

Great Waldingfield Parish Council

GWPC Document retention and disposal policy v1.1.docx

Contents

1. Purpose of this Policy	1
Principles	2
Responsibilities.....	2
2. Retention Schedules	3
Administration & Governance Records.....	3
Personnel Records.....	4
Financial Records.....	4
3. Storage & Security	4
Paper records	4
Electronic records.....	4
Email.....	5
4. Disposal of Records.....	5
Secure Disposal	5
Records Not to Be Destroyed	5
Suspension of Disposal.....	5
Freedom of Information (Fol).....	5
Data Protection & GDPR Compliance.....	5
5. Review & Approval	5

1. Purpose of this Policy

This policy sets out how Great Waldingfield Parish Council (GWPC) manages, stores, retains and disposes of its documents (docs) and records. It ensures compliance with:

- Babergh District Council (BDC)
- Local Government Act 1972 (LGA 1972)
- Local Government (Access to Information) Act 1985
- Employment Rights Act 1996 (ERA 1996)
- Freedom of Information Act 2000 (FOIA 2000)
- Data Protection Act 2018 (DPA 2018) & UK GDPR
- Limitation Act 1980 (LA 1980)
- HMRC record-keeping requirements
- Audit Regulations (AR)

The policy applies to all councillors, employees, contractors and volunteers handling council information.

Principles

GWPC will ensure that:

- Records are retained only for as long as necessary.
- Retention periods are based on statutory requirements or legitimate business need.
- Personal data is processed in accordance with GDPR principles.
- Records are stored securely and disposed of safely.
- Electronic and paper records are treated consistently.

Responsibilities

- The **Clerk** is the Data Controller and responsible for implementing this policy.
- Councillors and staff must follow retention and disposal rules.
- The Council will review this policy **annually**.

2. Retention Schedules

Administration & Governance Records

Document Type	Format	Minimum Retention	Legal Basis / Notes
Agendas	P ¹ & E ²	3 yrs	LGA 1972
Signed Minutes³	P&E	Indefinitely	Permanent historical record
Recordings of Meetings	E	Signing + 1 mth	Working docs
Draft Minutes	E	Until approved	Working docs
Declarations of AoO⁴	P&E	Term of office + 1 yr	LGA 1972
Register of Interests	E	Held by BDC	Localism Act 2011
Election documents	P	Election + 6 mths	Electoral legislation
Leases, agreements & contracts	P&E	Indefinitely	LA 1980
Inspection reports⁵	P&E	Indefinitely	Risk management
Policies & Procedures	P&E	Until superseded + 1 yr	Governance
Routine correspondence⁶	P&E	12 mnths	GDPR – data minimisation
Non-routine correspondence⁷	P&E	Until resolved + 6 yrs	LA 1980
Planning applications & responses	E	Until decision issued	BDC holds master record

¹ Paper

² Electronic

³ (Council & APM)

⁴ Acceptance of Office

⁵ (assets, play areas, trees)

⁶ Correspondence includes: letters, emails, texts, WhatsApp another social media platforms

⁷ (sensitive, complaints, legal)

Personnel Records

Document Type	Retention Period	Legal Basis
Employee personnel files	End employment + 6 yrs	ERA 1996
Payroll, PAYE, NI records	6 yrs	HMRC
Sickness & leave records	3 yrs	Statutory Sick Pay Regs
Recruitment records⁸	6 mnths	GDPR – legitimate interest

Financial Records

Document Type	Retention Period	Legal Basis
AGAR⁹	Indefinitely	AR
Bank statements	6 yrs (GWPC may keep 12 years)	HMRC / LA 1980
Invoices, receipts, vouchers	6 yrs (GWPC may keep 12 yrs)	HMRC / LA 1980
VAT records	6 yrs	HMRC
Insurance policies	Indefinitely	Liability claims may arise yrs later
Insurance claims	Closure + 6 yrs	LA 1980
Tenders & quotations	Award + 6 yrs (12 yrs if sealed contract)	LA 1980
Asset Register	Indefinitely	Governance

3. Storage & Security

Paper records

- Stored in the Clerk's secure room or locked cabinets.
- Fire-safe storage used for permanent records (minutes, leases).

Electronic records

- Stored in secure cloud storage (e.g., OneDrive/Dropbox).
- Access restricted to authorised users.
- Regular backups maintained.

⁸ (unsuccessful applicants)

⁹ Annual Governance & Accountability Return

Email

- Managed in accordance with GDPR.
- Routine emails deleted after 12 months unless required for ongoing matters.

4. Disposal of Records

Secure Disposal

- Paper records containing personal or confidential data must be **shredded**.
- Electronic files must be **permanently deleted** from all storage locations.
- Disposal must be logged by the Clerk.

Records Not to Be Destroyed

- Signed minutes
- Leases
- Legal agreements
- Historical documents of archival value

Suspension of Disposal

If litigation, audit or FoI request is pending, **no records may be destroyed** until the matter is closed.

Freedom of Information (FoI)

This policy forms part of the Council's FoI Publication Scheme. Retention periods ensure that information is available for public inspection where required.

Data Protection & GDPR Compliance

The Council will:

- Retain personal data only as long as necessary.
- Ensure data subjects can exercise their rights (access, erasure, rectification).
- Maintain a Record of Processing Activities (ROPA).
- Ensure secure handling and disposal of personal data.

5. Review & Approval

- Approved by Council: [Insert date]
- Next Review: May 2027
- Version: 2.0