

Data Retention and Disposal Policy – March 2026

BUCKLESHAM PARISH COUNCIL

Ruth Johnson
CLERK, BUCKLESHAM PARISH COUNCIL

Purpose

This Policy sets out how Bucklesham Parish Council retains and disposes of records in a lawful, consistent and proportionate manner. It ensures compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Freedom of Information Act 2000, audit requirements and relevant local government legislation, while supporting effective and efficient Council operations.

The Council recognises that its records are important public assets and must be managed throughout their lifecycle, from creation through to secure disposal or permanent archiving.

Scope

This Policy applies to all records created, received or held by the Council in the course of carrying out its functions, regardless of format. This includes:

- Paper records
- Electronic documents and databases
- Emails and digital communications
- Images, plans and scanned records

The Policy applies to Councillors, officers, contractors and volunteers handling records on behalf of the Council.

Legislative and Regulatory Framework

The Council manages its records in accordance with relevant legislation and guidance, including (but not limited to):

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000
- Local Government Act 1972
- Limitation Act 1980
- VAT Act 1994
- Audit and Accountability legislation

- Employers' Liability (Compulsory Insurance) Regulations 1998

Principles of Data Retention

The Council will ensure that records are:

- Retained only for as long as they are required for legal, regulatory, operational or historical purposes
- Accurate, accessible and held in a usable format
- Protected against unauthorised access, loss or damage
- Securely disposed of when no longer required

Personal data will not be retained for longer than necessary and will be processed in line with the Council's Data Protection Policy and Privacy Notices.

Retention Periods

Retention periods for Council records are set out in the Records Retention Schedule, which forms an appendix to this Policy.

The Schedule identifies:

- Categories of records
- Minimum retention periods
- The legal or operational basis for retention
- The appropriate action at the end of the retention period

Where a record is required for:

- Ongoing legal proceedings
- Audit queries
- Freedom of Information or Subject Access Requests

disposal will be suspended until the matter is fully resolved.

Storage and Security

Records will be stored securely to prevent unauthorised access, alteration or loss.

- Paper records containing confidential or personal data will be stored in locked cabinets with restricted access.
- Electronic records will be held on secure systems with role-based access controls and password protection.
- Cloud-based systems may be used to ensure resilience and business continuity. Electronic records, including emails, are subject to the same retention rules as paper records.

Disposal of Records

When records reach the end of their retention period, they will be disposed of in a secure and appropriate manner:

- Confidential paper records will be shredded or disposed of via secure waste services.
- Electronic records will be permanently deleted in accordance with IT and cyber security procedures.
- Equipment and storage media will be securely wiped or destroyed prior to disposal. No records will be destroyed where destruction could reasonably be perceived as intended to avoid disclosure or scrutiny.

Archiving and Historical Records

Records of long-term historical, legal or evidential value will be retained permanently or transferred to an appropriate archive, such as The Suffolk Hold, in accordance with statutory guidance.

Roles and Responsibilities

- Parish Council: Overall accountability for records management.
- Parish Council Clerk: Responsible for implementing this Policy, maintaining the Records Retention Schedule and advising on retention and disposal decisions.
- Councillors, Officers and Contractors: Responsible for ensuring records are managed in accordance with this Policy.

Where there is uncertainty about retention or disposal, advice will be sought and records retained until a decision is reached.

Adopted by the Parish Council at a meeting on: *11th March 2026*

Signed:

Ruth Johnson

Ruth Johnson
Clerk

Clive Lenton

Clive Lenton
Chair

Version Control

Date	Details	Next Review
11th March 2026	First Publication	September 2027
September 2027	Annual Review	

Appendix - Records Retention Schedule

This Schedule forms the appendix to, and should be read in conjunction with, the Council's Data Retention and Disposal Policy. It sets out the minimum retention periods for records held by Bucklesham Parish Council. Where a range or discretionary period is stated, records should be reviewed at the minimum point and retained only if there is a continuing legal, audit, operational or historical need.

Governance and Meetings

Record	Minimum Retention Period	Legal Guidance/Basis	Action at end of Period
Signed minutes of PC meetings	Permanent	Local Government Act 1972	Archive / Suffolk Hold
Draft minutes, notes and recordings	Until minutes approved	Best practice	Secure Disposal
Agendas	6 years	NALC LTN 40	Secure disposal / archive
Reports and papers with agendas	6 years	Limitation Act 1980	Secure disposal
Standing Orders Financial Regulations	Until superseded	Governance requirement	Archive previous versions
Policies and strategies	Indefinite (current and superseded)	Audit / governance	Archive

Finance and Audit

Record	Minimum Retention Period	Legal Guidance/Basis	Action at end of Period
Accounts	Permanent	Audit Requirement	Archive
Annual Governance Accountability Return (AGAR)	Permanent	Audit	Archive / Suffolk Hold
Internal and external audit reports	Permanent	Audit	Archive
Bank statements, paying-in books, cheque stubs	Last completed audit year	Audit	Secure disposal
Bank reconciliations	6 years	Audit / Limitation Act	Secure disposal
Paid invoices and receipts	6 years	VAT Act 1994	Secure disposal
VAT records	6 years (20 years for land/buildings)	HMRC	Secure disposal

Budgets and precepts calculations	6 years	Audit	Secure disposal
Councillor's allowances records	6 years	Tax / Limitation Act	Secure disposal

Legal, Property and Assets

Record	Minimum Retention Period	Legal Guidance/Basis	Action at end of Period
Title deeds, leases, land agreements	Permanent	Limitation Act 1980	Archive
Asset Registers	Permanent	Audit requirement	Archive
Contracts and agreements	6 years after expiry (12 years for deeds)	Limitation Act	Secure disposal
Insurance policies	While current plus 2 years	Limitation Act	Secure disposal
Employers' liability insurance certificates	40 years	EL Cl) Regulations 1998	Archive

Planning and Consultations

Record	Minimum Retention Period	Legal Guidance/Basis	Action at end of Period
Planning applications (determined)	As held on ESC planning portal	Statutory	No local retention
Major / controversial planning records	Permanent	Precedent / archive value	Archive
Public consultations, surveys and responses	3 years	Management	Secure disposal
Neighbourhood Plan evidence and examination	Permanent	Statutory	Archive

Personnel (staff)

Record	Minimum Retention Period	Legal Guidance/Basis	Action at end of Period
Personnel files (general)	6 years after employment ends	Limitation Act	Secure disposal
Contracts of employment	6 years after employment ends	Limitation Act	Secure disposal
Payroll and wages records	12 years	HMRC / pensions	Secure disposal
Timesheets	3 years	Limitation Act	Secure disposal

Pension records	12 years	Pensions legislation	Secure disposal
Recruitment records (unsuccessful)	6 months	Equality Act 2010	Secure disposal
Occupational Health Records	As advised (usually 6 months)	GDPR / best practice	Secure disposal

Councillors

Record	Minimum Retention Period	Legal Guidance/Basis	Action at end of Period
Declarations of acceptance of office	Permanent	Governance	Archive
Register of interests	Maintained by ESC	Statutory	N/A
Councillor contact details	Until superseded	Management	Secure disposal
Allowances claims	6 years	Tax / audit	Secure disposal

Community Services and Facilities

Record	Minimum Retention Period	Legal Guidance/Basis	Action at end of Period
Allotment registers and plans	Permanent	Audit / management	Archive
Allotment waiting lists	While current	Management	Secure disposal
Village Hall hire agreements/invoices	6 years	VAT Act 1994	Secure disposal
Risk assessment	3 years from review	Management	Secure disposal
Inspections and maintenance records	25 years	Management / PL	Secure disposal

Correspondence and Communications

Record	Minimum Retention Period	Legal Guidance/Basis	Action at end of Period
Correspondence / emails	6 months – 2 years	Management	Secure disposal
Complaints	5 years after closure	Management	Secure disposal
Press releases and publicity	1 year	Management	Secure disposal
Reports and publications	As long as useful	Management	Secure disposal

Electronic Records and IT

Record	Minimum Retention Period	Legal Guidance/Basis	Action at end of Period
Emails	As above	Management	Secure deletion
Portable storage devices	3 years	Information Security	Secure destruction
Backup media	1 year	IT Policy	Secure destruction
Cryptographic keys	As required	Cyber security	Secure destruction