Document Retention Policy

Purpose: To set out the arrangements for the retention, storage and disposal of West Wittering Parish Council documents in accordance with legal, regulatory and operational requirements.

Adopted: WWPC Full Council Meeting Minute Reference: 088/26 ii

Review: Autumn 2029

Introduction

This policy sets out the procedure for the retention, storage, access and disposal of documents and records held by West Wittering Parish Council, to support good governance, effective administration, transparency and compliance with legal and regulatory requirements.

The Council recognises that records should be accurate, accessible when required, retained only for as long as necessary and disposed of securely when they are no longer required.

This policy applies to all documents and records created, received or maintained by the Council while carrying out its functions, whether held in paper, electronic, email, image, archive or other formats.

Responsibilities

The Parish Council has a corporate responsibility to maintain its records and record management systems in accordance with the regulatory environment. The Clerk has overall responsibility for the implementation, maintenance and review of this policy.

Storage and access

Records must be stored securely, protected from unauthorised access, loss or damage, and be capable of retrieval within a reasonable time. Personal data and confidential information must be accessible only to those with a legitimate need to use it.

Electronic records containing personal or confidential information must be stored in appropriate Council systems and deleted securely when their retention period has expired. Paper records containing personal or confidential information must be kept in secure storage and disposed of as confidential waste.

Retention and disposal

The Council will retain records for the minimum periods set out in Appendix A unless there is a lawful or operational reason to retain them for longer.

This policy has been prepared with regard to the UK GDPR, Data Protection Act 2018, Freedom of Information Act 2000, Environmental Information Regulations 2004, Local Government Act 1972, Limitation Act 1980 and other relevant statutory, audit and employment requirements.

Confidential waste includes personal data, exempt information, records provided on a confidential basis, personnel records, financial information containing personal details, and any other record that could identify an individual or disclose sensitive Council business. Such records must be shredded or securely deleted. Non-confidential records may be recycled or deleted when no longer required.

Relationship with other policies

This policy should be read alongside the Council's Data Protection Policy, Freedom of Information Policy, Publication Scheme, Information Technology arrangements, Financial Regulations and any other relevant Council policies.

Document retention schedule

The retention schedule is not exhaustive. Where a record is not listed, the Clerk will determine an appropriate retention period by reference to legal, audit, operational and historical requirements.

Document	Minimum retention period	Reason	Disposal
Governance and Council business			
Signed minutes	Indefinite	Archive and public inspection	Not applicable
Agendas, reports and meeting papers	Indefinite where part of the formal Council record; otherwise until no longer required	Governance and audit	Confidential waste where appropriate
Policies and procedures	Until superseded, with historic versions retained where required	Governance and continuity	Bin, confidential waste or secure deletion as appropriate
Declarations of office and registers of interests	Term of office	Governance and transparency	Confidential waste or secure deletion
General correspondence and emails	Retained for as long as required, normally up to 3 years	Management and accountability	Confidential waste or secure deletion
Complaints	Resolution of complaint + 2 years, unless required for legal, insurance or audit purposes	Accountability and complaint handling	Confidential waste or secure deletion
Councillor training records	Term of office + 6 years	Governance, capability and accountability	Confidential waste or secure deletion
Finance, audit and payroll			
Financial records, invoices, VAT and accounting records	6 years unless audit requires longer	Audit, VAT and limitation requirements	Confidential waste or secure deletion
Audited accounts, annual governance and accountability returns, budgets and asset registers	Indefinite	Audit and archive	Not applicable

Payroll, tax and National Insurance records	6 years from the end of employment or relevant tax year	Employment, audit and tax requirements	Confidential waste or secure deletion
Grant applications, grant awards and monitoring records	6 years after final payment or project completion, unless the funder requires longer	Audit, funding conditions and accountability	Confidential waste or secure deletion where appropriate
Employment and recruitment			
Personnel files and training records	6 years after employment ceases	Employment management and potential claims	Confidential waste or secure deletion
Unsuccessful job applications	6 months after appointment	Recruitment management	Confidential waste or secure deletion
Insurance, health and safety			
Insurance policies and claims	While valid; claims for 7 years after conclusion or longer where required	Insurance and limitation requirements	Confidential waste or secure deletion
Employer's liability insurance certificates	40 years	Legal requirement	Archive or secure disposal when no longer required
Accident and incident records involving adults	3 years from the date of the accident, or longer where required	Potential claims	Confidential waste or secure deletion
Accident and incident records involving children	Until the child reaches age 25	Potential claims	Confidential waste or secure deletion
Health and safety inspection records, risk assessments and equipment testing	2 to 6 years depending on record type	Health and safety management	Bin, confidential waste or secure deletion as appropriate
Play area and play equipment inspection records	5 years, or longer where required for a claim or investigation	Health and safety management and potential claims	Confidential waste or secure deletion where appropriate
Tree surveys and inspection records	7 years, or longer where a risk, claim or works history requires it	Land management, health and safety and potential claims	Confidential waste or secure deletion where appropriate
Pavilion fire risk assessments, fire alarm testing and safety checks	Until superseded + 6 years	Fire safety, premises management and potential claims	Confidential waste or secure deletion where appropriate
Asbestos records and exposure records	40 years	Health and safety requirement	Archive or secure disposal when no longer required

Information governance and data protection			
Freedom of Information, Environmental Information and Subject Access Requests	3 years after the request is completed	Accountability and statutory compliance	Confidential waste or secure deletion
Data breach records	6 years after closure of the incident	Data protection accountability	Confidential waste or secure deletion
CCTV recordings	Normally up to 30 days unless required for an investigation or legal purpose	Security and data minimisation	Secure deletion
Property, contracts and planning			
Contracts, leases, title deeds and legal agreements	Indefinite for deeds and key records; 6 or 12 years after completion or expiry for contracts depending on execution	Legal, audit and property management	Confidential waste or secure deletion where appropriate
Planning applications, decisions and appeals	Council recommendations are retained within minutes indefinitely	Planning and governance	Confidential waste or secure deletion
Allotments, assets and bookings			
Allotment application forms, tenancy agreements, waiting lists and related correspondence	Length of tenancy or application + 2 years, unless required for a dispute, debt recovery or legal matter	Allotment management and accountability	Confidential waste or secure deletion
Allotment registers and plans	Indefinite	Audit, land management and historical record	Not applicable
Memorial bench applications, agreements, location records and maintenance correspondence	Duration of agreement or asset life + 6 years	Asset management, public realm management and potential claims	Confidential waste or secure deletion
Memorial bench register, asset record and location plan	Indefinite while the Council maintains the asset, then 6 years after removal unless retained for historical purposes	Asset management and historical record	Archive or secure disposal when no longer required
Public open space, grounds maintenance and contractor records	6 years after completion of the works or contract, unless required for a claim, dispute or asset history	Contract management, audit, land management and potential claims	Confidential waste or secure deletion where appropriate

Pavilion booking forms, hire agreements, invoices and related correspondence	6 years after the booking or final payment, whichever is later	Contract, audit, VAT and potential claims	Confidential waste or secure deletion
Tennis court booking records, payment records and related correspondence	6 years after the booking or final payment, whichever is later	Contract, audit, VAT and potential claims	Confidential waste or secure deletion
Football pitch booking records, hire agreements, payment records and related correspondence	6 years after the booking or final payment, whichever is later	Contract, audit, VAT, insurance and potential claims	Confidential waste or secure deletion
Facility key, code holder and access records	Keep current while access is authorised; retain historic records for up to 2 years after access ends unless required for an investigation	Security and facilities management	Confidential waste or secure deletion
Archive and local history			
Local or historical records	Indefinite	Historical or archival value	Not applicable