

Laverstoke & Freefolk Parish Council

Data Retention Policy

1. Introduction

This Data Retention Policy sets out how Laverstoke & Freefolk Parish Council manages, stores, and disposes of the information it holds.

The Council is committed to meeting its obligations under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Freedom of Information Act 2000, and all other relevant legislation.

The purpose of this policy is to ensure that information is retained only for as long as necessary, kept securely, and disposed of appropriately.

2. Scope

This policy applies to all information created, received, or maintained by the Council, including:

- Paper records
- Digital files
- Emails
- Photographs, video, and audio
- Data held by third-party processors
- Website data and logs

It covers councillors, staff, volunteers, contractors, and data processors acting on the Council's behalf.

3. Roles and Responsibilities

The Council (Data Controller): Determines what information is held, how long it is retained, and how it is used.

Clerk / Data Protection Lead: Responsible for implementing this policy, managing records, and ensuring compliance.

Councillors: Must follow this policy and ensure personal data is only kept as long as required.

Data Processors (e.g., website host, email provider, payroll provider): Must follow the Council's retention and disposal instructions.

4. Legal and Regulatory Framework

Retention periods are based on statutory requirements and best-practice guidelines, including:

- UK GDPR & Data Protection Act 2018
- Freedom of Information Act 2000
- Local Government Act 1972
- Limitation Act 1980
- HMRC financial retention rules
- Audit requirements (AGAR)

5. Retention Schedule

The Council maintains a Records Retention Schedule that sets out how long each category of data is kept. The following periods apply unless otherwise stated.

Governance

- Minutes (signed): Permanent
- Agendas: 6 years
- Reports/background papers: 6 years

Finance

- Annual accounts: Permanent
- AGAR forms: 6 years
- Bank statements: 6 years
- Invoices, receipts, purchase orders: 6 years
- Budget/precept information: 6 years

Staffing & Councillors

- Personnel files: 6 years after employment ends
- Payroll records: 6 years
- Job applications/interview notes: 6 months
- Register of Interests: held by Basinsgtoke & Deane Borough council
- Declarations of Acceptance: Term of office + 1 year

Property & Assets

- Leases and agreements: 12 years after end
- Insurance policies: 6 years
- Inspection logs: 6 years

Contracts

- Contracts and tenders: 6 years after end

Communications & Community

- Consultation responses: 2 years
- Mailing lists (e.g., Mailchimp): Until consent withdrawn
- Correspondence (general): 2 years unless required longer

Website, IT

- Website backups/logs 90 days
- Emails: 2 years, unless forming part of an ongoing matter

6. Secure Storage

The Council ensures all records are stored securely:

- Paper records held securely
- Digital files protected by passwords
- Restricted access for staff and councillors
- One Drive cloud storage used
- Regular IT security checks

7. Secure Disposal of Records

Records must be disposed of in a secure and confidential manner.

Paper Records

- Shredding or use of a certified confidential-waste provider

Digital Records

- Permanent deletion from systems and backups
- Ensuring processors (e.g., website host, email provider) also delete data

8. Data Retention Exceptions

Information may be kept longer when:

- It is required for legal or regulatory proceedings
- It is needed for an active complaint, FOI request, or insurance matter
- Archival value is identified (e.g., historical parish records)

9. Review of the Policy

This policy will be reviewed annually in May or earlier if legislation or guidance changes.

10. Related Council Policies

- Data Protection Policy
- Privacy Notice
- IT & Email Policy
- Data Breach Procedure

This Data Retention Policy was approved by Laverstoke & Freefolk Parish Council on

Date: 9.12.25