

Shrivenham & Parish Council (SPC) Retention & Disposal Policy

1. Introduction

Shrivenham Parish Council (“the Council”) is committed to the lawful, fair, and transparent management of information. This Retention & Disposal Policy sets out how long the Council retains its records, the legal or operational reasons for doing so, and the procedures for secure disposal.

This policy supports compliance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000 (FOIA)
- Local Government Act 1972
- Limitation Act 1980
- ICO guidance for local authorities

The Council must be able to demonstrate that personal data is kept **no longer than necessary** and that records of long-term historical, legal, or evidential value are preserved appropriately.

2. Purpose of the Policy

This policy ensures that:

- Records are retained for an appropriate period to meet legal, financial, administrative, and historical requirements.
- Personal data is not kept longer than necessary.
- Records of permanent value are preserved.
- Information is disposed of securely and consistently.
- The Council can respond effectively to FOI, EIR, and Subject Access Requests.

3. Scope

This policy applies to all records created, received, or maintained by Shrivenham Parish Council in any format, including:

- Cemetery and burial records
- Allotment records
- Governance documents (minutes, agendas, policies)

- Financial and audit records
- HR and employment records
- Health & safety documentation
- CCTV footage
- Emails and correspondence
- Contracts, leases, and legal documents
- Complaints and FOI requests

It covers both paper and electronic records.

4. Principles

The Council follows the following principles:

- **Lawfulness** — retention periods reflect statutory requirements where applicable.
- **Accountability** — the Council maintains a documented retention schedule.
- **Data minimisation** — only information necessary for Council functions is retained.
- **Storage limitation** — personal data is not kept longer than required.
- **Security** — records are stored and disposed of securely.
- **Transparency** — retention periods are published and available to the public.

5. Roles and Responsibilities

- **The Clerk/RFO** is responsible for implementing this policy, maintaining the retention schedule, and ensuring secure disposal.
- **Councillors** must follow the policy when handling Council information.
- **Data Protection Officer (if appointed)** provides oversight and advice.

6. Retention Schedule

The following schedule sets out the retention periods for each category of Council records. Where no statutory period exists, recommended best practice for local authorities is applied.

6.1 Cemetery & Burial Records

- Burial registers — **Permanent**

- Cemetery maps and plot plans — **Permanent**
- Exclusive Rights of Burial / grave purchase records — **100 years after last action**
- Burial applications — **15 years**
- Memorial permit applications — **25 years**
- Memorial safety inspection records — **6 years**
- Correspondence relating to burials — **6 years**

6.2 Allotments

- Tenancy agreements — **6 years after termination**
- Waiting lists — **Until updated + 1 year**
- Allotment correspondence — **6 years**
- Allotment site plans — **Permanent**

6.3 Governance

- Minutes (signed) — **Permanent**
- Draft minutes — **Until approved**
- Agendas — **5 years**
- Policies and procedures — **Current version + 6 years**
- Declarations of acceptance of office — **Term of office + 1 year**
- Register of members' interests — **As long as the member holds office**
- Parish meeting papers — **5 years**

6.4 Finance & Audit

- Annual accounts and audit papers — **7 years**
- Invoices, receipts, purchase orders — **7 years**
- Bank statements — **7 years**
- Precept documentation — **7 years**
- Grants awarded — **6 years**
- Grants received — **6 years**

6.5 HR & Employment

- Personnel files — **6 years after employment ends**

- Payroll records — **7 years**
- Recruitment records — **1 year**
- Training records — **3 years**
- Disciplinary records — **6 years after case closure**

6.6 Health & Safety

- Accident reports (adults) — **3 years**
- Accident reports (children) — **Until the child is 21**
- Risk assessments — **3 years**
- Fire safety records — **6 years**
- Inspection logs — **3 years**

6.7 CCTV Footage

Where SPC operates CCTV systems:

- Routine CCTV footage — **30 days**, unless required for an investigation
- Footage relating to an incident — **Retain until the conclusion of all proceedings**
- CCTV system maintenance logs — **3 years**

Retention must comply with ICO CCTV Code of Practice.

6.8 Contracts & Legal Documents

- Contracts and leases — **6 years after expiry**
- Insurance policies — **6 years after expiry**
- Insurance claims — **6 years after settlement**

6.9 Correspondence & Communications

- Routine emails — **1 year**
- General correspondence — **3 years**
- Complaints — **6 years**
- FOI/EIR requests — **3 years**
- Subject Access Requests — **3 years**

7. Secure Disposal

The Council ensures that:

- Paper records containing personal data are **confidentially shredded**.
- Electronic records are **securely deleted**, including from backups where feasible.
- Records of permanent value are transferred to **archival storage**.
- Disposal decisions are documented where appropriate.

8. Review and Amendment

This policy and the retention schedule will be reviewed **annually** or sooner if:

- Legislation changes
- New Council functions are introduced
- The Data Protection Officer recommends amendments

Approval of amendments rests with the Council.

9. Adoption

This policy was approved by Shrivenham Parish Council on: **06/05/26**

Signed:

A handwritten signature in black ink, appearing to read 'Liza Whitney', with a vertical line above the 'y' and a horizontal line below it.

Liza Whitney, Clerk/RFO