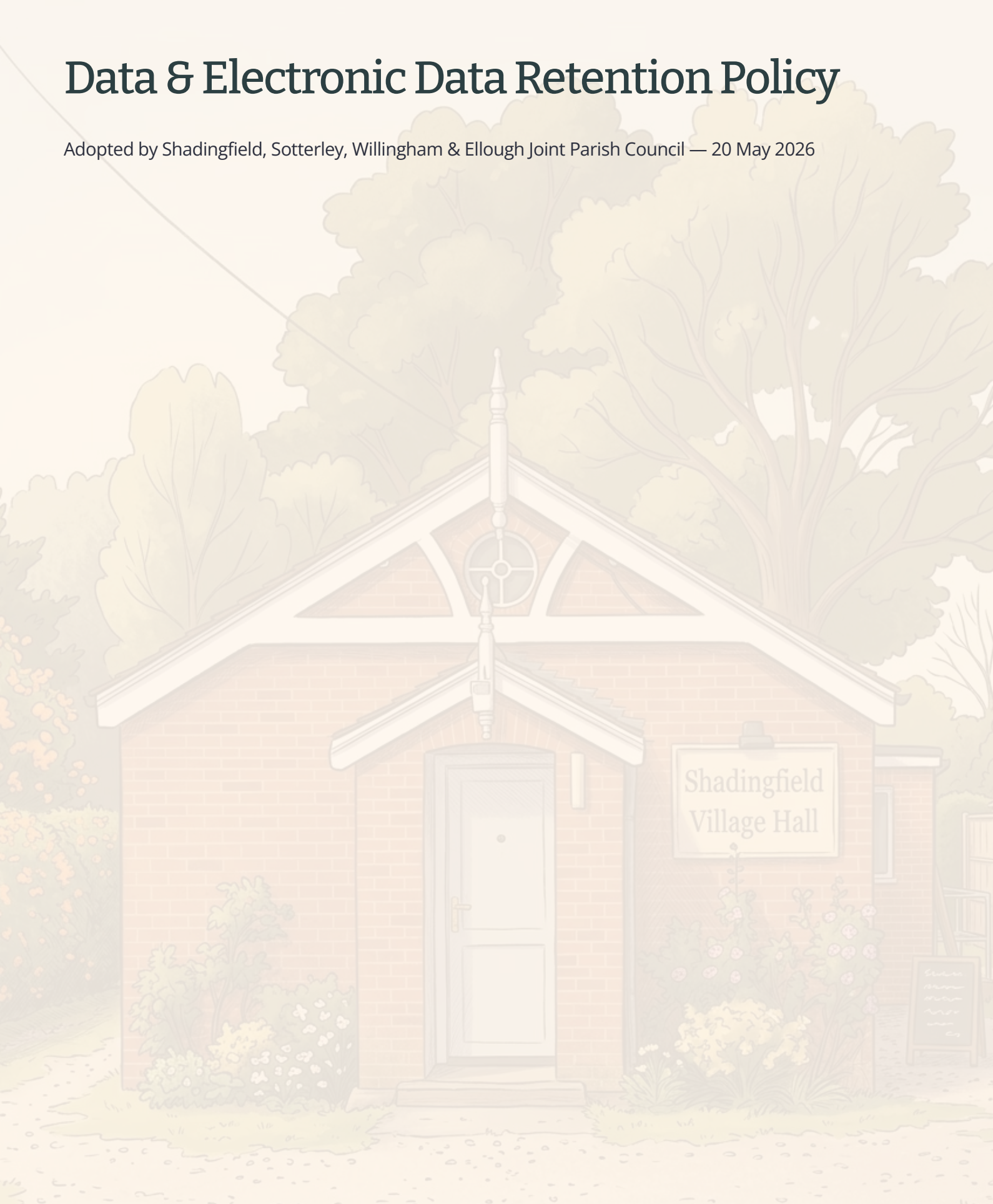
Data & Electronic Data Retention Policy

Adopted by Shadingfield, Sotterley, Willingham & Ellough Joint Parish Council — 20 May 2026



This policy will be reviewed every two years, or sooner if legislation or best practice changes.

Next review: April 2028

Introduction

This policy applies to all records held by Shadingfield, Sotterley, Willingham & Ellough Joint Parish Council, regardless of format (paper or electronic).

It ensures that information is retained only for as long as necessary, in accordance with:

- UK GDPR and the Data Protection Act 2018
- The Freedom of Information Act 2000
- The Local Government Act 1972
- The Limitation Act 1980
- Relevant regulatory and audit requirements

The Council will maintain a structured approach to the retention, review and disposal of records to ensure compliance, reduce risk and avoid unnecessary storage.

An annual review of records will be undertaken by the Clerk, with recommendations reported to the Council.

Documents of historical value will be offered to the Suffolk County Record Office before disposal.

Not all records need to be retained. Trivial, duplicated or superseded material — such as draft agendas, out-of-date distribution lists and routine circulars — may be destroyed routinely once their administrative use has passed.

Retention of Documents

Retention Schedule

Appendix 1 (Audit and Governance Records) and Appendix 2 (Digital Records) set out the minimum retention periods for key categories of information.

Legal Disputes

Where documents may be relevant to a legal claim, they will be retained in accordance with the limitation periods set out in Section 3.

Other Document Types

Planning Documents

- Approved applications: retain until development is complete.
- Appeals: retain the appeal decision until development is complete.
- Refused applications: retain until the appeal period expires; retain the appeal decision if dismissed.
- Local Plans and strategic planning documents: retain while in force.

Insurance

- Policies and significant correspondence: retain for the life of the policy.
- Employers' Liability Insurance certificates: retain for 40 years from the date the policy commences or is renewed (statutory requirement).

Correspondence

- Audit-related: retain per Appendix 1.
- Planning-related: retain as set out above for planning documents.
- General correspondence: retain while relevant to Council business.

Personnel Records

Personal data must be retained only as long as necessary for employment, legal or safeguarding purposes, in line with the data minimisation principle under UK GDPR.

Retention for Legal Purposes

Most legal claims are subject to statutory limitation periods. The table below sets out those periods by category.

Category	Limitation Period
Negligence / tort	6 years
Defamation	1 year
Contract	6 years
Leases	12 years
Sums recoverable by statute	6 years
Personal injury	3 years
Recovery of land	12 years
Rent	6 years
Breach of trust	No limitation

Trust deeds and similar documents will be retained indefinitely.

Where a document falls into multiple categories, the longest limitation period will apply.

Encrypted Data

Where encrypted data is retained, the associated encryption keys must also be securely stored for the duration of the retention period. Keys must be protected against loss, corruption and unauthorised access.

Disposal of Documents

Disposal must be secure, proportionate and documented.

Methods of Disposal

Confidential waste

Cross-cut shredding for any document containing personal or sensitive information.

Recycling

General waste for non-confidential documents.

Secure deletion

For electronic files.

External archive

Transfer historically significant records (e.g. Suffolk County Record Office).

Disposal of Electronic Hardware

Devices capable of storing data include laptops, printers, scanners, servers, USB drives and external hard drives.

- Disposal must be managed by the Chair and Clerk.
- All devices must be securely wiped before disposal.
- Disposal must comply with the Waste Electrical and Electronic Equipment Regulations 2013 (WEEE).

Documentation of Disposal

The Council will maintain a disposal log recording:

- Document type
- Date of disposal
- Method of disposal
- Officer authorising disposal
- Reason for disposal (if outside the standard schedule)

This ensures accountability and compliance with audit requirements.

Retention of Documents Required for Audit

Document	Minimum Retention Period	Reason
Minutes	Indefinite	Archive
Receipt and Payment Accounts	Indefinite	Archive
Receipt books	6 years	VAT
Bank statements	Last completed audit year	Audit
Paying-in books	Last completed audit year	Audit
Cheque stubs	Last completed audit year	Audit
Supplier contracts	6 years	Limitation Act 1980
Quotations and tenders	12 years / indefinite	Limitation Act 1980
Paid invoices	6 years	VAT
Paid cheques	6 years	Limitation Act 1980
VAT records	6 years	VAT
Insurance policies	While valid	Management
Employers' liability insurance certificates	40 years from the date the policy commences or is renewed	Statutory requirement
Title deeds, leases and agreements	Indefinite	Audit / Management

Retention of Digital Records

Digital Record	Minimum Retention	Reason
Emails	2 years	Complaint handling
Cloud & Hard Drive backup	2 years	Data protection
Working documents (electronic)	3 years from last use	Data integrity
Portable / removable media	End of project	Security and governance