



VERWOOD TOWN COUNCIL

Participating Pensions Employer Personal Data Retention Policy

This document has been prepared by Verwood Town Council, in its capacity as a scheme employer in the Dorset County Pension Fund and sets out the Employer's policy on the retention of personal data relating to its employees who are members of the Fund.

As data controllers, Verwood Town Council is required by legislation to comply with the principles of data minimisation and storage limitation. Personal data processed:

- must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed; and
- must not be kept in a form which permits identification of a data subject for longer than is necessary for the purposes for which the personal data is processed.

Verwood Town Council is obliged to retain certain records (whether in hard copy or electronic form) for various periods of time because

- of a statutory obligation to do so; and/or
- the information contained in those records may be necessary for the future (for example, questions may arise about the calculation of benefits either to be put into payment or that have been paid in the past, and data that may be relevant to a possible legal claim needs to be kept until the period within which that claim could be brought has expired).

This policy document sets out the measures adopted by Verwood Town Council to comply with the principles of data minimisation and storage limitation in relation to personal data that is held for the purposes of the Dorset County Pension Fund.

Types of personal data held

Verwood Town Council holds and processes the following types of personal data in relation to current and former employees who are Members of the Dorset County Pension Fund.

- Contact details, including name, address, telephone numbers and email address.
- Identifying details, including date of birth, national insurance number and employee and membership numbers.
- Information that is used to calculate and assess eligibility for benefits, for example, length of service, history of hours worked or membership and salary information necessary for the calculation of the Member's benefits in the Dorset County Pension Fund.
- For current employees, information about the Member's family, dependants or personal circumstances, for example, marital status and information relevant to the distribution and allocation of benefits payable on death in service.

- Information about the Member's health, for example, to assess eligibility for benefits payable on ill health, or where the scheme Member's health is relevant to a claim for benefits following their death.
- Information about a criminal conviction if this has resulted in the Member owing money to the Employer or the Dorset County Pension Fund (the Employer or the Dorset County Pension Fund may be reimbursed from the Member's benefits).

Retention periods for personal data

In compiling the policy on the retention of personal data, Verwood Town Council has taken into account the guidelines on the retention of personal data as set out in/by:

- Information and Records Management Society;
- HMRC compliance handbook manual CH15400;
- the Lord Chancellor's Code of Practice on the Management of Records issued under Section 46 of the Freedom of information Act 2000;
- ICO's retention policy;
- Eu Article 29 Working Party guidance; and
- The Pension Regulator's code of practice 14 for public service pension schemes.

Data protection legislation requires that we retain personal data for no longer than is necessary in order to fulfil the purpose(s) for which it is processed. Given the long-term nature of pensions, Verwood Town Council needs to ensure that personal data is retained to:

- Comply with legal obligations as a participating employer regarding the payment of pensions from the Dorset County Pension Fund, and
- Deal with any questions or complaints that we or the Dorset County Pension Fund may receive about a Member's pension entitlement from the Dorset County Pension Fund.

Personal data will be retained for a maximum period of 15 years after termination of employment.

During any period when personal data is retained, all reasonable steps will be taken to keep that personal data up to date and take to ensure that inaccurate data is either erased or rectified without delay. Verwood Town Council will periodically review the personal data retained and consider whether it is still required; any personal data no longer required, will be destroyed.

Member's and Beneficiary's rights

Beneficiaries form a wider category of people who receive benefits from the Dorset County Pension Fund, for example the active/deferred/pensioner member's spouse/child(ren)/dependants). Member of the Dorset County Pension Fund and Beneficiaries have a right to access and obtain a copy of the personal data that is held about them and to ask Verwood Town Council to correct personal data if there are any errors or if it is out of date or incomplete.

In certain circumstances a Member/Beneficiary has the right to:

- Object to the processing of their personal data
- Restrict the processing of their personal data until any errors are corrected;
- Transfer their personal data; or
- Erase their personal data.

If the exercise of the Member's/Beneficiary's rights would prevent Verwood Town Council from providing the personal data to required for continued payment of the pension the Dorset County Pension Fund, a minimised version of that Member's/Beneficiary's personal data will be retained in order to fulfil legal obligations.

The Council is aware of and will fully comply with its obligations under GDPR (the General Data Protection Regulation).

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