PAPPLEWICK PARISH COUNCIL

GDPR Records Retention Policy

Adopted at a Parish Council meeting on 8th July 2026

Purpose

The UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 set out stringent requirements for the processing of personal data . One of the critical aspects of GDPR compliance is the proper retention and destruction of records containing personal data. The purpose of this policy is to establish guidelines for the retention and disposal of records in accordance with GDPR principles, ensuring the protection of individuals' privacy rights.

Scope

This policy applies to all types of records containing personal data, including electronic and physical documents, regardless of their format or storage medium. It covers all employees, contractors and third-party service providers involved in the processing of personal data on behalf of the Parish Council.

Definitions

- Personal Data: Any information relating to an identified or identifiable natural person, including names, addresses, email addresses, identification numbers, and other data that can directly or indirectly identify an individual.
- Processing: Any operation or set of operations performed on personal data, including collection, storage, alteration, retrieval, use, disclosure, and destruction.
- Retention Period: The length of time records containing personal data are kept before they are destroyed or archived.
- Data Subject: The individual to whom the personal data pertains.

Retention Principles

Papplewick Parish Council’s retention policy is guided by the following GDPR principles:

Lawfulness, Fairness, and Transparency

Personal data must be processed lawfully, fairly, and in a transparent manner. Records should be retained only for as long as necessary to fulfil legal, operational, or regulatory requirements.

Purpose Limitation

Personal data should be collected for specific, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes. Records should be retained only for the purposes for which they were originally collected.

Data Minimisation

Only the minimum amount of personal data necessary for the intended purpose should be collected and retained. Unnecessary data should be securely deleted or anonymized.

Accuracy

Personal data should be accurate and kept up to date. Inaccurate or outdated records should be corrected or securely deleted.

Storage Limitations

Personal data should be retained in a form that permits identification of data subjects only for as long as necessary for the purposes for which the data is processed. Records should be securely disposed of once they are no longer needed.

Retention Schedule

The organisation has established a retention schedule to ensure compliance with GDPR principles. The schedule specifies the retention periods for different types of records based on their purpose, sensitivity, and legal requirements.

Document	Minimum Retention Period	Reason
Minutes		
Minutes of Council meetings	Indefinite	Archive
Minutes of committee meetings	Indefinite	Archive
Employment		
Staff employment contracts	6 years after ceasing employment	Management
Staff payroll information	6 years	Management
Staff references	6 years after ceasing employment	Management
Application forms (interviewed – unsuccessful)	6 months	Management
Application forms (interviewed – successful)	6 years after ceasing employment	Management
Disciplinary files	6 years after ceasing employment	Management
Staff appraisals	6 years after ceasing employment	Management
Finance		
Scales of fees and charges	6 years	Management
Receipt and payment accounts	6 years	VAT
Bank statements	6 years	Audit
Cheque book stubs	6 years	Audit
Paid invoices	6 years	VAT
Paid cheques	6 years	Limitation Act 1980
Payroll records	12 years	HMRC
Petty cash accounts	6 years	HMRC
Insurance		
Insurance policies	6 years after policy end	Management

Certificates for Insurance against liability for employees	40 years after policy end	Employer's Liability Regs 1998
Certificates for Public Liability	6 years after policy end	Management
Insurance claim records	6 years after policy end	Management
Health and Safety		
Accident books	3 years from date of last entry	Statutory
Risk assessment	3 years	Management
General Management		
Councillors contact details	Duration of membership	Management
Lease agreements	Indefinite	Audit/Management
Contracts	Indefinite	Audit/Management
Email messages	At end of useful life	Management
Consent forms	5 years	Management
GDPR Security Compliance form	Duration of membership	Management

Archiving and Disposal

Records containing personal data should be securely archived or disposed of once they reach the end of their retention period. Archiving and disposal procedures must ensure the confidentiality and integrity of the data.

Roles and Responsibilities

Papplewick Parish Council is responsible for overseeing the implementation and compliance of the records retention policy. The Council ensures that all employees are trained on GDPR requirements and monitors adherence to the retention schedule.

Employees and Councillors

All employees and councillors must follow the guidelines set out in this policy and report any concerns or breaches to the Council. Employees and councillors are responsible for maintaining accurate and up-to-date records and securely disposing of data as required.

Third-Party Service Providers

Any third-party service providers processing personal data on behalf of the organisation must comply with this policy. Contracts with third parties should include provisions for data retention and disposal in accordance with GDPR principles.

Security Measures

The organisation has implemented security measures to protect personal data during retention and disposal. These measures include:

- Access controls to restrict unauthorized access to records.
- Encryption of electronic records and secure storage for physical records (if required).
- Spot checks (if required) to ensure compliance with the retention schedule.
- Secure disposal methods, such as shredding physical documents and permanently deleting electronic records.

Review and Updates

This policy will be reviewed (where necessary) and updated as required to reflect changes in legal, regulatory, or operational requirements. The Council is responsible for ensuring that the policy remains current and compliant with GDPR principles.