



DOCUMENT RETENTION AND DISPOSAL POLICY

Introduction

The guidelines set out in this policy supports Pucklechurch Parish Council's Data Protection Policy and compliance with the Freedom of Information Act 2000, the General Data Protection Regulation 2018 (GDPR) and other associated legislation.

The Council accumulates vast amounts of information and data during the course of its everyday activities both internally generated and information obtained from individuals and external organisations. This data is an important asset to the Council and measures need to be in place to safeguard this information. Properly managed records provide authentic and reliable evidence of the Council's transactions and is necessary to ensure it can demonstrate accountability and good governance.

This policy sets out the arrangements the Parish Council has in place for

- the retention and disposal of documents and data
- the minimum requirements for the retention of documents and
- the requirements for the disposal of said documents.

It is important to note that this is a 'live' document which may be subject to change to comply with legislative and statutory changes.

Aims and Objectives

Pucklechurch Parish Council aims to ensure that information is not kept for longer than is necessary. It will only retain appropriate information that it required to carry out its functions and the provision of services, whilst adhering to any legal or statutory requirements.

Up to date, reliable and accurate information is vital to support the work that the Parish Council does and the services it provides to our residents. This policy will help the council to:

- Maintain and retain relevant information that is necessary for the Council to operate and provide services to the public.
- Maintain and retain relevant information that is necessary to comply with legal and regulatory requirements, including the Freedom of Information Act 2000, the Environmental Information Regulations 2004 and the GDPR.
- Maintain and retain relevant information to aid its ability to effectively retrieve relevant information as required.
- Where applicable safeguard the retention of archival records of historical value for the benefit of future generations.



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The Data Protection Act 1998 requires that personal information must not be retained longer than is necessary for the purpose for which it was originally obtained. Councils are responsible for ensuring that they comply with these principles namely:

- Personal data is processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met.
- Personal data shall only be obtained for specific purposes and processed in a compatible manner.
- Personal data shall be adequate, relevant, but not excessive.
- Personal data shall be accurate and up to date.
- Personal data shall not be kept for longer than is necessary.
- Personal data shall be processed in accordance with the rights of the data subject.
- Personal data shall be kept secure.

The Data Protection Act provides an exemption for information about identifiable living individuals that is held for research, statistical or historical purposes to be held indefinitely provided that the specific requirements are met.

Scope

Any reference in this policy to 'documents', 'records' or 'data' can refer to both hard copy and electronic formats.

Where possible the storage and retention of hard copy paper records will be the original documents rather than photocopies.

Standards of good practice

The Parish Council will make every effort to ensure that it meets the following standards of good practice:

- Adhere to legal requirements for the retention of information as specified in the Retention Schedule in Appendix A.
- Personal information will be securely stored in cloud-based applications via the Local Council Community Cloud from Microshade VSM. Data held in the UK in a secure data centre. Any paper document are retained in locked filing cabinets.
- Appropriately dispose of information that is no longer required.
- Appropriate measures will be taken to ensure that confidential and sensitive information is securely destroyed.
- It is noted that information about unidentifiable individuals is permitted to be held indefinitely for historical, statistical or research purposes.



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Breach of Policy and Standards

Depending on the circumstances of the case, any employee who knowingly or recklessly contravenes any instruction contained within this Policy may face disciplinary action, which could include dismissal.

Where there is a breach of the policy, the Council may need to immediately consider whether there is also a breach of the GDPR and take appropriate actions.

Roles and Responsibilities

The Parish Clerk has responsibility for the effective implementation of the policy including ad-hoc checks to ensure compliance.

Retention

Timeframes for the retention of documents are set out in Appendix A. List of Documents for Retention or Disposal which provides guidance on the recommended minimum retention periods for specific classes of documents and records. This schedule is compiled from recommended best practice by Public Records Office, the Records Management Society of Great Britain, sector specific guidance and in accordance with relevant legislation

The conditions regarding safe storage and controlled access will remain in place at all time.

Disposal

Documents should only be disposed of if reviewed in accordance with the following:

- Is retention required to fulfil statutory or other regulatory requirements?
- Is retention required to meet the operational needs of the service?
- Is retention required to evidence events in the case of dispute?
- Is retention required because the document or record is of historic interest or intrinsic value?

When documents are scheduled for disposal the method of disposal should be appropriate to the nature and sensitivity of the documents concerned. A record of the disposal will be kept to comply with the General Data Protection Regulations.

The following principles should be followed when disposing of records:

- All records containing personal or confidential information should be destroyed at the end of the retention period.



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- Where computer records are deleted steps should be taken to ensure that data is 'virtually impossible to retrieve' as advised by the Information Commissioner.
- Where documents are of historical interest it may be appropriate that they are transmitted to the County Records office.
- Back-up copies of documents should also be destroyed (including electronic or photographed documents unless specific provisions exist for their disposal).

Records should be maintained of appropriate disposals. These records should contain the following information:

- The name of the document destroyed.
- The date the document was destroyed.
- The method of disposal.

APPENDIX A Pucklechurch Parish Council Appendix A: List of Documents for Retention or Disposal – subject to change in accordance with legislation

Document	Minimum Retention Period	Reason	Disposal
Minutes	Indefinite	Archive	N/A. Older original signed paper copies of Council minutes of meetings should be archived with relevant service provider
Agendas	5 years	Management	Bin (shred confidential waste)
Accident/incident reports	20 years	Potential claims	Confidential waste
Scales of fees and charges	6 years	Management	Bin
Receipt and payment accounts	Indefinite	Archive	N/A
Receipt books of all kinds	6 years	VAT	Bin
Bank statements including deposit/savings accounts	Last completed audit year	Audit	Confidential waste
Bank paying-in books	Last completed audit year	Audit	Confidential waste
Cheque book stubs	Last completed audit year	Audit	Confidential waste
Quotations and tenders	6 years	Limitation Act 1980 (as amended)	Confidential waste
Paid invoices	6 years	VAT	Confidential waste
Paid cheques	6 years	Limitation Act 1980 (as amended)	Confidential waste
VAT records	6 years generally but 20 years for VAT on rents	VAT	Confidential waste
Petty cash	6 years	Tax, VAT, Limitation Act 1980 (as amended)	Confidential waste
Timesheets	Last completed audit year 3 years	Audit (requirement) Personal injury	Bin
Wages books/payroll	12 years	Superannuation	Confidential waste
Insurance policies	While valid (but see next two items below)	Management	Bin
Insurance company names and policy numbers	Indefinite	Management	N/A

Document	Minimum Retention Period	Reason	Disposal
Certificates for insurance against liability for employees	40 years from date on which insurance commenced or was renewed	The Employers' Liability (Compulsory Insurance) Regulations 1998 (SI 2753)	Bin
Equipment inspection reports	21 years	Management	
For Burial Grounds <ul style="list-style-type: none"> • Register of burials and interments • Register of purchased graves • Register/plan of grave spaces • Copy of certificates of grant of exclusive right of burial 	Indefinite	Archives, Local Authorities Cemeteries Order 1977 (SI. 204)	N/A
For Allotments Register, contract and plans	Indefinite	Audit Management	N/A
Investments	Indefinite	Audit, Management	N/A
Title deeds, Trust deeds, leases, agreements, contracts	Indefinite	Audit, Management	N/A
Members' allowances register	6 years	Tax, Limitation Act 1980 (as amended)	Confidential waste.
Information from other bodies e.g. circulars from county associations, NALC, principal authorities	Retained for as long as it is useful and relevant		Bin
Local/historical information	Indefinite – to be securely kept for benefit of the Parish	Councils may acquire or be gifted records of local interest and wish to promote the use for such records.	N/A

Document	Minimum Retention Period	Reason	Disposal
General correspondence	Unless it relates to specific categories outlined in the policy, correspondence should only be kept for as long as they are needed and no more than two years.	Management	Bin (shred confidential waste)
Correspondence relating to staff	If related to Audit, see relevant sections above. Should be kept securely in personnel files and should not be kept for longer than is necessary for the purpose it was held. After an employment relationship has ended + 6years	Legal/employment requirements	Confidential waste
Freedom of Information requests	Can delete nine months after latest correspondence relating to request	FOI legislation	Confidential waste

This policy is reviewed bi-annually at the annual council meeting or when required by legislative or statutory changes.

Updated and approved 20th August 2025