- 5.1 The purpose of this Risk Management Policy is to state the council's risk management objectives and approach. The processes required to implement this policy are contained in the Risk Management Strategy.

6. Objectives

- 6.1 The purpose of risk management is to:
- Improve business performance
 - Promote a risk aware culture to avoid unnecessary liabilities and costs, but to encourage the taking of calculated risks in pursuit of opportunities that benefit the council
 - Promote corporate governance by integrating risk management and internal control
 - Preserve and protect the council's assets, reputation and staff.

7. Benefits of risk management

- 7.1 Effective risk management delivers benefits to individual services and the council as a whole. The key benefits include:
- A better, more informed, decision making process
 - The ability to manage the process of achieving objectives.
- 7.2 By delivering enhanced risk management practice and adhering to the Risk Management Strategy, the following additional benefits can be realised:
- Increased likelihood of achieving the council's objectives
 - More robust assessment of opportunities
 - Improved business planning through risk based decision making
 - Improved governance and controls
 - Enhanced stakeholder confidence and trust
 - Enhanced performance through an integrated approach
 - Effective allocation and use of resources
 - Improved organisational resilience

8. Legal framework and relevant legislation

8.1 Risk management is an integral part of internal control, and for local government a statutory requirement, defined in the Audit & Accounts Regulations 2003, as amended by the Accounts and Audit (Amendment) (England) Regulations 2006. Paragraph (1) of Regulation 4 (responsibility for financial management) states:

‘The relevant body shall be responsible for ensuring that the financial management of the body is adequate and effective and that the body has a sound system of internal control which facilitates the effective exercise of that body’s functions and which includes arrangements for the management of risk.’

8.2 Regulation 6 requires relevant bodies to conduct an annual review of the effectiveness of their system of internal audit. CIPFA’s guidance on the Review of the System of Internal Audit, published in January 2009, defines the system of internal audit as:

‘The framework of assurance available to satisfy a local authority that the risks to its objectives, and the risks inherent in undertaking its work, have been properly identified and are being managed by controls that are adequately designed and effective in operation.’

8.3 Risk management represents a part of the governance arrangements which are required to be reported on in the annual governance statement incorporated in the council’s annual statement of accounts.

8.4 In addition to the above requirements there are several other specific duties that the council is obliged to observe including, as examples, responsibilities arising from the Civil Contingencies Act 2004, Health and Safety at Work Act 1974 and equality impact assessments under the Equality Act 2010.

9. Roles and responsibilities

9.1 Risk management is all inclusive and every employee and member has a role to play. Specific roles and responsibilities are defined in the Risk Management Strategy.

10. Risk management approach

10.1 To ensure it is effective, risk management needs to be aligned with corporate aims, objectives and priorities. The council’s approach to embedding risk management is to create a culture that spreads best practice, identifies and communicates lessons learnt, and uses appropriate expertise.

- 10.2 Risk management has to be proactive to ensure that corporate and operational risks are:
- Identified
 - Assessed by considering the impacts and likelihoods of their occurrence
 - Effectively managed by identifying suitable controls and countermeasures, and assessing the mitigating actions proposed
 - Reviewing progress and emerging issues.
- 10.3 Effective risk management anticipates and avoids risks rather than dealing with the consequences of events happening.

11. Risk appetite

- 11.1 Risk appetite refers to the council's attitude towards risk, which in turn dictates the amount of risk that it considers acceptable.
- 11.2 The council recognises that it must take risks. Indeed, only by taking risks can it achieve its aims and deliver beneficial outcomes to its customers. It must, however, take risks in a controlled manner, thus reducing its exposure to a level deemed acceptable by the council and by relevant auditors, regulators and inspectors.
- 11.3 Methods of controlling risks must be balanced in order to support innovation and the imaginative use of resources, especially when it is to achieve substantial benefit. Calculated controlled risks, such as accepting new opportunities or using innovative approaches for the benefit of the council, may be taken providing the risk exposure is within the council's 'risk tolerance' levels, these are defined as:
- 11.4 *Acceptable risks* – the risks associated with any proposed actions and decisions need to be clearly identified, evaluated and managed to ensure that risk exposure is acceptable. Particular care is needed in considering actions that could:
- Have an adverse effect on the council's reputation and/ or performance
 - Undermine the independent and objective review of activities
 - Result in censure or fines being imposed by regulatory bodies
 - Result in financial loss.
- 11.5 Any threat or opportunity that could have a significant impact on the council's reputation or its services must be closely examined, and all risks clearly evaluated and referred to the appropriate executive director. Where there is risk that could potentially have a corporate impact on the council, it must be considered by Management Team.

11.6 *Prohibited risks* – risks are not acceptable where they could result in physical harm; non-compliance with legislation or government regulations; or non-compliance with council policy, rules and procedures. Therefore any opportunity or innovative approach that may result in such outcomes must not be pursued.

11.7 The organisation’s current overall risk appetite is defined as ‘open’:

Open *The council is prepared to consider all delivery options and select those with the highest probability of productive outcomes, even when there are elevated levels of associated risk.*

12. Risk management training

12.1 Risk management training will be provided to relevant officers with the aim of ensuring that they have the skills necessary to identify, appraise and control the risks associated with the services they provide and projects that they manage. Elected members will receive training on risk so that they can consider the implications of risk whilst engaged with council activities.

13. Health implications

13.1. The strategy is a key part of the council’s governance framework and will contribute towards wider health policies through mitigation measures.

14. Equalities implications

14.1 The policy is considered to have no equalities implications.

15. Reference documents

15.1 The policy provides direction to the council’s Risk Management Strategy.

16. Additional information or resources

16.1 The related Risk Management Strategy and Strategic and Corporate Risk Register can be found in the risk management section of InSite.

16.2 Further information can be obtained from Policy and Performance.

17. Implementation/distribution

17.1 The policy will be distributed to senior managers and to all staff and members via Internal Affairs, the Members Bulletin and InSite.

Signed: _____ Ray Harding, Chief Executive

Date: _____

Signed: _____ Cllr B Long, Leader

Date: _____

Version control

Policy name	Risk management policy			
Policy description	The risk management approach described in this policy is key to identifying, assessing, mitigating, managing and reviewing risks to the achievement of the council's objectives.			
Responsible Officer	Ged Greaves, Senior Policy and Performance Officer			
Version number	Date formally approved	Reason for update	Author	Review date
1	March 2016	Refresh	K. Littlewood	March 2019
2	TBC	Planned refresh	G. Greaves	March 2022



Draft Risk Management Strategy

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1. Introduction

- 1.1 Risk management can be defined as *‘the process of identifying risks, evaluating their potential consequences and determining the most effective methods of controlling or responding to them’*.
- 1.2 The council’s risk management objectives and approach are stated in the Risk Management Policy. This strategy explains the processes required to implement the policy and provides simple templates designed to evaluate the effect of a risk.
- 1.3 The purpose of risk management is to:
- Improve performance
 - Promote a risk aware culture to avoid unnecessary liabilities and costs, but to encourage the taking of calculated risks in pursuit of opportunities that benefit the council
 - Promote corporate governance by integrating risk management and internal control
 - Preserve and protect the council’s assets, reputation and staff.
- 1.4 This strategy will be reviewed every three years to ensure it remains relevant to the needs of the council. **The next review date is March 2022.**

2. Legal framework and relevant legislation

- 2.1 Risk management is an integral part of internal control, and for local government a statutory requirement, defined in the Audit & Accounts Regulations 2003, as amended by the Accounts and Audit (Amendment) (England) Regulations 2006. Paragraph (1) of Regulation 4 (responsibility for financial management) states:

‘The relevant body shall be responsible for ensuring that the financial management of the body is adequate and effective and that the body has a sound system of internal control which facilitates the effective exercise of that body’s functions and which includes arrangements for the management of risk.’

- 2.2 Regulation 6 requires relevant bodies to conduct an annual review of the effectiveness of their system of internal audit. CIPFA’s guidance on the Review of the System of Internal Audit, published in January 2009, defines the system of internal audit as:

‘The framework of assurance available to satisfy a local authority that the risks to its objectives, and the risks inherent in undertaking its work, have been properly identified and are being managed by controls that are adequately designed and effective in operation.’

- 2.3 Risk management represents a part of the governance arrangements which are required to be reported on in the annual governance statement incorporated in the council's annual statement of accounts.
- 2.4 In addition to the above requirements there are several other specific duties that the council is obliged to observe including, as examples, responsibilities arising from the Civil Contingencies Act 2004, Health and Safety at Work Act 1974 and equality impact assessments under the Equality Act 2010.

3. Process of managing the risk

3.1 Risk management overview

3.1.1 Risk management consists of initially defining the risk appetite and then applying four basic processes:

1. Identifying risks
2. Evaluating
3. Minimising, controlling and responding
4. Monitoring and reporting

3.2 Risk appetite

3.2.1 This is *'the amount of risk that an organisation is willing to seek or accept in the pursuit of its long-term objectives'*. The council's risk appetite is defined in the Risk Management Policy as *'open'*, which means that the council is *'prepared to consider all delivery options and select those with the highest probability of productive outcomes, even when there are elevated levels of associated risk'*.

3.3 Identify the risk

3.3.1 The purpose of this stage is to identify anything that might affect the achievement of the council's objectives and assess what that effect might be. The question to ask is 'What might possibly present itself in the course of delivering the objectives, which has the capacity to threaten or improve the success?' Once identified, the extent to which it might affect the objectives needs to be considered.

3.3.2 A number of approaches are taken to identify risks to the council at the earliest opportunity and ensure that they are managed from a very early stage. These include:

- Regular monitoring of the Corporate Business Plan.
- Regular monitoring of committee and performance monitoring reports.

- Regular reviews by Management Team to ensure all strategic and corporate risks have been recorded on the Strategic and Corporate Risk Register and accurately assessed.
- Annual reviews to ensure operational risks have been recorded in service plans.
- Robust processes at the commencement of projects, particularly major ones, and ongoing monitoring.
- Use of Internal Audit and peer reviews.
- Horizon scanning informed by professional and advisory bodies such as the Local Government Association.

3.4 Evaluate the risk

3.4.1 This stage develops a greater understanding of each risk, its impact and the likelihood of those consequences. It provides an input to risk evaluation and to decisions on how risk will be managed.

3.4.2 The categories for likelihood and impact are shown below.

Likelihood

Score	Definition
1 – Rare	The event may occur only in exceptional circumstances
2 – Unlikely	The event could, but is not expected to, occur
3 – Possible	The event might occur at some time
4 – Likely	The event will probably occur in most circumstances
5 – Almost Certain	The event is expected to occur in most circumstances

Impact

Score	Impact on service	Personal safety	Financial loss	Legal and Regulatory	Corporate objective	Environmental impact	Reputation
1	Little	No injury	<£25,000 or 1% of budget	Minor civil litigation or regulatory criticism	No effect on delivery	None or insignificant	No damage
2	Some	Minor injury	>£25,000 or >2.5% of budget	Minor regulatory enforcement	Little effect on delivery	Minor damage	Minimal damage (minimal coverage in local press)
3	Significant	Violence or threat of serious injury	>£175,000 or >5% of budget	Major civil litigation and/or public enquiry	Possible impact on delivery	Moderate damage	Significant coverage in local press
4	Service not available for 2-7 days	Extensive or multiple injuries	>£500,000 or >10% of budget	Major civil litigation and/or national public enquiry.	Significant impact on delivery	Major damage	Coverage in national press
5	Service not available for >7 days	Fatality	>£1m or >15% of budget	Section 151 or government intervention or criminal charges	Non delivery	Significant damage locally or nationally	Requires resignation of Chief Exec, Exec Director or Leader

3.4.3 Apply the definitions of likelihood and impact to establish the risk score and rating using the risk matrix below. This will determine what level of action is required and who by.

Risk Category	How the risk should be managed
Very High Risk (15 – 25) (Red)	Immediate action required. Senior management must be involved.
High Risk (10 – 12) (Orange)	Senior management attention needed and management responsibility specified.
Medium Risk (5 – 9) (Green)	Manage by specific monitoring or response procedures. Responsibility to be allocated by Management Team to a named service manager.
Low Risk (1 – 4) (White)	Manage by routine procedures, unlikely to need specific or significant application of resources.

Risk matrix

LIKELIHOOD	5 Almost Certain	(5) (Green)	(10) (Orange)	(15) (Red)	(20) (Red)	(25) (Red)
	4 Likely		(8) (Green)	(12) (Orange)	(16) (Red)	(20) (Red)
	3 Possible		(6) (Green)	(9) (Green)	(12) (Orange)	(15) (Red)
	2 Unlikely			(6) (Green)	(8) (Green)	(10) (Orange)
	1 Rare					(5) (Green)
		1 Insignificant	2 Minor	3 Moderate	4 Major	5 Extreme
IMPACT						

For example, a risk that is 'likely' to occur, and has a 'minor' impact will score 4 x 2 = 8 which is a 'medium' risk.

3.5 Minimising, controlling and responding

3.5.1 When deciding how to manage risks, the cost effectiveness of implementing proposed controls needs to be considered. There is little benefit to be gained from pursuing a course of action if the cost of controlling a risk outweighs the benefits to be gained.

3.5.2 There are four basic ways of responding to risk:

Avoidance	Deciding not to continue or proceed with the activity in view of the level of risk involved. This may be as a result of the cost of mitigating the risk being too high, or the consequences being too adverse. (Note: statutory requirements cannot be avoided).
Transfer	Involves another party bearing or sharing the risk, a typical example being the use of insurance. (Note: ultimate responsibility to undertake statutory requirements remains with the Council even if third party provision is engaged).
Mitigate	Ensuring existing controls are effective by periodic review and testing, and implementing additional controls where necessary.
Acceptance	Certain risks cannot be adequately treated by any of the above. In such cases, there is no alternative but for the Council to accept the residual risks concerned. Details of how these risks and their possible effects are to be managed must be recorded in the risk register at Corporate, Service or Project level as appropriate, and subject to regular review.

3.6 Monitoring and reporting

- 3.6.1 Management Team reviews the Strategic and Corporate Risk Register at regular intervals to assess if any risk has increased, reduced or stopped altogether, or if new risks need to be added.
- 3.6.2 The Terms of Reference for the Audit Committee state that *‘the purpose of an audit committee is to provide independent assurance of the adequacy of the risk management framework...’*, and as such one of its functions is to *‘consider the effectiveness of the council’s risk management arrangements’*.
- 3.6.3 The committee will therefore receive regular updates on the strategic and corporate risk register and will consider the effectiveness of the Risk Management Strategy.
- 3.6.4 Reports to committees will include an appraisal of all associated risks and their implications. This is specified in the mandatory report template.

4. Strategic and corporate risk register

4.1 Strategic risks

- 4.1.1 A strategic risk is defined as “An event or occurrence that would cause the council to be unable to operate or provide key services leading to a significant adverse effect on public wellbeing.”

4.2 Corporate risks

- 4.2.1 A corporate risk is defined as “An event or occurrence that would lead to a significant adverse effect on the council’s ability to provide important public services.”

4.3 Strategic and corporate risk register

- 4.3.1 The Strategic and Corporate Risk Register records high level risks that pose a threat or opportunity to the council’s ability to operate and deliver services that could have an adverse effect on public wellbeing and affect our ability to provide important public services or corporate business plan objectives.
- 4.3.2 Executive directors are responsible for identifying risks that have a strategic and corporate impact. The Senior Policy and Performance Officer should be notified of any such risk so that it can be added to the Strategic and Corporate Risk Register and included in the next review by Management Team.
- 4.3.3 The Strategic and Corporate Risk Register is held by the Policy and Performance Team and published on InSite. The table below sets out the format of the register and an explanation of each of the fields contained within the register:

Ref	This is a unique code for the risk.
Title	This is a brief title for the risk.

Description	This describes the vulnerabilities of the council.
Director	This is the lead officer for managing the risk.
The risk is that	This describes the consequences of the risk occurring.
Inherent risk without mitigation	This defines the likelihood, impact and resulting score for the risk without any form of mitigation or control.
Controls/mitigation	This describes the measures put in place by the council.
Current risk score	This defines the likelihood, impact and resulting score for the risk following mitigation or control.
Trend	This indicates the direction of travel of the current risk score compared with the previous 6 monthly review.
Latest update	This describes mitigation undertaken since the previous review.
Review date	This is the date of the current review.
Target risk score	This defines the likelihood, impact and resulting score for the risk that is deemed acceptable by the council following mitigation or control.

4.3.4 The register is reviewed by the Executive Directors on a 6-monthly basis. Any existing entries on the register are considered for changes to the nature of the risk, progress to be reported and any adjustments to the risk scores. Risks that are no longer relevant are removed and new risks considered in the context of current circumstances are added. The risk reference numbers are not reallocated when risks are removed from the register, to enable the history to be maintained.

4.3.5 A 6-monthly overview of changes to the register is provided to the Audit Committee. Details of the ‘Very High’ risks are given together with a list of the ‘High’ risks.

4.3.6 The full register, as agreed by Management Team, is provided to the Audit Committee in hard copy, for reference.

5. Operational risks

5.1 An operational risk is defined as “An event or occurrence arising from inadequate or failed internal processes, people and systems, or from external events, leading to an adverse impact on service provision.”

5.2 Operational risks should be recorded in service plans and reviewed annually.

6. Roles and responsibilities

- 6.1 Risk management is the responsibility of everyone. It is important that risk management becomes part of daily routines to ensure achievement of the council's objectives is not jeopardised by unrecognised risks.
- 6.2 All council employees and members are responsible for ensuring there are robust and fit-for-purpose systems of internal control and risk management in place; and they are aware of the risks that:
- they are empowered to take
 - must be avoided or reported upwards.

6.3 Members

- 6.3.1 The Leader of the Council is responsible for acting as lead councillor for risk management.
- 6.3.2 The Audit Committee has specific responsibility for the scrutiny of risk management. The committee receives the triennial review of the Risk Management Policy and Strategy and half-yearly reports on the update of the Corporate Risk Register. It is the committee's responsibility to ensure that risks are being actively managed.
- 6.3.3 The risk management policy and strategy are approved by Cabinet.

6.4 Management Team

- 6.4.1 Ultimately Management Team is responsible for managing risk. The responsibility cannot be devolved down, although actions to mitigate risk can be assigned to officers.
- 6.4.2 Executive Directors must inform the Section 151 Officer of any financial viability or resilience issues as soon as they emerge so that any appropriate action that may be required can be taken.
- 6.4.3 In addition, Management Team should:
- Nominate a member of Management Team with overall responsibility for risk management, currently the Chief Executive
 - Identify risks within their respective directorates through section and project meetings.
 - Take ownership of risks within their respective directorates and assign a responsible officer to all significant service risks
 - Receive regular updates on identified and any new significant emerging risks within their directorate
 - Ensure that the risk management process is reviewed on a regular basis.

6.5 Section 151 Officer

6.5.1 The Section 151 Officer has a responsibility to monitor the viability and resilience of the council's finances and take appropriate action if required to ensure the ongoing security of the council. The officer must be informed of any potential financial risk arising from project or service activities as it emerges.

6.6 Service managers

6.6.1 Service managers are responsible for raising awareness of the risk management strategy in their own service area and notifying their executive director of any significant risks.

6.6.2 Service managers, in conjunction with their executive director, should:

- Lead reviews of the operational risks relating to their services
- Ensure a responsible officer is assigned to manage significant risks
- Identify resources to address the highest priority risks
- Monitor progress on a regular basis
- Review the risks on an annual basis and when new situations arise
- Ensure committee reports include an appraisal of all associated risks and their implications.

6.7 Project managers

6.7.1 Managers of major projects are responsible for raising awareness of the strategy in their own projects and should monitor the project risk register on a regular basis. Any significant risks should be notified to the relevant executive director.

6.7.2 Project managers, in conjunction with their executive director, should:

- Lead reviews of the operational risks relating to their projects
- Ensure a responsible officer is assigned to manage significant risks
- Identify resources to address the highest priority risks
- Monitor progress on a regular basis
- Review the risks on an annual basis and when new situations arise.

6.8 Directors of council owned companies

6.8.1 Councillors and senior council officers are appointed as company directors on council owned companies such as West Norfolk Housing Company Ltd. There is a responsibility upon board directors to consider the risk management arrangements in place for these types of company.

6.9 Policy, Performance and Personnel

6.9.1 This service has responsibility for coordinating the implementation of the risk management strategy and reviewing the policy and strategy. This will include updating the corporate risk register, reporting where required to Management Team, Audit Committee and Cabinet and supporting ongoing communication and development.

6.10 Internal Audit

6.10.1 Audit of the risk management process is independently reviewed by Internal Audit to avoid a conflict of interest.

6.10.2 Internal auditors will consider any potential unidentified risks during their audit work and bring any issues to the attention of management where necessary.

6.10.3 The council's Fraud and Corruption Risk Register is maintained by Internal Audit. This forms part of the internal control environment and mitigation measures.

6.11 Health and safety risk management

6.11.1 The ongoing management of these types of risks is covered by the council's Health, Safety and Welfare General Policy.

6.11.2 Each directorate is responsible for undertaking their own annual risk assessments with support from the Corporate Health and Safety Group.

7. Risk management training

7.1 Risk management training will be provided to relevant officers with the aim of ensuring that they have the skills necessary to identify, appraise and control the risks associated with the services they provide and projects that they manage. Elected members will receive training on risk so that they can consider the implications of risk whilst engaged with council activities.

8. Health implications

8.1. The strategy is a key part of the council's governance framework and will contribute towards wider health policies through mitigation measures.

9. Equalities implications

9.1 The strategy is considered to have no equalities implications.

10. Reference documents

10.1 The strategy supports the council's Risk Management Policy.

11. Additional information or resources

11.1 The related Risk Management Policy and Strategic and Corporate Risk Register can be found in the risk management section of InSite.

11.2 Further information can be obtained from Policy and Performance.

12. Implementation/distribution

12.1 The strategy will be distributed to senior managers and all staff/members via Internal Affairs, the Members Bulletin and InSite.

Policy name	Risk Management Strategy			
Policy description	The risk management approach described in this strategy is key to identifying, assessing, mitigating, managing and reviewing risks to the achievement of the council’s objectives.			
Responsible Officer	Ged Greaves, Senior Policy and Performance Officer			
Version number	Date formally approved	Reason for update	Author	Review date
1	March 2016	Refresh		March 2019
2	TBC	Planned refresh	Ged Greaves	March 2022

POLICY REVIEW AND DEVELOPMENT PANEL REPORT

REPORT TO:	Audit Committee		
DATE:	12 November 2018		
TITLE:	Record Retention and Disposal Policy review		
TYPE OF REPORT:	Review		
PORTFOLIO(S):	Performance		
REPORT AUTHOR:	Ged Greaves, Senior Policy and Performance Officer		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	No

REPORT SUMMARY/COVER PAGE

PURPOSE OF REPORT/SUMMARY:
The council's record retention and disposal policy and strategy is due to be refreshed. This report introduces a draft framework and seeks members' comments. A final version will be presented to the committee in January 2019 to take forward to Cabinet in March 2019.
KEY ISSUES:
We are required by the Lord Chancellor's Code of Practice on the Management of Records issued under Section 46 of the Freedom of Information Act 2000 to have and to implement a records retention and disposal schedule. The current policy was approved in January 2012 and changes in working practices and enacted legislation have overtaken the current policy.
OPTIONS CONSIDERED:
These are detailed in the report.
RECOMMENDATIONS:
Members are requested to consider the draft.
REASONS FOR RECOMMENDATIONS:
In order to ensure the Council meets its statutory obligations to ensure that it has record management arrangements in place.

Refresh of the Council's Records Retention and Disposal Policy**1. Background**

- 1.1 We are required by the Lord Chancellor's Code of Practice on the Management of Records issued under Section 46 of the Freedom of Information Act 2000 to have and to implement a records retention and disposal schedule.
- 1.2 The council's Records Retention and Disposal Policy has two components; the policy and a detailed schedule of records with related retention information.
- 1.3 It was approved by Council in January 2012 and given developments in working practices, digitization and legislation is due for revision.

2. Executive Summary

2.1 Outlines of changes to the current policy and schedule are set out below.

2.2 The Policy and Retention Schedule were previously one document but have been separated out to simplify updates to reflect changes in legislation, practice, job titles and record types and classifications.

2.3 Policy – outline of changes

Introduction	Content has been added to this section to reference the General Data Protection Regulation (GDPR) and the Data Protection Act and Freedom of Information Act.
Score and Purpose	Content has been added to this section to reference unstructured (e.g. emails) and structured systems (e.g. IDOX) to focus attention upon the environment of these types of record storage methods. A list of related policies has also been added to inform the reader of the wider context of information governance at the council.
Retention and Disposal Protocol	Updated job title for Document Management Systems (DMS) Manager to Systems and Administration Manager. Content added to: <ul style="list-style-type: none"> describe how to dispose of electronic devices and removable media such as CDs, DVDs, USB sticks and need to contact ICT. Encourage use of a disposal log to provide an audit trail for disposed records, a template log and flowchart summarizing the process.
Roles and Responsibilities	Content added to: <ul style="list-style-type: none"> describe roles and responsibilities for members, Management Team, individuals, Eastlaw and with GDPR the recently created roles of Senior Information Risk Owner (and deputy), Information Asset Owners and Administrators. Highlight requirements for those contracted to provide services on our behalf and within partnership arrangements Clarify responsibilities when staff are working at home or agile working Clarifying responsibilities when sending data offsite.
Legislative Framework	High level content added regarding: <ul style="list-style-type: none"> Environmental Information Regulations General Data Protection Regulations

2.4 Schedule – outline of changes

Internal Audit	Content added as previous schedule signposted to a separate document
Community Safety and Neighbourhood Nuisance	Content added as previous schedule signposted to a separate document
Safeguarding	Content added to reflect council responsibilities that did not exist when the previous schedule was prepared
Regeneration	Content added as the previous schedule did not reflect these

projects	important aspects of the council's operations
Information governance	Content added to reflect record types relating to Freedom of Information, Data Protection and Environmental Information Regulations along with new records relating to GDPR.
Housing	Content added to reflect housing responsibilities that did not exist when the previous schedule was created.
Disposal	New content to reflect disposal classification e.g. Dispose, Archive, Secure
Reformatted	The document was in a format that could not be easily sorted or filtered. Conversion to Excel format now enables the schedule to be filtered by department, service manager and disposal classification.
Article 30 Records of processing activities	Amendments were made to align with the retention periods set out in service area records of processing activity required by legislation.

2.5 Development of the Policy and Schedule

2.5.1 The review of the policy and schedule was undertaken by the Policy and Performance unit along with the Systems and Administration Manager and input from Eastlaw and the ICT Manager.

2.5.2 Latest records management guidance were reviewed along with recently developed policy and retention schedules developed by other councils such as Boston Borough Council, Cambridge City Council, Essex County Council, London Borough of Bromley, Lincolnshire County Council, North Hertfordshire District Council, North Norfolk District Council, Sevenoaks District Council, Southampton City Council and Staffordshire County Council.

3. Facts/Issues

3.1 The Records Retention and Disposal Policy is a key element of the council's governance framework and informs the requirements to keep particular records for prescribed time periods that are specified by legislation or recommended in guidance or codes of practice. Where there is an absence of legislation or guidance, service managers have used common practice across the sector as a guide to retention.

3.2 As an integral part of the council's approach to information governance, the updated policy clarifies the council's expected standards of behaviour in relation to officers and members who create, manage, handle and dispose of records and reflects the latest legislation including the General Data Protection Regulation.

3.3 The council's approach to information governance includes:

- Central Information Asset Register
- Data Protection Policy
- Data Protection Impact Assessments
- Data Quality Strategy
- FOI Publication Scheme
- ICT Asset Disposal Policy
- ICT Asset Management Policy
- ICT Computer Usage Policy
- ICT Email Policy
- ICT Internet Policy
- ICT Security Policy
- Information Risk Policy
- Privacy Notices
- Records of Processing Activity
- Records Retention and Disposal Policy
- Travelling Abroad with Council Devices Policy
- Use of Removable Media Policy
- Guidelines for Homeworking, 2008

- 3.4 This suite of policies and strategies provides the structure to govern how the council captures, creates, accesses, secures, manages, shares and disposes of its information both internally and externally. In line with changing best practice nationally, the council has updated its approach to information governance.
- 3.5 The Records Retention and Disposal Policy ensures users are aware of the council's various statutory duties to make arrangements for the safekeeping and eventual disposal of its records. The disposal schedule ensures that all users dispose of records to ensure compliance with statutory, contractual, evidential, legal, regulatory and Council requirements.
- 3.6 Policy refresh
- 3.6.1 A refreshed policy is attached at Appendix A and has been developed with input from Eastlaw and the Systems and Administration Manager.
- 3.6.2 The Records Retention and Disposal Policy defines the council's obligations and responsibilities in the handling and storage of data in relation to the legislation such as the Data Protection Act 2018, Freedom of Information Act 2000 and 2016 General Data Protection Regulation. The policy establishes and verifies retention periods for the council's data depending on the type of personal data and the purpose of the processing to ensure that the council:
- Creates and captures accurate, authentic and reliable records
 - Maintains records to meet the council's business needs
 - Disposes of records that are no longer required in an appropriate manner
 - Protects vital records
 - Shares information in accordance with guidelines and legislation
 - Conforms to any legal and statutory requirements
- 3.6.3 The 2016 General Data Protection Regulation came into force in May 2018 and introduced additional requirements around the retention of personal data compared to the previous Data Protection Act 1998.
- 3.7 Retention Schedule
- 3.7.1 A draft Schedule is attached at Appendix B and includes new content relating to:
- Internal Audit – previously signposted to a separate schedule
 - Community Safety and Neighbourhood Nuisance – previously signposted to a separate schedule
 - Safeguarding – to reflect responsibilities for the council that did not exist when the previous schedule was prepared
 - Regeneration projects – the previous schedule had little content covering these important aspects of the council's activities
 - Freedom of Information, Data Protection, Environmental Information Regulations and GDPR
 - Housing – to reflect new responsibilities
 - Recommended disposal methods
- 3.7.2 The Schedule format has been changed from Word/pdf to Excel to make it possible to sort/filter the content for easier reference.
- 3.7.3 Generally, personal data held by the council should only be retained for as long as necessary and where there is a basis for its processing. The retention periods will differ based on the type of data being processed, the purpose of the processing or

other factors. Issues to consider include whether any legal requirements apply to the retention of any particular data, for example employment, contracts, litigation, etc.

- 3.7.4 To date, the council has followed the retention periods recommended by the Local Government Classification Scheme, Retention Guidelines for Local Authorities and statute. Within the current schedule, some retention periods are specified as being “permanent” or “indefinite”. There are potential issues regarding these classifications, for example storage costs, and service managers are encouraged to reconsider their application within the schedule and the deputy SIRO and Systems and Administration Manager are working with a these services to review their practices.
- 3.7.5 With the introduction of GDPR, service managers have been requested to complete Article 30 Records of Processing Activity (ROPAs) describing the types of data held, basis and purpose of processing and retention periods. These need to be aligned with the corresponding content of the Records Retention and Disposal Schedule.
- 3.7.6 The schedule has been updated based upon the submitted ROPAs. The content of the ROPAs may also fairly dynamic and consequently the schedule may need to be updated throughout the year.
- 3.7.7 The intention is to decouple the policy from the schedule. That will enable the draft policy to move forward for approval and the schedule to become a management tool.
- 3.8 Training and awareness raising
 - 3.8.1 Data Protection and Freedom of Information training is provided for elected members at induction.
 - 3.8.2 E-learning modules are available for officers regarding Data Protection, Freedom of Information, ICT security and the General Data Protection Requirement.
 - 3.8.3 Ongoing advice on the retention and disposal of records is available from the Data Protection Officer, Systems and Administration Manager and from the ICT Department. Additional advice and guidance is available from the Council’s Senior Information Risk Owner (SIRO) and deputy, Information Asset Owners and Information Asset Administrators.
 - 3.8.4 Once approved the new policy will be deployed using briefings and internal communications to direct officers and members to the new policy and schedule.
- 3.9 Record disposal logs
 - 3.9.1 Disposal refers to the actions taken at the end of a record’s lifecycle and will either be destruction, or permanent retention at Norfolk County Council’s archive service. A disposal log helps to demonstrate active records management.
 - 3.9.2 In most cases the disposal of records should be done with reference to the records retention schedule. This schedule will provide a framework in which to base disposal decisions on. Only in exceptional circumstances should disposal take place without reference to an approved retention schedule.
 - 3.9.3 Disposal logs are used alongside retention schedules to demonstrate that disposal actions have been implemented. A proposed template is included within the draft Policy. A template would be made available on Insite with service managers

responsible for ensuring ongoing completion for activities within their areas of responsibility.

3.10 Implementation issues

3.10.1 Service managers were consulted on the draft policy and retention schedule.

4.0 Corporate Priorities

4.1 The disposal and retention of records is an aspect of corporate governance affecting all services.

5.0 Policy Implications

5.1 The report seeks to refresh existing policy.

6.0 Financial Implications

6.1 None.

7.0 Personnel Implications

7.1 None.

8.0 Statutory Considerations

8.1 The council is required by the Lord Chancellor's Code of Practice on the Management of Records issued under Section 46 of the Freedom of Information Act 2000 to have and to implement a records retention and disposal schedule.

9.0 Equality Opportunity Considerations

9.1 None

10.0 Risk Management Implications

10.1 The policy assist in the mitigation of existing risks in the corporate risk register such as due diligence and GDPR.

11.0 Recommendations

11.1 Members are requested to consider the contents of the draft policy and make comment.

12.0 Declarations of Interest / Dispensations Granted

12.1 None

Background Papers



Records Retention And Disposal Policy

DRAFT

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1. Introduction

- 1.1 In the course of carrying out its various functions and activities, the Borough Council of King's Lynn & West Norfolk (BCKLWN) collects information from individuals and external organisations and generates a wide range of data /information /documentation which is recorded in various formats.
- 1.2 The purpose of this policy is to ensure that the council manages a record through its life cycle from creation or receipt, through maintenance and use to final disposal (for destruction, transfer or permanent retention).
- 1.3 The policy also aims to ensure that all BCKLWN staff, elected members and service delivery partners are aware of what they must do to manage records in an effective and efficient way.
- 1.4 For the purpose of this policy no distinction will be made between data, records, documents and files, all of which hold information in or on them that in turn makes them part of the 'information life cycle'.
- 1.5 Modern day records management philosophy emphasises the importance of organisations having in place systems for the timely and secure disposal of records and information that are no longer required for business purposes. The General Data Protection Regulation significantly tightens up the rules on privacy and consent.
- 1.6 Premature destruction of documents could weaken our ability to defend litigious claims, lead to operational difficulties and result in failure to comply with the Freedom of Information Act 2000, Environmental Information Regulations 2004 and the Data Protection Act 2018. In certain circumstances, the Information Commissioners Office has power to impose a financial penalty for breach of the 2016 General Data Protection Regulation (GDPR).
- 1.7 The council's policy and guidelines have evolved through two stages:
 - Research into notable practice
 - Additional input from staff.
- 1.8 By formalising the policy the council seeks to:
 - Assist in identifying records that may be worth preserving permanently
 - Prevent the premature destruction of records that need to be retained for a specified period to satisfy legal, financial and other requirements of public administration
 - Provide consistency for the destruction of records not required permanently after specified periods
 - Improved records management practices within the council.
- 1.9 The policy will be reviewed within 3 years from the date its approval.

2. Scope and purpose

- 2.1 The purpose of this policy is to provide a corporate policy framework to offer guidance and support to BCKLWN staff and members when making decisions on whether particular records and information should either be:
- Retained – and if so in what format, and for what period; or
 - Disposed of – and if so when and by what method.
- 2.2 The guidelines are intended to cover all records and information from creation through to either destruction or retention.
- 2.3 Record retention policies were primarily created to define retention periods for paper records. However as more of the council business is performed electronically there is a need to define the retention periods of electronic records. These guidelines are relevant to records which are electronic, paper or records which have been transferred to another format such as microfiche.
- 2.4 Retention of documents may be necessary to:
- Meet operational needs
 - Fulfil statutory or other regulatory requirements
 - Evidence events/agreements in case of disputes
 - Ensure the preservation of documents of historical or other value
- 2.5 There are however some records that do not need to be retained for any length of time. Standard Operating Procedure defines types of records that staff may routinely destroy in normal course of business. It usually applies to information that is duplicated, unimportant or only of short-term facilitative value. Such records or information include:
- Compliment slips
 - Catalogues and trade journals
 - Telephone message slips
 - Non-acceptance to invitations
 - Requests for stock information such as planning applications and regeneration plans
 - Out of date distribution lists
 - Working papers which lead to a final report
 - Duplicated and superseded material including manuals and drafts
- 2.6 Permanent retention of records and information is undesirable, and appropriate disposal is to be encouraged for the following reasons:
- Indefinite retention of personal data may be unlawful
 - There is a shortage of new storage space and what is available can be costly
 - Disposal of existing paper records can free up office space for more productive activities
 - Reduction of fire risk (for paper records)

- There is evidence that the de-cluttering of office accommodation can be psychologically beneficial for many workers.

2.7 Unstructured information systems

Email must not be used for storing council records. It is the responsibility of individuals to maintain their inboxes in compliance with data protection requirements and the council's retention and disposal policy and schedule. Emails that constitute a record which needs to be retained, including those containing person identifying information, must be stored in an appropriate filing system relevant to their confidentiality or business need.

Shared drives or other unstructured information storage solutions (including cloud based storage) used to store any council record should be managed in accordance with the Retention Schedule (Appendix A).

2.8 Structured systems storing person identifying information

All structured information management systems that store records containing person identifying information must be managed in accordance with the Retention Schedule. These systems must have a deletion or archival capability and where appropriate be able to identify a skeleton record (a subset of the original information) for continued retention.

2.9 The following council policies should also be considered when referring to the Records Retention and Disposal Policy:

- Data Protection Policy
- Data Quality Strategy
- FOI Publication Scheme
- ICT Asset Disposal Policy
- ICT Asset Management Policy
- ICT Computer Usage Policy
- ICT Email Policy
- ICT Internet Policy
- ICT Security Policy
- Information Risk Policy
- Records Retention and Disposal Policy
- Remote Working Personal Commitment Statement/Briefing Note
- Travelling Abroad with Council Devices Policy
- Use of Removable Media Policy

3. Records retention and disposal protocol

3.1 The Records Retention and Disposal Schedule (Appendix A) provides guidance on recommended and mandatory retention periods for specific classes of records and information.

- 3.2 If you wish to transfer permanent records to an archive please contact the Systems and Administration Manager, who will outline options for both paper and electronic records.
- 3.3 Where a retention period has expired in relation to a particular record or information a review should be carried out before a final decision is made to dispose. Such reviews need not necessarily be detailed or time consuming. Where the designated officer is familiar with the contents or where contents are straightforward and easily apparent then such an exercise may only take a few minutes.
- 3.4 In the event that a decision is taken to dispose of a particular record or set of records, then consideration should be given to the method of disposal.
- 3.4.1 Confidential Waste – making available for collection by a designated refuse service by placing paper documents containing personal data or confidential information in the blue ‘confidential waste’ bins. This applies to records listed as “Secure” in the Records Retention and Disposal Schedule.
- 3.4.2 Recycling – where practicable disposal should further recycling in line with the council’s commitment to promoting an alternative waste disposal strategy. This applies to records listed as “Dispose” in the Records Retention and Disposal Schedule.
- 3.4.3 Deletion from a system - Documents held on an electronic document management system and main back office systems are subject to national discussions with various software suppliers to enable archiving of data and records. The Information Commissioner has advised that if steps are taken to make data virtually impossible to retrieve, then this will be regarded as equivalent deletion. ICT and the Systems and Administration Manager will advise on deletion.
- 3.4.4 Migration of documents to an external body – this method will be relevant where records or documents are of historic interest. The third party could be the National Archives (formally the Public Records Office). The council’s Systems and Administration Manager will advise on this.
- 3.4.5 Electronic Devices and Removable Media - ICT will advise on this as specialised equipment or software may be required. Removable electronic media that have been used to store protectively marked data must be securely deleted before being re-used or disposed of, or securely destroyed where re-use is not possible or required. The normal delete function does not securely delete data as it can still be recovered using readily available recovery tools; ICT will perform the required secure sanitisation and disposal of ICT assets. All electronic equipment including computers, laptops and personal electronic devices, must be returned to ICT for re-use or disposal.

The disposal of data held on CDs, DVDs, USB Memory Sticks and any other removable media and devices should be the responsibility of the department who produced that data. It should be understood that any data belonging to BCKLWN that is discovered by a third party can cause controversy, adverse

publicity and other undesirable consequences for BCKLWN. If you have any doubts about the disposal of data in a safe and appropriate manner, then please contact the ICT Service Desk for further advice and information.

- 3.5 An audit trail of disposed records must be logged by keeping a record of the document or information disposed of, the date and method of disposal, and the officer who authorised disposal. The documenting of the disposal is particularly important due to the Freedom of Information Act. A log is maintained of records that are stored and disposed of by “Stor-a-File”. Services should retain a local log of records that are disposed of using the form attached at Appendix B. Guidance on disposal is attached at Appendix C.

4. Roles and responsibilities

4.1 Members

Elected members are responsible for overseeing effective records management by the officers of the council and promoting adherence to this policy and the supporting framework.

Members also have access to records in the form of agendas, minutes, reports, briefing notes and correspondence with officers, community groups, members of the public, etc. These records can be sensitive particularly where the documents are exempt from publication, relate to individuals within their electoral ward, etc. Members therefore have a responsibility to manage and dispose of records in accordance with the Record Retention and Disposal Policy and Schedule.

4.2 Chief Executive

The Chief Executive has responsibility for the oversight and implementation of information risk management and fulfils the function of Senior Information Risk Owner (SIRO).

4.3 Management Team

Management Team are responsible for:

- approving and promoting this policy and the supporting framework;
- considering from time to time records management reports and ensuring due attention and
- resources are applied throughout the council to identified areas of need; and
- the operation and promotion of this policy and supporting framework within their service areas:
 - ensuring sufficient resources are allocated to meet corporate record management requirements;
 - ensuring those acting on behalf of the council receive appropriate training that is maintained and monitored on a regular basis, to ensure understanding and effectiveness;

- appropriate officers are appointed (and designated as required) to liaise and support records management groups and activities, and communicate records management to services; and
- records management is included in the business planning process.

4.4 Service managers

Responsibility for determining (in accordance with the Retention and Disposal Policy) whether to retain or dispose of specific documents rests with the individual service manager, in respect of those documents that properly fall within the remit or control of his/her service. The service manager will also need to audit legacy data to find out where it is and identify whether consent was granted correctly. They also need to delete records where it was not or where new consent cannot be obtained. The service manager will also need to ensure that privacy is designed into processes and services by default.

The rationale for this is that it is reasonable to both assume and expect that each service manager should be broadly conversant with the types of records received, generated and stored by his/her service.

Service managers may delegate the operational aspects of this function to one or more senior officers within their service. However in doing so they should ensure that any such officer is fully conversant with this Policy and is also familiar with the operational requirements of the service in relation to document retention/disposal and the General Data Protection Regulations.

4.5 Deputy Senior Information Risk Owner (SIRO)

The Deputy Senior Information Risk Owner (SIRO) is a senior officer who is familiar with information risks and supports the Chief Executive to provide the focus for the management of information risk across the council. They help establish and maintain assurance that information risk is being managed appropriately and effectively across the council and for any services contracted for.

4.6 Information Asset Owners (IAOs)

Each Head of Service is an Information Asset Owner (IAO) and is accountable to the SIRO for information assets within their business unit. Each IAO is responsible for how that information is held, used and shared. Each IAO will provide assurance that information risk is being managed effectively for those information assets that they have been assigned ownership. IAOs will be assisted in their roles by staff acting as Information Asset Administrators or equivalent that have day to day responsibility for management of information risks affecting one or more assets.

4.7 Information Asset Administrators (IAAs)

IAs are operational staff with day to day responsibility for managing risks to their information asset and shall work with the IAO and with other supporting staff in risk management roles to manage information risk to their asset.

4.8 Individuals

Council employees, including contractors, consultants and volunteers employed to undertake council business, have a responsibility to document actions and decisions by creating and filing appropriate records and subsequently to maintain and dispose of those records in accordance with records management procedures.

4.9 Legal Services/Eastlaw

Can advise on whether minimum retention periods are prescribed by law, and whether retention is necessary to protect the council's position where the likelihood of a claim has been identified by the relevant service managers.

Legal Services/Eastlaw staff cannot be expected to possess the operational or background knowledge required to assess whether a particular document may be required by the service concerned for operational need. This is the responsibility of the relevant service manager or his/her designated officers.

4.10 Information Communications Technology (ICT)

The council's ICT Asset Policy states:

The disposal of all ICT hardware assets is the sole responsibility of the ICT Department. Furthermore, no ICT hardware asset should be disposed of by any person, other than an authorised member of the ICT Department.

The disposal of data held on CDs, DVDs, USB Memory Sticks and any other removable media and devices should be the responsibility of the department who produced that data. It should be understood that any data belonging to BCKLWN that is discovered by a third party can cause controversy, adverse publicity and other undesirable consequences for BCKLWN. If you have any doubts about the disposal of data in a safe and appropriate manner, then please contact the ICT Service Desk for further advice and information.

4.11 Systems and Administration Manager

The Systems and Administration Manager is available to provide Service Managers with advice and guidance on effective records management practices, and any queries regarding this Policy and the attached Retention and Disposal Schedule.

This Policy will be reviewed by the Systems and Administration Manager on a triennial basis unless any practical implications are identified sooner, at which time the guidance will be updated to reflect the latest position.

4.12 Commissioned services and suppliers

It is important to ensure contracts place clear obligations on suppliers to manage records, created or held by external agencies, on behalf of the council, in accordance with the Records Retention and Disposal Policy. A data sharing agreement should be considered to set out how a third party will be holding our data, the security arrangements they have in place and where data has been shared for a particular contract / project how data will be disposed of post-contract.

4.13 Partnership working

Where records are created as a result of partnership working there needs to be clearly defined responsibilities between BCKLWN and the partner organisation for the creation and management of records.

Where BCKLWN is the lead partner:

- the council's Records Retention and Disposal Policy will be applicable;
- the council will be responsible for the custody and ownership of the records;

Where another organisation is the lead partner:

- the records management policy and procedures of the lead organisation are applicable;
- the lead partner organisation will be responsible for custody and ownership of records;
- the council should identify and retain records relating to its role in the partnership required for its own business purposes. They should be retained in line with the council's records management policy.

Where there is no identified lead partner the council should ensure that provisions are made for one of the partners to assume responsibility for the management of the records.

A data sharing agreement should be considered to set out how a partner will be holding our data, the security arrangements they have in place and where data has been shared for a particular project how data will be disposed of post-project.

4.14 Home and mobile working

Modernised ICT systems, working practices and work styles have implications for records management particularly when working at home or from various locations. Please refer to the Remote Working Personal Commitment Statement/Briefing Note for further guidelines.

As a general rule, manual and electronic records containing personal data should not be removed from council premises. The ICT Computer Usage Policy states that:

..with the increased use of notebook computers and other mobile devices, the possibilities of confidential data accidentally entering the public domain has risen dramatically. As such users of (but not exclusive to) a Laptop, Netbook, PDA, Tablet and Smart Phone's must also adhere to the following guidelines:

- Do not allow anyone who is not an employee of BCKLWN to use the notebook. This especially applies to family and friends.
- When using a notebook in the public domain, do not leave data on screen for longer than is necessary as this may be able to be viewed by people nearby.
- If the notebook or mobile device contains confidential data, liaise with ICT to arrange for the notebook to have the data or device encrypted.
- Do not leave a notebook unattended in a public place and do not store in a car overnight.
- Do not use cloud data storage to synchronise any information between devices without prior ICT approval.

Additional guidance for home/mobile working is set out in the ICT Security Policy.

4.15 Data and media sent offsite

The ICT Security Policy sets out required practices. Should it be necessary to send media (CD's, DVD's USB memory sticks, etc.) off site that contain (or may possibly contain) sensitive or personal data, it must be sent by recorded delivery with a regulated and trusted courier.

All data should be classified according to the Government Security Classifications (GSC) scheme).

All records classified as 'Official - Sensitive' and above must be sent in an agreed encrypted format to minimise the risk of a data breach should the records go missing in transit. If in any doubt about sending data and media to suppliers, please contact the ICT Service Desk for further advice and guidance.

5. Legislative framework

- 5.1 Retention periods are often set by statute, whilst others are guidelines following notable practice in local government. The Retention and Disposal Policy reflects the requirements of the Data Protection Act 2018, General Data Protection Regulations, the Freedom of Information Act 2000 and the Environmental Information Regulations 2004.

5.2 Data Protection Act 2018 (DPA)

The fifth data protection principle states that:

"..personal data processed for any of the law enforcement purposes must be kept for no longer than is necessary for the purpose for which it is processed.

Appropriate time limits must be established for the periodic review of the need for the continued storage of personal data for any of the law enforcement purposes.”

If any personal detail is of sufficient interest to be archived, the DPA makes provisions for the personal data processed only for ‘*scientific, historical*’ or ‘*statistical purposes*’.

This is conditional on meeting the criteria outlined in the Act.

5.3 Freedom Of Information Act 2000 (FOIA)

The FOIA gives anyone the right access to information held by the council.

There should be clearly defined policies and procedures for the retention and disposal of records. To ensure compliance the council has established a Retention and Disposal Schedule (Appendix A) which details record types held by all areas of the organisation.

5.4 Environmental Information Regulations 2004

The Environmental Information Regulations 2004 give people a right of access to information about the activities of public authorities that relate to or affect the environment, unless there is good reason for them not to have the information. This is sometimes referred to as a presumption in favour of disclosure.

5.5 Local Government Act 1972 (LGA) Part VA

This legislation governs public access to certain documents relating to council and committee meetings. Certain documents that form part of the public part of the agenda are required to be available for inspection by members of the public.

5.6 Tax legislation

Minimum retention for certain financial records are imposed by statutes such as the VAT Act 1994, and the Taxes Management Act 1970.

5.7 Statutory registers

Various local government statutes require registers to be kept of certain events, notifications, or transactions. It is implicit within such legislation that these records be maintained on a permanent basis, unless the legislation concerned stipulates otherwise.

5.8 The Audit Commission Act 1998

This provides auditors with a right of access to every document relating to the council that appears necessary for the purposes of carrying out the auditor's function under the Act.

5.9 General Data Protection Regulations (GDPR)

GDPR, if implemented correctly and in the right spirit, will help the council to foster the public's trust in the way it works. GDPR builds on current data protection legislation across European member states to consolidate this into a common set of standards that will apply to the processing of personal data for any European citizen, wherever that citizen may reside or wherever the processing takes place.

Under the GDPR, the council will need to have consent or one of five other specific legitimate reasons to hold and process individuals' data, including all legacy data. GDPR also stipulates the right of citizens:

- to be forgotten
- to make subject access requests at any time
- to have their data protected by processes of encryption or pseudonymisation¹
- to prevent direct marketing
- to prevent automated decision-making and profiling, and
- to obtain and reuse any data held.

These obligations are applicable to both data controllers and processors. Data Controller means a person who determines the purpose for which and the manner in which any personal data are, or are to be, processed. The council is a Data Controller. Data Processor means any person or organisation that processes the data on behalf of the Data Controller.

Under Article 30 of GDPR, the council has responsibilities to document the personal data it processes as a controller and processor. These records will need to align with the Record Retention and Disposal Schedule.

The council will need to audit legacy data to find out where it is and identify whether consent was granted correctly. Records will need to be deleted where consent is absent or cannot be obtained. The council will also need to ensure that privacy is designed into processes and services by default.

In the absence of any legal requirements, personal data may only be retained as long as necessary for the purpose of processing. This means data is to be deleted e.g. when:

¹ Pseudonymisation" of data means replacing any identifying characteristics of data with a pseudonym, or, in other words, a value which does not allow the data subject to be directly identified. It should be distinguished from anonymisation, as it only provides a limited protection for the identity of data subjects as it still allows identification using indirect means. Where a pseudonym is used, it may be possible to identify the data subject by analysing the underlying or related data.

- the data subject has withdrawn consent to processing;
- a contract has been performed or cannot be performed anymore; or
- the data is no longer up to date.

Exceptions may apply to the processing for historical, statistical or scientific purposes.

Expiration of the retention period

After the expiration of the applicable retention period personal data does not necessarily have to be completely erased. It is sufficient to anonymise the data. This may, for example, be achieved by means of:

- erasure of the unique identifiers which allow the allocation of a data set to a unique person;
- erasure of single pieces of information that identify the data subject (whether alone or in combination with other pieces of information);
- separation of personal data from non-identifying information (e.g. an order number from the customer's name and address); or
- aggregation of personal data in a way that no allocation to any individual is possible.

In some cases, no action will be required if data cannot be allocated to an identifiable person at the end of the retention period, for example, because:

- the pool of data has grown so much that personal identification is not possible based on the information retained; or
- the identifying data has already been deleted.

Information obligations

In addition to other information obligations, in the context of data retention data subjects must be informed of:

- the retention period;
- if no fixed retention period can be provided – the criteria used to determine that period; and
- the new retention period if the purpose of processing has changed after personal data has been obtained.

6. Bibliography

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[Retention Guidelines for Local Authorities](#), The Records Management Society of Great Britain, 2003

[Managing Records Retention and Disposal](#), Alison North, Ark Group, 2009

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[The Guide to Freedom of Information](#), Information Commissioners Office
[The Guide to Data Protection](#), Information Commissioners Office
[The Guide to the General Data Protection Regulation \(GDPR\)](#), Information Commissioners Office
[Privacy Notice Code of Practice](#), Information Commissioners Office
[ISO27001](#), Information security management systems, International Organization for Standardization
[GDPR: Regulation \(EU\) 2016/679](#), European Parliament and of the European Council, 27 April 2016
[Data Protection Bill 2017](#), Department for Digital, Culture, Media & Sport, 2017

7. Revision history

Policy name	Records Retention and Disposal Policy
Policy description	This policy sets out the Council's approach to the retention and disposal of records to ensure compliance with various acts of legislation and notable practice.
Document authors	Di Hill, Debbie Ess, Ged Greaves

Version number	Date formally approved	Reason for update	Author	Review date
V0.1	30/09/2011	First draft	Diane Cross	
F1	26/01/2012	Final version	Karen Butler	2018
V0.1	14/02/2018	First draft	Ged Greaves	
V0.2	18/05/2018	Second draft	Ged Greaves	
V0.3	22/05/2018	Third draft	Ged Greaves	
V0.4	17/09/2018	Fourth draft	Ged Greaves	
V0.5	19/09/2018	Fifth draft	Ged Greaves	

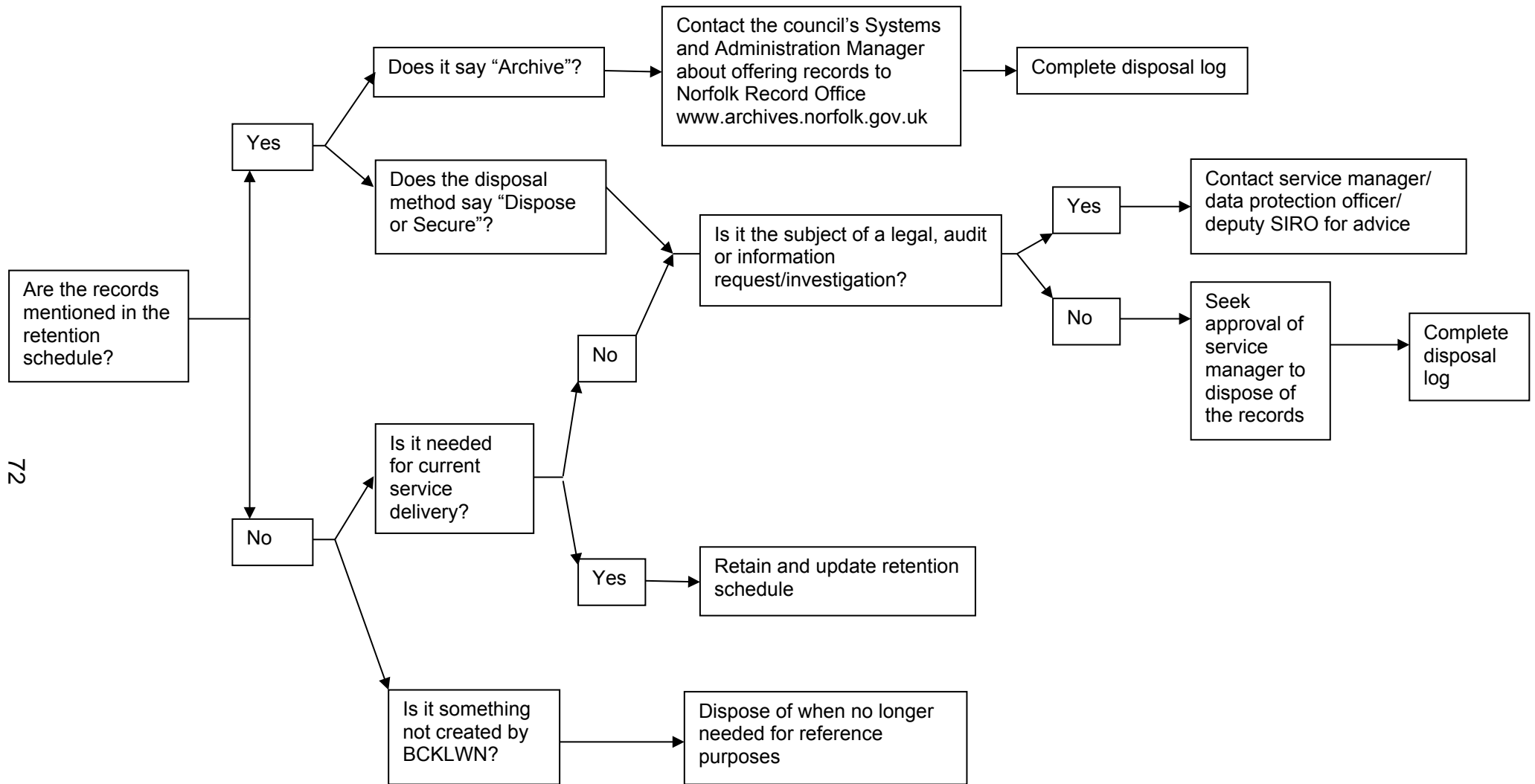
Appendix A – Records Retention and Disposal Schedule

Appendix B – Disposal log

Date of disposal	Document/Information	Method of Disposal	Is there an outstanding FOI/SAR request on these records?	Notes	Amount (nbr of boxes, files, records)	Authorised	Directorate
28/06/2017	<i>Legal file relating to the purchase of land at Main Street.</i>	<i>Shred Station – Shredded</i>	<i>No</i>	<i>Land disposed of in 1991.</i>	<i>1 file, approx. 200 pages</i>	<i>Name Job Title</i>	
28/06/2017	<i>Project files relating to service reviews conducted in 2010.</i>	<i>Shred Station – Shredded Data files deleted</i>	<i>No</i>		<i>2 files approx. 400 pages</i>	<i>Name Job Title</i>	

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Appendix C – Outline disposal flowchart



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Appendix D - Disposal checklist

1. Has the document been appraised?

Before a record is designated for disposal the nature and contents of the record needs to be ascertained. This process may only take a few minutes. However, this can be a skilled task depending on the complexity of the record concerned. This evaluation process should only be undertaken by officers who possess sufficient operational knowledge to enable them to identify the record concerned and its function within both the individual service and corporate framework.

2. Is retention required to fulfil statutory or other regulatory requirements?

Identifying how long records need to be kept is one of the most important areas to be addressed. The Retention Schedule at Appendix A is the key tool for facilitating how long records need to be kept. As a rule of thumb it should be possible to dispose of most records and ordinary correspondence type records after seven years. This is calculated by allowing a statutory limitation period of 6 years plus a further year as an added safeguard.

However, there are exceptions to this that include legal records and notices, records which the Council is legally required to maintain in a public register, correspondence about ongoing contracts and building works less than 15 years old, leases and matters about which a dispute is known or anticipated. However, some records will be of temporary nature and can be disposed of much more quickly.

If there is any doubt regarding the correct retention period for a certain record reference may need to be made to legislation that stipulates minimum retention periods for particular records in local government. In addition advice can be sought from the Legal Section of the Council. However, there may come a point at which the balance of convenience and safety rests with retaining a record rather than conducting extensive inquiries to determine whether it is safe to dispose of the record.

3. Is the retention required for evidence?

Occasionally, the Council becomes involved in disputes with third parties. Such disputes can result in the party who is dissatisfied bringing legal proceedings against the Council. Alternatively, the Council may wish or be required to institute legal proceedings against an individual or organisation. Such proceedings may be civil or criminal in nature. Where a dispute arises, or litigation has been commenced it is important that the Council has access to all records that are relevant to the matter. Without such records there is the danger that the Council's position will be compromised.

Specific time limits are laid down for the commencement of litigation. The time limits are different according to the nature of the claim. The starting point therefore, is that the retention period is the length of time that has to elapse before a claim is barred. The Legal Service at the Council will be able to give advice if there are areas of doubt.

4. Is retention required to meet the operations needs of the service?

In some cases retention may be desirable even though no minimum retention period applies, or has expired. Records may be useful for future reference purposes, as

precedents, or for performance management. Skilled judgment may be needed to assess the usefulness of a particular document.

5. Is the document or record of historic interest?

In most cases this consideration will not be applicable. However, some records currently in Council storage may be of historic interest. If the record is of historic interest consideration may be given to transfer to the County Archivist rather than retention or disposal by the Council.

Ref No	Lead Department	Lead Service	Function Description	Examples of Records	Retention Periods (Authority) <i>Officer decision</i>	Retention Periods (Authority) <i>Legislation</i>	Legislation/Guidance	Indicative Protective Marking	Disposal method
Section 1 - Communications									
1.1	CCS	Communi	Publications						
1.1.1	CCS	Communi	The process of designing information for publication		Destroy six months after publication has been distributed and all administrative use is concluded		RGLA 2.21	Official	Dispose
1.1.2	CCS	Communi	Photographs	Photo consent forms Photos	2 years			Official - Sensitive	Secure
1.1.3	CCS	Communi	The published work of the council	Newsletters Annual reports Strategy summaries	Five copies from initial print run to be archived as a permanent record.		RGLA 2.21	Not protectively marked	Dispose
1.2	CCS	Communi	Media relations						
1.2.1	CCS	Communi	Interaction with the media	Enquiries Releases Statements Briefing papers	All logged electronically on Newsflash		RGLA 2.21	Official	Secure
1.2.2	CCS	Communi	Media publications concerning the council	Press cuttings Media reports	All logged electronically. Physical clippings retained for one year from date of publication.		RGLA 2.21	Not protectively marked	Dispose
1.3	CCS	Communi	Marketing						
1.3.1	CCS	Communi	Developing and promotion of the council's campaigns and events		3 years		RGLA 2.21	Official	Secure
1.4	CCS	Communi	Civic and royal events						
1.4.1	CCS	Communi	Recording of ceremonial events and civic occasions	Visitors book Audio recordings Video recordings Photography	Permanent			Not protectively marked	Archive
1.5	CCS	Communi	Web development						
1.5.1	CCS	Communi	Archived web pages		Date pages archived + 3 years then review			Not protectively marked	Archive
Section 2 - Customer Information Centre									
2.1	CCS	CIC	Enquiries and complaints						
2.1.1	CCS	CIC	The management of enquiries, submissions and complaints which result in significant changes to policy or procedures	Reports, returns, correspondence, area forum queries	5 years		RGLA 2.15, RGLA 2.16	Official	Secure
2.1.2	CCS	CIC	The management of detailed and routine responses on council actions, policy or procedure e.g. council tax administration, housing benefit administration, council tax support, administration, non-domestic rates, choice based lettings	Reports, returns, correspondence, Ombudsman	1 month		RGLA 2.4, RGLA 2.7	Official	Secure
2.1.3	CCS	CIC	Collection of data to establish if customers are eligible for homeless assistance	Forms, eforms, health and financial paperwork and emails	Housing Services retention policy			Official - Sensitive	Secure
2.1.4	CCS	CIC	Collection of data to provide services for older people, Careline alarms, keysafes and housing adaptations	Forms, eforms, health and financial paperwork and emails	IEG4 eforms and Careline and Care and Repair retention strategy			Official - Sensitive	Secure
2.1.5	CCS	CIC	Collection of data for customers making requests for food and health and safety	Eforms and IDOX records	Food, Health and Safety retention policy			Official - Sensitive	Secure
2.16	CCS	CIC	Collection of data for customers making requests for service or complaining about a nuisance	Eforms and IDOX records	Community Safety retention policy			Official - Sensitive	Secure
2.17	CCS	CIC	Collection of data for customers applying for licenses	Eforms and IDOX records	Licensing retention policy			Official - Sensitive	Secure
2.18	CCS	CIC	Collection of data for customers complaining about rented properties or granting of licenses for HMOs or caravans	Eforms and IDOX records	Housing Standards retention policy			Official - Sensitive	Secure
2.19	CCS	CIC	Collection of data from customers paying council bills or invoices	Eforms	7 years			Official - Sensitive	Secure
2.20	CCS	CIC	Registration of citizens on the electoral roll	Eform	Electoral Services retention policy			Official - Sensitive	Secure
2.21	CCS	CIC	Setting up customer payment plans for accounts receivable	Eform	Financial Services retention policy			Official - Sensitive	Secure
2.22	CCS	CIC	Customers supplying or requesting information/service	Emails	1 month			Official - Sensitive	Secure
Section 3 - Democratic Services									
3.1	CCS	Democra	Electoral Registration						
3.1.1	CCS	Democra	Electoral Registration has a separate policy. This should be referred to for retention of documents relating the Electoral Register, election results and ballot papers.						
3.2	CCS	Democra	Declarations						
3.2.1	CCS	Democra	Member Acceptance of Office	Bound register	Permanent	Permanent	LGCS	Not protectively marked	Archive
3.2.2	CCS	Democra	Members Registration of Interest	Declarations of all current members retained.	In the event of a Members' resignation/retirement/ non election declarations are required to be retained for a period of 18 months.	Date of next election + 6 years	Local Government Act 1972 Section 94 (1)	Not protectively marked	Dispose
3.2.3	CCS	Democra	Members Allowances	Travel and subsistence claim forms	Current year + 6.	Date of next election + 6 years		Not protectively marked	Dispose
3.2.4	CCS	Democra	Parish Clerk registers of interests	Contact details and disclosure details	?			Official - Sensitive	Secure
3.3	CCS	Democra	Council and committee meetings						
3.3.1	CCS	Democra	The process of preparing business for Council consideration and making the record of discussion, debate and resolutions.	Minute Books and Indexes.	Permanent Transfer to Place of Deposit after 6 years	Permanent. Consider for Historic Records	RGLA 1.4 Local Government Act 1972 Section 100C	Not protectively marked	Archive
3.3.2	CCS	Democra	Agenda and non confidential reports considered by each Council, Cabinet, Committee and Panel meetings		Council year + 5 years	Permanent. Consider for Historic Records	RGLA 1.4 Local Government Act 1972 Section 100C	Not protectively marked	Dispose
3.3.3	CCS	Democra	Background Papers		Council Year + 4 years		Local Government Act 1972 Section 100D	Not protectively marked	Dispose
3.3.4	CCS	Democra	Constitution		Permanent			Not protectively marked	Dispose
3.3.5	CCS	Democra	Notice of meetings			Date of meeting + 1 year	Public Bodies (Admission to Meetings) Act 1960	Not protectively marked	Dispose

3.3.6	CCS	Democrat Services	Audio/Video Tapes of meetings			Date of meeting + 2 years	Local Government Act 1972 s100c Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2000	Not protectively marked	Dispose
3.3.7	CCS	Democrat Services	External user contact details for sending agendas and minutes	Records relating to external users of the Mod Gov system	?			Official - Sensitive	Secure
3.3.8	CCS	Democrat Services	Records relating to Licensing hearings	Contact details for Licence holders, objectors, convictions, medical history, decision notices and related personal data	?			Official - Sensitive	Secure
3.4	CCS	Democrat Services	Partnership, agency and external meetings						
3.4.1	CCS	Democrat Services	Preparing business for partnership and agencies consideration and making the record of discussion, debate and resolutions, <u>where the council legally owns the record.</u>	Documents establishing the committee Agendas and Minutes Reports Recommendations Supporting docs- such as briefing and discussion papers	6 years after the end of the financial year in which the records were created	Permanent. Consider for Historic Records	RGLA 1.6	Not protectively marked	Dispose
3.4.2	CCS	Democrat Services	Preparing business for external committees' consideration, and making the record of discussion, debate and resolutions, <u>where the council does not own the record</u>	Documents establishing the committee reports Recommendations Supporting documents such as briefing and discussion papers	7 years after last action	Destroy 3 years after last action	RGLA 1.6	Not protectively marked	Dispose
3.5	CCS	Democrat Services	Honours and submissions						
3.5.1	CCS	Democrat Services	Preparing of honours submission	Honours nomination form Covering documentation Letters of support Referral for comment from Lord Lieutenant	5 years after last action	Destroy 5 years after last action	RGLA 1.8	Official	Secure
3.6	CCS	Democrat Services	Political party papers						
3.6.1	CCS	Democrat Services	Undertaking representation of the local authority – council representatives	Leader of opposition papers Leader of council papers Party Political Group filing system and leaders records	3 years after last action	Destroy 3 years after last action	RGLA 1.9	Official	Secure
3.7	CCS	Democrat Services	Contact details						
3.7.1	CCS	Democrat Services	Records relating to contacts for the council's governance framework	Register of Members addresses Honorary Aldermen Members of Parliament and European Parliament Self-registered users of Mod Gov Parish Clerks Outside Bodies List Records of former councillors Records relating to distribution lists for meetings	Date of next election + 2 years		Local Government Act 1972 Section 94 (1)	Official	Secure
3.8	CCS	Democrat Services	Independent Remuneration Panel						
3.8.1	CCS	Democrat Services	Records created by the Independent Remuneration Panel		Date of meeting + 6 years			Official	Secure
3.9	CCS	Democrat Services	Members code of conduct						
3.9.1	CCS	Democrat Services	Records relating to the creation and maintenance of the Members Code of Conduct		Date code of conduct superseded + 6 years [one reference copy of each version of the code of conduct should be retained]			Not protectively marked	Dispose
3.10	CCS	Democrat Services	Member training						
3.10.1	CCS	Democrat Services	Records relating to the creation and management of Member induction and Member training		Current year + 6 years			Official	Secure
3.11	CCS	Democrat Services	Delegation						
3.11.1	CCS	Democrat Services	Records relating to the allocation and delegation of the powers and functions given to the Council in accordance with the Local Government Act 2000 (Constitutions)(England) Direction 2000			Date delegation ends + 7 years	Local Government Act 2000 (Constitutions)(England) Direction 2000	Not protectively marked	Dispose
3.12	CCS	Democrat Services	Forward plan						
3.12.1	CCS	Democrat Services	Records relating to the management and publication of the Forward Plan of Key Decisions		Permanent			Not protectively marked	Archive
3.13	CCS	Democrat Services	Wards and boundaries						
3.13.1	CCS	Democrat Services	Records created by the process of managing wards and boundaries			Permanent	Electoral Registration and Administration Act 2013	Official	Secure

3.14	CCS	Democrat Services	Internal meetings						
3.14.1	CCS	Democrat	Records for preparing business for strategic	Management Team	Indefinitely		RGLA 2.4	Official	Secure
3.14.2	CCS	Democrat Services	Records for preparing business for cross departmental consideration and making the record of discussion, debate and resolutions	Corporate Cross Cutting Groups Departmental Coordinators Minutes	5 years		RGLA 2.4	Official	Secure
3.15	CCS	Democrat	Corporate complaints						
3.15.1	CCS	Democrat	Records relating to corporate complaints	Complaint form, contact information, responses and correspondance	?			Official - Sensitive	Secure
3.16	CCS	Democrat	MP enquiries						
3.16.1	CCS	Democrat	Records relating to MP enquiries	Names, addresses, contact details ,details of enquiry, responses	?			Official - Sensitive	Secure
3.17	CCS	Democrat	Ombudsman enquiries						
3.17.1	CCS	Democrat	Records relating to Ombudsman enquiries	Names, addresses, contact details ,details of enquiry, responses	?			Official - Sensitive	Secure
3.18	CCS	Democrat	Records relating to Election staffing lists	Names, addresses, passport, National Insurance numbers, telephone numbers	?			Official - Sensitive	Secure
Section 4 - Community Safety and Neighbourhood Nuisance									
4.1	CCS	Communit y Safety	All records relating to Statutory Nuisance complaint handling.	Contact details, case notes, evidence	Dependent on outcome of case Suggest Informal case closure = 3months FPN - 2 yrs after date of issue Simple Caution - 6 yrs after date of Caution Prosecution / Appeal / Injunctions - 6yrs after last court action ASBO's - ASN? all ASBO's either expired or transferred to Civil Injunction CPW's - 3months after date of compliance CPN's - 2yrs after date of compliance Planning / Licensing - In line with data retention policy of these services (need to consider information not stored on public registers)		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
4.2	CCS	Communit y Safety	All records relating to Anti-social Behaviour case management				Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
4.3	CCS	Communit y Safety	All records relating to Waste enforcement case management				Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
4.4	CCS	Communit	All records relating to Public Health Acts and other				Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
4.5	CCS	Communit	All records relating to Service of statutory notices				Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
4.6	CCS	Communit	All records relating to Prosecution of cases and				Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
4.7	CCS	Communit y Safety	All records relating to Injunctions and other other ASB interventions.				Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
Section 5 - Information Communications Technology and Records Management									
5.1	CCS	ICT	Information communication and technology						
5.1.1	CCS	ICT	Records relating to network maintenance	Contact details for internal directory/network access, ICT support logs		Date of maintenance + 6 years	Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
5.1.2	CCS	ICT	Records relating to the Information Security Management System	Policy documents, guidelines and procedures documents, incident records, risk assessment reports, exception records, contact details	Permanent			Official - Sensitive	Secure
5.1.3	CCS	ICT	Records regarding ICT contracts, software licenses, agreements.		Destroy 7 years after sale or disposal of asset			Official - Sensitive	Secure
5.1.4	CCS	ICT	Records relating to the ICT management framework	Strategy and policy documents, guidance documents, terms of reference documents	2 years			Official	Secure
5.2	EP	Office Manager	Information and records management						
5.2.1	EP	Office Manager	All records relating to the development of the Corporate Retention Schedule		Current year + 3 years then review		TNA Retention and Disposal Guidance	Official	Secure
5.2.2	CE	Legal	All information relating to the logging, tracking and monitoring of data breaches		3 years (6 years for Tribunal or ICO decision)			Official - Sensitive	Secure
5.2.3	CE	Legal	All records relating to the responses to data breaches		3 years (6 years for Tribunal or ICO decision)			Official - Sensitive	Secure
5.2.4	CCS	ICT	Records relating to Information Asset Surveys/Information Audits		Date of audit + 3 years then review			Official - Sensitive	Secure
5.2.5	CCS	ICT	Records relating to the destruction of ICT systems			Date of disposal of system + 6 years	Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
5.2.6	EP	Office Manager	All records relating to the development and implementation of the Records Management Policy		Current year + 3 years then review		TNA Retention and Disposal Guidance	Official	Secure
5.2.7	EP	Office	Recording the disposal of records	Disposal logs and certificates	6 years after last action			Official	Secure
Section 6 - Corporate planning, policy and performance									
6.1	CCS	PPP	Corporate planning & reporting						
6.1.1	CCS	PPP	All records relating to corporate planning and reporting activities for the council	Corporate plans, strategic plans, business, departmental and service plans, annual and quarterly reports	6 years		RGLA 2.4 Local Government Act 1972 s100c	Not protectively marked	Dispose
6.1.2	CCS	PPP	All records relating to the council's corporate risk register	Risk register, update reports, administration	6 years		Limitation Act 1980	Official - Sensitive	Secure
6.2	CCS	PPP	Statutory returns						
6.2.1	CCS	PPP	All records relating to the process of preparing information to be passed on to central government as part of statutory requirements.	Reports to central government, National Indicators, transparency datasets	6 years		RGLA 2.5 Local Government Finance Act 1992	Official	Secure
6.3	CCS	PPP	Policy development, procedures, strategy and structure						
6.3.1	CCS	PPP	All records relating to the process that develops policies, procedures, strategies and structures for the council	Policy, procedure, precedent, instructions, organisation charts, departmental information, policy framework, policy register, key policies	6 years		RGLA 2.1, RGLA 2.6	Official	Secure
6.3.2	CCS	PPP	All records that relate to the monitoring and reviewing strategic plans, policies or procedure.	Performance management framework, quarterly and annual performance reports	6 years		RGLA 2.17	Official	Dispose
6.3.3	CCS	PPP	All records that to the management of detailed responses on Council actions, policy or procedure.	Reports, returns, correspondance, Ombudsman	6 years		RGLA 2.4	Official	Secure
6.4	CCS	Communi	Public consultation						
6.4.1	CCS	Communi	Consulting the public and staff in the development of	Consultation and research surveys, staff surveys,	5 years		RGLA 2.8	Official	Dispose

6.4.2	CCS	Communi- cations	Consulting the public and staff in the development of minor policies of the council	Draft reports, consultation documents	1 year from closure		RGLA 2.9	Official	Secure
6.5	CCS	PPP	Quality and performance management						
6.5.1	CCS	PPP	Records assessing, monitoring or reviewing the quality, efficiency, or performance of a council service or unit	Reports to Management Team, scrutiny panels, audit and inspection reports, business cases, service reviews	6 years		RGLA 2.17, RGLA 2.18 Local Government Finance Act 1992	Official	Archive
6.6	CCS	PPP	Partnership activities						
6.6.1	CCS	PPP	All records relating to the development, implementation and monitoring of a community strategy and related partnership projects	Strategy, action plans, monitoring reports, general correspondence	6 years		Local Government Finance Act 1992	Official	Secure
6.6.2	CCS	PPP	All records relating to the administration of Community Information Points	Contact details, correspondence	3 years			Official - Sensitive	Secure
Section 7 - Personnel									
7.1	CCS	PPP	Core personnel information						
7.1.1	CCS	PPP	All records relating to Personnel and Payroll for employees of the Council, Alive Management Limited and joint employees of Alive Management Limited and Alive Leisure	Personnel file, job application form, equal opportunities monitoring form, rehabilitation of offenders form, pre-employment medical questionnaire, references, qualification certificates, bank account details, health and medical information, employment history, emergency contacts and next of kin, ID photo, eligibility to work in the UK, contract detail, commencement form, termination of employment, retirement gifts/ long service awards, BUPA, apprenticeships	Being reviewed	6 years	Employment Practices Data Protection Code Part 1: Recruitment & Selection (March 2002). Section 2.1: Collection and keeping general records (Employee Records) Limitation Act (1980)	Official - Sensitive	Secure
7.1.2	CCS	PPP	Records relating to staff working with children and vulnerable adults and the Disclosure and Barring Service	Confidential file used to hold completed DBS checks	6 months - originals of checks 3 years - umbrella body			Official - Sensitive	Archive
	CCS	PPP		HR system	A record that a CRB check has been undertaken is retained indefinitely	Termination + 6 years	Limitation Act (1980) Section 4A (5)	Official - Sensitive	Archive
7.1.3	CCS	PPP	All records relating to general correspondence with employees/former employees	Personal data, correspondence	Being reviewed			Official - Sensitive	Secure
7.2	CCS	PPP	Employee relations records						
7.2.1	CCS	PPP	Records of consultation and/ negotiation with recognised trade unions relating to employee relation matters	Minutes from Senior Management/Trade Union meetings Evidence of consultation for specific projects Minutes from Joint Employee Committee meetings Minutes/notes from meetings to discuss specific projects/incidents Local Agreements (contained within Employee Handbook)	Indefinite	Routine - Destroy 2 years after use is concluded Strategy - Permanent	RGLA 6.6 RGLA 6.5	Official	Archive
7.2.2	CCS	PPP	Records of disciplinary, grievances and harassment investigations	Correspondence relating to investigation Investigating Officers report and supporting documentation (including witness statements where applicable) Records of meetings/hearings undertaken as part of an investigation Record of the outcome of any hearing (including if the case is unfounded) Records of any appeal processes	Records of investigations held permanently on personal file Warnings to be disregarded in relation to disciplinary procedures after the timescale agreed in the decision of the hearing panel chair			Official - Sensitive	Archive
7.2.3	CCS	PPP	All records relating to employee relations cases	Contact details, case files, administration	Being reviewed			Official - Sensitive	Secure
7.3	CCS	PPP	Equal opportunities monitoring						
7.3.1	CCS	PPP	As per 7.1	Equal Opportunities Monitoring form	As per 7.1			Official - Sensitive	Archive
7.4	CCS	PPP	Occupational health						
7.4.1	CCS	PPP	Records of specific activities undertaken to check or ensure the health of an employee	Pre-employment medical questionnaire Occupational health referral forms and associated medical reports Records of adjustment to work place Records of pre-employment meetings Records of meetings to discuss specific issues	Permanent Details retained on Employee Personal File	Cause of Action + 3 years	Limitation Act 1980 (c. 58). Section 11(4): Special time limit for actions in respect of personal injuries	Official - Sensitive	Archive
7.5	CCS	PPP	Recruitment						
7.5.1	CCS	PPP	The selection of successful candidates to vacancies within the organisation	Job application form Equal opportunities monitoring form Rehabilitation of Offenders disclosure form Copies of qualification certificates Confirmation of eligibility to work in the UK References Medical Enquiry Form Interview notes	Permanent - successful applicant Details retained on Employee Personal File and key records also held on HR system	6 years minimum requirement	Employment Practices Data Protection Code Part 1: Recruitment & Selection (March 2002). Section 2.1: Collection and keeping general records (Employee Records)	Official - Sensitive	Archive
7.5.2	CCS	PPP	Records of unsuccessful job applicants for vacancies within the organisation	Job application form Equal opportunities monitoring form Rehabilitation of Offenders disclosure form Interview notes (if selected for interview) Copies of qualification certificates Confirmation of eligibility to work in the UK References	6 months	Destroy 1 year after recruitment finalised	RGLA 6.11	Official - Sensitive	Secure
7.6	CCS	PPP	Staff monitoring (general)						

7.6.1	CCS	PPP	Performance	Correspondence/reports relating to probationary periods Performance/improvement plans (where applicable) Records of performance as assessed via annual appraisal process	Permanent Details retained on Employee Personal File Records of performance ratings also held on HR system	6 years minimum requirement	Employment Practices Data Protection Code Part 1: Recruitment & Selection (March 2002). Section 2.1: Collection and keeping general records (Employee Records) Limitation Act (1980) Section 4A (5)	Official - Sensitive	Archive
7.6.2	CCS	PPP	Leave/attendance records	Sickness absence records (absence information, fit to work notes, occupational health correspondence and reports, review meetings) Special leave requests Jury/Study Leave Records of return to work discussions Annual leave requests Records of maternity, paternity, parental and adoption leave Record of KIT days	Permanent Details retained on Employee Personal File Records also held on CIPHR and Etarmis		Employment Practices Data Protection Code Part 1: Recruitment & Selection (March 2002). Section 2.1: Collection and keeping general records (Employee Records)	Official - Sensitive	Archive
7.6.3	CCS	PPP	Stress risk assessments	Completed forms referred to Personnel/Safety and Welfare	Permanent. Details retained on Employee Personal File.			Official - Sensitive	Archive
7.6.4	CCS	PPP	All records relating to flexible working requests	Submissions from employee, assessments, correspondence	Being reviewed			Official - Sensitive	Secure
7.6.5	CCS	PPP	All records relating to professional memberships	Personal data, membership requirements and evidence	Being reviewed			Official - Sensitive	Secure
7.6.6	CCS	PPP	All records relating to building security	Personal data, photograph	Being reviewed			Official - Sensitive	Secure
7.6.7	CCS	PPP	All records relating to audits	Personal data, union membership, pension information	Being reviewed			Official - Sensitive	Secure
7.6.8	CCS	PPP	All records relating to service reviews	Personal data, structure plans, correspondence, business cases	Being reviewed			Official - Sensitive	Secure
7.6.9	CCS	PPP	All records related to establishment	Personal data, salaries, grades, allowances, post filling forms, change of post forms, budgets	Being reviewed			Official - Sensitive	Secure
7.6.10	CCS	PPP	All records relating to gender pay gap	Name, gender, salary, payroll related information	Being reviewed			Official - Sensitive	Secure
7.6.11	CCS	PPP	All records relating to employment monitoring	Personal data, job title, grade, salary, allowances	Being reviewed			Official - Sensitive	Secure
7.7	CCS	PPP	Termination of employment						
7.7.1	CCS	PPP	Records relating to the termination of employment of an employee	Correspondence to/from employee regarding arrangements for termination Redundancy payment calculations (if applicable) Pension estimates (if applicable) Correspondence/records of any meetings leading to a dismissal (if applicable)	Permanent Details retained on Employee Personal File Record of leaving date and leaving reason held on HR system		Employment Practices Data Protection Code Part 1: Recruitment & Selection (March 2002). Section 2.1: Collection and keeping general records (Employee Records)	Official - Sensitive	Archive
7.8	CCS	PPP	Training and development						
7.8.1	CCS	PPP	Records relating to training/development activities undertaken by employees	Record of date(s), course title and costs	CPD – Permanently recorded on CIPHR. Administration paperwork retained (1 full previous year and 1 rolling year).		Employment Practices Data Protection Code Part 1: Recruitment & Selection (March 2002). Section 2.1: Collection and keeping general records (Employee Records)	Official - Sensitive	Archive
	CCS	PPP			In House – Permanently recorded on CIPHR. Administration paperwork retained (2 full previous years and 1 rolling year)			Official - Sensitive	Archive
7.8.2	CCS	PPP	Records relating to qualification training undertaken by employees	Post entry training scheme application form Records of costs incurred Correspondence with employee/qualification provider Evidence of progress/ completion of qualification	Permanently recorded on CIPHR and completed paperwork is retained in Employee Personal File. Post Entry paperwork is kept in A4 files in locked cupboard until the employee has passed the qualification, then it is finalised and filed away.			Official - Sensitive	Archive
7.9	CCS	PPP	Appointments of statutory officers						
7.9.1	CCS	PPP	Appointment of an individual for a statutory position	As per 7.1	As per 7.1			Official - Sensitive	Archive
7.10	CCS	PPP	Miscellaneous employment records						
7.10.1	CCS	PPP	Death in Service beneficiaries	Completed form	Details retained on personal file – kept until superseded by updated form		Pensions Act 2008. Section 60	Official - Sensitive	Archive
7.10.2	CCS	PPP	Eye Tests	Record of test dates	Permanent – held on HR system			Official - Sensitive	Archive
7.10.3	CCS	PPP	Bank/Building society references	Correspondence to/from external organisation	Permanent – held on personal file			Official - Sensitive	Archive
7.10.4	CCS	PPP	All records relating to TUPE case files	Personal data, case files and correspondence	Being reviewed			Official - Sensitive	Secure
7.10.5	CCS	PPP	All records relating to queries from statutory agencies	Personal data, correspondence		6 years plus current tax year		Official - Sensitive	Secure
7.10.6	CCS	PPP	All records relating to job evaluation appeals	Personal data, job descriptions, proposals, appeal case files	Being reviewed			Official - Sensitive	Secure
7.11	CCS	PPP	Pay, payroll and pension records						
7.11.1	CCS	PPP	Starters, Leavers and Transfers	As per 7.1	As per 7.1		Taxes Management Act (1970). Section 12 B	Official - Sensitive	Archive
7.11.2	CCS	PPP	Change of personal details (including bank account, address, name, tax circumstances, voluntary/statutory deductions)	Change form, letter, copy of marriage certificate, copy of decree absolute, P45, P46, deduction authorisation forms. Personal data, earning details, student loans, sickness absence, attachment of earnings orders. Held	As per 7.1		Limitation Act (1980) Section 4A (5)	Official - Sensitive	Archive
	CCS	PPP		Age exception certificate	Original returned to employee on termination of employment.			Official - Sensitive	Archive
7.11.3	CCS	PPP	Statutory Payments. Records of SMP, SSP, SPP, SAP payments made and leave taken	Correspondence to/from employee Statutory forms Mat B1, SC3 etc held on Personnel file as per 7.1 Records of payments made and calculations held by outsourced payroll provider	As per 7.1			Official - Sensitive	Archive
7.11.4	CCS	PPP	Overpayment documentation	Correspondence to/from employee held on Personnel file as per 7.1	As per 7.1		Limitation Act (1980) Section 4A (5)	Official - Sensitive	Archive

7.11.5	CCS	PPP	All records relating to Real Time Information submissions to HMRC and personal payroll history. Record of pay history, performance related pay, overtime pay, allowances, pay enhancements, other taxable allowances, payment for untaken leave, reduced pay, no pay, maternity leave. Tax and NI deductions, payroll reconciliation	Timesheets and other input documentation. Fit notes and other sickness forms Details relevant to personnel are recorded on CIPHR Electronic records held on payroll system by outsourced payroll provider.	Held on site for current year then sent to storage for a further 6 years.			Official - Sensitive	Archive
7.11.6	CCS	PPP	All records relating to pensions and pension estimates	Employee & employer forms held on Personnel file as per 7.1 Bandings information held on CIPHR Contributions records held on payroll system by outsourced payroll provider.	As per 7.1			Official - Sensitive	Archive
7.11.7	CCS	PPP	Travel & Subsistence claims	Claims held by outsourced payroll provider Personal data, receipts, vehicle information and mileage, driving licence, insurance, MOT				Official - Sensitive	Archive
7.11.8	CCS	PPP	Year end processes and statement of accounts	Collated information on individual taxable benefits, PSA calculations, Dispensation & PSA documentation, payment records.	Held on site for current year and then stored off site for a further 6 years.			Official - Sensitive	Archive
	CCS	PPP		Pension returns, P11D, P9D, P14 P35, P60 etc stored electronically by outsourced payroll provider.			Taxes Management Act (1970). Section 12 B	Official - Sensitive	Archive
7.12	CCS	PPP	Safeguarding policy and referrals						
7.12.1	CCS	PPP	Records relating to the development, implementation and monitoring of the council's safeguarding policy and action plan	Policy, strategy, action plan, monitoring reports, research, staff surveys	Awaiting clarification from Legal Services		6 years Limitation Act 1980	Official - Sensitive	Secure
7.12.2	CCS	PPP	Records relating to the administration and coordination of the council's Safeguarding Group	Agendas, minutes, reports			6 years Limitation Act 1980	Official - Sensitive	Secure
7.12.3	CCS	PPP	Records relating to safeguarding referrals	Paper files, spreadsheet, NSAB forms, NCSB forms, VTR forms, HSB referrals			75 years Limitation Act 1980	Official - Sensitive	Secure
7.13	CCS	PPP	Employee welfare and wellbeing						
7.13.1	CCS	PPP	Health referrals, including medical reports from doctors or consultants, corres with the appointed	Letters Correspondence	All kept on personal files.		Limitation Act 1980 (Section 2)	Official - Sensitive	Archive
7.13.2	CCS	PPP	Papers relating to any injury on duty	Incident Reporting Form	3 years			Official - Sensitive	Secure
7.13.3	CCS	PPP		2 nd Party Claims				Official - Sensitive	Secure
7.13.4	CCS	PPP	Medical/Self Certificates – unrelated to industrial injury		3 years			Official - Sensitive	Secure
7.13.5	CCS	PPP	Driving At Work Forms - Driving risk assessments		Current year + 2 years			Official	Secure
7.13.6	CCS	PPP	Display Screen Equipment Reports			Life of assessment + 4 years	Limitation Act 1980 (Section 11)	Official	Secure
7.13.7	CCS	PPP	New and Expectant Mother Risk Assessments			Life of assessment + 4 years		Official	Secure
7.13.8	CCS	PPP	Stress Assessments (individual or teams)			Life of assessment + 4 years		Official	Secure
7.13.9	CCS	PPP							
Section 8 - Revenues and Benefits									
8.1	FS	Revenues & Benefits	Benefits						
8.1.1	FS	Revenues & Benefits	Records relating to the assessment and payment of benefit and support claims, discretionary payments, recovery of overpaid benefits, provision of benefits advice and the prevention and detection of fraud.	Claim forms, income details, rent information, identity paperwork, medical forms, housing information, personal information	7 years		HMRC - Compliance Handbook Manual CH15400 Limitation Act 1980	Official - Sensitive	Secure
8.1.2	FS	Revenues & Benefits	Regulation of Investigatory Powers Act authorisations for the use of surveillance			5 years from date of completion	Criminal Procedure and Investigations Act 1996 Codes of Practice (Part 5) and Department of Work and Pensions Guidance.	Official - Sensitive	Secure
8.1.3	FS	Revenues & Benefits	Documents received by Benefit Service in support of a benefit claim. Documents include claim form and any supporting evidence			Current + 6 years		Official - Sensitive	Secure
8.1.4	FS	Revenues & Benefits	Telephone calls received by Benefit Service in support of a specific benefit claim.			Current + 6 years		Official - Sensitive	Secure
8.1.5	FS	Revenues & Benefits	Actual Housing & Council Tax claim records			Current + 6 years		Official - Sensitive	Secure
8.1.6	FS	Revenues & Benefits	Government returns (DHP, mid-year and final subsidy returns)			Current + 6 years		Official - Sensitive	Secure
8.1.7	FS	Revenues & Benefits	Customer Information System (CIS) – client records			18 months		Official - Sensitive	Secure
8.1.8	FS	Revenues & Benefits	Case closed - no investigation conducted or no fraud established. (includes physical evidence gathered, interview tapes and electronic information held on Civica)			2 years from completion of the investigation.	Criminal Procedure and Investigations Act 1996 Codes of Practice (Part 5) and Department of Work and Pensions Guidance.	Official - Sensitive	Secure
8.1.9	FS	Revenues & Benefits	Case closed - fraud established but no further action to be taken			2 years	Criminal Procedure and Investigations Act 1996 Codes of Practice (Part 5) and Department of Work and Pensions Guidance.	Official - Sensitive	Secure
8.1.10	FS	Revenues & Benefits	Case closed – sanction applied. This could be a caution, administration penalty or prosecution for an offence (including physical evidence gathered, interview tapes and electronic information held on Academy)			6 years from date of case closure		Official - Sensitive	Secure

8.1.11	FS	Revenues & Benefits	Case closed – prosecution for an offence but individual is then acquitted (including evidence gathered, interview tapes and electronic information held on Civica)			2 years from date of acquittal.		Official - Sensitive	Secure
8.1.12	FS	Revenues & Benefits	QB50 notebooks			5 years from date of completion	Criminal Procedure and Investigations Act 1996 Codes of Practice (Part 5) and Department of Work and Pensions Guidance.	Official - Sensitive	Secure
8.1.13	FS	Revenues & Benefits	Vehicle Information and Communications System (VICS) visiting records			Current year + 6 years	DWP requirement	Official - Sensitive	Secure
8.2	FS	Revenues	Business rates & Council Tax correspondence						
8.2.1	FS	Revenues & Benefits	Records relating to the billing, collection and recovery of council tax, business rates and Business Improvement District Levy due to be collected by the council and prevention of fraud.	Notices, objections, applications, correspondence, rate certificates, notices of acquisition and disposition, property files, appeals	7 years after last action		Limitation Act (1980) Section 4A (5)	Official	Secure
Section 9 - Internal Audit									
9.1	FS	Internal	Core audit files and reports – hard copy.			Current + previous audit.		Official - Sensitive	Secure
9.2	FS	Internal	Core audit files and reports – electronic.			Current + last 3 audits.		Official - Sensitive	Secure
9.3	FS	Internal	Non-Core audit files and reports – hard copy.			Current year only.		Official - Sensitive	Secure
9.4	FS	Internal	Non-Core audit files and reports – electronic.			Current + previous audit.		Official - Sensitive	Secure
9.5	FS	Internal	Allegations with no further action taken.			Retain for a period of 1 year.		Official - Sensitive	Secure
9.6	FS	Internal	Investigation files including electronic records where			Retain for a period of 2 years following the conclusion of the		Official - Sensitive	Secure
9.7	FS	Internal	Investigation files including electronic records where			Retain for a period of 2 years following the conclusion of the		Official - Sensitive	Secure
9.8	FS	Internal	Investigation files including electronic records			Retain for a period of 5 years following the acceptance of the		Official - Sensitive	Secure
9.9	FS	Internal	Investigation files including electronic records			Retain for a period of 5 years following the acceptance and		Official - Sensitive	Secure
9.1	FS	Internal	Investigation files including electronic records			Retain for a period of 7 years following the successful		Official - Sensitive	Secure
9.11	FS	Internal	Investigation files including electronic records			Retain for a period of 7 years following the disciplinary action		Official - Sensitive	Secure
9.12	FS	Internal	RIPA Surveillance Records and QB50 pocket			Retain for 5 years from the date of the last entry.		Official - Sensitive	Secure
9.13	FS	Internal	Audit Management Files.	Strategic Audit Plan, Reports to Committee.		Current + 2 years.		Official - Sensitive	Secure
9.14	FS	Internal	Audit Charter & Strategy.			Current + 1 year.		Official - Sensitive	Secure
9.15	FS	Internal	Audit Manual.			Current only.		Official - Sensitive	Secure
9.16	FS	Internal	CIPFA matrices.			Current + 1 year where a new version has been released.		Official - Sensitive	Secure
Section 10 - Procurement, quotations and tendering									
10.1	FS	Procurement	Pre-contract advice						
10.1.1	FS	Procurement	The process of calling for and evaluating expressions of interest.	Pre Qualification Questionnaire (PQQ) PQQ evaluation spreadsheet		Destroy 6 months after contract let or not proceeded with.	RGLA 4.5	Official	Secure
10.2	FS	Procurement	Specification and contract development						
10.2.1	FS	Procurement	Tender Specification	Invitation to quote or tender including specification. Note: For project files containing drafts leading to a final version these records can be destroyed.		1 year after contract has been completed		Official	Secure
10.3	FS	Procurement	Tender issuing and return						
10.3.1	FS	Procurement	Return of Tender process and tender opening	Opening Record Book Tender Envelope		Indefinite Forms part of main contract	Limitation Act (1980) Section 4A (5) RGLA 4.7	Official	Archive Secure
10.4	FS	Procurement	Evaluation of tender						
10.4.1	FS	Procurement	Summary tender evaluation criteria	Evaluation spreadsheet		Destroy at end of contract or after 6 months Contracts Under Seal – paper copy Destroy 12 years after the terms of contract have expired Electronic Copies of both types. Retain for 12 years (Statutory)	Limitation Act (1980) Section 4A (5)	Official	Secure
10.4.2	FS	Procurement	Successful Tender Document	Tender Documents Quotations		Ordinary Contracts – Paper copy Destroy 1 year after the terms of contract or any warranties have expired Contracts Under Seal – paper copy Destroy 12 years after the terms of contract have expired Electronic Copies of both types. Retain for 12 years (statutory)	Limitation Act (1980) Section 4A (5) Limitation Act (1980) Section 4A (5)	Official	Secure Secure
10.4.3	FS	Procurement	Unsuccessful Tender Document	Tender documents Quotations		Destroy at end of contract or 3 years after start of contract. Whichever is soonest.	RGLA 4.10	Official	Secure
10.5	FS	Procurement	Post tender negotiation						
10.5.1	FS	Procurement	The process in negotiation of a contract after a preferred tender is selected	Clarification of contract Post tender negotiation minutes		To be kept as part of the contract	Limitation Act (1980) Section 4A (5) Limitation Act (1980) Section 4A (5)	Official	Secure Secure
10.6	FS	Procurement	Awarding of contract						
10.6.1	FS	Procurement	The process awarding of contract	Under £100k. Purchase Order Over £100k. Signed contract		Current + 6 years in accordance with Financial Regulations Contracts Under Seal – paper copy Destroy 12 years after the terms of contract have expired Electronic Copies of both types. Retain for 12 years (Statutory)	Limitation Act (1980) Section 4A (5) Limitation Act 1980 Section 8	Official	Secure Secure
10.7	FS	Procurement	Contract management						
10.7.1	FS	Procurement	Contract management operation and monitoring	Service Level Agreements Contract and Statistical Monitoring Reports Complaints Disputes on payment		6 months after the terms of contract have expired	Limitation Act (1980) Section 4A (5)	Official	Secure
10.7.2	FS	Procurement	Amendment of contract	Minutes and papers of meetings Changes to requirements Variation forms Extension of contract		To be passed to Legal services to be stored with the contract.	Limitation Act 1980 Section 8	Official	Secure
Section 11 - Finance (This Schedule is also part of the Council's Financial Regulation. All are Current Year + 6 years unless otherwise indicated).									
11.1	FS	Accountancy	Accounts & audit reporting						
11.1.1.	FS	Accountancy	Records for the process of consolidating financial transactions on an annual basis for corporate reporting purposes	Consolidated annual reports and financial statements Statement of financial position Operating statements General ledger Grant claims / returns		Current Year + 6 years	Limitation Act (1980) Section 4A (5) HMRC - Compliance Handbook Manual CH15400	Official	Secure

11.1.2	FS	Accountancy	Process that supports and consolidates financial transactions on a periodic less than annual basis, superseding those from the previous period. NOT journals, subsidiary ledgers or cash books	Consolidated monthly and quarterly reports & financial statements Working papers for the above Monthly accrual statements Cashflow statements Creditor listings and reports Debtor listings & reports					Official	Secure
11.2 FS Accountancy Financial transactions management										
11.2.1	FS	Accountancy	Management of the approvals process for purchase, including investigations	Appointments & delegations Audit investigations		Current Year + 6 years		Limitation Act (1980) Section 4A (5) Local Government Finance Act 1992 HMRC - Compliance Handbook Manual CH15400	Official	Secure
11.2.2	FS	Accountancy	Identification of the receipt, expenditure and write offs of public monies	Allowances, Creditors of Payroll Overpayments,		Where retained for reconciliation purposes. Merchant copies of credit/debit card receipts must not contain the full 16 digit PAN number. All but the last 4 digits of the PAN must be obscured as soon as the receipt is printed.			Official	Secure
	FS	Accountancy		Merchant copies of credit/debit card receipts					Official	Secure
	FS	Accountancy		Write off schedules		Indefinitely			Official	Archive
11.2.3	FS	Accountancy	Process for the provision and support for individuals using public transport	Applications, Card issue, Rail warrants		6 years after the conclusion of the financial transaction that the record supports			Official	Secure
11.2.4	FS	Accountancy	Processes that balance & reconcile financial accounts	Reconciliation (including bank) Summaries of accounts					Official	Secure
11.3 FS Accountancy Financial provisions, budgets and estimates										
11.3.1	FS	Accountancy	Process of finalising council's annual budget	Annual budget	6 years after annual budget adopted by council	Current Year + 6 years		Limitation Act (1980) Section 4A (5)	Not protectively marked	Dispose
11.3.2	FS	Accountancy	Process of developing council's annual budget	Draft budgets, Departmental budgets, Draft estimates					Official	Secure
11.3.3	FS	Accountancy	Process of reporting which examines the budget in relation to actual revenue and expenditure	Monthly statements		Destroy after next year's annual budget has been adopted by council			Official	Secure
11.4 FS Treasury Loans and investments										
11.4.1	FS	Treasury	Borrowing money to enable the council to perform its functions and exercise its powers	Loan files	7 years after the loan has been repaid	Current Year + 6 years		Limitation Act (1980) Section 4A (5)	Official	Secure
	FS	Treasury		PWLB Year End Statements		Current Year + 6 years			Official	Secure
11.4.2	FS	Treasury	Summary management of loans	Loan certificates and registers		5 years			Official	Secure
11.4.3	FS	Treasury	Investing money to generate income.	Investment files		6 years after the investment has been repaid		The Money Laundering Regulations 2007 No. 2157. Section 19(1)	Official	Secure
11.4.4	FS	Treasury	Summary management of investments	Investment certificates and registers		6 years			Termination + 5 years	Official
11.5 FS Accountancy Housing										
11.5.1	FS	Accountancy	Mortgages	Mortgage agreements		Last payment + 6 years if signed		Limitation Act (1980) Section 4A (5)	Official	Secure
	FS	Accountancy		Correspondence		Last payment +12 years if unsigned			Official	Secure
11.5.2	FS	Accountancy	"Right to Buy"	Agreement concerning sale		2 years after sale of house			Official	Secure
11.5.3	FS	Accountancy	Home Improvement Grants	Agreement to pay loan		6 years after last payment for grants under £50,000			Official	Secure
	FS	Accountancy		Details of payments		12 years for over £50,000			Official	Secure
11.6 FS Accountancy Council Tax valuation										
11.6.1	FS	Accountancy	The valuation of rateable land within a municipal district for the purpose of the making of the rate	Valuation lists		Valuation lists-Permanent.		Limitation Act (1980) Section 4A (5)	Official	Secure
	FS	Accountancy		Correspondence		10 years after the year in which the valuation was made			Official	Secure
	FS	Accountancy		Objections					Official	Secure
	FS	Accountancy		Reports					Official	Secure
11.7 FS Accountancy Property history										
11.7.1	FS	Accountancy	Recording of information for rateable properties identifying the person or company rated, value of the property. Note: records containing primarily accounts information and not being a source of property history, should be disposed of according to the appropriate record class within the Accounts & Audit function	Rate books		7 years.		Limitation Act (1980) Section 4A (5)	Official	Secure
	FS	Accountancy		Rate cards		Tenants Details 20 years			Official	Secure
	FS	Accountancy		Register of rateable properties					Official	Secure
11.8 FS Accountancy Summary assets management										
11.8.1	FS	Accountancy	See Property Management for real property assets. (Section 15)							
	FS	Accountancy	See Transport Management for vehicle assets. (Section 15)							
11.8.2	FS	Accountancy	Summary management reporting on the overall assets of the local authorities	Schedules of acquisitions		5 years		Limitation Act (1980) Section 4A (5)	Official	Secure
	FS	Accountancy		Consolidated current asset reports					Official	Secure
	FS	Accountancy		Annual reports					Official	Secure
	FS	Accountancy		Summary of current assets		6 years after disposal of item/asset or last one in register			Official	Secure
	FS	Accountancy		Asset registers					Official	Secure
11.9 FS Accountancy Asset monitoring and maintenance										
11.9.1	FS	Accountancy	Management systems that allow the monitoring & management of assets in summary form	Subsidiary asset registers		10 years after the conclusion of the financial transaction that the record supports		HMRC - Compliance Handbook Manual CH15400	Official	Secure
11.9.2	FS	Accountancy	Reporting and reviewing assets status	Returns & reports on asset status		2 years after administrative use is concluded			Official	Secure
	FS	Accountancy		Inventories					Official	Secure
	FS	Accountancy		Stocktaking					Official	Secure
	FS	Accountancy		Acquisition and disposal reports & proposals					Official	Secure
11.9.3	FS	Accountancy	Process of maintaining assets			7 years			Official	Secure
11.9.4	FS	Accountancy	Process of maintaining plant & equipment	Service records, Plant files					Official	Secure
11.10 FS Treasury Bank records										
11.10.1	FS	Treasury	Records related to banking and cheques	Cheques and associated records types, Paid and Presented Lists, Cheque numbers, Cancelled, Dishonoured, Stoppage of cheque, Record of open cheque books, Record of cheques drawn for payment, Bank deposits, Bank deposit book/slip/butts, Bank deposit summary sheets. Summaries of daily banking, cheque schedules, Register of cheques lodged for collection, Reconciliation files/sheets, Unpaid cheques, Daily list of paid cheques		Current Year + 6 years		HMRC - Compliance Handbook Manual CH15400	Official	Secure
11.10.2	FS	Treasury	Bank statements	Periodic reconciliation					Official	Secure
	FS	Treasury		Bank certificates of balance					Official	Secure
11.10.3	FS	Treasury	Electronic banking and electronic funds transfer						Official	Secure

11.10.4	FS	Treasury	Cash transactions, payment instructions, deposits and withdrawals					Official	Secure
11.10.5	FS	Treasury	Securitor Records					Official	Secure
11.11	FS	Accountancy	Expenditure records including accounts payable						
11.11.1	FS	Accountancy	Records relating to expenditure	Cash books/sheets, Expenditure sheets, Petty cash records, Record/book/sheet/receipts, Postal cash book/ sheets, postage/courier account/cash records, Register of postage expenditure, Creditors history records, lists/reports, Credit notes, Postage paid records, postage books/sheets, Summary cash books	Current Year + 6 years		HMRC - Compliance Handbook Manual CH15400		
11.11.2	FS	Accountancy		Statements of accounts outstanding, outstanding	2 years			Official	Secure
11.12	FS	Accountancy	Ledger records						
11.12.1	FS	Accountancy	Records relating to general and subsidiary ledgers produced for preparing certified financial statements or published information	Budget Book Statement of Accounts	Indefinitely		HMRC - Compliance Handbook Manual CH15400	Official	Archive
11.12.2	FS	Accountancy		Other ledgers e.g. contracts, costs, purchases, etc, Creditors ledgers, Related records, Audit sheets – ledger postings / transfers, Journals prime records for the raising of charges, Journals routine adjustments, Trial balances & reconciliation, Year-end balances, reconciliation and variations to support ledger balances and published accounts	Current Year + 6 years			Official	Secure
11.13	FS	Accountancy	Receipts and revenue records						
11.13.1	FS	Accountancy	Receipt butts/books; office copies of receipts.	Cashiers', cash register, fines and costs, sale of publications and general receipt books/butts/records	Current Year + 6 years		HMRC - Compliance Handbook Manual CH15400	Official	Secure
11.13.2	FS	Accountancy	Cash registers	Butts/copies of cash register forms, Cash register reconciliation sheets, Cash register audit rolls, Analysis and summary records, Cash register reading books/sheets				Official	Secure
11.13.3	FS	Accountancy	Revenue records	Revenue cash books /sheets/records; receipt cash books/sheets				Official	Secure
11.13.4	FS	Accountancy	Debtors invoices – includes invoices paid and					Official	Secure
11.13.5	FS	Accountancy	Source documents/records used for raising of					Official	Secure
11.13.5	FS	Accountancy	Debts/refunds	Records relating to unrecoverable revenue, debts and overpayments – include register of debts written off, register of refunds, etc				Official	Secure
11.14	FS	Accountancy	Stores and services records						
11.14.1	FS	Accountancy	Stores records	Delivery dockets Stock/stores control cards/sheets/records	2 years		Limitation Act (1980) Section 4A (5)	Official	Secure
11.14.2	FS	Accountancy	Stock/stores issue	Goods inwards books, records, Purchase order records, Purchase order books/records, Railway/courier consignment books/records, Stock transfer forms	6 years after disposal of item/asset, or last one in register				
11.14.3	FS	Accountancy	Assets	Requisition records, Asset registers, Assets/equipment	3 years			Official	Secure
11.14.4	FS	Accountancy	Financial statements	Ad Hoc Statements Statements/summaries prepared for inclusion in the quarterly and annual reports	1 year			Official	Secure
11.14.5	FS	Accountancy	Periodic financial statements prepared for management on a regular basis		2 years Destroy when cumulated into quarterly or annual reports			Official	Secure
11.15	FS	Accountancy	Systems management						
11.15.1	FS	Accountancy	Process to develop or extend the capabilities of a system.		Retain for life of system		RGLA 8.11	Official	Secure
11.15.2	FS	Accountancy	Process to implement a system.	Implementation plan	Review 6-12 months after Implementation			Official	Secure
11.15.3	FS	Accountancy	Process to support and administer a system.		5 years after last action			Official	Secure
11.16	FS	Accountancy	Transport management						
11.16.1	FS	Accountancy	Acquisition and disposal of vehicles through lease or purchase	Leases, Contracts, Quotes, Approvals Fleet authorisation numbers	7 years after the disposal of the vehicle	Destroy 6 years after disposal of the vehicle Destroy 6 years after disposal of the vehicle	Limitation Act (1980) Section 4A (5)	Official	Secure
11.16.2	FS	Accountancy	Managing allocation & maintenance of vehicles	Approvals as drivers Allocations & authorisations for vehicles Maintenance	7 years after the sale or disposal of the vehicle	Destroy 7 years after disposal of the vehicle Destroy 7 years after disposal of the vehicle	RGLA 8.15 RGLA 8.15	Official	Secure
11.16.3	FS	Accountancy	Recording vehicle usage	Vehicle usage reports	18 months – VOSA 7 years HMRC	Termination + 6 years	Limitation Act (1980) Section 4A (5)	Official	Secure
11.16.4	FS	Accountancy	Recording drivers usage	Vehicle log book	18 months – VOSA 7 years HMRC	Termination + 6 years		Official	Secure
11.17	FS	Accountancy	Insurance policy management						
11.17.1	FS	Accountancy	Summary management of insurance arrangements	Insurance register	Indefinite		Limitation Act 1980 (Section 2)	Official	Archive
11.17.2	FS	Accountancy	Insuring council officers, property, vehicles and equipment against negligence, loss or damage	Insurance policies Correspondence Schedules Valuations	Indefinite			Official	Archive
11.17.3	FS	Accountancy	Renewing insurance policies	Insurance policy Renewal records Correspondence	5 years after the insurance policy has been renewed			Official	Secure
11.17.4	FS	Accountancy	Insurance Claims Management	Claims records	7 years after all obligations/entitlements are concluded, allowing for the claimant to reach 25 years of age			Official	Secure
11.17.4	FS	Accountancy	Process that records insurance claims against the	Correspondence				Official	Secure
Section 12 - Legal Services									
12.1	CE	Legal	Data Protection Act						
12.1.1	CE	Legal	Data subject access requests		3 years (6 years for Tribunal or ICO decision)		TNA Retention and Disposal Guidance	Official - Sensitive	Secure

12.1.2	CE	Legal	All paperwork relating to informal advice given about freedom of information and data protection matters		3 years (6 years for Tribunal or ICO decision)			Official	Secure
12.1.3	CE	Legal	System containing all information relating to the logging, tracking and monitoring of subject access requests made under the Data Protection Act 1998		3 years (6 years for Tribunal or ICO decision)			Official - Sensitive	Secure
12.2	CE	Legal	Environmental Information Regulations						
12.2.1	CE	Legal	Information requests and responses	All paperwork relating to responses to Environmental Information Regulations	3 years (6 years for Tribunal or ICO decision)		TNA Retention and Disposal Guidance	Official	Secure
12.3	CE	Legal	Freedom of Information Act						
12.3.1	CE	Legal	Publication Scheme		Dynamic document and each version will replace the next		TNA Retention and Disposal Guidance	Not protectively marked	Disposal
12.3.2	CE	Legal	Freedom of information requests		3 years (6 years for Tribunal or ICO decision)			Official	Secure
12.3.3	CE	Legal	All paperwork relating to responses to freedom of information requests		3 years (6 years for Tribunal or ICO decision)			Official	Secure
12.3.4	CE	Legal	All records relating to internal reviews of responses to requests for information made under the Freedom		3 years (6 years for Tribunal or ICO decision)			Official	Secure
12.3.5	CE	Legal	All records relating to complaints made about responses to requests for information made under the Freedom of Information Act 2000, the Environmental Information Regulations 2004 and the Data Protection Act 1998		3 years (6 years for Tribunal or ICO decision)			Official - Sensitive	Secure
12.4	CE	Legal	General Data Protection Regulations						
12.4.1	CE	Legal	Privacy Impact assessments		3 years (6 years for Tribunal or ICO decision)		The National Archives Retention and Disposal Guidance	Official	Secure
12.4.2	CE	Legal	Data Protection Impact Assessments		3 years (6 years for Tribunal or ICO decision)			Official	Secure
12.4.3	CE	Legal	Right to be forgotten requests		3 years (6 years for Tribunal or ICO decision)			Official - Sensitive	Secure
12.4.4	CE	Legal	Privacy notices		3 years (6 years for Tribunal or ICO decision)			Official	Secure
12.4.5	CE	Legal	Breach notifications		3 years (6 years for Tribunal or ICO decision)		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
12.4.6	CE	Legal	Subject access requests		3 years (6 years for Tribunal or ICO decision)		The National Archives Retention and Disposal Guidance	Official - Sensitive	Secure
12.4.7	CE	Legal	Consent forms		3 years (6 years for Tribunal or ICO decision)			Official - Sensitive	Secure
12.4.8	CE	Legal	Record of Processing Activities under Article 30 of the GDPR		3 years (6 years for Tribunal or ICO decision)			Not protectively marked	Secure
12.5	CE	Legal	Regulation of Investigatory Powers						
12.5.1	CE	Legal	Records relating to the Regulation of Investigatory Powers	Photographs, Audio and video files, Observation logs, notes, reports, Noise monitoring records, Council Authorisations, Magistrates' Court approvals, Applications, renewals and cancellations for CHIS, Applications, renewals and cancellations for surveillance, Risk assessments, Appeals		5 years	Regulation of Investigatory Powers Act 2000	Official - Sensitive	Secure
12.6	CE	Legal	All case and advice files						
12.6.1	CE	Legal	Working files and papers.	Section 106 agreements, TPO's, Leases, licences and general matters.	6 years.		Limitation Act (1980) Section 4A (5)	Official	Secure
12.7	CE	Legal	Litigation						
12.7.1	CE	Legal	The process of managing, undertaking or defending for or against litigation on behalf of the council	Criminal case file Civil case file Correspondance	7 years after last action.		Limitation Act (1980) Section 4A (5)	Official - Sensitive	Secure
12.7.2	CE	Legal	The process of providing legal advice on a point of law	Correspondance	7 years after last action			Official - Sensitive	Secure
12.8	CE	Legal	Agreements						
12.8.1	CE	Legal	Process of agreeing terms between organisations. Note: this does not include contractual agreements	Concordat	6 years after agreement expires or is terminated		Limitation Act (1980) Section 4A (5)	Official - Sensitive	Secure
12.9	CE	Legal	Conveyance - see also Property acquisition and disposal						
12.9.1	CE	Legal	Deeds of Title	Deeds of Covenant	Permanent		Limitation Act (1980) Section 4A (5)	Official	Archive
12.9.2	CE	Legal	The process of changing ownership of land or property	Conveyancing files	12 years after closure			Official	Secure
12.1	CE	Legal	Standards - investigation of complaints regarding conduct of district and parish councillors						
12.1.1	CE	Legal	Process of investigating complaints	Paper and electronic files containing personal details, family details, financial details, personal appearance	3 years			Official - Sensitive	Secure
Section 13 - Housing Services									
13.1	CE	Housing	Choice-Based Lettings & Housing Options service						
13.1.1	CE	Housing	All records relating to assessing applications for social housing, homelessness and other housing assistance	Contacts details, health and medical information, debt details, occupational support needs assessments, carer information, decisions letters	6 years		RGLA 3.26 Homelessness Reduction Act 2017	Official - Sensitive	Secure
13.1.2	CE	Housing	All records relating to housing advice and assistance to prevent or relieve homelessness and to assess homeless applications where A&A has been unsuccessful	Contacts details, health and medical information, debt details, occupational support needs assessments, carer information, decisions letters, MARAC and MAPPA info, NCSB1 forms	6 years		RGLA 3.26 Homelessness Reduction Act 2017	Official - Sensitive	Secure
13.1.3	CE	Housing	All records relating to the Custom Build register	Contact information, budget, housing preferences	Nothing in place	6 years		Official	Secure
13.1.4	CE	Housing	All records relating to the development of affordable housing	Contact information, research and comments on planning applications	Nothing in place	6 years		Official	Secure
13.1.5	CE	Housing	All records relating to repair enforcement	Contact information, land and property ownership, grants, tenancies and council tax status	6 years		Housing Act 2004, Building Act 1984, Energy Act 2013, Energy Act 2011, Environmental Protection Act 1990, Health Act 2006, Housing Act 1985, Housing and Planning Act 2016, Local Government (Miscellaneous Provisions) Act 1976, Public Health Act 1936, Housing and Planning Act 2016, Enterprise and Regulatory Reform Act 2013, Safeguarding	Official - Sensitive	Secure
13.1.6	CE	Housing	All records relating to harassment and illegal evictions	Contact information, land and property ownership, grants, tenancies and council tax status	6 years		Protection from Eviction Act 1977, Housing Act 2004, Caravan Sites Act 1968	Official - Sensitive	Secure
13.1.7	CE	Housing	All records relating to licensing of caravan sites	Contact information, land and property ownership, tenancies, council tax status, planning application details	Permanent			Official	Secure

13.1.8	CE	Housing	All records relating to complaints by tenants or residents	Contact information, complaint details	6 years			Official - Sensitive	Secure
13.1.9	CE	Housing	All records relating to unauthorised encampments	Contact information, tenancies, land and property ownership, health and medical, criminal records, planning application details	6 years		Criminal Justice and Public Order Act 1994, Notice to Quit (Council Land), Environmental Protection Act 1990	Official - Sensitive	Secure
13.1.10	CE	Housing	All records relating to licensing of Houses of Multiple Occupation	Houses of Multiple Occupation (HMO) direction order	Permanent		Housing Act 2004, Town and Country Planning Act, The Energy Efficiency (Private Rented Property) Regulations	Official - Sensitive	Secure
	CE	Housing		Compulsory purchase orders	Permanent			Official - Sensitive	Secure
	CE	Housing		Housing Act 2004 suspended Improvement / Prohibition Notices	Permanent			Official	Secure
	CE	Housing		Interim Management Orders	Permanent			Official	Secure
	CE	Housing		Empty Dwelling Management Orders	Permanent			Official	Secure
	CE	Housing		HMO declaration	Permanent			Official	Secure
	CE	Housing		HMO Licence certificates and conditions	Permanent			Official	Secure
	CE	Housing		Tenant or resident complaints	6 years			Official - Sensitive	Secure
13.1.11	CE	Housing	All records relating to housing assistance and grants	Contacts information, health and medical, grants and benefits, tenancies, land and property ownership, council tax status, planning application details, financial data	6 years		Housing Grants Construction and Regeneration Act 1996, Regulatory Reform (Housing Assistance) (England and Wales) Order 2002	Official - Sensitive	Secure
13.1.12	CE	Housing	Care & Repair	Disabaled Facilities Grants, applications, case files, admin	6 years			Official - Sensitive	Secure
	CE	Housing		Land Charges information	For lifetime of the loan condition			Official - Sensitive	Secure
		Housing		Warranties	Damp proofing - 15 years Fensa - 10 years			Official - Sensitive	Secure
13.1.13	CE	Housing	Careline	Client records for Careline Community Alarm	To be deleted 6 months after account cancelled			Official - Sensitive	Secure
	CE	Housing		Client records for Ask LILY				Official - Sensitive	Secure
	CE	Housing		CCSS Benefits check, installation, faults, work scheduling	Auto-archives after 90 days			Official - Sensitive	Secure
	CE	Housing		Questionnaires within IDOX and SNAP	Permanent			Official - Sensitive	Secure
	CE	Housing		Ask LILY entries and referrals within Open Objects system	Awaiting response from provider			Official - Sensitive	Secure
	CE	Housing		Client contacts and emergency contacts within PNC call handling system	Awaiting response from provider			Official - Sensitive	Secure
	CE	Housing		Client data and marketing spreadsheet	Indefinite			Official - Sensitive	Secure
	CE	Housing		Referrals from Central Information Centre via eforms	Indefinite			Official - Sensitive	Secure
	CE	Housing		Orders placed with Amazon	Unknown			Official - Sensitive	Secure
	CE	Housing		Installation checklists, personal record forms and agreements	On DMS			Official - Sensitive	Secure
	CE	Housing		General email correspondance	Within Outlook			Official - Sensitive	Secure
	CE	Housing		NCAN common referral system details	7 years			Official - Sensitive	Secure
13.1.14	CE	Housing	All records relating to the Handy Person Scheme	Case files, admin	6 years			Official - Sensitive	Secure
Section 14 - Commercial Services									
14.1	CS	Business	Car parks						
14.1.1	CS	Business Operations	Excess Charge Payments	Enforcement notices, Letters, Court/tribunal records, Bailiff records	1 year. Destroy - 2 years after certificate has expired or penalty payment has been made or the matter has been finished or correspondence on the matter has ceased.		RGLA 9.23	Official	Secure
14.1.2	CS	Business	Long Tern Season Tickets	Application Forms	Destroyed on Expiry			Official	Secure
14.1.3	CS	Business	Penalty Charge notices	Road Traffic Regulation Act 1984	7 years			Official	Secure
14.1.4	CS	Business	Excess Charge Posting Reports		7 years			Official	Secure
14.1.5	CS	Business	Monthly Transaction Reports		7 years			Official	Secure
14.1.6	CS	Business	Ticket Machine Audit	Tickets and corresponding details	7 years			Official	Secure
14.1.7	CS	Business	Cash Count Slips		7 years			Official	Secure
14.1.8	CS	Business	Car Park Work Instructions		7 years		RGLA 11.6	Official	Secure
14.1.9	CS	Business Operations	Car Parking Permits	Permits, Suspensions, Dispensations, Skip licenses	Destroy - 2 years after registration or entitlement lapses		RGLA 9.16	Official	Secure
14.1.10	CS	Business Operations	Abandoned vehicles - Enforcement against vehicles which deemed to have been abandoned	Enforcement notices, Letters, Business records	Destroy - 2 years after certificate has expired or penalty payment has been made or the matter has been finished or correspondence on the matter has ceased		RGLA 9.23	Official	Secure
14.2	CS	Business	Cemeteries and crematoria						
14.2.1	CS	Business	Statutory documentation	Certificate of Medical Attendance	Original - 2 years			Official - Sensitive	Secure
	CS	Business		Electronic - Indefinitely				Official - Sensitive	Archive
14.2.2	CS	Business	Summary management systems that record the location of burials and identity of deceased individuals	Register of interments	Burial records kept indefinitely	Permanent. Consider for Historic Records	Cemeteries Clauses Act 1847 (c.65) Section 53	Official - Sensitive	Archive
	CS	Business		Cemetery register		Permanent. Consider for Historic Records	Cemeteries Clauses Act 1847 (c.65) Section 41	Official - Sensitive	Archive
	CS	Business		Cemetery plans		Permanent. Consider for Historic Records	Cemeteries Clauses Act 1847 (c.65) Section 53	Official - Sensitive	Archive
14.2.3	CS	Business Operations	Application for cremation and any certificates or other documents relating to a cremation		Destroy 15 Years after creation		Cremation (England and Wales) Regulations 2008 No. 2841 section 34	Official - Sensitive	Secure
14.2.4	CS	Business	Bookings and applications		Destroy 15 years after last action		In line with cremation records	Official - Sensitive	Secure

14.2.5	CS	Business	Burial plot layout		Permanent. Consider for Historic Records		Cemeteries Clauses Act 1847 (c.65) Section 41	Official - Sensitive	Archive
14.2.6	CS	Business	Cemetery plans		Permanent. Consider for Historic Records		Cemeteries Clauses Act 1847 (c.65) Section 41	Official - Sensitive	Archive
14.2.7	CS	Business	Cemetery register (register of interments)		Permanent. Consider for Historic Records		Cemeteries Clauses Act 1847 (c.65) Section 53	Official - Sensitive	Archive
14.2.8	CS	Business	Certificate of cremation		Destroy 15 years after last action		RGLA9.25	Official - Sensitive	Secure
14.2.9	CS	Business	Exhumations		Permanent		RGLA9.24	Official - Sensitive	Archive
14.2.10	CS	Business Operation s	Grant of exclusive rights of burial and register of grants		Permanent		Cemeteries Clauses Act 1847 (c.65). Section 43	Official - Sensitive	Archive
14.2.11	CS	Business Operation s	Memorial Inspection records: risk assessments, visual inspection forms, hand test record, force testing equipment record, recommendations		Destroy 6 years from the last amendment when superseded		Health & Safety at Work Act (1974) Section 2 (3)	Official - Sensitive	Secure
14.2.12	CS	Business Operation s	Register of cremations including of a stillborn child, foetus or body parts.		Permanent		Cremation (England and Wales) Regulations 2008 No. 2841 sections 32 & 33	Official - Sensitive	Archive
14.2.13	CS	Business	Right to erect headstone		Permanent			Official - Sensitive	Archive
14.2.14	CS	Business Operation s	Working procedure for memorial inspections		Destroy 6 years from the last amendment when superseded		Health & Safety at Work Act (1974) Section 2 (3)	Official - Sensitive	Secure
14.3	CS	Public	Waste management						
14.3.1	CS	Public Open Space	Records relating to the processing of brown bin applications	Electronic and paper records containing customer name, address and contact details. Whitespace software records - Kier/client Brown bin database	Ongoing		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
14.3.2	CS	Public	Records relating to assisted bin collections	Electronic and paper records containing customer	Ongoing		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
14.3.3	CS	Public Open Space	Records relating Black bins, applications, Green Bin applications, Outdoor food caddy applications, Indoor food caddy applications, sack applications, lost bins, bin removals & additional bins	Electronic and paper records containing customer name, address and contact details. Whitespace software records - Kier/client Worksheets OneView records Green bin database Black bin database	?		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
14.3.4	CS	Public Open Space	Records relating to purchasing bins, sacks, litter bins & stationary	Orders, quotations, invoices, delivery notes	?		Limitation Act 1980 (Section 2)	Official	Secure
14.3.5	CS	Public Open Space	Records relating to Commercial Services - Trade Waste	Electronic and paper records containing customer name, address and contact details. Whitespace software records - Kier/client	Indefinitely		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
14.3.6	CS	Public	Records relating to stray dogs	Name of dog/owner, address, contact phone number,	3 years		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
14.3.7	CS	Public	Records relating to all communications from the	Case records	Deleted on completion of work		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
14.3.8	CS	Public	Records relating to tree enquiries	Case records	In accordance with retention policy		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
14.3.9	CS	Public	Records relating to consultation on planning	Case records	Generally indefinitely		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
14.3.10	CS	Public	Records relating to supplier/contractor invoicing	Supplier/contractor accounts	?		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
14.3.11	CS	Public	Records relating to reporting fly tipping / dog fouling /	Case records on Idox and One View	?		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
14.3.12	CS	Public Open Space	Records relating to allotments	Application forms Tenants Information / Tenancy agreements / Notices / Terminations	?		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
14.3.13	CS	Public	Records relating to Adopt a Bedders scheme	Scheme membership files	For as long as scheme runs		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
14.3.14	CS	Public Open Space	Records relating to Friends of the HHG Group	Project files Contact and membership list	As long as the project runs		Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
14.3.15	CS	Public	Waste transfer notes - commercial waste	Bulk annual notes	Current year +2		RGLA 9.26	Official	Secure
14.3.16	CS	Public	Waste transfer notes - household waste	Bulk annual notes	Contract +2		RGLA 9.26	Official	Secure
14.3.17	CS	Public	Weighbridge tickets - non-recyclable waste	Individual notes (contractor)	Current year +2		RGLA 9.26	Official	Secure
14.3.18	CS	Public Open Space	Weighbridge Tickets - recyclable waste	Individual notes (Council Copy)	Not retained as required to be passed to County for Recycling Credits		RGLA 9.26	Official	Secure
14.3.19	CS	Public	Commercial waste contracts	Contract document (electronic or paper)	Contract period +6		RGLA 9.26	Official	Secure
14.3.20	CS	Public	Garden Waste Contracts - household waste	Electronic details	Contract period +1		RGLA 9.26	Official	Secure
14.3.21	CS	Public	Bring Sites Agreements - household waste	Agreement (electronic or paper)	Agreement +2		RGLA 9.26	Official	Secure
14.3.22	CS	Public	Waste Carriers Licence	Licence	Licence period +6		RGLA 9.26	Official	Secure
14.3.23	CS	Public	Waste Collection Contracts - contract documents	Contract	Contract Period +6		RGLA 9.26	Official	Secure
14.3.24	CS	Public	Waste Collection Contracts - contract documents	Work instructions (Paper)	Current +2		RGLA 9.26	Official	Secure
14.3.25	CS	Public	Waste Collection Contracts - contract documents	Work instructions (Electronic)	Contract +6		RGLA 9.26	Official	Secure
14.3.26	CS	Public	Waste Collection Contracts	Formal Correspondence	Contract +6		RGLA 9.26	Official	Secure
14.3.27	CS	Public Open Space	Hazardous Waste Collections - household waste	Invoice electronic	Current +3		The Hazardous Waste (England and Wales) Regulations 2005 No. 894 Section 49	Official	Secure
Section 15 - Property, land management and projects									
15.1	CS	Property	Property and land management						
15.1.1	CS	Property	Reports to management on overall property of the council	Consolidated property & buildings annual reports	6 years after the conclusion of the financial year in which the records were created		Limitation Act (1980) Section 4A (5)	Official	Secure
	CS	Property		Summary of leased property				Official	Secure
	CS	Property		Summary of owned property				Official	Secure
	CS	Property		Site register				Official	Secure
	CS	Property		Register of leases				Official	Secure
15.1.2	CS	Property	Asbestos register			Permanent	The Control of Asbestos Regulations 2006 SI 2006 2739	Official	Secure
15.1.3	CS	Property	Process to determine the presence of asbestos	Documented assessments to determine the presence of asbestos	Elimination of asbestos plus 5 years.		Limitation Act 1980	Official	Secure
15.1.4	CS	Property	Electrical installation certificates relating to individual properties			Whole life of the installation + 6 years	Limitation Act 1980 (Section 2)	Official	Secure
15.1.5	CS	Property	Fire Certificates			Date certificate expires + 6 years	The Regulatory Reform (Fire Safety) Order 2005	Official	Secure
15.1.6	CS	Property	All records relating to energy management in council buildings		Current year + 6 years		Limitation Act (1980) Section 4A (5)	Official	Secure
15.2	CS	Property	Property development and renovation						
15.2.1	CS	Property	Management of all other buildings and estates	Project specifications plans	Retain for life of property or until sold		Limitation Act (1980) Section 4A (5)	Official	Secure

	CS	Property		Installation manuals				Official	Secure
	CS	Property		Certificates of approval				Official	Secure
15.2.2	CS	Property	Process of development and renovation of property	Work orders	7 years after the conclusion of the transaction that the record supports			Official	Secure
	CS	Property		Tender documents				Official - Sensitive	Secure
	CS	Property		Conditions of contracts				Official - Sensitive	Secure
15.3	CS	Property	Bills of quantity						
15.3.1	CS	Property	Bills of quantities - project files		Review 12 years after project completion		Limitation Act (1980) Section 4A (5)	Official	Secure
15.4	CS	Property	Schedules of known tenant alterations						
15.4.1	CS	Property	Tenant alterations		Retain until property sold.		Limitation Act (1980) Section 4A (5)	Official	Secure
15.5	CS	Property	Property acquisition and disposal						
15.5.1	CS	Property	See also Conveyance	Plans	QA PMP3 Files retained for 10 years. Offer material re major/significant properties to Archivist for review		Limitation Act (1980) Section 4A (5)	Official	Secure
	CS	Property	Management of the acquisition by financial lease of purchase process for real property.					Official	Secure
15.5.2	CS	Property	Management of the disposal by sale or transfer for real property	Legal documents relating to the sale	QAPMP2 (Competitive Sale) Files retained for 10 years after sale.			Official - Sensitive	Secure
	CS	Property		Particulars of sale documents	QAPMP5a/b (Right to Buy) Sale records retained indefinitely and held in deed packet			Not protectively marked	Dispose
	CS	Property		Tender documents				Official - Sensitive	Secure
	CS	Property		Conditions of contracts				Official - Sensitive	Secure
15.6	CS	Property	Tests and statutory certificates						
15.6.1	CS	Property	Tests and Statutory Certificates		12 years after expiry or when superseded		Limitation Act (1980) Section 4A (5)	Official	Secure
15.7	CS	Property	Planning consents and correspondence						
15.7.1	CS	Property	Alterations to buildings		Review 12 years after issue		RGLA 10.6	Official	Secure
	CS	Property	New buildings					Official	Secure
15.7.2	CS	Property	Listed buildings consents and correspondence		Review 12 years after issue			Official	Secure
15.7.3	CS	Property	Correspondence		Review 12 years after date of last paper			Official	Secure
	CS	Property	Consultants and Contractors					Official	Secure
15.7.4	CS	Property	Photographic records		Review 10 yrs after compilation			Official	Secure
15.7.5	CS	Property	Maintenance manuals		Review 2 years after revision or cancellation			Official	Secure
15.7.6	CS	Property	Maintenance Contracts		Review after 7 years after contract ends			Official	Secure
15.8	CS	Property	Major building projects						
15.8.1	CS	Property	Record set	Minutes & papers	Review 12 years after project completion		Limitation Act (1980) Section 4A (5)	Official	Secure
	CS	Property	All other copies					Official	Secure
15.8.2	CS	Property	Tender and evaluation papers		Successful review after 7 years			Official - Sensitive	Secure
	CS	Property			Unsuccessful review after 1 year			Official - Sensitive	Secure
15.9	CS	Property	Architectural						
15.9.1	CS	Property	Architectural		Life of building – CDM H&S File		RGLA 10.10 and RGLA 10.11	Official	Secure
15.9.2	CS	Property	Structural engineering		Life of building – CDM H&S File			Official	Secure
15.9.3	CS	Property	Mechanical and electrical engineering		Life of building – CDM H&S File			Official	Secure
15.9.4	CS	Property	Drainage services		Life of building – CDM H&S File			Official	Secure
15.9.5	CS	Property	Building condition surveys		Review 10 years after issue			Official	Secure
15.9.6	CS	Property	Quinquennial inspections		Review 15 years after issue			Official	Secure
15.9.7	CS	Property	Fire precautions and services		Life of building – CDM H&S File			Official	Secure
15.9.8	CS	Property	Asbestos inspections	Original surveys reports	Retain for life of building, review on disposal of building			Official	Secure
15.9.9	CS	Property	Conservation	Listed Building and Scheduled Ancient Monument	Review 12 years after issue			Official	Secure
	CS	Property	Historic & Listed Buildings	Consents				Official	Secure
15.9.10	CS	Property	Other specialist reports not referred to above		Review 12 years after compilation			Official	Secure
15.9.11	CS	Property	Buildings Records, Maps, Plans, & Drawings Site		Life of building – CDM H&S File			Official	Secure
15.9.12	CS	Property	Measured surveys		Review 10 years after compilation or on disposal of building			Official	Secure
15.9.13	CS	Property	Archaeological record		Review 25 years after compilation			Official	Secure
15.9.14	CS	Property	Design drawings		Life of building – CDM H&S File			Official	Secure
15.9.15	CS	Property	Perspective drawings		Review 5 years after compilation			Official	Secure
15.9.16	CS	Property	Working copies of above		Review 5 years after compilation			Official	Secure
15.9.17	CS	Property	Consultants and contractors drawings and		Life of building – CDM H&S File			Official	Secure
15.9.18	CS	Property	'As built' or 'as installed' drawings		Life of building – CDM H&S File			Official	Secure
15.9.19	CS	Property	Presentation records, include drawings, photographs,		Review 5 years after compilation			Official	Secure
15.9.20	CS	Property	Competition drawings		Review successful after 7 years			Official	Secure
	CS	Property			Review unsuccessful after 1 year			Official	Secure
15.9.21	CS	Property	Feasibility studies, preliminary designs and other		Indefinitely at least life of building			Official	Secure
15.9.22	CS	Property	Computer Aided Design CAD records		At least life of building			Official	Secure
15.9.23	CS	Property	Maintenance schedules		Review 10 years after final entry			Official	Secure
15.9.24	CS	Property	Maintenance diaries or logs		Review 10 years after final entry			Official	Secure
15.9.25	CS	Property	Installation surveys plant & services		Life of building – CDM H&S File			Official	Secure
15.9.26	CS	Property	Maintenance programme		Review 10 years after final entry			Official	Secure
15.9.27	CS	Property	Maintenance and operational manuals		Life of building – CDM H&S file			Official	Secure
15.9.28	CS	Property	Health and safety inspection reports		Until superseded			Official	Secure
15.9.29	CS	Property	Plant and equipment condition surveys		Review 10 years after final entry			Official	Secure
15.9.30	CS	Property	Maintenance contracts and related correspondence		Review 5 years after end of contract			Official	Secure
15.10	CS	Property	Meetings with contractors						
15.10.1	CS	Property	Agenda, minutes etc, record set	Agenda, minutes etc, other copies	Review 12 years after project completion		RGLA 10.11	Official	Secure
	CS	Property		Drafts, domestic arrangements etc				Official	Secure
15.10.2	CS	Property	Asbestos	Registers	Review 30 years after date of event			Official	Secure
15.10.3	CS	Property		Incidents-correspondence, reports and papers	Indefinitely, transfer to new freeholder on disposal			Official - Sensitive	Secure
15.10.4	CS	Property	Legal documents	Title deeds , other documents relating to freehold property – not public records, Leases signed copies, Memoranda of terms, Subletting agreements, Way leave agreements, Landlord's consents, Licences	Indefinitely in deed packet			Official - Sensitive	Secure
Section 16 - Regeneration and Corporate Projects									
16.1	CS	Regeneration	Economic development, Regeneration and Tourism – general files	Meeting notes, administration	Current year + 5 years			Official	Secure
16.2	CS	Regeneration	Economic and demographic data collected and	Data sets, reports, briefings	Current year + 6 years then review			Official	Secure
16.3	CS	Regeneration	International Relations: general files	Meeting notes, administration, twinning information, international trade visits	Current year + 12 years			Official	Secure
16.4	CS	Regeneration	Regeneration Grants	Applications, award notification, reports		Current year + 6 years	Limitation Act 1980 (Section 2)	Official	Secure

16.5	CS	Regeneration	Regeneration Project Files	Project meetings, business cases, presentations, appraisals		Closure of file + 12 years	Limitation Act 1980 (Section 2)	Official	Secure
16.6	CS	Regeneration	Development Contributions	Administration, confirmation of support, conditions and details of arrangements		Closure of file + 12 years	Limitation Act 1980 (Section 2)	Official	Secure
16.7	CS	Corporate Projects	Housing sales	Records relating to housing build and sales	5 years			Official - Sensitive	Secure
16.8	CS	Corporate Projects	Defects and remedies	Records relating to defects and remedies	5 years			Official - Sensitive	Secure
16.9	CS	Corporate Projects	Leasehold properties and maintenance	Records relating to lease hold flats and maintenance arrangements	Ongoing			Official - Sensitive	Secure
16.10	CS	Corporate Projects	Housing ancillary projects	Records relating to Heritage Lottery Fund, nature and other project work	Ongoing			Official - Sensitive	Secure
Section 17 - Environmental Health									
17.1	EP	EH - Commercial	Food, health and safety						
17.1.1	EP	EH - Commercial	Health & Safety notices	Health & Safety Act 1974, Regulations and Orders made thereunder.	Duration of notice + plus 6 years (insurance claims reasons)..		RGLA 9.3, Police and Criminal Evidence Act	Official	Secure
17.1.2	EP	EH - Commercial	Accident report forms	Health & Safety Act 1974	Current plus 3 years (insurance claims reasons).		RGLA 9.3	Official - Sensitive	Secure
17.1.3	EP	EH - Commercial	Food Poisoning results	Food & Safety Act 1990	3 years after all actions have been completed.		RGLA 9.3	Official - Sensitive	Secure
17.1.4	EP	EH - Commercial	All records relating to businesses that are trading	Contact details	6 years after closure			Official	Secure
17.2	EP	EH - Commercial	Licensing						
17.2.1	EP	EH - Commercial	Applications for individual, premises and vehicle licences.	Application forms, photos, correspondence etc	3 years after cease of individual/premises licence. 25 years for vehicle licence.		Various see below	Official	Secure
17.2.2	EP	EH - Commercial	Animal boarding licences		Destroy - 2 years after registration lapses		Animal Boarding Establishments Act 1963.	Official	Secure
17.2.3	EP	EH - Commercial	Animal breeding licences		Destroy - 2 years after registration lapses		Breeding of Dogs Acts 1973 and 1991, Breeding and Sale of Dogs (Welfare) Act 1999.	Official	Secure
17.2.4	EP	EH - Commercial	Animal Welfare - licensing files		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.5	EP	EH - Commercial	Butchers licences		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.6	EP	EH - Commercial	Caravan and camp site licences		Destroy - 2 years after registration lapses		Caravan Sites and Control of Development Act 1960 Caravan Sites Act 1968.	Official	Secure
17.2.7	EP	EH - Commercial	Cemetery licences		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.8	EP	EH - Commercial	Crematoria licences		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.9	EP	EH - Commercial	Dangerous wild animals licences		Destroy - 2 years after registration lapses		Dangerous Wild Animals Act 1976	Official	Secure
17.2.10	EP	EH - Commercial	Food hygiene and safety premises registration		Destroy - 6 years after registration lapses		Food Safety Food Premises (Registration) Regulations 1991	Official	Secure
17.2.11	EP	EH - Commercial	Hackney licences		Destroy - 25 years after registration lapses		Local Government (Miscellaneous provisions) Act 1976	Official	Secure
17.2.12	EP	EH - Commercial	Highway projection licences		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.13	EP	EH - Commercial	Hoarding licences		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.14	EP	EH - Commercial	Infectious diseases licensing		Destroy - 3 years after registration lapses		RGLA 9.16	Official	Secure
17.2.15	EP	EH - Commercial	Late hours catering licences		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.16	EP	EH - Commercial	Liquor licences		Destroy - 6 years after registration lapses		RGLA 9.16 Based on 6 years legal proceedings time limit.	Official	Secure
17.2.17	EP	EH - Commercial	Lottery (gambling) - licensing files		Review every 3 years		Licensing Act 2003. Section 8: Requirement to keep a register	Official	Secure
17.2.18	EP	EH - Commercial	Lottery registration		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.19	EP	EH - Commercial	Massage and special treatment licences		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.20	EP	EH - Commercial	Non medicinal poisons licences		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.21	EP	EH - Commercial	Nursing agencies licences		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.22	EP	EH - Commercial	Other hazardous substances		Permanent - offer to archivist		RGLA 9.17	Official	Secure
17.2.23	EP	EH - Commercial	Personal licenses (pubican) - licensing files		Review every 3 years		Licensing Act 2003. Section 8: Requirement to keep a register	Official	Secure

17.2.24	EP	EH - Commercial	Pet shop licences		Destroy - 2 years after registration lapses		Pet Animals Act 1951 (as amended by the 1983 Act)	Official	Secure
17.2.25	EP	EH - Commercial	Petroleum		Permanent - offer to archivist		Petroleum (Regulation) Acts 1928 and 1936	Official	Secure
17.2.26	EP	EH - Commercial	Premises and Club (alcohol) – licensing files		Review every 3 years		Licensing Act 2003. Section 8: Requirement to keep a register	Official	Secure
17.2.27	EP	EH - Commercial	Private hire licences		Destroy - 25 years after registration lapses		Local Government (Miscellaneous provisions) Act 1976	Official	Secure
17.2.28	EP	EH - Commercial	Radioactive substances		Retain records for a specified period after ceasing to carry on the activities regulated by his registration or authorisation		Radioactive Substances Act 1993	Official	Secure
17.2.29	EP	EH - Commercial	Riding establishment licences		Destroy - 2 years after registration lapses		Riding Establishments Act 1964 and 1970	Official	Secure
17.2.30	EP	EH - Commercial	Sale of explosives licences		Destroy - 2 years after registration lapses		Manufacture and Storage of Explosives Regulations 2005.	Official	Secure
17.2.31	EP	EH - Commercial	Scaffold licences		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.32	EP	EH - Commercial	Scrap metal licences		Destroy - 2 years after registration lapses		Scrap Metal Dealers Act 2013 (replaces 1964 Act)	Official	Secure
17.2.33	EP	EH - Commercial	Sex establishments		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.34	EP	EH - Commercial	Shops		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.35	EP	EH - Commercial	Skin piercings		Destroy 6 years after business closure			Official	Secure
17.2.36	EP	EH - Commercial	Skip licences		Destroy - 2 years after registration lapses		RGLA 9.16	Official	Secure
17.2.37	EP	EH - Commercial	Street collections and lotteries licences		Destroy - 2 years after registration lapses		House To House Collections Act 1939 Lotteries and Amusements Act 1976.	Official	Secure
17.2.38	EP	EH - Commercial	Street trading licences		Destroy - 2 years after registration lapses		Local Government (Miscellaneous Provisions) Act 1982.	Official	Secure
17.2.39	EP	EH - Commercial	Venue licences – licensing files (3 year cycle)		Review every 3 years		Licensing Act 2003. Section 8: Requirement to keep a register	Official	Secure
17.2.40	EP	EH - Commercial	Cooling towers		Destroy - 2 years after registration lapses		The Notification of Cooling Towers and Evaporative Condensers Regulations 1992.	Official	Secure
17.2.41	EP	EH - Commercial	Private water suppliers monitoring		Destroy after person moves from the premises		RGLA 9.3	Official	Secure
17.2.42	EP	EH - Commercial	Swimming pools monitoring		Destroy - 3 years from last action		RGLA 9.3	Official	Secure
17.2.43	EP	EH - Commercial	Contaminated land register		Permanent		Contaminated Land (England) Regulations 2000	Official	Secure
17.2.44	EP	EH - Commercial	Animal Impounding Notices		Destroy 2 years after the matter is concluded		RGLA 9.19	Official	Secure
17.2.45	EP	EH - Environment	Air Pollution Monitoring		Destroy - 3 years from last action		RGLA 9.3	Official	Secure
17.2.46	EP	EH - Commercial	Land Pollution Monitoring		Destroy - 3 years from last action		RGLA 9.3	Official	Secure
17.2.47	EP	EH - Commercial	River Pollution Monitoring		Destroy - 3 years from last action		RGLA 9.3	Official	Secure
17.3	EP	EH -	Civil emergency						
17.3.1	EP	EH - Environment	Activities that report on all civil emergencies in the local community, whether the emergency plan has been invoked or not	Borough Emergency Response and Recovery Plan. Major incident plan, Emergency plan, Contact list of emergency agencies, Contact list of core staff	Permanent retention of high level management records only, offer to archivist. Destroy other records –after 6 years		RGLA 9.11 Limitation Act 1980	Official - Sensitive	Secure
17.3.2	EP	EH - Environment	Emergency plan exercises. Process of recording the results of the test for emergency/disaster plan.	Exercise briefs, Tests, Feedback, Action plans	Destroy - 10 years after closure		RGLA 9.12 Limitation Act 1980	Official - Sensitive	Secure
17.3.3	EP	EH - Environment	All records relating to business continuity planning and training. Relating to business continuity in the event of a disaster or unforeseen event. Includes disaster recovery and business continuity and recovery plans.	Borough Business Continuity Plan, Threat Cards, Evacuation Plans	6 years		RGLA 9.11 Limitation Act 1980	Official - Sensitive	Secure
17.3.4	EP	EH - Environment	Records relating to the Business Continuity Corporate Officer Group	Agendas, minutes, reports, correspondence	6 years		Limitation Act 1980	Official - Sensitive	Secure
17.4	EP	EH -	Health and safety						
17.4.1	EP	EH -	Records of the development and establishment of	Health and safety policies.	Reviewed Annually		Limitation Act 1980 (Section 2)	Official	Secure

	EP	EH -	the Health and Safety Policy and plans.	Health & safety management strategies.				Official	Secure
17.4.2	EP	EH -	Monitoring health & safety performance.	Health & Safety Audit records	Completion of audit plus 5 years.			Official	Secure
	EP	EH -		Records of actions to address issues raised.				Official	Secure
17.4.3	EP	EH - Commercial	Recording consultation and communication with employees.	Records documenting the formation, proceedings and decisions of safety committees formed under the Safety Representatives and Safety Committee Regulations 1977 or other consultation/ communication with employee representatives under the Consultation with Employees Regulations 1996.	Life of the Committee or the current year plus 3 years.			Official	Secure
17.5	EP	EH -	Risk assessments and procedures						
17.5.1	EP	EH - Commercial	Assessing the level of work and the process to eliminate related risk.	Results of risk assessments.	Life of the work plus 6 months		Limitation Act 1980 (Section 2)	Official	Secure
17.5.2	EP	EH - Commercial	Records of hazardous substances present or in use in the workplace & exposure to them.	Record of hazardous substances present or in use.	While product is in use.		Control of Substances Hazardous to Health	Official	Secure
17.5.3	EP	EH -	COSHH Risk Assessments			Date of creation + 40 years	Control of Substances Hazardous to Health	Official	Secure
17.5.4	EP	EH - Commercial	Health and Safety team meetings and working groups		Current year + 3 years		Limitation Act 1980 (Section 2)	Official	Secure
17.5.5	EP	EH - Commercial	Health and Safety: Safety Complaints			Date complaint resolved + 6 years		Official	Secure
17.6	EP	EH -	Site and equipment safety						
17.6.1	EP	EH -	Process of monitoring land, buildings, facilities or operations for purposes of ensuring health and safety.	Site & safety inspection records.	Until superseded		Limitation Act 1980 (Section 2)	Official	Secure
	EP	EH - Commercial		Records of actions to address issues raised.				Official	Secure
17.6.2	EP	EH -	Monitoring work equipment for purposes of ensuring health and safety.	Equipment repair log.	Date of examination, test or repair plus 5 years.			Official	Secure
	EP	EH -		Records of the issue of protective equipment.				Official	Secure
17.6.3	EP	EH -	Legionella checks undertaken in BCKLWN premises			Date of check + 6 years		Official	Secure
17.6.4	EP	EH -	Water checks undertaken in BCKLWN premises					Official	Secure
17.7	EP	EH -	Accidents						
17.7.1	EP	EH - Commercial	Process that records and notifies the HSE of injuries, ill-health, dangerous occurrences and notifiable diseases affecting/involving adults.	Accident book records, Accident reports, Incident reports, Work related Ill-health reports, Notifiable diseases reports	The date of recording or HSE notification plus 3 years.		Statutory Instrument 1995 No 3163 - The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995	Official - Sensitive	Secure
17.7.2	EP	EH - Commercial	Process that records injuries, ill-health, dangerous occurrences and notifiable diseases affecting/involving children.	Accident book records, Accident reports, Incident reports, Work related Ill-health reports, Notifiable diseases reports..	Until the child has reached the age of 21. Date of birth of the youngest participant + 22 years		Limitation Act 1980 (Section 11)	Official - Sensitive	Secure
17.7.3	EP	EH -	Investigation of accidents, dangerous occurrences and notifiable diseases.	Investigation reports.	3 years from the closure of the investigation.		Statutory Instrument 1995 No 3163 - The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995	Official - Sensitive	Secure
	EP	EH - Commercial		Witness Statements.				Official - Sensitive	Secure
17.7.4	EP	EH - Commercial	Corporate health and safety audits, monitoring reports			Date of audit + 6 years then review	Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
17.3.5	EP	EH - Environm	Emergency Volunteer Records	Access database	Only whilst active as a volunteer or 1 year from leaving		Limitation Act 1980	Official - Sensitive	Secure
17.3.6	EP	EH - Environm	Contact details for emergency response and liaison to develop plans	Excel spreadsheet	Whilst plans active		Limitation Act 1980	Official - Sensitive	Secure
17.3.7	EP	EH - Environm	Recrds relating to the Safety Advisory Group	Contact details, agendas, minutes, reports, related correspondance	10 years		Limitation Act 1980	Official - Sensitive	Secure
17.8	EP	EH - Environm	Environmental Health - Environment						
17.8.1	EP	EH - Environm	All records relating to case files.	EH complaints	In line with corporate retention periods?	6 years	Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
17.8.2	EP	EH - Environm ent		Service requests	In line with corporate retention periods?	6 years	Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
17.8.3	EP	EH - Environm ent		Contaminated land investigations	In line with corporate retention periods?	Permanent		Official - Sensitive	Secure
17.8.4	EP	EH - Environm		Environmental permit applications	In line with corporate retention periods?	6 years after expiry	Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
17.8.5	EP	EH - Environm		Scrap metal licensing	In line with corporate retention periods?	6 years after expiry	Limitation Act 1980 (Section 2)	Official - Sensitive	Secure
Section 18 - Planning Control									
18.1	EP	Planning Control	All records relating to the management of the development control process (excluding parts of the process included in other parts of the retention schedule)	Building files and plans, specifications, correspondance, application, permits, certificates, objections, inspection reports, appeals	Indefinitely		Town and Country Planning Act 1990	Official	Secure
18.2	EP	Planning Control	All records relating to listed building applications	Building files and plans, specifications, correspondance, application, permits, certificates, objections, inspection reports, appeals	Indefinitely			Official	Secure
18.3	EP	Planning Control	All records relating to pre-applications	Building files and plans, specifications, correspondance, pre-application	5?		15	Official	Secure
18.4	EP	Planning Control	All records relating to the discharge of condition applications	Building files and plans, specifications, correspondance, application, permits, certificates, inspection reports	Indefinitely			Official	Secure
18.8	EP	Planning Control	All records relating to enforcement cases	case files and plans relating to breach of condition notices and planning contravention, specifications, correspondance, application, permits, certificates,	10?		Limitation Act 1980 (Section 2) 6 years	Official	Secure
18.9	EP	Planning Control	All records relating to Planning Committee	Files and plans, specifications, correspondance, application, permits, certificates, objections, inspection reports, appeals	?		Local Government Act 1972 s100c 6 years	Official	Secure
18.10	EP	Planning Control	All records relating to complaints and general correspondance	Files and plans, specifications, correspondance, application, permits, certificates, objections, inspection reports	?		10 years - Level 1 complaints	Official	Secure

18.11	EP	Planning Control	All records relating to Land Charge searches	Correspondance, search reports	6		1 year	Official	Secure
18.12	EP	Planning Control	All records relating to street naming and numbering applications	Applications, correspondance	?		Permanent	Official	Secure
18.13	EP	Planning Control	All records relating to Environmental Impact Assessment screening				15 years	Official	Secure
18.14	EP	Planning Control	Land Charges Register				Permanent	Official	Secure
18.15	EP	Planning Control	All records relating to the creation and implementation of Certificates of Lawful Use or Development				Permanent	Official	Secure
18.16	EP	Planning Control	All records relating to applications for and management of Certificates of Lawful Use or				Permanent	Official	Secure
18.17	EP	Planning Control	All records relating to the creation and management of Local Development Orders				Permanent	Official	Secure
18.18	EP	Planning Control	All records relating to the creation and implementation of Neighbourhood Development Orders				Permanent	Official	Secure
18.19	EP	Planning Control	All records relating to applications for and management of outline planning consents				15 years	Official	Secure
18.20	EP	Planning Control	All records relating to planning area searches				1 year	Official	Secure
18.21	EP	Planning Control	All records relating to the management of public enquiries related to planning issues				Permanent	Official	Secure
18.22	EP	Planning Control	All records relating to the planning consultation process				15 years	Official	Secure
18.23	EP	Planning Control	All records relating to the creation and publication of formal planning decision notices				Permanent	Official	Secure
18.24	EP	Planning Control	All records relating to planning minor material amendments				15 years	Official	Secure
18.25	EP	Planning Control	All records relating to planning non-material amendments				15 years	Official	Secure
18.27	EP	Planning Control	All records relating to the monitoring of building and landscape design				Permanent	Official	Secure
18.28	EP	Planning Control	All records relating to planning pre-application advice				15 years	Official	Secure
18.29	EP	Planning Control	All records relating to applications for and management of planning applications for approval of reserved matters				15 years	Official	Secure
18.30	EP	Planning Control	All records relating to applications for and management of prior notifications of development				6 years Limitation Act 1980 (Section 2)	Official	Secure
18.31	EP	Planning Control	All records relating to the removal/variation of planning conditions				Permanent	Official	Secure
18.32	EP	Planning Control	All records relating to the management of the planning applications system				Permanent	Official	Secure
18.33	EP	Planning Control	All records relating to the management of the planning applications system				Permanent	Official	Secure
18.34	EP	Planning Control	All records relating to the creation, management and publication of the Self Build and Custom House Building Register				6 years	Official	Secure
18.35	EP	Planning Control	Self Build and Custom House Building Register				Permanent	Official	Secure
18.36	EP	Planning Control	Case files relating to Section 106 agreements under the Town and Country Planning Act 1990				6 years	Official	Secure
18.37	EP	Planning Control	All records relating to the maintenance of specific sites and monuments				6 years Limitation Act 1980 (Section 2)	Official	Secure
18.38	EP	Planning Control	All records relating to the management of conservation areas				Permanent	Official	Secure
18.39	EP	Planning Control	Records relating to the allocation of allotments to individual allotment holders and the management of the tenancy				6 years Limitation Act 1980 (Section 2)	Official	Secure
18.40	EP	Planning Control	All records relating to the provision of advice and consultation to local residents who are considering carrying out any works on property within a conservation area				Permanent	Official	Secure
18.41	EP	Planning Control	All records relating to the management of dangerous structures				6 years Limitation Act 1980 (Section 2)	Official	Secure
18.42	EP	Planning Control	All records relating to the monitoring and management of derelict properties				6 years Limitation Act 1980 (Section 2)	Official	Secure
18.43	EP	Planning Control	All records relating to listed buildings				Permanent	Official	Secure
18.44	EP	Planning Control	All records relating to the creation of property enquiry certificates				6 years	Official	Secure
18.45	EP	Planning Control	All records relating to the registration of publicly owned land and property				Until disposed of	Official	Secure
18.46	EP	Planning Control	All records relating to the creation, management and publication of the Land Register				6 years	Official	Secure
18.47	EP	Planning Control	Register of Land				Permanent	Official	Secure
18.48	EP	Planning Control	All records relating to the naming and numbering of streets				Permanent	Official	Secure
Section 19 - Planning Policy									
19.1	EP	Planning	Developing a vision and strategic direction regarding existing/future land use within the local authority	Local Plan	10 years.		RGLA 10.1	Official	Archive
	EP	Planning Policy		LDF documents					Official
19.2	EP	Planning	Consultation to gain approval for the LDF or Local Plans.	Consultation docs and replies	10 years.		RGLA 10.2	Official	Archive
	EP	Planning		Inquiries and Objections					Official

	EP	Planning		Public Inquiry documents				Official	Archive
19.3	EP	Planning Policy	Maintaining and developing open spaces for public amenity	Tree preservation orders	Must retain records of TPO's. Permanent - until tree no longer exists		RGLA 10.6	Official	Archive
	EP	Planning		Tree works - admin files	Destroy after 7 years		RGLA 10.7	Official	Secure
	EP	Planning Policy		All records relating to the management of trees which are the responsibility of the authority	Destroy after 7 years		RGLA 10.7	Official	Secure
	EP	Planning		Public Open Spaces	Property services will retain records of land ownership.		RGLA 10.7	Official	Secure
	EP	Planning Policy		Development plans and correspondence	Permanent. Consider for Historic records		RGLA 10.7	Official	Archive
	EP	Planning Policy		Section 106 agreements	Permanent. Consider for Historic Records		Town and Country Planning Act 1990	Official	Archive
	EP	Planning Policy		Land purchase agreements	Permanent. Consider for Historic Records		RGLA 10.7	Official	Archive
19.4	EP	Planning Policy	Sites and monuments	Sites and monuments records	Permanent. Consider for Historic Records		RGLA 10.3	Official	Archive
19.5	EP	Planning Policy	All records relating to the creation and implementation of the Community Infrastructure Levy	Contact details, case files, administration	5 years			Official	Archive

POLICY REVIEW AND DEVELOPMENT PANEL REPORT

REPORT TO:	Audit Committee		
DATE:	12 th November 20108		
TITLE:	Internal Audit Half Year Progress Report 2018-19		
TYPE OF REPORT:	Update		
PORTFOLIO(S):	Cllr Hodson, Performance		
REPORT AUTHOR:	Kathy Woodward, Internal Audit Manager		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	No

REPORT SUMMARY/COVER PAGE

PURPOSE OF REPORT/SUMMARY:
To provide Members with an update on progress against the Internal Audit Strategic Plan 2018-19 that was endorsed by the Audit Committee at the meeting on 12th February 2018. The report also provides an update on the fraud work for the first half of the year.
KEY ISSUES:
Section 5 of the Accounts and Audit Regulations 2015 state that ' <i>A relevant authority must undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance.</i> '
The work of the Internal Audit team throughout the year is directed towards compliance with this requirement as well as aiming to add value to the Council's services by identifying opportunities to improve efficiency and effectiveness.
The Audit Committee Terms of Reference require it to monitor the delivery of the internal audit activity.
OPTIONS CONSIDERED:
<i>Not applicable</i>
RECOMMENDATIONS:
Members are asked to review the progress against the audit plan and to note the update of the fraud work.
REASONS FOR RECOMMENDATIONS:
Audit Committee members are required to monitor the delivery of the Internal Audit Plan as part of the Committee's Terms of Reference, which is legislated in section 5 of the Accounts and Audit Regulations 2015.

REPORT DETAIL

1. Introduction

- 1.1 The Strategic Audit Plan 2018-19, endorsed by the Audit Committee on 12th February 2018, sets out the work Internal Audit expect to carry out during the year. This work complies with the requirements of the Accounts and Audit Regulations 2015:

Section 3 – A relevant authority must ensure that it has a sound system of internal control which:

- a) Facilitates the effective exercise of its functions and the achievement of its aims and objectives*
- b) Ensures that the financial and operational management of the authority is effective*

Section 5 - A relevant authority must undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance.'

- 1.2 Performance Standard 2060 of the Public Sector Internal Audit Standards (PSIAS) requires the Audit Manager to report to the Audit Committee on the internal audit activity and performance relative to this plan.
- 1.3 The Terms of Reference for the Audit Committee require the Committee to monitor delivery of the internal audit activity to ensure that the resources and work are sufficient to fulfil the requirements of the Accounts and Audit Regulations.

2. Monitoring Report

- 2.1 On completion of each audit a formal report is issued to the relevant line managers, the Executive Director and Portfolio Holder. Copies are sent to the Chief Executive, Executive Director – Finance Services (s151 Officer), and the external auditors, Ernst and Young. A copy is also placed on InSite in the restricted area for members of the Audit Committee to view. Each report contains an action plan, with target dates, that has been agreed with the managers to address any observations and recommendations raised by the Internal Auditor. This forms the basis of the follow-up audit, which is carried out approximately six months later to assess progress in implementing the agreed actions.
- 2.2 The following audits have been completed during the first half of 2018-19 and reports issued as described above:
- Care & Repair
 - Asset Management *
 - Alive Management *
 - Ethical Culture *
 - Revenues (Council Tax and NNDR) *
 - Housing Benefits *
 - Accounts Receivable *
 - Information and Security Management Follow Up
 - Housing Options and Allocations Follow Up
 - Housing Standards Follow Up
 - Cemeteries & Crematorium Follow Up

* These reports are complete but the Final reports have not been issued yet.

A summary of the reports is attached as **Appendix 1** and the full versions are available under the relevant year to members of the Audit Committee on InSite.

- 2.3 The following audits are currently ongoing and will be reported to the Committee in the next progress report:
- Vehicle Fleet
 - Legal Services
 - Child Protection
 - Procurement
 - Partnerships
 - Treasury Management
 - External Communications
 - Data Quality and Interpretation
 - Risk Management
 - Cost Reduction Programme
- 2.4 In addition to the standard audits, Internal Audit also undertook other work during the first half of the year including the following:
- Review of the Audit Manual and internal audit working papers.
 - Providing support to the Finance System software tender process, ensuring compliance with relevant regulations and legislation.
 - Providing support to the Management Team on the RIPA desktop inspection and GDPR legislation.
 - Providing training to members on the Role of the Audit Committee.
- 2.5 One of our auditors left the authority in June 2018, which resulted in a period of vacancy while the recruitment process was underway. An appointment to the vacant post was made commencing in July 2018. This post has received mentoring support and training to bring him up to speed with Council Services, policies and procedures. A number of audits have been 'doubled up' resulting in a lower output of productive work throughout this training phase.

The audit of Flood and Water Management has been removed from the plan. Discussions at the start of the audit revealed that the level of assurance gained during the Emergency Planning audit covers most of the legislative requirements of the Council in relation to Flood and Water management and nothing further could be gained by re-doing this work so soon after the Emergency Planning audit. A note has been made on the Assurance Framework and the position will be monitored each year to ensure the position remains the same.

3.0 Work planned for November 2018 to March 2019.

- 3.1 As well as completing the ongoing work listed in paragraph 2.3, the following audits are planned for the second half of 2018/19:
- Housing Strategy
 - Payroll
 - Training
 - Grants / Funding to third parties
 - S106 / CIL / Habitat Levy
 - Alive Leisure / Management
 - Careline
 - Electoral Services
 - Refuse Collection and Recycling
 - Creditors

The audits of Alive Leisure and Creditors systems may result in a different type of audit being undertaken due to the ongoing changes taking place within the current systems. Audit support and advice will be ongoing throughout these projects.

4. Investigations work April 2018 – October 2018

4.1 There are currently 2 themes of National Fraud Initiative (NFI) reporting being completed:

- 1) The NFI National Exercise 2016/17 – This is a council wide data matching exercise, focusing on all possible areas of the council including Creditors, Payroll, Council Tax and Housing Benefits. This exercise is undertaken every two years.
- 2) The Flexible Matching Service – This is carried out annually, focusing primarily on Council Tax data matches in need of investigation. The Flexible Matching Service deals with matches mainly consisting of:
 - Council Tax Single Person Discount (SPD) - the outstanding matches are for Council Tax accounts that do not match Electoral Register information that require further investigation.
 - Additionally some matches refer to details where the second adult is due to turn 18 between now and the end of the financial year

4.2 The “NFI National Exercise 2016/17 report” identified 3,227 matches in January 2017, with only 5 left to be processed. All preparation work for the “2018/19” exercise has been carried out, including ensuring that privacy notices and fair processing statements are in place and up to date. The data required has been extracted and provided to the Cabinet Office for the exercise.

4.3 The “Flexible Matching Service Exercises” for January and April 2017 datasets, 3094 matches have now been processed and these exercises have now concluded.

The “Flexible Matching Service Exercises” for January 2018 datasets identified 3,909 matches have been completed, with 205 left to process.

Data extractions and uploads are due to take place in early December for the January 2019 exercise.

4.4 In total there are 210 matches still to be processed.

4.5 A further exercise has been carried out with the Revenues Department known as “DataTank”. This primarily focuses upon Council Tax matches in need of investigation, but some customer may also receive benefit entitlement that needs to be investigated. Those cases with benefit entitlement resulted in 296 matches, of which 252 have been processed and 44 are still being investigated.

4.6 The total fraud and error has been identified during April to October:

	£
Council Tax Reduction Scheme error	4,225
Council Tax Reduction Scheme fraud	0
Administrative Penalty	0
Housing Benefit and Council Tax Benefit	34,119
Council Tax error	14,762
Council Tax penalties	70
Non Domestic Rates (Business Rates)	3,912
Duplicate invoices	0
Beach Hut lease/rent	0
Total additional fraud and error	57,088

- 4.7 Investigation work has continued on an adhoc basis to attempt to trace debtors/absconders who have not advised of their address/contact information but have outstanding arrears with the Authority. Where a successful trace has been made any new address/contact information is being passed on to the relevant section for recovery purposes. The following values of Debtors/Absconders have been identified during April to October 2018.

	No. of cases	£
Council Tax	13	13,970
National Non-Domestic Rates	0	0.00
Financial Services	9	7,366
Benefit Overpayments	1	2,062
Total debts traced	23	23,398

- 4.8 Other investigation work has resulted in 21 Council Tax accounts being amended from a Single Person Discount award to a Student Disregard.
- 4.9 Work has commenced to produce an Anti-Fraud and Corruption Risk Register which will be used by Internal Audit to help identify any potential areas of risk and to then further mitigate those risks where possible.

5. Issues for the Panel to Consider

- 5.1 The Committee needs to consider if the work completed by the Internal Audit team during 2018-19 is sufficient to support an opinion on the systems of internal control within the Council.

6. Corporate Priorities

- 6.1 The internal audit activity supports the achievement of the Corporate Business Plan by adding value to the organisation (and its stakeholders) when it provides objective and relevant assurance, and contributes to the effectiveness and efficiency of governance, risk management and control processes.

7. Financial Implications

- 7.1 None to Consider.

8. Any other Implications/Risks

- 8.1 Monitoring the work of the Internal Audit Team enables the Audit Committee to receive assurance on the state of the internal control system of the Council.

9. Conclusion

- 9.1 The Strategic Internal Audit plan provides the basis for the Internal Audit team to carry out the work necessary to provide assurance on the systems of internal control. Monitoring progress against the plan ensures sufficient work is completed to provide an Annual Audit Opinion for the Annual Governance Statement and to fulfil the requirements of the Accounts and Audit Regulations 2015.
- 9.2 Progress to date has been satisfactory and at this point nothing has arisen to suggest that the plan will not be completed within the year. If anything does arise that will impact on the completion of the plan, the Committee will be informed at the next available meeting.

10. Background Papers

Strategic Internal Audit Plan 2018-19.
Accounts and Audit Regulations 2015

Notes to support the summary in Appendix 1

The following tables provide an explanation of the terms used to grade the recommendations contained in the final audit reports, and the overall opinion attributed as the result of each audit.

Recommendations

The observations and recommendations are allocated a grading High, Medium or Low as defined below|:

High	Major risk requiring action by the time the final report is issued.
Medium	Medium risk requiring action within six months of the issue of the draft.
Low	Matters of limited risk. Action should be taken as resources permit.

Please note – ‘Low’ recommendations are not summarised in this report due to the insignificant nature of the issue.

Audit Opinion

At the conclusion of the audit an overall audit opinion is formed for the audit area. The definition for each level of assurance is given below.

Full Assurance	A sound system of internal control that is likely to achieve the system objectives, and which is operating effectively in practice.
Substantial Assurance	A sound system of internal control, but there are a few weaknesses that could put achievement of system objectives at risk.
Limited Assurance	A system of internal control with a number of weaknesses likely to undermine achievement of system objectives, and which is vulnerable to abuse or error.
No Assurance	A fundamentally flawed system of internal control that is unlikely to achieve system objectives and is vulnerable to serious abuse or error.

Audits completed April to October 2018-19	Overall Opinion
<u>Care and Repair</u> Report published September 2018 3 High recommendations and 7 Medium recommendation was made. The High recommendations relate to record keeping and contracts with partners. The medium recommendations relate to record keeping, invoice processing, review fee levels and ensuring that we are comparable with national thresholds in place.	Substantial Assurance
<u>Asset Management</u> Report due to be published. Update to follow in next progress report	Limited Assurance
<u>Alive Leisure</u> Report due to be published. Update to follow in next progress report	Limited Assurance
<u>Ethical Culture</u> Report due to be published. Update to follow in next progress report	Full Assurance
<u>Revenues</u> Report due to be published. Update to follow in next progress report	Full Assurance
<u>Housing Benefits</u> Report due to be published. Update to follow in next progress report	Full Assurance
<u>Accounts Receivable</u> Report due to be published. Update to follow in next progress report	Substantial Assurance

Audits completed April to October 2018-19	Overall Opinion
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Follow up report

<u>Information management and Security</u> The report published in September 2017 contained 5 low recommendations. 1 is complete, three are progressing as planned and 1 is no longer required.	Sept 2017 Full Assurance	June 2018 Very Good
<u>Housing Options and Allocations</u> The report published in February 2017 contained 1 high recommendation, 4 medium recommendations and 2 low recommendations. Due to staffing issues within the team progress is slower than anticipated on the recommendations. A further follow up has been scheduled for November 2018.	Feb 2017 Substantial Assurance	Aug 2018 Adequate
<u>Housing Standards</u> The report published in October 2017 contained 5 high recommendations and 1 medium recommendation 2 of the high recommendations are complete and 1 is progressing as planned. There are high recommendations progressing slower than planned and a further follow up has been scheduled for November 2018.	Oct 2017 Limited Assurance	Aug 2018 Adequate
<u>Cemeteries and Crematorium</u> The report published in February 2018 contained 2 low recommendations. Both are now complete.	Feb 2018 Full Assurance	Sept 2018 Very Good

AUDIT COMMITTEE WORK PROGRAMME 2018/2019

DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER	OBJECTIVES AND DESIRED OUTCOMES
30 May 2018	Training/Briefing – Internal and External Audits		K Woodward	
30 May 2018	Certification of Claims and Annual Report 2016/17	Annual	D Cooke Ernst & Young	
30 May 2018	Risk Based Verification Policy Update	Update	J Stanton	
30 May 2018	Corporate Risk Register	Monitoring	G Greaves	To note the report which presents the changes to the Risk Register since the last report.
30 May 2018	Draft Annual Governance Statement covering the 2017/2018 year.	Monitoring	G Greaves	To receive and note the draft Annual Governance Statement for the 2017/2018 year
30 May 2018	Internal Audit Annual Report and Opinion 2017/2018	Annual	K Woodward	To receive the Audit Manager's Annual Report.
30 May 2018	Internal Audit Full Year Progress Report 2017/2018	Progress Report	K Woodward	To receive the Audit Manager's Annual report.
30 May 2018	Audit Committee Effectiveness Report	Cabinet	K Woodward	To review the work of the Audit Committee during 2017/2018 and consider if the Committee has effectively fulfilled its role.

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Agenda Item 13

DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER	OBJECTIVES AND DESIRED OUTCOMES
30 July 2018	Training/Briefing – Statement of Accounts		T Cowper	
30 July 2018	Statement of Accounts		L Gore/ T Cowper	
30 July 2018	External ISA 260 Report		L Gore/ T Cowper	
30 July 2018	Annual Governance Statement Covering the 2017/2018 year	Annual	G Greaves	To approve the Annual Governance Statement for the 2017/2018 year..
30 July 2018	Treasury Outturn Report 2017/2018		T Cowper	
17 September 2018	Annual Audit Letter for Year ending 31 March 2018	Annual Audit Letter	L Gore	
Immediately following the meeting commencing at 5 pm, the Committee will receive the following training session				
17 September 2018	Audit Committee – An Introduction.	Training Session	K Woodward	
12 November 2018	Training – Business Rates Retention		L Gore T Cowper	
12 November 2018	Business Continuity Update	Annual Update	G Greaves	

DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER	OBJECTIVES AND DESIRED OUTCOMES
12 November 2018	Corporate Risk Register Monitoring Report	Monitoring	G Greaves	To note the report which presents the changes to the Risk Register since the last report.
12 November 2018	Risk Management Policy and Strategy Review	Review	G Greaves	To review the Risk Management Policy and Strategy
12 November 2018	Record Retention and Disposal Policy Review	Review	G Greaves	To review the Record Retention and Disposal Policy
12 November 2018	Internal Audit Half Year Progress Report	Monitoring	K Woodward	To receive the half year progress report.
28 January 2019	Training/Briefing – Budget Process and Scenario (internal controls/disaster recovery)	Training	L Gore T Cowper	
28 January 2019	Mid-Year Treasury Report	Mid-Year	T Cowper	To receive the mid-year report.
28 January 2019	Update on progress with the Annual Governance Statement covering the 2018/2019 year	Update	G Greaves	To provide the Committee with an update on the progress with the Annual Governance Statement covering the 2018/2019 year.
11 March 2019	Training – Treasury Strategy			
11 March 2019	Strategic Internal Audit Plan		K Woodward	To provide the Committee with the opportunity to review the proposed Strategic Audit Plan 2017 – 2022.

Potential Future Training Sessions

Contracts (Nora, Major Housing, Revenues and Benefits software, Refuse and Recycling).