



# Bow Brickhill Parish Council

## Document Retention and Disposal Policy

Bow Brickhill Parish Council

*Adopted: March 2026*

*Review Date: March 2027*

# 1. Introduction

The Parish Council accumulates a significant volume of information and data throughout its day-to-day operations. This data originates from both internal sources and from individuals or external organisations. It is recorded in a variety of document types. The records created and maintained by the Parish Council represent a vital asset, and it is essential to safeguard this information.

Effectively managed records offer reliable and authentic evidence of the Parish Council's activities and transactions, ensuring the Parish Council can demonstrate accountability whenever necessary.

Documents may exist in either paper ('hard') format or electronic format. For the purposes of this policy, the terms 'document' and 'record' refer to both hard copy and electronic records. It is important that documents are retained for an appropriate duration. Premature destruction could result in operational difficulties, reputational damage, and potential legal repercussions for both the Parish Council and its officers, especially for failing to comply with relevant legislation. Conversely, retaining documents longer than necessary may breach the General Data Protection Regulations (GDPR), as personal information must not be held indefinitely. Timely disposal also promotes efficient use of limited storage space.

## 2. Scope and Objectives of the Policy

This document sets out a working framework to guide decisions on which documents are retained—and for how long—or disposed of, including the appropriate disposal method. Some records do not require retention and are routinely destroyed as part of business activities, typically where information is duplicated, unimportant, or only of short-term value.

Examples of unimportant records include:

- 'With compliments' slips
- Catalogues and trade journals
- Non-acceptance of invitations
- Trivial electronic mail messages not connected to Council business
- Requests for information such as maps, plans, or advertising material
- Out-of-date distribution lists

Duplicated or superseded materials, such as stationery, manuals, drafts, forms, address books, and reference copies of annual reports, may also be destroyed. However, records that may be required as evidence of events should not be destroyed, and any disposal must comply with GDPR.

## 3. Roles and Responsibilities for Document Retention and Disposal

Parish Councils are responsible for determining whether documents should be retained or disposed of and must review documentation at least annually to ensure unnecessary records are disposed of properly in accordance with GDPR. Parish Councils should also ensure all employees are aware of the retention and disposal schedule.

## 4. Document Retention Protocol

Parish Councils should maintain adequate systems for documenting their activities, taking into account the legislative and regulatory environment. These systems must ensure that records of each activity are complete and accurate, enabling staff and their successors to fulfil their responsibilities. Key purposes include:

- Facilitating audits or examinations by authorised individuals
- Protecting the legal and other rights of the Parish Council, its clients, and others affected by its actions
- Verifying individual consent for the recording, management, and disposal of personal data
- Ensuring the authenticity of records so the evidence they provide is credible and authoritative

The following principles should be adopted:

- Records should be organised in a system that allows for quick and easy retrieval of information in compliance with GDPR
- Documents no longer needed for operational purposes but required for retention should be stored at the Pavillion or in the cloud

Retention schedules provided in Appendix A offer guidance on minimum retention periods for specific document classes, compiled from best practice recommendations and relevant legislation. When litigation is possible, related records must not be amended or disposed of until the threat has passed.

## 5. Document Disposal Protocol

Documents should only be disposed of following a thorough review, considering whether retention is required to:

- Fulfil statutory or regulatory requirements
- Meet operational needs
- Provide evidence in case of dispute
- Preserve records of historic interest or intrinsic value

Disposal methods should be appropriate to the sensitivity of the documents. A record of disposal must be kept to comply with GDPR where necessary. Documents may be disposed of by:

- Placing non-confidential records in waste paper bins
- Shredding confidential or personal information records
- Deleting computer records
- Transmitting records to an external body, such as the County Records Office

The following principles apply when disposing of records:

- All personal or confidential information should be destroyed at the end of the retention period to avoid breaches of GDPR or the Freedom of Information Act, and prevent reputational damage
- Deleted computer records should be rendered 'virtually impossible to retrieve' as advised by the Information Commissioner
- Documents of historical interest may be sent to the County Records Office
- Back-up copies, including electronic or photographed documents, should also be destroyed unless specific provisions apply

Appropriate disposal records should include:

- The name of the document destroyed
- The date of destruction
- The disposal method used

## 6. Data Protection Act 1998 – Obligation to Dispose of Certain Data

The Data Protection Act 1998 ('Fifth Principle') requires that personal information is not retained longer than necessary for its original purpose. Personal information is defined as data relating to a living individual who can be identified from the data alone or in combination with other information held by the data controller. It includes any expression of opinion about the individual and any indication of the intentions of the Council or other persons towards the individual.

An exemption exists for information held for research, statistical, or historical purposes, allowing indefinite retention if specific requirements are met. Parish Councils must ensure compliance with the principles of GDPR, including:

- Fair and lawful processing of personal data, meeting specific conditions
- Obtaining and processing data for specific purposes, ensuring compatibility
- Ensuring data is adequate, relevant, and not excessive
- Maintaining accurate and up-to-date data
- Not retaining data longer than necessary
- Processing data in accordance with data subject rights
- Keeping data secure

External storage providers or archivists holding Parish Council documents must also adhere to these principles.

## 7. Scanning of Documents

Generally, once a document has been scanned into a document image system, the original paper copy becomes redundant. No specific legislation governs the format for retaining local government records after electronic storage, except for certain requirements prescribed by HM Revenue and Customs. As a rule, hard copies of scanned documents should be kept for three months post-scanning. Original documents needed for VAT and tax purposes must be retained for six years unless HM Revenue and Customs approves a shorter period.

## 8. Review of Document Retention

This policy will be reviewed, updated, and amended as needed, at least every three years in line with the Code of Practice on the Management of Records issued by the Lord Chancellor. The document is compiled from various sources of recommended best practice, including:

- Local Council Administration, Charles Arnold-Baker, 910th edition, Chapter 11
- Local Government Act 1972, sections 225–229, section 234
- SLCC Advice Note 316 Retaining Important Documents
- SLCC Clerks' Manual: Storing Books and Documents
- Lord Chancellor's Code of Practice on the Management of Records issued under Section 46 of the Freedom of Information Act 2000

## 9. List of Documents

The Parish Council's comprehensive list of documents and the procedures for retention or disposal are detailed in Appendix A: List of Documents for Retention and Disposal. This appendix is updated regularly to reflect changes in legal requirements.

## Bow Brickhill Parish Council Appendix A: List of Documents for Retention or Disposal Document

| Document                                                   | Minimum Retention Period                                       | Reason                                                                     | Disposal                                                                                                                        |
|------------------------------------------------------------|----------------------------------------------------------------|----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| Minutes                                                    | Indefinite                                                     | Archive                                                                    | Original signed paper copies must be kept indefinitely in safe storage. Archive and deposit with Higher Authority every 5 years |
| 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, 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)                       | Bin                                                                                                                             |
| Wages books/payroll                                        | 12 years                                                       | Superannuation                                                             | Confidential waste                                                                                                              |
| Insurance policies                                         | While valid                                                    | Management                                                                 | Bin                                                                                                                             |
| 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 Bin                                                                                                                  |
| Town Park equipment inspection reports                     | 21 years                                                       | Investments                                                                | 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               |                                                            | Bin                            |
| Local/historical information                                                                         | Indefinite                                                      | To be securely kept for benefit of the Parish              | N/A                            |
| Magazines and journals                                                                               | For others retain as long as useful and relevant                | The Legal Deposit Libraries Act 2003                       | Bin if applicable              |
| General correspondence                                                                               | As long as needed for reference or accountability purposes      | Management                                                 | Bin (shred confidential waste) |
| Correspondence relating to staff                                                                     | Recommend 3 years after employment ends                         | Audit, references, tax, NI, pensions, legal claims         | Confidential waste             |
| Negligence (legal matters)                                                                           | 6 years                                                         |                                                            | Confidential waste             |
| Defamation (legal matters)                                                                           | 1 year                                                          |                                                            | Confidential waste             |
| Contract (legal matters)                                                                             | 6 years                                                         |                                                            | Confidential waste             |
| Leases (legal matters)                                                                               | 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                            |
| Application to hire (Halls, Centres, Recreation Grounds)                                             | 6 years                                                         | VAT                                                        | Confidential waste             |
| Invoices (Halls, Centres, Recreation Grounds)                                                        | 6 years                                                         | VAT                                                        | Confidential waste             |
| Record of tickets issued (Halls, Centres, Recreation Grounds)                                        | 6 years                                                         | VAT                                                        | Confidential waste             |
| Lettings diaries                                                                                     | Electronic files linked to accounts                             | VAT                                                        | N/A                            |
| Terms and Conditions                                                                                 | 6 years                                                         | Management                                                 | Bin                            |
| Event Monitoring Forms                                                                               | 6 years unless required for claims, insurance or legal purposes | Management                                                 | Bin                            |
| Register and plans (Allotments)                                                                      | Indefinite                                                      | Audit, Management                                          | N/A                            |
| Minutes (Allotments)                                                                                 | Indefinite                                                      | Audit, Management                                          | N/A                            |
| Legal papers (Allotments)                                                                            | Indefinite                                                      | Audit, Management                                          | N/A                            |
| Register of fees collected (Burial Grounds)                                                          | Indefinite                                                      | Archives, Local Authorities Cemeteries Order 1977 (SI 204) | N/A                            |

|                                                         |                                       |                                                            |                    |
|---------------------------------------------------------|---------------------------------------|------------------------------------------------------------|--------------------|
| Register of burials                                     | Indefinite                            | Archives, Local Authorities Cemeteries Order 1977 (SI 204) | N/A                |
| Register of purchased graves                            | Indefinite                            | Archives, Local Authorities Cemeteries Order 1977 (SI 204) | N/A                |
| Register/plan of grave spaces                           | Indefinite                            | Archives, Local Authorities Cemeteries Order 1977 (SI 204) | N/A                |
| Register of memorials                                   | Indefinite                            | Archives, Local Authorities Cemeteries Order 1977 (SI 204) | N/A                |
| Applications for interment                              | Indefinite                            | Archives, Local Authorities Cemeteries Order 1977 (SI 204) | N/A                |
| Applications for right to erect memorials               | Indefinite                            | Archives, Local Authorities Cemeteries Order 1977 (SI 204) | N/A                |
| Disposal certificates                                   | Indefinite                            | Archives, Local Authorities Cemeteries Order 1977 (SI 204) | N/A                |
| Copy certificates of grant of exclusive right of burial | Indefinite                            | Archives, Local Authorities Cemeteries Order 1977 (SI 204) | N/A                |
| Planning Papers: Applications                           | 1 year                                | Management                                                 | Bin                |
| Planning Papers: Appeals                                | 1 year unless significant development | Management                                                 | Bin                |
| Planning Papers: Trees                                  | 1 year                                | Management                                                 | Bin                |
| Local Development Plans                                 | Retained as long as in force          | Reference                                                  | Bin                |
| Local Plans                                             | Retained as long as in force          | Reference                                                  | Bin                |
| Town/Neighbourhood Plans                                | Indefinite – final adopted plans      | Historical purposes                                        | N/A                |
| CCTV 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 |
| 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 |

# POLICY APPROVAL

**Adopted by:** Bow Brickhill Parish Council

**Meeting date:**

**Minute reference:**

**Next review date:**

**Signed:** \_\_\_\_\_

*Chair of Council*

**Signed:** \_\_\_\_\_

*Clerk to the Council*

## Version Control

| Version | Date       | Description                    | Author          |
|---------|------------|--------------------------------|-----------------|
| 1.0     | 17/03/2025 | Policy adopted by Full Council | J Godden, Clerk |