OVING PARISH COUNCIL
Retention and Disposal Policy

Report to Council: Introduction of Defined Email Retention Periods

Purpose of Report
To explain why Oving Parish Council is introducing defined email retention periods and to recommend adoption of the updated Retention and Disposal Policy and Appendix A – Records Retention Schedule.

Permanent Records
Oving Parish Council will retain certain core governance and financial records permanently in line with audit requirements and best practice. This includes signed Council and Committee minutes, AGAR returns, annual accounts and external audit reports.

Financial Records – Clarification
Routine financial records will be retained for a minimum of six years plus the current financial year to ensure compliance with audit requirements and avoid premature disposal.

Background
Historic emails retained without defined retention limits resulted in disproportionate officer time and compliance risk when responding to a Subject Access Request. Defined retention periods are required to ensure compliance with data protection law and audit standards.

Recommendation
- Adopt the updated Retention and Disposal Policy.
- Adopt Appendix A – Records Retention Schedule.
- Implement defined email retention periods.
- Require councillors and officers to comply with the policy.

Retention and Disposal Policy

1. Introduction
Oving Parish Council creates, receives and holds records in paper and electronic form. Proper records management ensures transparency, accountability and compliance with legal and audit requirements.

2. Legal and Regulatory Framework
- UK GDPR
- Data Protection Act 2018
- Freedom of Information Act 2000

- Local Audit and Accountability Act 2014
- Accounts and Audit Regulations 2015
- Lord Chancellor's Code of Practice (FOIA s.46)
- JPAG Practitioners' Guide

3. Scope

This policy applies to all records created or held by Oving Parish Council, including those held by councillors, officers, contractors and third-party providers.

4. Principles of Retention

- Retained only where there is a lawful and business need
- Adequate, relevant and not excessive
- Accessible for FOI, SAR, audit and legal purposes
- Securely disposed of at the end of the retention period

5. Roles and Responsibilities

Oving Parish Council is the data controller. The Clerk, as Proper Officer, is responsible for implementing this policy. All councillors and officers must comply with it.

6. Email Retention and Management

- Routine operational emails – retain for 2 years
- Decision-making and financial emails – retain for 6 years
- Duplicated emails – delete once captured

Emails must not be retained indefinitely. Council business conducted via personal email accounts remains subject to this policy.

7. Disposal of Records

Records may only be disposed of once the retention period has expired and no legal hold applies. A disposal log must be maintained.

8. Review

This policy will be reviewed at least every three years or sooner if required by changes in legislation or guidance.

Appendix A – Records Retention Schedule

- Council and Committee minutes (signed) – Retain permanently
- AGAR, annual accounts, external audit reports – Retain permanently
- Agendas and reports – 6 years
- Invoices, vouchers and financial records – 6 years
- Payroll and pension records – 6 years
- Contracts and agreements – 6 years after expiry
- Property deeds and leases – Retain permanently
- Personnel files – 6 years after employment ends
- FOI and SAR files – 3 years after closure

- Complaints files – 6 years after resolution
- Routine operational emails – 2 years
- Decision-making emails – 6 years
- Disposal logs – Retain permanently

Adopted: 19 March 2026