

# **ABERTILLERY & LLANHILLETH COMMUNITY COUNCIL**

## **POLICY FOR PUBLIC QUESTIONS AT FULL COUNCIL MEETINGS**

### **General**

Meetings shall be open to the public unless their presence is prejudicial to the public interest by reason of the confidential nature of the business to be transacted or for other special reasons. The public's exclusion from part or all of a meeting shall be by a resolution which shall give reasons for the public's exclusion.

A member of the public who lives in, works in or represents a public, private, voluntary or community organisation based in the Abertillery and Llanhilleth area may ask a question of the Council at a Council meeting.

The Chair may use their discretion to allow questions from people outside of the local area in exceptional circumstances.

Members of the public may also be permitted, at the discretion of the Chair, to answer questions or give evidence in respect of any item of business on the agenda.

### **Number of Questions**

At any one meeting no person may submit more than one question and no more than one question may be asked on behalf of an organisation.

### **Time Limit**

**\*\*The officers will be responsible for monitoring the time limits\*\***

There will be a 15 minute session at each Council meeting for this purpose, **\*\*if a public question has been asked\*\***

The Chair shall have discretion, with the agreement of the Council, to extend this time limit in exceptional circumstances.

Any question not asked because of insufficient time will be answered subsequently in writing, with a copy of the answer provided to all councillors.

If answering a question or giving evidence, each member of the public may not speak for more than five minutes.

### **Order of questions**

Questions will be asked in the order that notice of them was received. The Chair may use their discretion to amend the order of questions or to group together similar questions.

Agreed by Full Council September 25<sup>th</sup> 2024

## **Notice of Questions**

A question may only be asked if the question has been delivered in writing or by e-mail to the Proper Officer no later than midday, 5 clear working days before the date of the meeting. Each question must give the name and address of the questioner and the name of the organisation they represent, if any.

Questions should be addressed to the Clerk via email at [clerk@abertilleryandllanhilleth-wcc.gov.uk](mailto:clerk@abertilleryandllanhilleth-wcc.gov.uk) or by post to The Council Offices, Mitre Street, Abertillery, NP13 1AE

At the Council meeting, the previously submitted written question shall be read out by the questioner.

If the questioner is not present in the meeting, the question will not be dealt with.

## **Response to Questions**

All questions and answers must be directed through the Chair. An answer may take the form of:

- a direct oral answer;
- where the desired information is in a publication of the Council or other published work, a reference to that publication; or
- where the reply cannot conveniently be given orally, a written answer circulated later to the questioner and copied to all members of the Council.

There will be no debate on questions or answers.

## **Supplementary question**

The Chair may at his or her discretion permit a supplementary question arising directly out of the original question or the reply. Supplementary questions may not introduce new material.

## **Recording of questions and answers**

A summary of the questions asked under this section and the replies to the questions will be recorded in the minutes of the meeting.

## **Scope of the Questions**

Questions may only be asked on matters about which the Council has powers or duties.

The Chair or Proper Officer may reject a question if it:

- does not meet any of the criteria specified in this policy (e.g. the questioner is from

outside the local area or the question is about a matter over which the Council has no power);

- is defamatory, frivolous or offensive;
- is substantially the same as a question which has been put at a meeting of the Council in the past six months;
- discloses or requires the disclosure of confidential or exempt information;
- relates to a matter which is the subject of legal or enforcement proceedings or an appeal to a court or tribunal or to a Government Minister or the National Assembly for Wales or an ongoing investigation by the Public Services Ombudsman or relates to a decision which has been made by the Council in exercise of its regulatory functions in respect of which there are legal rights of redress;
- relates to the personal circumstances or conduct of an officer or Councillor or to the conditions of service of individual employees;
- seeks to promote a political party or organisation;
- is a statement and not a genuine enquiry;
- is such that the preparation of the answer would require the expenditure of a disproportionate amount of time, public money or effort; or
- is a matter on which the Council must follow other rules or procedures contained in the Constitution.

The decision of the Chair or Proper Officer in the above matters shall be final, but when a question from a member of the public has been rejected under the terms above, the Chair, under that agenda item, will announce to the Council the reason for the rejection and this explanation will be recorded in the minutes of the meeting.



## Abertillery & Llanhilleth Community Council

### Social Media and Electronic Communication Policy

The use of digital and social media and electronic communication enables the Council to interact in a way that improves communications both within the Council and between the Council and the people, businesses and agencies it works with and serves.

The Council has a website, ~~and~~ a Facebook page ~~and~~ Instagram profile, and uses email to communicate. The Council will always try to use the most effective channel for its communications. Over time the Council may add to the channels of communication that it uses as it seeks to improve and expand the services it delivers. This Policy will be kept under regular review to reflect any new arrangements.

The Council Facebook ~~and~~ Instagram pages intend to provide information and updates regarding activities and opportunities within our communities and promote our community positively.

#### Social Media communications from the Council will meet the following criteria:

- Be civil, tasteful and relevant;
- Not contain content that is knowingly unlawful, libellous, harassing, defamatory, abusive, threatening, harmful, obscene, profane, sexually oriented or racially offensive;
- Not contain content knowingly copied from elsewhere ~~which we do not have permission to share; which is subject to copyright, for which we do not own the copyright, or if permission has not been given;~~
- Not contain ~~any~~ personal information, ~~other than necessary basic contact details; unless there are legitimate grounds or consent to do so;~~
- ~~If it is official Council business it will be moderated by either the Clerk or the Deputy Clerk to the Council;~~
- Be moderated by the officers of the Council;
- ~~Social media will~~ not be used for the dissemination of any political advertising.

#### All Communications

In order to ensure that all discussions on the Council pages are productive, respectful and consistent with the Council's aims and objectives, ~~the follow guidelines should be observed: we ask you to follow~~

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~~these guidelines:~~

- Be considerate and respectful of others. Vulgarity, threats or abusive language will not be tolerated.
- Differing opinions and discussion of diverse ideas are encouraged, but personal attacks on anyone, including the Council, members or staff, will not be permitted.
- Share freely and be generous with official Council posts but be aware of copyright laws; be accurate and give credit where credit is due.
- Stay on topic.
- Refrain from using the Council's ~~Facebook~~ pages for commercial purposes or to advertise, market or sell products.

The ~~website and other outlets~~ ~~is~~ ~~are~~ not monitored 24/7 and we will not always be able to reply individually to all messages or comments received. However, we will endeavour to ensure that any emerging themes or helpful suggestions are passed to the relevant people or authorities. Please do not include personal/private information in your social media posts to us.

Sending a message/post via Facebook ~~or Instagram~~ will not be considered as contacting the Council for official purposes and we will not be obliged to monitor or respond to requests for information through these channels. Instead, please make direct contact with the Council ~~'s Clerk and/or members of the council by emailing~~ via email:

[clerk@abertilleryandllanhilleth-wcc.gov.uk](mailto:clerk@abertilleryandllanhilleth-wcc.gov.uk)

We retain the right to remove comments or content that includes:

- Obscene or racist content
- Personal attacks, insults, or threatening language
- Potentially libellous statements
- Plagiarised material; any material in violation of any laws, including copyright
- Private, personal information published without consent
- Information or links unrelated to the content of the forum
- Commercial promotions or spam
- Alleges a breach of a Council's policy or the law.

The Council's response to any communication received not meeting the above criteria will be to either ignore it, inform the sender of our policy or send a brief response as appropriate. This will be at the Council's discretion based on the message received, given our limited resources available. Any

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information posted on the Facebook ~~or Instagram~~ pages not in line with the above criteria will be removed as quickly as practically possible. Repeat offenders will be blocked. ~~from the Facebook page.~~ The Council may post a statement that 'A post breaching the Council's Social Media and Electronic Communications Policy has been removed'. If the post alleges a breach of a Council's policy or the law, the person who posted it will be able to submit a formal complaint to the Council or report the matter to the Police as soon as possible to allow due process.

## Council Website

Where necessary, we may direct those contacting us to our website to see the required information, or we may forward their question to one of our Councillors for consideration and response. We may not respond to every comment we receive, particularly if we are experiencing a heavy workload.

The following items will NOT be included on the website:

- Articles affiliated to, or promoting any political organisation;
- Commercial advertisements;
- Publicity for any non-charitable fundraising event.

~~The Council may, at its discretion, allow and enable approved local groups to have and maintain a presence on its website for the purpose of presenting information about the group's activities. The local group would be responsible for maintaining the content and ensuring that it meets the Council's 'rules and expectations' for the website. The Council reserves the right to remove any or all of a local group's information from the website if it feels that the content does not meet the Council's 'rules and expectations' for its website. Where content on the website is maintained by a local group it should be clearly marked that such content is not the direct responsibility of the Council.~~

## Council Email

The ~~Clerk~~ Officers to the Council have their own council email address: [clerk@abertilleryandllanhillleth-wcc.gov.uk](mailto:clerk@abertilleryandllanhillleth-wcc.gov.uk) ~~clerk.alcc@gmail.com~~

The email account is monitored during office hours, Monday to Friday 9am to 1pm. We aim to reply to all queries as soon as we can. An 'out of office' message will be used as appropriate.

The Clerk and Deputy Clerks are responsible for dealing with all email received and passing on any relevant mail to members or external agencies for information and/or action. All communications on behalf of the Council will usually come from the Clerk or Deputy Clerks, and/or otherwise will always be copied to the Council's email address. New emails which require data to be passed on will be followed up where necessary with a data consent form for completion before action is taken with that correspondence.

Individual councillors are also provided with council-owned email addresses and are at liberty to communicate directly with constituents in relation to their own personal views and, if appropriate, copy in the Council email address. ~~They may use their own personal email or social media accounts to do so. They may copy correspondence to the Clerk.~~ Any emails copied to the Clerk become official Council communications and will be subject to the Freedom of Information Act. Any emails that are sent or received by councillors are subject to the Freedom of Information Act.

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These procedures will ensure that a complete and proper record of all correspondence is kept.

Do not forward personal information on to other people or groups outside of the Council. This includes names, addresses, email, IP addresses and cookie identifiers.

### **SMS (texting) Text Messages and Whatsapp (SMS)**

Members and the Clerk may use SMS as a convenient way to communicate at times. All are reminded that this policy also applies to such messages.

Use of SMS should be limited to:

- Reminders (but not as the primary means of notification) of practical aspects of meetings, for example dates and times;
- A tool for rapid communication for sharing information in the event of an emerging situation facing the community, for example, flooding;

SMS should not be used for:

- Day-to-day discussion of, and views on, Council policies and their implementation;
- As evidence of agreement/disagreement;
- An alternative to voting;
- An agreement of a specific course of action or financial commitment by the Council;
- Providing feedback to other Councillors;
- Proposing agenda items, sharing papers, notification in advance of apologies.

### **Video Conferencing e.g. Skype**

If this medium is used to communicate, this policy also applies.

The Council is able to hold formal meetings via video conferencing.

### **Internal communication and access to information within the Council**

The Council is continually looking at ways to improve its working and the use of social media and electronic communications is a major factor in delivering improvement.

### **Councillors are required to abide by the Code of Conduct and the General Data Protection regulation (formerly the Data Protection Act) in all their work on behalf of the Council**

As more and more information becomes available at the press of a button, it is vital that all information is treated sensitively and securely. Councillors are expected to be aware of the confidentiality of information they have access to and not to share confidential information with anyone. Failure to properly observe confidentiality may be seen as a breach of the Council's Code of Conduct and will be dealt with through prescribed procedures. It may result in a member being reported to the Public Services Ombudsman. It may also lead to criminal proceedings.

Members should also be careful only to copy essential recipients in to emails. Think about whether you need to, and if possible avoid using the 'Reply to All' option, but of course copy in all who need to know

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and ensure irrelevant email trails (earlier emails on the same subject which are no longer relevant) are removed.

Councillors who post on social media must observe the Code of Conduct. Councillors are personally responsible for the social media content they create, publish and share. Being a Councillor does not prevent a member of the public from pursuing legal action following the publication of untrue statement and Councillors may be held personally liable.

Any Councillor posting, referring to themselves as a Councillor – even if it is in a personal capacity – may be considered as acting in an official capacity.

When posting to social media, it should be remembered that:

- The Councillor is an elected representative of the Council;
- Any post can affect the reputation of the Council;
- It is the Council which is the corporate decision-making body – no Councillor can independently make decisions for the Council over social media;
- Some issues and communications are best left to the Council's official social media accounts;
- Having a single voice or message can be critical in some situations;
- The Council cannot be involved in party political issues;
- It is not necessary to respond or make comment on everything on social media – in fact sometimes it is better not to;
- Posts must not contain any form of discrimination – including racism, sexism, ageism, ableism, homophobia, transphobia or religious intolerance.

Everyone should be reminded that a good general rule is that if there is uncertainty about something – stop, think and ask for advice before doing anything else.

Adopted by the Council: ..... date .....





**THE COMMUNITY COUNCIL OF ABERTILLERY & LLANHILLETH  
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## **Retention and Disposal Policy**

### **1. Introduction**

- 1.1 The Council accumulates a vast amount of information and data during the course of its everyday activities. This includes data generated internally in addition to information obtained from individuals and external organisations. This information is recorded in various different types of document.
- 1.2 Records created and maintained by the Council are an important asset and as such measures need to be undertaken to safeguard this information. Properly managed records provide authentic and reliable evidence of the Council's transactions and are necessary to ensure it can demonstrate accountability.
- 1.3 Documents may be retained in either 'hard' paper form or in electronic forms. For the purpose of this policy, 'document' and 'record' refers to both hard copy and electronic records.
- 1.4 It is imperative that documents are retained for an adequate period of time. If documents are destroyed prematurely the Council and individual officers concerned could face prosecution for not complying with legislation and it could cause operational difficulties, reputational damage and difficulty in defending any claim brought against the Council.
- 1.5 In contrast to the above the Council should not retain documents longer than is necessary. Timely disposal should be undertaken to ensure compliance with the General Data Protection Regulations so that personal information is not retained longer than necessary. This will also ensure the most efficient use of limited storage space.

### **2. Scope and Objectives of the Policy**

- 2.1 The aim of this document is to provide a working framework to determine which documents are:
  - Retained – and for how long; or
  - Disposed of – and if so by what method.
- 2.2 There are some records that do not need to be kept at all or that are routinely destroyed in the course of business. This usually applies to information that is duplicated, unimportant or only of a short-term value. Unimportant records of information include:
  - 'With compliments' slips.
  - Catalogues and trade journals.
  - Non-acceptance of invitations.

- Trivial electronic mail messages that are not related to Council business.
- Requests for information such as maps, plans or advertising material.
- Out of date distribution lists.

23 Duplicated and superseded material such as stationery, manuals, drafts, forms, address books and reference copies of annual reports may be destroyed.

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- 24 Records should not be destroyed if the information can be used as evidence to prove that something has happened. If destroyed the disposal needs to be disposed of under the General Data Protection Regulations

### **3. Roles and Responsibilities for Document Retention and Disposal**

- 3.1 Councils are responsible for determining whether to retain or dispose of documents and should undertake a review of documentation at least on an annual basis to ensure that any unnecessary documentation being held is disposed of under the General Data Protection Regulations.
- 3.2 Councils should ensure that all employees are aware of the retention/disposal schedule.

### **4. Document Retention Protocol**

- 4.1 Councils should have in place an adequate system for documenting the activities of their service. This system should take into account the legislative and regulatory environments to which they work.
- 4.2 Records of each activity should be complete and accurate enough to allow employees and their successors to undertake appropriate actions in the context of their responsibilities to:
- Facilitate an audit or examination of the business by anyone so authorised.
  - Protect the legal and other rights of the Council, its clients and any other persons affected by its actions.
  - Verify individual consent to record, manage and record disposal of their personal data.
  - Provide authenticity of the records so that the evidence derived from them is shown to be credible and authoritative.
- 4.3 To facilitate this the following principles should be adopted:
- Records created and maintained should be arranged in a record-keeping system that will enable quick and easy retrieval of information under the General Data Protection Regulations
  - Documents that are no longer required for operational purposes but need retaining should be placed at the records office.
- 4.4 The retention schedules in Appendix A: List of Documents for Retention or Disposal provide guidance on the recommended minimum retention periods for specific classes of documents and records. These schedules have been compiled from recommended best practice from the Public Records Office, the Records Management Society of Great Britain and in accordance with relevant legislation.
- 4.5 Whenever there is a possibility of litigation, the records and information that are likely to be affected should not be amended or disposed of until the threat of litigation has been removed.

### **5. Document Disposal Protocol**

- 5.1 Documents should only be disposed of if reviewed in accordance with the following:
- Is retention required to fulfil statutory or other regulatory requirements?
  - Is retention required to meet the operational needs of the service?

- Is retention required to evidence events in the case of dispute?
  - Is retention required because the document or record is of historic interest or intrinsic value?
- 52 When documents are scheduled for disposal the method of disposal should be appropriate to the nature and sensitivity of the documents concerned. A record of the disposal will be kept to comply with the General Data Protection Regulations.
- 53 Documents can be disposed of by any of the following methods:
- Non-confidential records: place in waste paper bin for disposal.
  - Confidential records or records giving personal information: shred documents.
  - Deletion of computer records.
  - Transmission of records to an external body such as the County Records Office.
- 54 The following principles should be followed when disposing of records:
- All records containing personal or confidential information should be destroyed at the end of the retention period. Failure to do so could lead to the Council being prosecuted under the General Data Protection Regulations.
  - the Freedom of Information Act or cause reputational damage.
  - Where computer records are deleted steps should be taken to ensure that data is 'virtually impossible to retrieve' as advised by the Information Commissioner.
  - Where documents are of historical interest it may be appropriate that they are transmitted to the County Records office.
  - Back-up copies of documents should also be destroyed (including electronic or photographed documents unless specific provisions exist for their disposal).
- 55 Records should be maintained of appropriate disposals. These records should contain the following information:
- The name of the document destroyed.
  - The date the document was destroyed.
  - The method of disposal.

## **6. Data Protection Act 2018 – Obligation to Dispose of Certain Data**

- 6.1 The Data Protection Act 2018 ('Fifth Principle') requires that personal information must not be retained longer than is necessary for the purpose for which it was originally obtained. Section 1 of the Data Protection Act defines personal information as:

Data that relates to a living individual who can be identified:

- a) from the data, or
- b) from those data and other information which is in the possession of, or is likely to come into the possession of the data controller.

It includes any expression of opinion about the individual and any indication of the intentions of the Council or other person in respect of the individual.

- 6.2 The Data Protection Act provides an exemption for information about identifiable living individuals that is held for research, statistical or historical purposes to be held indefinitely provided that the specific requirements are met.
- 6.3 Councils are responsible for ensuring that they comply with the principles of the under the General Data Protection Regulations namely:
- Personal data is processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met.

- Personal data shall only be obtained for specific purposes and processed in a compatible manner.
  - Personal data shall be adequate, relevant, but not excessive.
  - Personal data shall be accurate and up to date.
  - Personal data shall not be kept for longer than is necessary.
  - Personal data shall be processed in accordance with the rights of the data subject.
  - Personal data shall be kept secure.
- 6.4 External storage providers or archivists that are holding Council documents must also comply with the above principles of the General Data Protection Regulations.

## **7. Scanning of Documents**

- 7.1 In general once a document has been scanned on to a document image system the original becomes redundant. There is no specific legislation covering the format for which local government records are retained following electronic storage, except for those prescribed by HM Revenue and Customs.
- 7.2 As a general rule hard copies of scanned documents should be retained for three months after scanning.
- 7.3 Original documents required for VAT and tax purposes should be retained for six years unless a shorter period has been agreed with HM Revenue and Customs.

## **8. Review of Document Retention**

- 8.1 It is planned to review, update and where appropriate amend this document on a regular basis (at least every three years in accordance with the *Code of Practice on the Management of Records* issued by the Lord Chancellor).
- 8.2 This document has been compiled from various sources of recommended best practice and with reference to the following documents and publications:
- *Local Council Administration*, Charles Arnold-Baker, 12th edition, Chapter 11
  - NALC LTN 40 – *Local Councils' Documents and Records*, January 2013
  - NALC LTN 37 – *Freedom of Information*, July 2009
  - *Lord Chancellor's Code of Practice on the Management of Records* issued under Section 46 of the *Freedom of Information Act 2000*

## **9. List of Documents**

- 9.1 The full list of the Council's documents and the procedures for retention or disposal can be found in Appendix A: List of Documents for Retention and Disposal. This is updated regularly in accordance with any changes to legal requirements.

Document	Minimum Retention Period	Reason	Location Retained	Disposal
Minutes	Indefinite	Archive	Office	Original signed paper copies of Council minutes of meetings must be kept indefinitely in safe storage.
Agendas	5 years	Management	Office	Bin (shred confidential waste)
Accident/incident reports	20 years	Potential claims	Office	Confidential waste A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Scales of fees and charges	6 years	Management	Office	Bin
Receipt and payment accounts	Indefinite	Archive	Office	N/A
Receipt books of all kinds	6 years	VAT	Office	Bin
Bank statements including deposit/savings accounts	Last completed audit year	Audit	Office	Confidential waste
Bank paying-in books	Last completed audit year	Audit	Office	Confidential waste
Cheque book stubs	Last completed audit year	Audit	Office	Confidential waste

Quotations and tenders	6 years	Limitation Act 1980 (as amended)	Office	Confidential waste A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Paid invoices	6 years	VAT	Office	Confidential waste
Paid cheques	6 years	Limitation Act 1980 (as amended)	Office	Confidential waste
VAT records	6 years generally but 20 years for VAT on rents	VAT	Office	Confidential waste
Petty cash, postage and telephone books	6 years	Tax, VAT, Limitation Act 1980 (as amended)	Office	Confidential waste
Timesheets	Last completed audit year 3 years	Audit (requirement) Personal injury (best practice)	Office	Bin
Wages books/payroll	12 years	Superannuation	Office	Confidential waste
Insurance policies	While valid (but see next two items below)	Management	Office	Bin
Insurance company names and policy numbers	Indefinite	Management	Office	N/A
Certificates for insurance against liability for employees	40 years from date on which insurance commenced or was renewed	The Employers' Liability (Compulsory Insurance) Regulations 1998 (SI 2753) Management	Office	Bin
Town Park equipment inspection reports	21 years		Office	
Investments	Indefinite	Audit, Management	Office	N/A

Title deeds, leases, agreements, contracts	Indefinite	Audit, Management	Office	N/A
Members' allowances register	6 years	Tax, Limitation Act 1980 (as amended)	Office	Confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Information from other bodies e.g. circulars from county associations, NALC, principal authorities	Retained for as long as it is useful and relevant		Office	Bin
Local/historical information	Indefinite – to be securely kept for benefit of the Parish	Councils may acquire records of local interest and accept gifts or records of general and local interest in order to promote the use for such records (defined as materials in written or other form setting out facts or events or otherwise recording information).	Office	N/A
Magazines and journals	Council may wish to keep its own publications  For others retain for as long as they are useful and relevant.	The Legal Deposit Libraries Act 2003 (the 2003 Act) requires a local council which after 1 <sup>st</sup> February 2004 has published works in print (this includes a pamphlet, magazine or newspaper, a map, plan, chart or table) to deliver, at its own expense, a copy of them to the British Library Board (which manages and controls the British Library). Printed works as	Office	Bin if applicable



		defined by the 2003 Act published by a local council therefore constitute materials which the British Library holds.		
	<b>Record-keeping</b>			
<p>To ensure records are easily accessible it is necessary to comply with the following:</p> <ul style="list-style-type: none"> <li>☐ A list of files stored in cabinets will be kept</li> <li>☐ Electronic files will be saved using relevant file names</li> </ul>	<p>The electronic files will be backed up periodically on a portable hard drive and also in the cloud-based programme supplied by the Council's IT company.</p>	Management	Office	<p>Documentation no longer required will be disposed of, ensuring any confidential documents are destroyed as confidential waste.</p> <p>A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.</p>
General correspondence	<p>Unless it relates to specific categories outlined in the policy, correspondence, both paper and electronic, should be kept.</p> <p>Records should be kept for as long as they are needed for reference or accountability purposes, to comply with regulatory requirements or to protect legal and other rights and interests.</p>	Management	Office	<p>Bin (shred confidential waste)</p> <p>A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.</p>

Correspondence relating to staff	If related to Audit, see relevant sections above. Should be kept securely and personal data in relation to staff should not be kept for longer than is necessary for the purpose it was held. Likely time limits for tribunal claims between 3–6 months Recommend this period be for 3 years	After an employment relationship has ended, a council may need to retain and access staff records for former staff for the purpose of giving references, payment of tax, national insurance contributions and pensions, and in respect of any related legal claims made against the council.	Office	Confidential waste A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Recruitment	6 Months	Candidates for any vacancies have up to six months post appointment to appeal if they have been unsuccessful	Office/ Email system	Shredded.



**THE COMMUNITY COUNCIL OF ABERTILLERY & LLANHILLETH  
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**Telephone 01495 217323**

**Privacy Notice**

**When you contact us**

The information you provide (personal information such as name, address, email address, phone number, organisation) will be processed and stored to enable us to contact you and respond to your correspondence, provide information and/or access our facilities and services. Your personal information will be not shared or provided to any other third party.

**The Councils Right to Process Information**

General Data Protection Regulations Article 6 (1) (a) (b) and (e)

Processing is with consent of the data subject or Processing is necessary for compliance with a legal obligation or Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

**Information Security**

Abertillery and Llanhilleth Community Council has a duty to ensure the security of personal data. We make sure that your information is protected from unauthorised access, loss, manipulation, falsification, destruction or unauthorised disclosure. This is done through appropriate technical measures and appropriate policies. Copies of these policies can be requested.

We will only keep your data for the purpose it was collected for and only for as long as is necessary. After which it will be deleted. (You may request the deletion of your data held by Abertillery and Llanhilleth Community Council at any time).

**Children**

We will not process any data relating to a child (under 13) without the express parental/ guardian consent of the child concerned.

**Access to Information**

You have the right to request access to the information we have on you. You can do this contacting the Council in writing:

**The Clerk of the Council, Abertillery and Llanhilleth Community Council, Council Offices,  
Mitre Street, Abertillery, NP13 1AE [clerk@abertilleryandllanhilleth-wcc.gov.uk](mailto:clerk@abertilleryandllanhilleth-wcc.gov.uk)**

### **Information Deletion**

If you wish Abertillery and Llanhilleth Community Council to delete the information about you please contact the Council in writing:

**The Clerk of the Council, Abertillery and Llanhilleth Community Council, Council Offices, Mitre Street, Abertillery, NP13 1AE [clerk@abertilleryandllanhilleth-wcc.gov.uk](mailto:clerk@abertilleryandllanhilleth-wcc.gov.uk)**

### **Right to Object**

If you believe that your data is not being processed for the purpose it has been collected for, you may object: Please contact the Council in writing to object.

**The Clerk of the Council, Abertillery and Llanhilleth Community Council, Council Offices, Mitre Street, Abertillery, NP13 1AE [clerk@abertilleryandllanhilleth-wcc.gov.uk](mailto:clerk@abertilleryandllanhilleth-wcc.gov.uk)**

### **Rights Related to Automated Decision Making and Profiling**

Abertillery and Llanhilleth Community Council does not use any form of automated decision making or the profiling of individual personal data. Conclusion: In accordance with the law, we only collect a limited amount of information about you that is necessary for correspondence, information and service provision. We do not use profiling, we do not sell or pass your data to third parties. We do not use your data for purposes other than those specified. We make sure your data is stored securely. We delete all information deemed to be no longer necessary. We constantly review our Privacy Policies to keep it up to date in protecting your data. (You can request a copy of our policies at any time).

### **Complaints**

If you have a complaint regarding the way your personal data has been processed you may make a complaint to Abertillery and Llanhilleth Community Council Data Information Officer:

**The Clerk of the Council, Abertillery and Llanhilleth Community Council, Council Offices, Mitre Street, Abertillery, NP13 1AE [clerk@abertilleryandllanhilleth-wcc.gov.uk](mailto:clerk@abertilleryandllanhilleth-wcc.gov.uk)**

and the Information Commissioners Office [casework@ico.org.uk](mailto:casework@ico.org.uk) Tel: 0303 123 1113



**THE COMMUNITY COUNCIL OF ABERTILLERY & LLANHILLETH  
CYNGOR CYMUNED ABERTYLERI A LLANHILLEDD**

**E-mail: [clerk@abertilleryandllanhilleth-wcc.gov.uk](mailto:clerk@abertilleryandllanhilleth-wcc.gov.uk)**

**Telephone 01495 217323**

## **Information and Data Protection Policy**

In order to conduct its business, services and duties, Abertillery and Llanhilleth Community Council processes a wide range of data, relating to its own operations and some which it handles on behalf of partners. In broad terms, this data can be classified as:

- Data shared in the public arena about the services it offers, its mode of operations and other information it is required to make available to the public.
- Confidential information and data not yet in the public arena such as ideas or policies that are being worked up.
- Confidential information about other organisations because of commercial sensitivity.
- Personal data concerning its current, past and potential employees, Councillors, and volunteers.
- Personal data concerning individuals who contact it for information, to access its services or facilities or to make a complaint.

Abertillery and Llanhilleth Community Council will adopt procedures and manage responsibly, all data which it handles and will respect the confidentiality of both its own data and that belonging to partner organisations it works with and members of the public. In some cases, it will have contractual obligations towards confidential data, but in addition will have specific legal responsibilities for personal and sensitive information under data protection legislation.

The Council will review and revise this policy in the light of experience, comments from data subjects and guidance from the Information Commissioners Office.

The Council will be as transparent as possible about its operations and will work closely with public, community and voluntary organisations. Therefore, in the case of all information which is not personal or confidential, it will be prepared to make it available to partners and members of the Town's communities. Details of information which is routinely available is contained in the Council's Publication Scheme which is based on the statutory model publication scheme for local councils.

### **Protecting Confidential or Sensitive Information**

Abertillery and Llanhilleth Community Council recognises it must at times, keep and process sensitive and personal information about both employees and the public, it has therefore adopted this policy not only to meet its legal obligations but to ensure high standards.

The General Data Protection Regulation (GDPR) which became law on 25th May 2018 and will like the Data Protection Act 1998 before them, seek to strike a balance between the rights of

individuals and the sometimes, competing interests of those such as the Council with legitimate reasons for using personal information.

**The policy is based on the premise that Personal Data must be:**

- Processed fairly, lawfully and in a transparent manner in relation to the data subject.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date.
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Processed in a manner that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

**Data Protection Terminology**

**Data subject** - means the person whose personal data is being processed. That may be an employee, prospective employee, associate or prospective associate of BTC or someone transacting with it in some way, or an employee, Member or volunteer with one of our clients, or persons transacting or contracting with one of our clients when we process data for them.

**Personal data** - means any information relating to a natural person or data subject that can be used directly or indirectly to identify the person. It can be anything from a name, a photo, and an address, date of birth, an email address, bank details, and posts on social networking sites or a computer IP address.

**Sensitive personal data** - includes information about racial or ethnic origin, political opinions, and religious or other beliefs, trade union membership, medical information, sexual orientation, genetic and biometric data or information related to offences or alleged offences where it is used to uniquely identify an individual.

**Data controller** - means a person who (either alone or jointly or in common with other persons) (e.g. Council, employer, council) determines the purposes for which and the manner in which any personal data is to be processed.

**Data processor** - in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller. Processing information or data - means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including:

- organising, adapting or altering it
- retrieving, consulting or using the information or data

- disclosing the information or data by transmission, dissemination or otherwise making it available
- aligning, combining, blocking, erasing or destroying the information or data. regardless of the Technology used.

**Abertillery and Llanhilleth Community Council processes personal data in order to:**

- fulfil its duties as an employer by complying with the terms of contracts of employment, safeguarding the employee and maintaining information required by law.
- pursue the legitimate interests of its business and its duties as a public body, by fulfilling contractual terms with other organisations, and maintaining information required by law.
- monitor its activities including the equality and diversity of its activities • fulfil its duties in operating the business premises including security
- assist regulatory and law enforcement agencies
- process information including the recording and updating details about its Councillors, employees, partners and volunteers.
- process information including the recording and updating details about individuals who contact it for information, or to access a service, or make a complaint.
- undertake surveys, censuses and questionnaires to fulfil the objectives and purposes of the Council.
- undertake research, audit and quality improvement work to fulfil its objects and purposes.
- carry out Council administration.

Where appropriate and governed by necessary safeguards we will carry out the above processing jointly with other appropriate bodies from time to time.

**The Council will ensure that at least one of the following conditions is met for personal information to be considered fairly processed:**

- The individual has consented to the processing
- Processing is necessary for the performance of a contract or agreement with the individual
- Processing is required under a legal obligation
- Processing is necessary to protect the vital interests of the individual
- Processing is necessary to carry out public functions
- Processing is necessary in order to pursue the legitimate interests of the data controller or third parties.

Particular attention is paid to the processing of any sensitive personal information and the Council will ensure that at least one of the following conditions is met:

- Explicit consent of the individual

- Required by law to process the data for employment purposes
- A requirement in order to protect the vital interests of the individual or another person

### **Who is responsible for protecting a person's personal data?**

The Council as a corporate body has ultimate responsibility for ensuring compliance with the Data Protection legislation. The Council has delegated this responsibility day to day to the Clerk.

- Email: [clerk@abertilleryandllanhilleth-wcc.gov.uk](mailto:clerk@abertilleryandllanhilleth-wcc.gov.uk)
- Phone: 01495 217323
- Correspondence: The Clerk, Council Offices, Mitre Street, Abertillery, NP13 1AE

### **Diversity Monitoring**

Abertillery and Llanhilleth Community Council monitors the diversity of its employees, and Councillors, in order to ensure that there is no inappropriate or unlawful discrimination in the way it conducts its activities. It undertakes similar data handling in respect of prospective employees. This data will always be treated as confidential. It will only be accessed by authorised individuals within the Council and will not be disclosed to any other bodies or individuals. Diversity information will never be used as selection criteria and will not be made available to others involved in the recruitment process. Anonymised data derived from diversity monitoring will be used for monitoring purposes and may be published and passed to other bodies.

The Council will always give guidance on personnel data to employees, councillors, partners and volunteers through a Privacy Notice and ensure that individuals on whom personal information is kept are aware of their rights and have easy access to that information on request.

Appropriate technical and organisational measures will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data. Personal data shall not be transferred to a country or territory outside the European Economic Areas unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

### **Information provided to us**

The information provided (personal information such as name, address, email address, phone number) will be processed and stored so that it is possible for us to contact, respond to or conduct the transaction requested by the individual. By transacting with Abertillery and Llanhilleth Community Council, individuals are deemed to be giving consent for their personal data provided to be used and transferred in accordance with this policy, however where ever possible specific written consent will be sought. It is the responsibility of those individuals to ensure that the Council is able to keep their personal data accurate and up-to-date. The personal information will be not shared or provided to any other third party or be used for any purpose other than that for which it was provided.



## **The Councils Right to Process Information**

General Data Protection Regulations (and Data Protection Act) Article 6 (1) (a) (b) and (e)  
Processing is with consent of the data subject, or

Processing is necessary for compliance with a legal obligation. Processing is necessary for the legitimate interests of the Council.

## **Information Security**

The Council cares to ensure the security of personal data. We make sure that your information is protected from unauthorised access, loss, manipulation, falsification, destruction or unauthorised disclosure. This is done through appropriate technical measures and appropriate policies. We will only keep your data for the purpose it was collected for and only for as long as is necessary, after which it will be deleted.

## **Children**

We will not process any data relating to a child (under 13) without the express parental/ guardian consent of the child concerned.

## **Rights of a Data Subject**

**Access to Information:** an individual has the right to request access to the information we have on them. They can do this by contacting our Clerk.

**Information Correction:** If they believe that the information we have about them is incorrect, they may contact us so that we can update it and keep their data accurate. Please contact: Clerk.

**Information Deletion:** If the individual wishes the Council to delete the information about them, they can do so by contacting the Clerk.

**Right to Object:** If an individual believes their data is not being processed for the purpose it has been collected for, they may object by contacting the Clerk or Data Protection Officer.

The Community Council does not use automated decision making or profiling of individual personal data

**Complaints:** If an individual has a complaint regarding the way their personal data has been processed, they may make a complaint to the Clerk, or the Information Commissioners Office [casework@ico.org.uk](mailto:casework@ico.org.uk) Tel: 0303 123 1113.

The Council will always give guidance on personnel data to employees through the Employee handbook. The Council will ensure that individuals on whom personal information is kept are aware of their rights and have easy access to that information on request.

## **Making Information Available**

The Publication Scheme is a means by which the Council can make a significant amount of information available routinely, without waiting for someone to specifically request it. The scheme is intended to encourage local people to take an interest in the work of the Council and its role within the community.

In accordance with the provisions of the Freedom of Information Act 2000, this Scheme specifies the classes of information which the Council publishes or intends to publish. It is supplemented with an Information Guide which will give greater detail of what the Council will make available and hopefully make it easier for people to access it.

All formal meetings of Council and its committees are subject to statutory notice being given on notice boards and the Website. The Council publishes an annual programme in May each year. All formal meetings are open to the public and press and reports to those meetings and relevant background papers are available for the public to see. The Council welcomes public participation and has a formal public question policy. Details can be seen in the Council's Standing Orders, which are available on its Website or at its Offices.

Occasionally, Council or committees may need to consider matters in private. Examples of this are matters involving personal details of staff, or a particular member of the public, or where details of commercial/contractual sensitivity are to be discussed. This will only happen after a formal resolution has been passed to exclude the press and public and reasons for the decision are stated. Minutes from all formal meetings, including the confidential parts are public documents.

The Openness of Local Government Bodies Regulations 2014 requires written records to be made of certain decisions taken by officers under delegated powers. These are not routine operational and administrative decisions such as giving instructions to the workforce or paying an invoice approved by Council, but would include urgent action taken after consultation with the Chairman, such as responding to a planning application in advance of Council. In other words, decisions which would have been made by Council or committee had the delegation not been in place. The 2014 Regulations also amend the Public Bodies (Admission to Meetings) Act 1960 to allow the public or press to film, photograph or make an audio recording of council and committee meetings normally open to the public. The Council will where possible facilitate such recording unless it is being disruptive. It will also take steps to ensure that children, the vulnerable and members of the public who object to being filmed are protected without undermining the broader purpose of the meeting

The Council will be pleased to make special arrangements on request for persons who do not have English as their first language or those with hearing or sight difficulties.

### **Disclosure Information**

The Council will as necessary undertake checks on both staff and Members with the Disclosure and Barring Service and will comply with their Code of Conduct relating to the secure storage, handling, use, retention and disposal of Disclosures and Disclosure Information. It will include an appropriate operating procedure in its integrated quality management system.

### **Data Transparency**

The Council has resolved to act in accordance with the Code of Recommended Practice for Local Authorities on Data Transparency (September 2011). This sets out the key principles for local authorities in creating greater transparency through the publication of public data and is intended to help them meet obligations of the legislative framework concerning information. "Public data" means the objective, factual data on which policy decisions are based and on

which public services are assessed, or which is collected or generated in the course of public service delivery.

The Code will therefore underpin the Council's decisions on the release of public data and ensure it is proactive in pursuing higher standards and responding to best practice as it develops.

The principles of the Code are:

**Demand led:** new technologies and publication of data should support transparency and accountability

**Open:** the provision of public data will be integral to the Council's engagement with residents so that it drives accountability to them.

**Timely:** data will be published as soon as possible following production.

Government has also issued a further Code of Recommended Practice on Transparency, compliance of which is compulsory for parish councils with turnover (gross income or gross expenditure) not exceeding £25,000 per annum. These councils will be exempt from the requirement to have an external audit from April 2017. Abertillery and Llanhilleth Community Council exceeds this turnover but will never the less ensure the following information is published on its Website for ease of access:

- All transactions above £100.
- End of year accounts
- Annual Governance Statements
- Internal Audit Reports
- List of Councillor or Member responsibilities
- Details of public land and building assets
- Draft minutes of Council and committees within seven days
- Agendas and associated papers no later than three clear days before the meeting.

**Adopted by Council:** Abertillery and Llanhilleth Community Council

**Adoption date:**

**Review Date:**

# **Abertillery and Llanhilleth Community Council**

## **Staff Equality and Diversity Policy**

Abertillery and Llanhilleth Community Council is committed to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination.

The aim is for our workforce to be truly representative of all sections of society and for each employee to feel respected and able to give their best.

The Council, in providing goods and/or services and/or facilities – is also committed against unlawful discrimination of customers or the public.

### **Purpose**

This policy's purpose is to:

1. Provide equality, fairness and respect for all in our employment, whether temporary, part-time or full-time.
2. Not unlawfully discriminate because of the Equality Act 2010 protected characteristics of:
  - age
  - disability
  - gender reassignment
  - marriage and civil partnership
  - pregnancy and maternity
  - race (including colour, nationality, and ethnic or national origin)
  - religion or belief
  - sex
  - sexual orientation
3. Oppose and avoid all forms of unlawful discrimination. This includes in:
  - pay and benefits
  - terms and conditions of employment
  - dealing with grievances and discipline
  - dismissal
  - redundancy
  - leave for parents
  - requests for flexible working
  - selection for employment, promotion, training or other developmental opportunities

## **Our Commitments**

Abertillery and Llanhilleth Community Council commits to:

1. Encourage equality, diversity and inclusion in the workplace as they are good practice and make business sense.
2. Create a working environment free of bullying, harassment, victimisation and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued.

This commitment includes training all stakeholders and all employees about their rights and responsibilities under the equality, diversity and inclusion policy. Responsibilities include staff conducting themselves to help the Council provide equal opportunities in employment, and prevent bullying, harassment, victimisation and unlawful discrimination.

All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.

3. Take seriously complaints of bullying, harassment, victimisation and unlawful discrimination by fellow employees, councillors, customers, suppliers, visitors, the public and any others in the course of the Council's work activities.

Such act, by staff, will be dealt with as misconduct under the Council's grievance and/or disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

Further, sexual harassment may amount to both an employment rights matter and a criminal matter, such as in sexual assault allegations.

In addition, harassment under the Protection from Harassment Act 1997 – which is not limited to circumstances where harassment relates to a protected characteristic – is a criminal offence.

4. Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the Council.
5. Make decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the Equality Act).
6. Review employment practices and procedures when necessary to ensure fairness and also update them and the policy to take account of changes in the law.

## **Agreement to follow this policy**

The equality, diversity and inclusion policy is fully supported by the Council.

## **Disciplinary and grievance procedures**

Details of the grievance and disciplinary policies can be found at [insert details as appropriate]. This includes with whom an employee should raise a grievance.

Use of the Council's grievance or disciplinary procedures does not affect an employee's right to make a claim to an Employment Tribunal within three months of the alleged discrimination.

DRAFT

	<p><b>Documents from legal matters, negligence and other torts</b></p> <p>Most legal proceedings are governed by the Limitation Act 1980 (as amended). The 1980 Act provides that legal claims may not be commenced after a specified period. Where the limitation periods are longer than other periods specified the documentation should be kept for the longer period specified. Some types of legal proceedings may fall within two or more categories. If in doubt, keep for the longest of the three limitation periods.</p>		Office	
Negligence	6 years		Office	Confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Defamation	1 year		Office	Confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.

Contract	6 years		Office	Confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Leases	12 years		Office	Confidential waste.
Sums recoverable by statute	6 years		Office	Confidential waste.
Personal injury	3 years		Office	Confidential waste.
To recover land	12 years		Office	Confidential waste.
Rent	6 years		Office	Confidential waste.
Breach of trust	None		Office	Confidential waste.
Trust deeds	Indefinite		Office	N/A
<b>For Halls, Centres, Recreation Grounds</b>				
<input type="checkbox"/> Application to hire <input type="checkbox"/> Invoices <input type="checkbox"/> Record of tickets issued	6 years	VAT	Office	Confidential waste A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Lettings diaries	Electronic files linked to accounts	VAT	Office	N/A
Terms and Conditions	6 years	Management	Office	Bin
Event Monitoring Forms	6 years unless required for claims, insurance or legal purposes	Management	Office	Bin. A list will be kept of those documents disposed of to meet the requirements of the GDPR



				regulations.
	<b>For Allotments</b>			
Register and plans	Indefinite	Audit, Management	Office	N/A
Minutes	Indefinite	Audit, Management	Office	N/A
Legal papers	Indefinite	Audit, Management	Office	N/A
	<b>For Burial Grounds</b>			
<input type="checkbox"/> Register of fees collected <input type="checkbox"/> Register of burials <input type="checkbox"/> Register of purchased graves <input type="checkbox"/> Register/plan of grave spaces <input type="checkbox"/> Register of memorials <input type="checkbox"/> Applications for interment <input type="checkbox"/> Applications for right to erect memorials <input type="checkbox"/> Disposal certificates <input type="checkbox"/> Copy certificates of grant of exclusive right of burial	Indefinite	Archives, Local Authorities Cemeteries Order 1977 (SI 204)	Office	N/A
	<b>Planning Papers</b>			
Applications	1 year	Management	Office	Bin
Appeals	1 year unless significant development	Management	Office	Bin
Trees	1 year	Management	Office	Bin

Local Development Plans	Retained as long as in force	Reference	Office	Bin
Local Plans	Retained as long as in force	Reference	Office	Bin
Town/Neighbourhood Plans	Indefinite – final adopted plans	Historical purposes	Office	N/A
	<b>CCTV</b>			
Daily notes	Daily	Data protection	Office	Confidential waste
Radio rotas	1 week	Management	Office	Confidential waste
Work rotas	1 month	Management	Office	Confidential waste
Observation sheets	3 years	Data protection	Office	Confidential waste
Stats	3 years	Data protection	Office	Confidential waste
Signing in sheets	3 years	Management	Office	Confidential waste
Review requests	3 years	Data protection	Office	Confidential waste
Discs – master and working	For as long as required	Data protection	Office	Confidential waste
Internal Operations Procedure Manual	Destroy on renewal Review annually	Management	Office	Confidential waste
Code of Practice	Destroy on renewal Review annually	Management	Office	Confidential waste
Photographs/digital prints	31 days	Data protection	Office	Confidential waste