



# **Old Woughton Parish Council Document Retention and Disposal Policy**

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**Reviewed and adopted November 2025**

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## **1. Introduction**

1.1 The Parish Council generates and receives a significant amount of information during its day-to-day activities. This includes data created internally and information obtained from individuals, contractors, and external organisations. Such information is recorded in a variety of formats, both paper and electronic.

1.2 Council records are valuable assets that support effective administration, transparency, and accountability. Proper management ensures that reliable evidence of the Council's decisions and activities is available when required.

1.3 For the purposes of this policy, the terms 'document' and 'record' refer to both hard copy and electronic information.

1.4 Documents must be retained for an appropriate period. Premature destruction could result in non-compliance with legislation, operational difficulties, reputational harm, or an inability to defend legal claims.

1.5 Conversely, retaining information for longer than necessary is contrary to data protection law and may lead to breaches of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Unnecessary retention also wastes storage space and staff time.

## **2. Purpose and Scope**

2.1 This policy provides a framework for determining:

- Which documents and records should be retained and for how long; and
- How and when records should be securely disposed of.

2.2 Some information does not need to be retained. The following are examples of documents that may be routinely destroyed once they have served their immediate purpose:

- "With compliments" slips and general correspondence of no lasting value;
- Catalogues, circulars, and trade journals;
- Non-acceptance of invitations and trivial emails;
- Requests for general information, maps, or advertising material;
- Out-of-date distribution lists or superseded drafts.

2.3 Duplicated or superseded materials such as old stationery, manuals, and reference copies of documents may also be destroyed when no longer required.

2.4 Records must **not** be destroyed if they are or may be needed:

- As evidence in a legal claim or investigation;
- To demonstrate that a statutory duty or obligation has been fulfilled; or
- For historical, archival, or research purposes.

### 3. Roles and Responsibilities

3.1 The Council is responsible for determining retention periods and ensuring compliance with this policy. An annual review of stored documents should be undertaken to identify material suitable for disposal.

3.2 All councillors, employees, and volunteers handling Council records must be aware of and comply with this policy and the associated retention schedule.

3.3 The Clerk is responsible for maintaining the retention schedule, recording disposals, and ensuring secure storage and destruction procedures are followed.

### 4. Document Retention Protocol

4.1 The Council must maintain an adequate record keeping system that reflects its functions, activities, and legal obligations.

4.2 Records should be complete, accurate, and maintained in a way that enables staff and their successors to:

- Support audit or inspection requirements;
- Protect the legal and other rights of the Council and affected individuals;
- Verify lawful consent and demonstrate compliance with data protection law; and
- Provide reliable evidence of Council business.

4.3 Principles:

- Records must be organised to allow quick and secure retrieval;
- Documents no longer required for daily business but still within retention periods should be archived securely;
- Retention periods are set out in Appendix A: Document Retention and Disposal Schedule;
- Records relevant to ongoing or potential litigation, Freedom of Information (FOI) requests, or investigations must not be destroyed until the matter is fully resolved.

### 5. Document Disposal Protocol

5.1 Before disposing of any document, the following questions must be considered:

- Is retention required to meet statutory or regulatory obligations?
- Is the record still needed for operational or audit purposes?
- Could it be needed to evidence events in case of dispute?
- Does it have historical or archival value?

5.2 Disposal methods must reflect the sensitivity of the document. A record of disposal must be kept in compliance with the UK GDPR.

5.3 Acceptable disposal methods include:

- **Non-confidential records:** placed in normal waste or recycling;
- **Confidential or personal data:** shredded or securely destroyed;

- **Electronic records:** securely deleted and overwritten so they cannot be recovered;
- **Historic documents:** transferred to the County Records Office or other approved archive.

#### 5.4 Key principles:

- All records containing personal or confidential data must be securely destroyed once their retention period expires;
- Deleted computer files must be permanently erased, following ICO best practice;
- Backup or duplicate copies must also be securely destroyed;
- Records of disposal must include:
  - The title or description of the document;
  - The date of destruction; and
  - The method of disposal.

### 6. Data Protection Obligations

6.1 Under the Data Protection Act 2018 and UK GDPR, personal data must not be retained longer than necessary for the purpose for which it was collected (the “storage limitation principle”).

6.2 Personal data includes any information relating to a living individual who can be identified directly or indirectly. This includes opinions or intentions about that person.

6.3 Information retained for research, statistical, or historical purposes may be kept indefinitely if the appropriate safeguards are in place and it is not used for decision-making affecting individuals.

6.4 The Council must ensure:

- Data is processed fairly, lawfully, and transparently;
- Data is collected for specified, legitimate purposes;
- Data is adequate, relevant, and limited to what is necessary;
- Data is accurate and up to date;
- Data is not kept longer than necessary;
- Data is kept secure;
- Data subjects’ rights are respected.

6.5 External storage providers or archivists acting on behalf of the Council must comply with these principles and appropriate data processing agreements must be in place.

### 7. Scanning and Electronic Storage

7.1 Documents scanned into an electronic document management system generally render the original paper version redundant, except where legal requirements specify otherwise (e.g. HMRC records).

7.2 Hard copies of scanned documents should normally be retained for three months after scanning to confirm image quality and completeness.

7.3 Original tax and VAT records must be retained for six years, unless a shorter period has been agreed with HMRC.

### 8. Review and Maintenance of this Policy

8.1 This policy will be reviewed every four years or sooner if required by legislative or best practice changes.

8.2 The policy draws upon recognised sources of best practice, including:

- Local Council Administration (Charles Arnold-Baker, 12th edition);
- NALC Legal Topic Note 40 – Local Councils’ Documents and Records;
- NALC Legal Topic Note 37 – Freedom of Information;
- Lord Chancellor’s Code of Practice on the Management of Records (issued under s.46 of the Freedom of Information Act 2000).

## 9. Retention Schedule

9.1 The detailed Document Retention and Disposal Schedule is attached as Appendix A. It provides minimum retention periods for specific record types and will be updated as legislation or best practice changes.

## Review History

May 2023	New policy adopted
November 2025	Condensed and removed information not relevant to OWPC

## Appendix A: Document Retention and Disposal Schedule

Document	Minimum Retention Period	Reason	Disposal
Signed minutes of Council and committee meetings	Indefinite	Statutory record	Original signed paper copies of Council minutes of meetings must be kept indefinitely in safe storage. At regular intervals of not more than 5 years they must be archived and deposited with the Higher Authority.
Agendas	5 years	Administrative reference	Recycle (shred confidential waste)
Accident/incident reports	20 years	Potential claims	Confidential waste.
Scales of fees and charges	6 years	Management	Recycle/bin
Receipt and payment accounts	Indefinite	Archive	N/A
Receipt books of all kinds	6 years	VAT	Recycle/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, postage and telephone books	6 years	Tax, VAT, Limitation Act 1980 (as amended)	Confidential waste
Timesheets	Last completed audit year 3 years	Audit (requirement) Personal injury (best practice)	Recycle/bin
Wages books/payroll	12 years	Superannuation	Confidential waste
Insurance policies	While valid	Management	Recycle/bin

Document	Minimum Retention Period	Reason	Disposal
Insurance company names and policy numbers	Indefinite	Management	N/A
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) Management	Recycle/bin
Investments	Indefinite	Audit, Management	N/A
Title 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		Recycle/bin
Local/historical information	Indefinite – to be securely kept for benefit of the Parish	Councils may acquire records of local interest and accept gifts or records of general and local interest to promote the use for such records (defined as materials in written or other form setting out facts or events or otherwise recording information).	N/A
Magazines and journals	Council may wish to keep its own publications  For others, retain for as long as they are useful and relevant.	The Legal Deposit Libraries Act 2003 (the 2003 Act) requires a local council which after 1st February 2004 has published works in print (this includes a pamphlet, magazine or newspaper, a map, plan, chart or table) to deliver, at its own expense, a copy of them to the British Library Board (which manages and controls the British Library). Printed works as defined by the 2003 Act published by a local council therefore constitute materials which the British Library holds.	Recycle/bin if applicable

Document	Minimum Retention Period	Reason	Disposal
<b>Record-keeping</b>			
To ensure records are easily accessible it is necessary to comply with the following: A list of files stored in cabinets will be kept Electronic files will be saved using relevant file names	The electronic files will be backed up periodically on a portable hard drive and also in the cloud-based programme supplied by the Council's IT company.	Management	Documentation no longer required will be disposed of, ensuring any confidential documents are destroyed as confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
General correspondence	Unless it relates to specific categories outlined in the policy, correspondence, both paper and electronic, should be kept. Records should be kept for as long as they are needed for reference or accountability purposes, to comply with regulatory requirements or to protect legal and other rights and interests.	Management	Bin (shred confidential waste) A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Correspondence relating to staff	If related to Audit, see relevant sections above. Should be kept securely and personal data in relation to staff should not be kept for longer than is necessary for the purpose it was held. Likely time limits for tribunal claims between 3–6 months Recommend this period be for 3 years	After an employment relationship has ended, a council may need to retain and access staff records for former staff for the purpose of giving references, payment of tax, national insurance contributions and pensions, and in respect of any related legal claims made against the council.	Confidential waste A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.

Document	Minimum Retention Period	Reason	Disposal
<b>Documents from legal matters, negligence and other torts</b> Most legal proceedings are governed by the Limitation Act 1980 (as amended). The 1980 Act provides that legal claims may not be commenced after a specified period. Where the limitation periods are longer than other periods specified the documentation should be kept for the longer period specified. Some types of legal proceedings may fall within two or more categories. If in doubt, keep for the longest of the three limitation periods.			
Negligence	6 years		Confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Defamation	1 year		Confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Contract	6 years		Confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Leases	12 years		Confidential waste.
Sums recoverable by statute	6 years		Confidential waste.
Personal injury	3 years		Confidential waste.
To recover land	12 years		Confidential waste.
Rent	6 years		Confidential waste.
Breach of trust	None		Confidential waste.
Trust deeds	Indefinite		N/A



Document	Minimum Retention Period	Reason	Disposal
<b>For Halls, Centres, Recreation Grounds</b>			
<ul style="list-style-type: none"> <li>• Application to hire</li> <li>• Invoices</li> <li>• Record of tickets issued</li> </ul>	6 years	VAT	Confidential waste A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
Lettings diaries	Electronic files linked to accounts	VAT	N/A
Terms and Conditions	6 years	Management	Recycle/bin
Event Monitoring Forms	6 years unless required for claims, insurance or legal purposes	Management	Recycle/bin. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.
<b>For Allotments</b>			
Register and plans	Indefinite	Audit, Management	N/A
Minutes	Indefinite	Audit, Management	N/A
Legal papers	Indefinite	Audit, Management	N/A
<b>Planning Papers</b>			
Applications	1 year	Management	Recycle/bin
Appeals	1 year unless significant development	Management	Recycle/bin
Trees	1 year	Management	Recycle/bin
Local Development Plans	Retained as long as in force	Reference	Recycle/bin
Local Plans	Retained as long as in force	Reference	Recycle/bin
Neighbourhood Plans	Indefinite – final adopted plans	Historical purposes	N/A
<b>CCTV</b>			
Daily notes	Daily	Data protection	Confidential waste
Radio rotas	1 week	Management	Confidential waste
Work rotas	1 month	Management	Confidential waste
Observation sheets	3 years	Data protection	Confidential waste

<b>Document</b>	<b>Minimum Retention Period</b>	<b>Reason</b>	<b>Disposal</b>
Stats	3 years	Data protection	Confidential waste
Signing in sheets	3 years	Management	Confidential waste
Review requests	3 years	Data protection	Confidential waste
Discs – master and working	For as long as required	Data protection	Confidential waste
Internal Operations Procedure Manual	Destroy on renewal Review annually	Management	Confidential waste
Code of Practice	Destroy on renewal Review annually	Management	Confidential waste
Photographs/digital prints	31 days	Data protection	Confidential waste