SEALAND COMMUNITY COUNCIL

RECORDS MANAGEMENT POLICY

1. PURPOSE

Sealand Community Council recognises that effective records management is essential to good governance, accountability, transparency, financial management, internal control, and the continuity of Council business.

This Policy ensures Council records are appropriately created, maintained, stored, protected, accessible, and disposed of.

The Council will operate records-management arrangements that are proportionate to its size, functions and resources and that comply with applicable legal and regulatory requirements.

2. SCOPE

This Policy applies to all records created, received or maintained by the Council, whether in paper or electronic form.

Records include, but are not limited to:

- Council minutes and agendas;
- financial and accounting records;
- correspondence and emails;
- contracts and agreements;
- employment records;
- Members' records;
- complaints and information requests;
- policies, procedures and reports;
- grant and project records;
- asset and insurance records; and
- information published on the Council's website.

3. LEGAL AND GOVERNANCE FRAMEWORK

The Council will manage its records having regard to applicable legislation and guidance, including:

- Local Government Act 1972;
- Local Government (Democracy) (Wales) Act 2013;
- Local Government and Elections (Wales) Act 2021;

- Freedom of Information Act 2000;
- Environmental Information Regulations 2004, where applicable;
- UK General Data Protection Regulation;
- Data Protection Act 2018;
- Accounts and Audit (Wales) Regulations 2014;
- applicable employment and taxation legislation; and
- relevant Welsh Government, Information Commissioner's Office and HM Revenue & Customs guidance.

The Council will have regard to the Welsh Government's statutory guidance for community and town councils in Wales.

The Council will also have regard to Welsh Government guidance concerning access to information and electronic publication by community and town councils.

4. CREATION AND MAINTENANCE OF RECORDS

Council records should be accurate, reliable and sufficiently complete to demonstrate decisions, transactions and significant Council activity.

Records should be stored in an appropriate Council-controlled location or system and organised so that they can be located and retrieved when required.

Financial and governance records must be maintained in sufficient detail to support the Council's accounting, audit, decision-making and accountability requirements.

The Council recognises the importance of maintaining adequate records to demonstrate how decisions have been made, how public money has been used and, where relevant, how value for money has been considered. This reflects issues Audit Wales identified in its work on community and town councils in Wales.

5. ELECTRONIC RECORDS AND BACKUP

Electronic Council records will be stored using appropriate and secure systems.

Important electronic records will be backed up regularly to reduce the risk of loss arising from equipment failure, accidental deletion, cyber incidents or other disruption. For additional security, these files will also be backed up to an encrypted portable hard drive and Microsoft OneDrive (Council has not purchased a computer and an independent external disk drive).

The Council will maintain appropriate arrangements to recover important records where reasonably practicable.

Access to electronic records will be restricted to authorised persons and appropriate security measures will be maintained.

The Council's specific systems, equipment, and backup methods may change as technology and working arrangements develop. Such changes must continue to provide appropriate security, backup and recoverability.

6. PAPER RECORDS

Important paper records will be stored securely and protected against loss, damage, deterioration and unauthorised access.

Records of permanent or significant historical, legal, financial or evidential value will be appropriately preserved.

Where a paper record is converted to electronic form, the electronic record must remain reliable, accessible and subject to the Council's retention requirements.

The Council receives and sends a large number of documents covering current and historical time periods. It is recognised that many documents are of little or no importance after a very short period.

7. WEBSITE AND ELECTRONIC PUBLICATION

The Council's website is an important means of providing information to the public.

The Council will maintain appropriate arrangements for the electronic publication and accessibility of information required by law and relevant Welsh Government guidance.

This includes, where required:

- Council contact information;
- information concerning Members;
- Council meeting minutes;
- documents referred to in minutes, so far as reasonably practicable; and
- annual audited accounts.

The Clerk will ensure, so far as reasonably practicable, that information published on the website is supported by the Council's underlying records.

The Council will retain or archive published information of continuing governance or historical value appropriately, and records management policy requires the website to be backed up at least every 6 months.

8. RETENTION AND DISPOSAL

Council records will be retained in accordance with the Council's Retention of Records Policy and Retention Schedule.

The Retention Schedule identifies the minimum retention period and reason for retaining each category of record.

Where a statutory requirement specifies a different retention period, the statutory requirement will take precedence.

Records may be retained for longer where there is a continuing legal, financial, audit, administrative, evidential or historical reason.

The Council will not retain personal data longer than necessary. The Council will maintain documented retention periods and periodically review retained personal information, deleting or anonymising it when there is no longer a lawful or legitimate reason to retain it. This reflects the ICO's storage-limitation and records-management guidance.

9. INFORMATION SECURITY AND DATA PROTECTION

The Council will take reasonable and proportionate measures to protect the confidentiality, integrity and availability of its records.

Records containing personal data will be managed in accordance with the UK GDPR and Data Protection Act 2018.

Personal data will be protected against unauthorised access, accidental loss, destruction or damage.

Any suspected loss, unauthorised disclosure or significant information-security incident will be reported to the Clerk without undue delay and dealt with under the Council's Information Security and Data Protection arrangements.

10. SECURE DISPOSAL

When a record reaches the end of its retention period, the Clerk will consider whether any continuing legal, financial, administrative, evidential, or historical reason exists for retention.

Where no continuing reason exists:

- confidential paper records will be securely shredded or destroyed;
- electronic records will be securely deleted where appropriate; and
- personal information will be securely destroyed or anonymised.

Disposal should be carried out in a manner that protects confidential and personal information.

11. RESPONSIBILITIES

The Council has overall responsibility for its records-management arrangements.

The Clerk, Ashley Griffiths, is responsible for implementing this Policy and maintaining appropriate arrangements, and the Councillors should keep Council records in their possession securely and return or transfer them to the Council when they are no longer required for Council business.

12. REVIEW OF POLICY

This policy was reviewed and approved by Sealand Community Council at its meeting on 11th December 2017 and updated on 25th January 2022 and 21st September 2026. It will be reviewed annually, or sooner where there is a significant change in legislation.

A Griffiths – Clerk of the Council – September 2026