

Sturminster Newton Town Council

Records Retention and Disposal Policy

1. Introduction

Sturminster Newton Town Council ("the Council") recognises that the proper creation, management, retention, and disposal of records is essential for effective administration, legal compliance, transparency, and accountability.

This policy sets out how the Council will manage its records, whether in paper, digital, or other formats, in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Freedom of Information Act 2000 (FOIA), and the Lord Chancellor's Code of Practice on the Management of Records (issued under section 46 of the FOIA and updated by the Information Commissioner's Office in 2021).

2. Scope

This policy applies to all recorded information created, received, or maintained by the Council in the course of its business, regardless of format or medium. It also covers information held by third parties on the Council's behalf, including contractors and service providers.

Transitory or duplicate records such as routine correspondence, out-of-date circulars, or promotional materials should be deleted or destroyed as soon as they are no longer required.

3. Roles and Responsibilities

The Town Clerk is responsible for maintaining the Records Retention Schedule, overseeing secure storage and disposal, and ensuring staff are aware of their responsibilities.

All staff and councillors must ensure records they create or manage are stored securely and disposed of in accordance with this policy.

The Council is responsible for approving updates to the Retention Schedule and for monitoring compliance with this policy.

4. Record Keeping and Security

Records must be stored in systems that ensure integrity, authenticity, and accessibility. Digital records must be backed up and subject to appropriate access controls.

Cloud storage providers must meet UK GDPR standards for security and data location.

No record should be destroyed if it is subject to an ongoing Freedom of Information request, Subject Access Request, audit, or investigation.

5. Retention and Disposal Principles

The Council will retain information only as long as necessary for legal, regulatory, or operational purposes. Retention periods are defined in the Records Retention Schedule (Appendix A).

Personal data will be retained only as long as necessary in line with the UK GDPR and Data Protection Act 2018. The Council will securely dispose of or anonymise personal data when it is no longer required.

Records will be disposed of securely and appropriately, for example by confidential shredding, secure electronic deletion, or transfer to an approved archive. Certificates of destruction will be obtained where external contractors are used.

6. Scanning and Digital Copies

Electronic copies are acceptable provided they are clear, accurate, and accessible for the full retention period.

Once verified, scanned copies may replace paper originals, except where the original must be retained by law (for example, financial documents required by HMRC).

Digital records must be regularly backed up and stored in formats that ensure long-term accessibility.

7. Review and Update

This policy will be reviewed at least every two years, or sooner if required by changes in law or guidance from the Information Commissioner's Office.

The Records Retention Schedule (Appendix A) will be reviewed and updated by the Town Clerk as necessary.

This policy should be read alongside the Council's Freedom of Information Policy, Publication Scheme, and Privacy and Data Protection Policies.

Appendix A – Records Retention Schedule

The following table sets out the minimum retention periods for key categories of records. Records may be retained for longer where there is a legal or operational justification.

Record Category	Examples / Description	Minimum Retention Period	Disposal Method
Governance	Agendas, minutes, reports, policy documents	Permanent	Archive
Finance	Invoices, receipts, accounts, VAT, payroll	7 years	Confidential shredding / secure deletion
Human Resources	Personnel files, contracts, training records	6 years after employment ends	Confidential shredding / secure deletion
Property and Assets	Leases, deeds, wayleaves, maintenance records	12 years after expiry (or permanent if sealed)	Archive or confidential shredding
Planning	Planning applications, objections, responses	6 years	Confidential shredding
Health & Safety	Risk assessments, accident logs	3 years or longer if required	Confidential shredding
CCTV / Surveillance	CCTV footage and logs	30 days unless required longer	Secure deletion
General Correspondence Registers / Logs	Routine letters, emails, admin files Asset register, allotment lists, burial records	2 years unless required longer Permanent	Confidential shredding / deletion Archive
Contracts & Procurement	Tenders, supplier contracts	6 years after contract end	Confidential shredding
Audit / Governance Records	Audit reports, returns	7 years	Confidential shredding

The Council will maintain a simple record of the secure destruction of key documents, such as HR, financial or contractual records, where necessary to demonstrate compliance. Routine administrative papers and duplicate copies will be securely disposed of without detailed logging.

Adopted: October 2025

Next Review Due: October 2027