

ALWOODLEY PARISH COUNCIL

RECORDS RETENTION & DISPOSAL POLICY

Draft for approval 5th November 2025

1. Introduction

This policy sets out how Alwoodley Parish Council (“the Council”) manages, retains, and disposes of its records in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018), and guidance from the Information Commissioner’s Office (ICO) and the National Association of Local Councils (NALC).

It ensures that records are:

- retained only for as long as necessary;
- securely disposed of when no longer required;
- available for audit, transparency, and legal compliance; and
- protected against loss, damage, or unauthorised access.

2. Scope

This policy applies to all records created, received, or maintained by the Council, whether electronic or paper, including:

- Council and committee minutes and agendas
- Financial, payroll, and audit records
- Correspondence and contracts
- Personnel records
- Planning responses
- Electronic communications (e-mails, cloud files)

3. Legal and Regulatory Framework

This policy is based on:

- UK GDPR (Articles 5 and 30) and the Data Protection Act 2018
- Local Government Act 1972
- Accounts and Audit Regulations 2015
- Freedom of Information Act 2000
- Limitation Act 1980
- Transparency Code for Smaller Authorities (2015)
- NALC Model Policy and LGA Records Management Toolkit

4. Principles

1. Records shall be kept only as long as necessary for legal, operational, or audit purposes.
2. Records containing personal data will be securely destroyed when no longer required.
3. Records needed for permanent historical, administrative, or statutory purposes shall be preserved and transferred to an approved archive.
4. Disposal shall be authorised by the **Clerk (Data Protection Lead)**.
5. All retention and disposal actions shall be documented in the **Records of Processing and Retention Register**.

5. Retention Schedule

Record Type	Minimum Retention Period	Rationale / Authority	Disposal Method
Council minutes (signed)	Permanent	Local Government Act 1972 s.225	Archive
Agendas and reports	5 years	Good practice / audit	Secure delete or shred
Policies, procedures, Standing Orders, Financial Regs	Until superseded + 1 year	Governance continuity	Secure delete
Correspondence (routine)	2 years	Business need	Secure delete
Financial accounts and records (including invoices, receipts, payments)	6 years	Limitation Act 1980; Audit	Secure delete / shred
Bank statements and reconciliations	6 years	Audit	Secure delete
Precept and budget records	6 years	Audit	Secure delete
Payroll, PAYE, NI, pensions	6 years	HMRC	Secure delete
Contracts and tenders	6 years after completion	Limitation Act 1980	Secure delete
Insurance policies	6 years after expiry	Limitation Act 1980	Secure delete
Accident / incident reports	3 years (adults) / until age 21 (if child)	Health & Safety	Secure delete
Personnel files	6 years after termination	Employment law	Secure delete
Planning consultation responses	3 years	Reference / audit	Secure delete
Allotment or hire agreements	6 years after expiry	Contract law	Secure delete
Members' declarations and register of interests	Duration of term + 1 year	Statutory / audit	Secure delete
Electoral roll (working copy)	Superseded annually	Data Protection Act	Secure delete

Record Type	Minimum Retention Period	Rationale / Authority	Disposal Method
Emails (non-essential)	1 year	Operational need	Secure delete
Photographs / event media	Duration of consent	UK GDPR (consent basis)	Secure delete
Complaints and investigations	6 years	Limitation Act	Secure delete

Permanent records (e.g. minutes, deeds, historic maps) shall be held indefinitely or transferred to the West Yorkshire Archive Service .

6. Disposal Procedures

- The Clerk authorises and records all disposal actions.
- Paper records are shredded or sent to a secure destruction facility.
- Electronic records are permanently deleted from storage, including backups.
- Disposal must ensure that personal data cannot be reconstructed.
- A Record of Disposal is maintained (date, records destroyed, method, authorising officer).

7. Records of Processing and Retention Register

The Council maintains a Register of Processing Activities (ROPA), as required by UK GDPR Article 30, to record:

- Categories of personal data processed
- Purpose and lawful basis
- Data subjects involved
- Retention period
- Security and access controls
- Third-party processors or recipients

8. Review and Audit

- The Clerk (Data Protection Lead) reviews retention schedules annually and reports to Council.
- Retention periods may be amended if legal or operational requirements change.
- This policy will be reviewed annually at the Annual Meeting of the Council.

9. Policy Approval and Version Control

Version Date Adopted Next Review Approved by

1.0 [insert date] [insert date] Alwoodley Parish Council

Appendix A: Records of Processing and Retention Register (Template)

Data Category	Purpose of Processing	Lawful Basis	Data Subjects	Data Format	Retention Period	Disposal Method	Data Processor / Recipient	Security Controls	Notes
Councillor contact details	To manage council business and communications	Public task	Councillors	Electronic	Duration of term + 1 year	Secure delete	None	Password-protected files	Updated annually
Staff employment records	Payroll, HR, pensions	Contract / legal obligation	Employees	Paper & electronic	6 years after termination	Secure delete / shred	HMRC, Pension provider	Encrypted drive	
Supplier payments / invoices	Financial control, audit	Legal obligation	Suppliers	Electronic	6 years	Secure delete	HMRC, auditors	Restricted access	
Resident correspondence	Responding to enquiries / services	Public task / consent	Residents	Paper & electronic	2 years	Secure delete	None	Email security	
Planning consultations	To respond to planning applications	Public task	Residents / Planning Authority	Electronic	3 years	Secure delete	Leeds City Council		
Photographs (events)	Community engagement / publicity	Consent	Residents / volunteers	Electronic	Duration of consent	Secure delete	Website / social media		

Sources and Guidance

- National Association of Local Councils (NALC) Model Data Protection Toolkit
- Information Commissioner's Office (ICO) guidance on Records Management and Article 30 documentation
- Local Government Association – Records Management Toolkit for Local Authorities (2023 edition)
- Practitioners' Guide 2025 Addendum for Smaller Authorities
- Accounts and Audit Regulations 2015
- Limitation Act 1980
- Transparency Code for Smaller Authorities (2015)