



# DATA AUDIT

To comply with General Data Protection Regulations that came into force on 23<sup>rd</sup> May 2018

Reviewed February 2020

Reviewed February 2022

Reviewed February 2024

Reviewed February 2026

## Lawful Basis for processing Data:-

- (a) Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.
- (b) Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- (c) Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).
- (d) Vital interests:** the processing is necessary to protect someone's life.
- (e) Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- (f) Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

Document	Minimum Retention Period	Who can access it?	Lawful Basis for processing Data (consent/contract/legal obligation/vital interests/public task/legitimate interests)	Security controls And Location Retained	Disposal	Action Required
Minutes	Indefinite	Public Document	Archive (legal obligation)	Back ups stored in locked safe. Web Page Hard copy in office. Public made aware the Minutes will become a public document and there names would be included.	Original signed paper copies of Council minutes of meetings must be kept indefinitely in safe storage. At regular intervals of not more than 5 years they must be archived and deposited with the Higher Authority	
Agendas	5 years	Public Document	Management (public task)	Back ups stored in locked safe Web page Hard copy in office.	Bin (shred confidential waste)	
Accident/incident reports	20 years	Clerk & Assistant	Potential claims (legal obligation)	Kept in locked cabinet	Confidential waste A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.	
Scales of fees and charges	6 years	Public Document	Management (public task)	Minutes Hard copy in office	Bin	
Receipt and payment accounts	Indefinite	Public Document	Archive (legal obligation)	Back up stored in locked safe	N/A	

Document	Minimum Retention Period	Who can access it?	Lawful Basis for processing Data (consent/contract/legal obligation/vital interests/public task/legitimate interests)	Security controls And Location Retained	Disposal	Action Required
				Computer Hard copy in locked store.		
Receipt books of all kinds	6 years	Clerk Assistant	VAT (legal obligation)	Locked Store	Bin	
Bank statements including deposit/savings accounts	Last completed audit year	Clerk Assistant	Audit (legal obligation)	Locked cabinet	Confidential waste	
Bank paying-in books	Last completed audit year	Clerk Assistant	Audit (legal obligation)	Locked cabinet	Confidential waste	
Cheque book stubs	Last completed audit year	Clerk Assistant	Audit (legal obligation)	Locked cabinet	Confidential waste	
Quotations and tenders	6 years	Clerk Assistant	Limitation Act 1980 (as amended) (legal obligation)	Office Locked store	Confidential waste A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.	
Paid invoices	6 years	Clerk Assistant	VAT (legal obligation)	Office Locked Store	Confidential waste	
Paid cheques	6 years	Clerk Assistant	Limitation Act 1980 (as amended) (legal obligation)	Office Locked Store	Confidential waste	
VAT records	6 years generally but 20 years for	Clerk Assistant	VAT (legal obligation)	Office Locked Store	Confidential waste	

Document	Minimum Retention Period	Who can access it?	Lawful Basis for processing Data (consent/contract/legal obligation/vital interests/public task/legitimate interests)	Security controls And Location Retained	Disposal	Action Required
	VAT on rents					
Petty cash, postage and telephone books	6 years	Clerk Assistant	Tax, VAT, Limitation Act 1980 (as amended) (legal obligation)	Office Locked Store	Confidential waste	
Timesheets	Last completed audit year 3 years	Clerk Assistant	Audit (requirement) Personal injury (best practice) (legitimate interest)	Office	Bin	
Wages books/payroll	12 years	Clerk Assistant DCK	Superannuation (legal obligation)	Locked cupboard (have DCK policy)	Confidential waste	
Insurance policies	While valid (but see next two items below)	Clerk Assistant	Management(public task)	Locked storage	Bin	
Insurance company names and policy numbers	Indefinite	Clerk Assistant	Management (public task)	Locked storage	N/A	
Certificates for insurance against liability for employees	40 years from date on which insurance commenced or was renewed	Currently on display otherwise Clerk & Assistant	The Employers' Liability (Compulsory Insurance) Regulations 1998 (SI 2753) Management (legal obligation)	On display Locked Storage	Bin	
Play Park equipment inspection reports	21 years	Clerk & Assistant	Management (legal obligation)	Locked storage	Bin	
Title deeds, leases, agreements,	Indefinite	Clerk Assistant	Audit, Management (contract)	Locked storage Solicitors Office	N/A	

Document	Minimum Retention Period	Who can access it?	Lawful Basis for processing Data (consent/contract/legal obligation/vital interests/public task/legitimate interests)	Security controls And Location Retained	Disposal	Action Required
contracts		Solicitor				
Information from other bodies e.g. circulars from county associations, NALC, principal authorities	Retained for as long as it is useful and relevant	Clerk Assistant Councillors	Interest (legitimate interest)	Locked office	Bin	
Local/historical information	Indefinite – to be securely kept for benefit of the Parish	Clerk Assistant	Councils may acquire records of local interest and accept gifts or records of general and local interest in order to promote the use for such records (defined as materials in written or other form setting out facts or events or otherwise recording information). (legitimate interest)	Locked office Locked Store	N/A	

Document	Minimum Retention Period	Who can access it?	Lawful Basis for processing Data (consent/contract/legal obligation/vital interests/public task/legitimate interests)	Security controls And Location Retained	Disposal	Action Required
Emergency Plan Winter Parish Plan	Indefinite	Clerk Assistant	Councils who have emergency plan need to have records of volunteers on the plan in order to contact them and involve them in the plan (public task)	Locked cabinet	Confidential disposal	

Document	Minimum Retention Period	Who can access it?	Lawful Basis for processing Data (consent/contract/legal obligation/vital interests/public task/legitimate interests)	Security controls And Location Retained	Disposal	Action Required
Magazines and journals	<p>Council may wish to keep its own publications</p> <p>For others retain for as long as they are useful and relevant.</p>	Clerk Assistant Council	<p>The Legal Deposit Libraries Act 2003 (the 2003 Act) requires a local council which after 01.02.2004 has published works in print (this includes a pamphlet, magazine, newspaper, a map, plan, chart or table) to deliver, at its own expense, a copy of them to the British Library Board (which manages and controls the British Library). Printed works as defined by the 2003 Act published by a local council therefore constitute materials which the British Library holds. (public task)</p>		Bin if applicable	

Document	Minimum Retention Period	Who can access it?	Lawful Basis for processing Data (consent/contract/legal obligation/vital interests/public task/legitimate interests)	Security controls And Location Retained	Disposal	Action Required
	<b>Record-keeping</b>					
<p>To ensure records are easily accessible it is necessary to comply with the following:</p> <ul style="list-style-type: none"> <li>• A list of files stored in cabinets will be kept</li> <li>• Electronic files will be saved using relevant file names</li> </ul>	<p>The electronic files will be backed up periodically on a portable hard drive and also in the cloud-based programme supplied by the Council's IT company.</p>	<p>Clerk Assistant</p>	<p>Management</p>	<p>Filing cabinets store in locked cupboard</p> <p>Back ups stored in fire proof safe in locked cupboard</p>	<p>Documentation no longer required will be disposed of, ensuring any confidential documents are destroyed as confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.</p>	
<p>General correspondence and emails</p>	<p>General Correspondence, both paper and electronic, should be kept for 6-12 months unless legal documentation or needed for reference or accountability purposes.</p>	<p>Clerk Assistant</p>	<p>Management (legitimate interest). To respond to correspondence.</p>	<p>Locked cabinet</p> <p>Office</p> <p>Locked cupboard</p> <p>Computer, password protected.</p>	<p>Bin (shred confidential waste).</p> <p>.</p>	

Document	Minimum Retention Period	Who can access it?	Lawful Basis for processing Data (consent/contract/legal obligation/vital interests/public task/legitimate interests)	Security controls And Location Retained	Disposal	Action Required
Correspondence relating to staff	If related to Audit, see relevant sections above. Should be kept securely and personal data in relation to staff should not be kept for longer than is necessary for the purpose it was held. Likely time limits for tribunal claims between 3–6 months Recommend this period be for 3 years	Clerk Assistant	After an employment relationship has ended, a council may need to retain and access staff records for former staff for the purpose of giving references, payment of tax, national insurance contributions and pensions, and in respect of any related legal claims made against the council. (contract)	Kept in locked cabinet in office  Metal cabinet in locked cupboard	Confidential waste A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.	
Contracts	6 years	Clerk Assistant	Legal requirement (contract)	Metal cabinet Inside locked cabinet Computer Back Up	Confidential waste. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.	

Document	Minimum Retention Period	Who can access it?	Lawful Basis for processing Data (consent/contract/legal obligation/vital interests/public task/legitimate interests)	Security controls And Location Retained	Disposal	Action Required
Leases	12 years	Clerk Assistant	Legal requirement Management (contract)	Metal cabinet in locked cabinet	Confidential waste.	
Sums recoverable by statute	6 years		contract		Confidential waste.	
<b>For Halls, Centres, Recreation Grounds</b>						
<ul style="list-style-type: none"> <li>Hire agreements</li> <li>Invoices</li> </ul>	6 years	Clerk Assistant	VAT (legal obligation)	Locked cabinet	Confidential waste A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.	
Lettings diaries	Electronic files linked to accounts		VAT (public task)		N/A	
Terms and Conditions	6 years	Clerk Assistant Public	Management (public task)	Locked office	Bin	
Event Monitoring Forms	6 years unless required for claims, insurance or legal purposes	Clerk Assistant	Management (public task)	Locked office	Bin. A list will be kept of those documents disposed of to meet the requirements of the GDPR regulations.	

Document	Minimum Retention Period	Who can access it?	Lawful Basis for processing Data (consent/contract/legal obligation/vital interests/public task/legitimate interests)	Security controls And Location Retained	Disposal	Action Required
	<b>PLANNING</b>					
Applications	1 year	Clerk Assistant Councillors Public	Management (public task)	Locked Office	Bin	
Appeals	1 year unless significant development	Clerk Assistant Councillors Public	Management (public task)	Locked Office	Bin	
Trees	1 year	Clerk Assistant Councillors Public	Management (public task)	Locked Office	Bin	
Local Development Plans	Retained as long as in force	Clerk Assistant	Reference (public task)	Store Cupboard	Bin	
Local Plans	Retained as long as in force	Clerk Assistant	Reference (public task)	Store Cupboard	Bin	
Town/Neighbourhood Plans	Indefinite – final adopted plans	Clerk Assistant Councillors Public	Historical purposes (public task)		N/A	

Document	Minimum Retention Period	Who can access it?	Lawful Basis for processing Data (consent/contract/legal obligation/vital interests/public task/legitimate interests)	Security controls And Location Retained	Disposal	Action Required
	CCTV					
Review requests	3 years	Clerk Assistant	Data protection (legal obligation)		Confidential waste	
Discs – master and working	For as long as required	Clerk Assistant Councillor x 1	Data protection (legal obligation)		Confidential waste	
Code of Practice	Destroy on renewal Review annually		Management (legal obligation)		Confidential waste	
Photographs/digital prints	31 days		Data protection (legal obligation)		Confidential waste	