



GENERAL DATA PROTECTION REGULATIONS **DOCUMENT RETENTION AND DISPOSAL POLICY**

1 Introduction

The guidelines set out in this document supports the Council's Data Protection Policy and assists the Council in compliance with the Freedom of Information Act 2000, the General Data Protection Regulation & The Data Protection Act 2018 and other associated legislation.

It is important that the Council has in place arrangements for the retention and disposal of documents necessary for the adequate management of services in undertaking its responsibilities. This policy sets out the minimum requirements for the retention of documents and sets out the requirements for the disposal of documents. However, it is important to note that this is a live document and will be updated on a regular basis.

The Council will ensure that information is not kept for longer than is necessary and will retain the minimum amount of information that it requires to carry out its functions and the provision of services, whilst adhering to any legal or statutory requirements.

2 Aims and Objectives

It is recognised that up to date, reliable and accurate information is vital to support the work that the Council do and the services that it provides to its residents. This document will help the Council to:-

- a) Ensure the retention and availability of the minimum amount of relevant information that is necessary for the Council to operate and provide services to the public.
- b) Comply with legal and regulatory requirements, including the Freedom of Information Act 2000, the Data Protection Act 1998, the General Data Protection Regulation, the Data Protection Act 2018 and the Environmental Information Regulations 2004.
- c) Save employees' time and effort when retrieving information by reducing the amount of information that may be held unnecessarily. This will assist them as they carry out their daily duties, or if searching for information requested under the Freedom of Information Act.
- d) Ensure archival records that are of historical value are appropriately retained for the benefit of future generations.

Office Opening Times:

Mondays, Tuesdays & Fridays 10am - 12 noon

Email: clerk@mardenkent-pc.gov.uk

Website: www.mardenkent-pc.gov.uk

Parish Council GDPR Document Retention Policy March 2025



3 Scope

For the purpose of this Policy, 'documents' includes electronic, microfilm, microfiche and paper records.

Where storage is by means of paper records, originals rather than photocopies should be retained where possible.

4 Standards

The Council will make every effort to ensure that it meets the following standards of good practice:

- a) Adhere to legal requirements for the retention of information as specified in the Retention Schedule at Annex A. This document provides a framework for good practice requirements for retaining information.
- b) Personal information will be retained in locked filing cabinets within the Clerk's Office, access to these documents will only be by authorised personnel.
- c) Disclosure information will be retained in a locked cabinet in the Clerk's Office.
- d) Appropriately dispose of information that is no longer required.
- e) Appropriate measures will be taken to ensure that confidential and sensitive information is securely destroyed.
- f) Information about unidentifiable individuals is permitted to be held indefinitely for historical, statistical or research purposes e.g. Equalities data.

Wherever possible only one copy of any personal information will be retained and that will be held within the Clerk's Office.

5 Breach of Policy and Standards

Any employee who knowingly or recklessly contravenes any instruction contained in, or following from, this Policy and Standards may, depending on the circumstances of the case, have disciplinary action, which could include dismissal, taken against them.

6 Roles and Responsibilities

The Clerk has overall responsibility for the policy.

The Clerk is responsible for the maintenance and operation of this policy including ad-hoc checks to ensure compliance.

Other delegated staff are responsible for ensuring their records are kept and destroyed in line with this policy.

The Clerk is responsible for ensuring that the guidelines set out in this policy are adhered to and to ensure that any documents disposed of are done so in accordance with their 'sensitivity' (i.e. whether they are normal waste or 'Confidential Waste')

Office Opening Times:

Mondays, Tuesdays & Fridays 10am - 12 noon

Email: clerk@mardenkent-pc.gov.uk

Website: www.mardenkent-pc.gov.uk

Parish Council GDPR Document Retention Policy March 2025



7 Confidential Waste

Fundamentally any information that is required to be produced under the Freedom of Information Act or Environmental Information Regulations, is available on the website or is open to public inspection should NOT be treated as confidential waste.

Examples of what constitutes confidential waste:

- a) Exempt information contained within committee reports.
- b) Files containing the personal details of an individual and files that predominantly relate to a particular individual or their circumstances. For example, completed application forms and letters.
- c) Materials given to the Council on a 'confidential' or on a limited use basis e.g. material provided by contractors or the police.

However, any information that is protected by the Data Protection Act or as Confidential under the Council's Constitution should be treated as confidential waste for disposal purposes.

Examples of what does not constitute confidential waste:

- a) Documents that are available to the public via our web site or by submitting an appropriate search request to ourselves for general information.
- b) All reports and background papers of matters taken to Committee in public session unless specifically exempt.

8 Disposal of Documentation

Confidential waste which clearly shows any personal information or information which can be identified using the parameters set out in 7.3 will be shredded within the council buildings.

9 Retention

Timeframes for retention of documents have been set using legislative requirements and the Chartered Institute of Personnel and Professional Development (CIPD) guidelines.

Throughout retention the conditions regarding safe storage and controlled access will remain in place.

Disclosure information appertaining to Disclosure and Barring Checks must be kept securely in a locked cabinet. Only those entitled to see it in the course of their duties should have access. The security and confidentiality of all Disclosure information is closely registered under the Police Act 1997.

Disclosure information must not be retained for a period of more than six months and must be destroyed in a secure manner using the shredder in the Parish Clerk's office.

Office Opening Times:

Mondays, Tuesdays & Fridays 10am - 12 noon

Email: clerk@mardenkent-pc.gov.uk

Website: www.mardenkent-pc.gov.uk

Parish Council GDPR Document Retention Policy March 2025



Any unauthorised employee accessing or attempting to access Disclosures or Disclosure information or personnel records will be dealt with under the Council's disciplinary procedures.

The attached 'Appendix A' shows the minimum requirements for the retention of documents as determined by those officers responsible for the management of these particular documentation types. Officers holding documents should exercise judgement as to whether they can be disposed of at the end of those periods detailed in the attached 'Appendix A'

10 Storage and Access

Disclosure information is kept separately from personnel files in a securely lockable, non-portable cabinet with access strictly controlled and limited to the Clerk, and/or the Deputy Clerk.

11 Handling

The Council complies with s124 of the Police Act 1997, so that Disclosure Information is only passed to those who are authorised to receive it in the course of their duties. The Council maintains a record of all those to whom Disclosures or Disclosure Information has been revealed and recognises that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Personal information will only be available to those who are authorised officers.

Customer's details and information will be kept up to date and reviewed annually by an authorised officer.

12 Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's/employee's consent has been given. Disclosure Information will be shared between different areas of the Council, if necessary.

Where Disclosure information is shared with anyone other than the Clerk and Deputy Clerk the employee must be given a reason why this information is being shared.

Office Opening Times:

Mondays, Tuesdays & Fridays 10am - 12 noon

Email: clerk@mardenkent-pc.gov.uk

Website: www.mardenkent-pc.gov.uk

Parish Council GDPR Document Retention Policy March 2025



APPENDIX A

Recommended Document Retention Timescales

The retention period should be the number of years specified plus the current financial period (i.e. three years plus the current period, therefore at least three years documentation will always be retained at any given point in time).

This list is not exhaustive; if you are unsure about any document contact the Parish Clerk or the Deputy Clerk for clarification.

Document Retention Period

Finance

Indefinitely

Capital and contracts register
Current and expired insurance contracts and policies
Financial Plan
Financial Published Final Accounts
Precept Forms
Published budget books
Signed Audited Accounts
Statutory end of year returns to Inland Revenue and Pensions Section

40 years

Insurance Certificates

21 years

Public Liability Insurance policies

12 years

Final accounts of contracts executed under seal (from completion)

10 years

Asset Register for statutory accounting purposes
Ledger/Trial Balance

6 years

BACS listings
Banking Records including Giro cheques, bills of exchange and Bank Statements (Disk Space) and Instructions to Banks
Bank Statements (hard copies)
Cash Books (records of moneys paid out and received)
Cheque Payment Listings (invoices received)
Copy receipts
Debtors and rechargeable works records
Expenses and travel allowance claims

Office Opening Times:

Mondays, Tuesdays & Fridays 10am - 12 noon

Email: clerk@mardenkent-pc.gov.uk

Website: www.mardenkent-pc.gov.uk

Parish Council GDPR Document Retention Policy March 2025



Final accounts of contracts executed under hand (from completion)
Insurance records and claims
Loans and Investment Records; temporary loan receipts and
Loan tabulations (6 years after redemption)
Other negotiable instruments
Payment Vouchers Capital and Revenue (copy invoices)
Payroll and tax information relating to employees
Petty cash vouchers and reimbursement claims
Prime evidence that money has been banked
Purchase Orders
Records of payment made to employees for salaries / wages (including Intermediate
payslips)
Time sheets and overtime claims
VAT, Income Tax and National Insurance

5 years

Fees and Charges Schedules
Final Account working papers
Grant/Funding Applications & Claims
Journal sheets
Records of all accounting transactions held by the Financial Management System (at
least)
Year end ledger tabulations – ledger details and cost updates

3 years

All other reconciliations
Bank Reconciliation
Budget Estimates – Detailed Working Papers and summaries
Cheques presented / drawn on the Council bank accounts
Council's bank accounts
Goods received notes, advice notes and delivery notes
Internal Audit Plans / Reports
Prime records that money has been correctly recorded in the

2 years

Cancelled Expenditure cheques
Payroll costing analysis
Refer to Drawer (RD) cheques

Office Opening Times:

Mondays, Tuesdays & Fridays 10am - 12 noon

Email: clerk@mardenkent-pc.gov.uk

Website: www.mardenkent-pc.gov.uk

Parish Council GDPR Document Retention Policy March 2025



Personnel

Permanently

Disciplinary or grievance investigations (Proved) – Anything involving children

For duration of employment + 5 years

Annual leave records

Personnel records and training records

References received

Statutory sick records, pay, calculations, certificates etc

Successful application forms and CVs

Unpaid leave/special leave

6 years

Wages/Salary records, overtime, bonuses, expenses etc

3 years

Statutory Maternity/Paternity records, calculations, certificates etc (3 years after the tax year when maternity leave period ends)

2 years

Time Control records

1 year

Unsuccessful reference requests

Disciplinary or grievance investigations (Proved) - Written

18 months

Disciplinary or grievance investigations (Proved) – Final Warning

6 months

Criminal Records Bureau Checks

Disciplinary or grievance investigations (Proved) - Verbal

Unsuccessful application forms

Other

Annual appraisal/assessment records – current + previous two years

Disciplinary or grievance investigations (Unproven) – Destroy immediately after

Investigation or appeal

Corporate

Indefinitely

Asset Management records

Asset Management reports

Deeds of land and property

Details regarding burials

Electronic booking information (due to the need to gather statistical info)

Office Opening Times:

Mondays, Tuesdays & Fridays 10am - 12 noon

Email: clerk@mardenkent-pc.gov.uk

Website: www.mardenkent-pc.gov.uk

Parish Council GDPR Document Retention Policy March 2025



Equalities data
Minutes and reports of Full Council and Committee meetings
Minutes and reports for Special Committee meetings
Minutes and reports of Sub-Committees
Notes and reports of working groups
Performance reports
Premises License applications
Property evaluation lists
Questionnaire data
Risk management reports
Risk register

7 years

Internal audit fraud investigation (from final outcome of investigation)

6 years

Documentation referring to externally funded projects
Drivers log books and mileage
Land and property rental agreements (6 years after agreement expiry)
Lease agreements, variations and valuation queries (6 years after agreement expiry)

3 years

Booking diaries
Fuel usage records
Internal audit records

2 years

Show health & safety statements
Vehicle maintenance and registration records (all necessary Certificates, test records and vehicle registration documents etc) (after disposal)

1 year

Contacts for show
Paper application
Pre-tender qualification document.
Summary list of expression of Interest received, company contacts, a summary of any financial or technical evaluation supplied with the expressions of interest, initial Application
Services and equipment quotations
Show application including caterers, displays, competition entrants
Show stalls database including handcraft and horticulture entrants' details
Trip database of applicants Coach Tours
Trips tenders for coach hire

Office Opening Times:

Mondays, Tuesdays & Fridays 10am - 12 noon

Email: clerk@mardenkent-pc.gov.uk

Website: www.mardenkent-pc.gov.uk

Parish Council GDPR Document Retention Policy March 2025



Other

Draft Minutes of Committees, Sub-Committees and other meetings - until agreed
Rough notes and handwritten notes from Committees, Sub-Committees and other meetings - until minutes agreed

Policies and Procedures - until next review

Allotment application forms - Length of tenancy + 2 years

Allotment agreements - Length of tenancy + 2 years

Successful tender documentation - Life of contract + 6 years

Unsuccessful tender documentation - until final payment is made

Office Opening Times:

Mondays, Tuesdays & Fridays 10am - 12 noon

Email: clerk@mardenkent-pc.gov.uk

Website: www.mardenkent-pc.gov.uk

Parish Council GDPR Document Retention Policy March 2025



Health & Safety

40 years

Medical records containing details of employee exposed to Asbestos or as specified by the Control of Substances Hazardous to Health Regulations 1999 (after date of last entry)

Asbestos records for premises/property including survey and removal records

10 years

Disposing of hazardous waste

Warranties

5 years

Parks and play area inspection report

4 years

Records relating to accidents - person over 18 years (from date of accident)

3 years

Documents relating to the process of collecting, transporting and disposing of general waste

Health and Safety Accident books (after the date of the last entry) (unless an accident involves chemicals or asbestos is contained within)

Manual Handling Assessment Forms

Unused Incident Forms

2 years

All inspection certificates (Gas Safe, FENSA etc)

Documents relating to the process of collecting, transporting and Plant and equipment testing

Periodic machinery inspection tests (PAT, equipment calibration etc)

Repairs job sheets

Risk Assessment Forms

Other

Medical examination certificates -4 years from date of issue

Records relating to accidents – person under 18 years - until 21st birthday

Office Opening Times:

Mondays, Tuesdays & Fridays 10am - 12 noon

Email: clerk@mardenkent-pc.gov.uk

Website: www.mardenkent-pc.gov.uk

Parish Council GDPR Document Retention Policy March 2025



Additional Items

Indefinitely

MPC Planning Permissions

Title deeds, leases, agreements, contracts

Other

Planning Applications - no requirement as details available on Local Authority website. Controversial plans may be kept subject to Clerk and/or Cllrs discretion

Children/Play Scheme details - 21 years and 3 months

Electoral Roll (original held with Maidstone Borough Council) - current year

Adopted by Marden Parish Council on: 12th June 2018

Reviewed on: June 2019 / 4th May 2021 / 8th March 2022 / 14th March 2023 / 12th

March 2024 / 14th January 2025

Review date: March 2026

Office Opening Times:

Mondays, Tuesdays & Fridays 10am - 12 noon

Email: clerk@mardenkent-pc.gov.uk

Website: www.mardenkent-pc.gov.uk

Parish Council GDPR Document Retention Policy March 2025

