

BLACKTHORN PARISH COUNCIL

Document Retention and Disposal Policy and Procedure

(Revised 2025)

1. Policy Statement

The Parish Council recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations, including the **UK General Data Protection Regulation (GDPR)**, the **Data Protection Act 2018**, and the **Freedom of Information Act 2000**.

Good record management supports effective administration, accountability, and transparency and ensures that the Council meets its responsibilities to the public and other stakeholders.

This policy provides the framework through which records are created, maintained, and disposed of appropriately.

2. Scope of the Policy

This policy applies to all records created, received, or maintained by the Parish Council in the course of its business.

Records include any form of information — whether paper, electronic, photographic, or audio — that facilitates the Council's work or provides evidence of its transactions, decisions, and responsibilities.

A small proportion of records will be selected for permanent preservation as part of the Council's archives for historical or research purposes.

3. Responsibilities

The **Clerk to the Council** has overall responsibility for the implementation of this policy and for ensuring that the Council's record management practices comply with relevant legislation.

All Councillors and staff are responsible for ensuring that:

- Records are accurate, complete, and stored securely.
- Personal information is only retained for as long as necessary.
- Disposal of records is carried out in accordance with this policy and recorded where required.

An **annual review of records** will be undertaken to identify those due for disposal or transfer to archive.

4. Retention Schedule – Introduction

The **Retention Schedule** lists the minimum periods for which the Council's records should be kept and provides guidance on when records should be destroyed or archived.

It applies to all forms of records, regardless of the media on which they are held (paper, electronic files, photographs, or audio).

The schedule ensures that:

- Records are retained for statutory, financial, legal, or administrative reasons.
- Obsolete records are disposed of securely in a timely manner.
- Personal data is not retained longer than necessary, in accordance with GDPR.

Records required for ongoing or potential litigation, investigations, or claims must **not** be destroyed until such matters are fully resolved.

5. Retention of Documents Procedure

Under the **Freedom of Information Act 2000** and **GDPR**, the Parish Council must maintain a clear retention schedule that specifies how long records are held and what action is taken when they are no longer required.

The Clerk will manage record-keeping systems using this schedule, ensuring compliance with legal and operational requirements.

6. Retention Schedule

Document / Record Type	Minimum Retention Period	Reason / Notes
Minute Books	Indefinite	Archive / Historical record
Annual Accounts	Indefinite	Audit / Archive
Annual Governance & Accountability Return	Indefinite	Audit / Archive
Bank Statements	7 years	Audit / Financial management
Cheque Book Stubs	Last completed audit	Management
Paying-in Books	Last completed audit	Management
Quotations & Tenders	7 years	Audit / Procurement
Paid Invoices	7 years	Audit / VAT
VAT Records	7 years	HMRC requirement
Salary & Payroll Records	7 years	Audit / HMRC
Tax & NI Records	7 years	HMRC requirement
Insurance Policies	While valid + 3 years	Management

Document / Record Type	Minimum Retention Period	Reason / Notes
Certificates of Employers' Liability	40 years	Legal requirement
Certificates of Public Liability	40 years	Legal requirement
Assets Register	Indefinite	Audit / Management
Deeds, Leases, Title Documents	Indefinite	Legal / Audit
Electoral Register	Until superseded by new register	Management
Declarations of Acceptance of Office	Term of office + 1 year	Management
Members' Register of Interests	Term of office + 1 year	Legal requirement
Complaints (resolved)	3 years	Management / Reference
General Correspondence & Routine Emails	1 year (unless required longer)	Management / GDPR compliance
Planning Applications (correspondence only)	6 months (after decision)	Management
Council Recommendations on Planning	Indefinite (recorded in minutes)	Archive
Personnel Records	Duration of employment + 6 years	Legal / Employment rights
Risk Assessments	3 years after superseded	Health & Safety
Health & Safety Accident Reports	3 years (or 40 years if involving chemicals/asbestos)	Legal requirement

7. Disposal Procedures

- **Confidential records** (including all personal data) must be **shredded** or securely destroyed so that the information cannot be reconstructed.
- **Electronic records** must be permanently deleted, ensuring data cannot be recovered.
- A **record of disposal** should be kept, noting:
 - The document type,
 - Date of disposal, and
 - Method used.
- **Back-up copies** (digital or paper) must also be destroyed once no longer required.
- Records with **historical or archival value** may be transferred to the County Records Office or another approved archive.

Where litigation, investigation, or audit is pending, relevant records must **not** be destroyed.

8. Data Protection and GDPR Compliance

The Council complies with the **Data Protection Act 2018** and **UK GDPR**, which require that personal data:

- Is processed lawfully, fairly, and transparently.
- Is collected for specified, explicit purposes.
- Is adequate, relevant, and limited to what is necessary.
- Is accurate and kept up to date.
- Is not kept for longer than necessary.
- Is kept secure against unauthorised access, loss, or damage.

External storage or processing providers holding Council data must also comply with these principles.

9. Review

This policy will be reviewed **every two years** or sooner if legislation, guidance, or operational needs change.

Adopted at the Council meeting on: **6 November 2025**

Minute Ref: **M9/2025-25.147-c**

Next review due: **November 2027**