



EDLESBOROUGH PARISH COUNCIL

Data Retention Policy

Purpose and Scope

This Data Retention Policy outlines how Edlesborough Parish Council retains, manages, and disposes of data in accordance with its legal obligations. The Council recognises its duty to maintain accurate records, ensure transparency, and protect personal data, particularly where data is stored and accessed via councillors' personal devices.

This policy applies to all records and data held or processed by the Parish Council, including but not limited to:

- Emails sent and received via official .gov.uk addresses.
- Financial records.
- Minutes and agendas.
- Correspondence with the public.
- Data processed for statutory and service delivery purposes.

Legal and Regulatory Framework

This policy adheres to the following legal and regulatory obligations:

- UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.
- The Local Government Transparency Code 2015.
- Proper Practices in Governance (JPAG Practitioners' Guide).
- NALC and SLCC guidelines.
- Statutory retention periods under legislation such as the Limitation Act 1980, Audit Regulations, and HMRC rules.

Retention Principles

- Personal data will be retained no longer than necessary for the purposes for which it is processed (Article 5(1)(e) UK GDPR).
- Some data is subject to statutory retention periods which override Council discretion.
- Where a minimum or maximum retention period is not legally required, the Council retains the right to adjust retention periods via policy review.
- Data held by councillors on personal devices must comply with this policy and be protected accordingly (see Section Councillor Responsibilities and Device Use).

Retention Schedule (Summary)

Document	Minimum retention period	Reason
Minute books	Indefinite	Archive
Scales of fees and charges	Six years	Management
Receipt and payment account(s)	Indefinite	Archive
Receipt books of all kinds	Six years	VAT
Bank statements, including deposit/savings accounts	Last completed audit year	Audit

Bank paying-in books	Last completed audit year	Audit
Cheque book stubs	Last completed audit year	Audit
Quotations and tenders	Six years	Limitation Act 1980 (as amended)
Paid invoices	Six years	VAT
Paid cheques	Six years	Limitation Act 1980 (as amended)
VAT records	Six years generally but 20 years for VAT on rents	VAT
Petty cash, postage, and telephone books	Six years	Tax, VAT, and Limitation Act 1980 (as amended)
Timesheets	Three years (or last completed audit year)	Audit (requirement) and personal injury (best practice)
Wages books	12 years	Superannuation
Insurance policies	As long as a claim can be made under it	Management and legal proceedings
Certificates for Insurance against liability for employees	Indefinitely	Future claims
Investments	Indefinite	Audit and management
Title deeds, leases, agreements, contracts	Indefinite	Audit and management
Members allowances register	Six years	Tax and Limitation Act 1980 (as amended)
For halls, centre, and recreation grounds:		
Application to hire lettings diaries copies of bills to hires record of tickets issue	Six years	VAT
For allotments:		
Register and plans	Indefinite	Audit and management
For burial grounds:		
Register of fees collected, register of burials, register of purchased graves, register/plan of grave spaces, register of memorials, applications for interment, applications for right	Indefinite	Archives and Local Authorities Cemeteries Order 1977 (SI. 204)

to erect memorials, disposal certificates, and copy certificates of grant of exclusive right of burial.		
---	--	--

A full schedule is maintained and reviewed annually by the Clerk as the Data Protection Officer.

Review and Disposal

- The Clerk shall conduct annual reviews of retained data to ensure compliance and delete or archive records accordingly.
- Disposal shall be secure (e.g., digital shredding or secure deletion software).
- Records scheduled for permanent retention will be archived appropriately and securely.

Councillor Responsibilities and Device Use.

- Councillors are issued official .gov.uk email addresses and must use these for all Council business.
- Emails and documents held on personal devices are subject to Council policies and UK GDPR.
- Councillors must not delete Council-related emails outside the retention schedule.
- Councillors are responsible for ensuring that devices used for Council work have appropriate:
 - Password protection.
 - Encryption where possible.
 - Email application access logging.
 - Ability to respond to subject access or FOI requests.

The Council reserves the right to implement remote data wipe for .gov.uk accounts in exceptional circumstances.

Right to Amend Retention Periods

Where no statutory minimum or maximum period exists, the Council reserves the right to amend retention periods based on operational, legal, or risk considerations. Such changes will be formally adopted at Council meetings and recorded.

Data Subject Rights and Transparency

- The Council upholds the rights of individuals under GDPR, including:
 - Right to access personal data.
 - Right to rectification .
 - Right to erasure (subject to legal exceptions).
- Data retained and published under the Transparency Code must be accessible and up to date.

Policy Review

This policy will be reviewed annually or when relevant legislation or guidance changes.

Signed for and on behalf of Edlesborough Parish Council	
Name	Cllr Rosie Booth
Signature	<i>R Booth</i>
Position	Chair
Date	19/02/2026
Minute Record	17. Data Retention Policy