

West Sussex County Council Communications & Engagement Retention Schedule

Introduction

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

This retention schedule identifies Communications & Engagement 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

Communications & Engagement 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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Oct 2024**

- Definition of terms

Term	Definition
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

- 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

Communications & Engagement

CE1 Complaints

Code	Record Type	Retention Period	Retention Period Calculated From	Statutory Provision / Justification	Contains Personal Data?	Action	Additional Notes
CE1.1	Complaints relating to Looked After Children	6 years	Date complaint resolved	Best practice	Yes	Review and if no longer needed destroy	Any formal complaint record that is managed and kept separately from a person's documented case records will be kept according to these timeframes. A copy of the specific complaint and any issues about service delivery to the person will also be kept on the care record.
CE1.2	Complaints relating to Adoption & Fostering service	6 years	Date complaint resolved	Best practice	Yes	Review and if no longer needed destroy	Any formal complaint record that is managed and kept separately from a person's documented case records will be kept according to these timeframes. A copy of the specific complaint and any issues about service delivery to the person will also be kept on the care record.
CE1.3	Complaints relating to schools from parents or guardians	6 years	Date complaint resolved	Best practice	Yes	Review and if no longer needed destroy	n/a

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CE1.4	Complaints relating to Special Educational Needs	6 years	Date complaint resolved	Best practice	Yes	Review and if no longer needed destroy	Any formal complaint record that is managed and kept separately from a person's documented case records will be kept according to these timeframes. A copy of the specific complaint and any issues about service delivery to the person will also be kept on the care record.
CE1.5	General complaints - (Stage 1 or 2)	6 years	Date complaint resolved	Best practice	Yes	Review and if no longer needed destroy	n/a
CE1.6	Adults' Social Care - Stage 1 Complaints by or about people in contact with Adults' Services and their own care and support	6 years	Date complaint resolved	Best practice	Yes	Review and if no longer needed destroy	Any formal complaint record that is managed and kept separately from a person's documented case records will be kept according to these timeframes. A copy of the specific complaint and any issues about service delivery to the person will also be kept on the care record.

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Code	Record Type	Retention Period	Retention Period Calculated From	Statutory Provision / Justification	Contains Personal Data?	Action	Additional Notes
CE1.7	Adults' Social Care - Stage 2 (complaints to the Local Government and Social Care Ombudsman) Complaints by or about people in contact with Adults' Services and their own care and support	6 years	Date complaint resolved	Best practice	Yes	Review and if no longer needed destroy	Any formal complaint record that is managed and kept separately from a person's documented case records will be kept according to these timeframes. A copy of the specific complaint and any issues about service delivery to the person will also be kept on the care record.
CE1.8	Adults' Social Care - Complaints relating to the business of Adults' Services	6 years	Date complaint resolved	Best practice	Yes	Review and Destroy	n/a