

## West Sussex County Council Libraries Retention Schedule

### Introduction

The County Council's record retention and disposal schedule for Libraries has been developed by the Libraries department in collaboration with the Records Management Service. The schedule applies to both hard copy and electronic records.

This retention schedule identifies Library record types. Each of these record types has then been allocated a retention period based on legislation, business need, best practice, or a combination of these.

The schedule is a vital tool to ensure the council complies with the Data Protection Act 2018 and UK GDPR.

### Why this schedule is important

Library activities produce many types of record. It is vital that these are organised in a manner that makes them retrievable and retained for a suitable period of time.

The council has a legal duty not to retain information longer than is necessary, as outlined in the [Principle \(c\): Data minimisation](#) of UK GDPR. It is also important that council resources are not being used to store records and data that are no longer required, whilst also ensuring these are not destroyed or deleted too soon. Having a fully implemented, comprehensive and regularly updated retention schedule enables the council to meet these legislative duties.

A further explanation as to why a retention schedule is important can be found on the Information Commissioner's Office website as part of [Principle \(e\): Storage Limitations](#) of UK GDPR.

### Using the Record Retention and Disposal Schedule

The retention schedule is not based on the current directorates and business units of the council, but rather the overall functions and activities. This means it will remain relevant in the event of future re-structuring or renaming of directorates and business units.

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- Definition of terms

<b>Term</b>	<b>Definition</b>
Function	The top-level function within the County Council, e.g. Children’s Services
Activity	The activity within the function, e.g. social care
Code	A unique code given to each record type
Record Type	The different types of record used to carry out the activity, e.g. case file
Retention Period	The number of years the record type should be retained before being reviewed for destruction or permanent archive
Retention Period Calculated From	The point at which the retention period begins. This may be the date of birth or the last contact with an individual, the end of a contract, or something else
Statutory Provision / Justification	The reason for the retention period. This is usually based on legislation, business need, best practice or a combination of these
Contains Personal Data?	Yes/No - Does the record type contain any of the following information about an individual: name, address, telephone number, email address or any other information that could identify the individual?
Action	A description of what happens once the retention period is up. This will usually be that the record will be reviewed for destruction or further retention, or appraised for permanent preservation in the County Archives
Additional Notes	Any additional information or caveats relating to the record type, the retention period or the action
Fileplan	List of functions, activities, and record types to form the main reference tool of the retention schedule

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- When should information be retained beyond agreed retention schedule?

Information may occasionally be retained beyond the agreed retention period. The 'Retention Period Calculated From' date may begin again if:

- a case has been re-opened;
- a new case activity has occurred;
- it is felt there is an ongoing business or care need to retain the record; or
- an inquiry or police investigation require a record or group of records to be retained

### **Destruction process**

Paper records authorised for destruction are confidentially destroyed. Electronic records are deleted from council systems.

### **What items go into permanent archive?**

When a record has been designated for destruction or deletion it may be randomly selected or appraised by an archivist from the West Sussex Record Office to determine if it holds historical value. If this is the case, it may be retained permanently in the council's corporate archive.

### **Limitations**

Many types of record do not have specified retention periods in law or in official local government guidance. To develop this schedule, departments have reviewed and provided updates for their areas to establish a 'best practice' retention period where there is not one in legislation. Further, a review of the best practices adopted by some other local authorities was conducted during the creation of the schedule.

Deleting information from a system is not always a straightforward matter. Where an IT system does not allow for part-deletion of a record, the Council will consider data protection legislation and guidance from the Information Commissioner's Office (ICO).

## The Retention Schedule

### Libraries

#### LI1 Banking

Code	Record Type	Retention Period	Retention Period Calculated From	Statutory Provision / Justification	Contains Personal Data?	Action	Additional Notes
LI1.1	Financial Records	2 years	End of current financial year	The National Archives - Records Management retention scheduling 3. Accounting records	No	Secure destruction	n/a

**LI2 Borrower Information**

Code	Record Type	Retention Period	Retention Period Calculated From	Statutory Provision / Justification	Contains Personal Data?	Action	Additional Notes
LI2.1	Disability Register Data	7 years	Date of register	Best Practice	Yes	Secure destruction	n/a
LI2.2	Borrower Registers	3 years	Date of register	Best Practice	Yes	Secure destruction	n/a
LI2.3	Borrower Information	Retain while an active borrower	n/a	Best Practice	Yes	Secure destruction	n/a
LI2.4	Inactive borrower information	7 years	Last activity	Best Practice	Yes	Secure destruction	n/a
LI2.5	List of customers banned from libraries	Permanent	n/a	Best Practice	Yes	n/a	n/a
LI2.6	Customer newsletter mailing lists	Retain on list while customer has a library card	n/a	Best Practice	Yes	Secure destruction	Customer may unsubscribe to newsletter
LI2.7	Home Library Direct customer application form	Retain as long as the customer is receiving the service	n/a	Best Practice	Yes	Secure destruction	n/a

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**LI3 Buildings**

Code	Record Type	Retention Period	Retention Period Calculated From	Statutory Provision / Justification	Contains Personal Data?	Action	Additional Notes
LI3.1	All information relating to the capture and use of CCTV	Retained as long as necessary to fulfil the purpose of an investigate on insurance claim	n/a	Best practice	Yes	Destruction / deletion	n/a
LI3.2	Risk Assessments - covering buildings and activities	Permanent - reviewed regularly	n/a	Best practice	No	Secure destruction	n/a

**LI4 Library Administration**

Code	Record Type	Retention Period	Retention Period Calculated From	Statutory Provision / Justification	Contains Personal Data?	Action	Additional Notes
LI4.1	Customer Enquiries (via email)	15 months	Date email received	Best practice - standard WSCC policy for email retention	Yes	Automatic deletion	n/a
LI4.2	Correspondence with customers	15 months	Date email received / sent	Best practice - standard WSCC policy for email retention	Yes	Automatic deletion	n/a
LI4.3	Staff / Volunteer newsletter mailing lists	Retain on list while a member of library or while volunteering	n/a	Best Practice	Yes	Deletion	n/a

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Code	Record Type	Retention Period	Retention Period Calculated From	Statutory Provision / Justification	Contains Personal Data?	Action	Additional Notes
LI4.4	School Library Service (SLS) newsletter mailing lists	Retain on spreadsheet, contacts can unsubscribe	n/a	Best Practice	Yes	Deletion	Contacts may unsubscribe to newsletter
LI4.5	Copyright Forms	7 years	Date of form	Limitation Act 1980	Yes	Secure destruction	n/a
LI4.6	Library Catalogue - part of the Library Management System	Permanent	n/a	Continuously updated	No	n/a	n/a
LI4.7	Local Clubs and Society information form	18 months	Date of form	Best practice	No	Secure destruction	n/a
LI4.8	Parental consent forms for using public access computers	Retain until child is 16 years old	n/a	Best practice	Yes	Secure destruction	n/a



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Code	Record Type	Retention Period	Retention Period Calculated From	Statutory Provision / Justification	Contains Personal Data?	Action	Additional Notes
LI4.9	Photo consent forms	10 years	Date of form	Best practice	Yes	Secure destruction	n/a
LI4.10	Reading Group requests	2 years	Date of request	Best practice	Yes	Secure destruction	n/a
LI4.11	Statistics / data including visitor numbers, percentages of stock on loan etc	Permanent	n/a	Best practice	No	n/a	Some deleted when no longer required
LI4.12	Vehicle documentation - fuel receipts, defect sheets etc. needed for the O licence	6 months	After end of lease of vehicle	Best practice	No	Secure destruction	Vehicles such as the library delivery vans, the Bookbuses and Schools Library Service van/bookbus

**LI5 Staffing**

<b>Code</b>	<b>Record Type</b>	<b>Retention Period</b>	<b>Retention Period Calculated From</b>	<b>Statutory Provision / Justification</b>	<b>Contains Personal Data?</b>	<b>Action</b>	<b>Additional Notes</b>
LI5.1	Staff and volunteer personnel records	7 years	End of employment	Standard WSCC retention for staff records	Yes	Secure destruction	n/a
LI5.2	Staff and volunteer application forms for unsuccessful candidates	6 months	Date of application	Standard WSCC retention for staff records	Yes	Secure destruction	n/a