SEALAND COMMUNITY COUNCIL

RETENTION OF RECORDS POLICY

1. PURPOSE

This Policy ensures that Sealand Community Council properly manages, retains, and securely disposes of its records in accordance with applicable legal, financial, governance, audit, and data-protection requirements.

The Council will retain records for as long as reasonably necessary to meet statutory, financial, administrative, evidential or historical requirements.

2. SCOPE

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

This includes Council minutes, financial records, correspondence, emails, contracts, employment records, Members' records, complaints, information requests, grant records, project records, asset records and insurance records.

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; 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 concerning the governance of community and town councils in Wales.

The Council recognises that proper records management forms part of effective governance, accountability, financial management and internal control.

4. RETENTION OF DOCUMENTS

Retention of Document	Minimum Retention	Reason
Minute Books	Indefinitely	Permanent record of Council decisions and proceedings

Retention of Document	Minimum Retention	Reason
Annual Returns / AGAR	Indefinitely	Permanent record of the Council's annual financial and governance reporting
Annual Accounts	Indefinitely	Financial accountability and audit purposes
Bank Statements	7 years	Financial and audit purposes
Cheque Book Stubs	Last completed audit	Financial and audit purposes
Paying-in Books	Last completed audit	Financial and audit purposes
Quotations	7 years	Procurement, accountability and audit purposes
Paid Invoices	7 years	Financial and audit purposes
VAT Records, where applicable	7 years	HMRC and audit purposes
Salary / Payroll Records	7 years	Financial and audit purposes
Staff Contracts and Personnel Records	Employment + 6 years	Employment and legal purposes
Tax and National Insurance Records	7 years	HMRC requirements and audit
Insurance Policies	Whilst valid	Insurance and legal purposes
Employers' Liability Insurance Certificates	7 years	Insurance and legal purposes
Public Liability Insurance Certificates	7 years	Insurance and legal purposes
Asset Register	7 years	Asset management and audit purposes
Deeds and Leases	Indefinitely / duration of legal right	Evidence of legal rights and audit purposes
Declarations of Acceptance of Office	Term of Office + 4 years	Governance and evidential purposes
Members' Register of Interests	Term of Office + 4 years	Legal and governance requirements
Complaints	1 year after closure	Governance, accountability and evidential purposes
Electoral Register	1 year	Administrative purposes

Retention of Document	Minimum Retention	Reason
Freedom of Information Requests	1 year after closure	Information governance and accountability
Environmental Information Requests	3 years after closure	Information governance and accountability
Grant Requests and Grant Records	7 years	Financial and audit purposes
Risk Assessments	Current version + 6 years	Health and safety and governance purposes
Policies and Procedures	Whilst Current	Governance and historical record
Routine Correspondence and Emails non-statutory obligations	6 months	Administrative purposes
Correspondence and Emails relating to statutory, legal or financial matters	3 years	Legal, financial and governance purposes
General information non-statutory obligations	6 months	Administrative purposes
Information statutory obligations	3 years	Administrative purposes

Where legislation or regulatory requirements specify a different retention period, the applicable statutory requirement will take precedence.

The Council may retain records for longer where there is a continuing legal, financial, audit, administrative, evidential or historical reason.

5. PERSONAL DATA

The Council will comply with the UK GDPR and Data Protection Act 2018 when retaining personal data.

The Council will not retain personal data longer than necessary for the purpose for which it is held, or where a legal or regulatory requirement requires its retention.

When personal data is no longer required, it will be securely deleted, destroyed or anonymised, where appropriate.

6. INFORMATION REQUESTS AND LEGAL MATTERS

Under the Freedom of Information Act 2000, and, where applicable, the Environmental Information Regulations 2004, the Council must maintain a retention schedule listing the record series it creates in the course of its business. The retention schedule sets out how long the record must be retained and the action to take when it is no longer of administrative use. The Clerk is expected to manage current record-keeping systems using the retention schedule and to account for different retention periods when creating new record-keeping systems. This retention schedule refers to record series regardless of the media in which they are stored.

7. ELECTRONIC RECORDS AND EMAILS

Manage electronic records and emails according to their content and purpose.

Emails forming part of a Council decision, financial transaction, contract, complaint, investigation, information request, legal matter or significant Council project will be retained with the relevant Council records.

Delete routine emails and electronic records with no continuing value when they are no longer required.

8. SECURE DISPOSAL

When a retention period has expired, the Clerk will consider whether a legitimate reason remains to retain the record.

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.

Records must not be disposed of where they are subject to an ongoing audit, investigation, complaint, information request, legal claim, insurance matter or other legitimate requirement for continued retention.

9. RESPONSIBILITIES

The Council has a corporate responsibility to maintain its records and record management systems in accordance with the regulatory environment. The Clerk to the Sealand Community Council has overall responsibility for implementing this policy and must manage the Council's records to promote compliance, ensuring information can be retrieved easily, appropriately, and in a timely manner.

10. REVIEW

This Policy was adopted at the Council meeting on 17th October 2016, was reviewed at its meeting on 11th December 2017 and updated on 25th January 2022, and its retention schedule will be reviewed annually, or sooner where there is a significant change in legislation, Welsh Government guidance, ICO guidance, HMRC requirements or the Council's functions.

This policy was reviewed and approved by Sealand Community Council at its meeting held on: 21st September 2026

A Griffiths – Clerk of the Council – September 2026