



COULSTON PARISH COUNCIL

Document Management Policy



ADOPTED: 06/05/2025

FOR REVIEW WITHIN 5 YEARS

Document Management Policy

Purpose

Coulston Parish Council (CPC) recognises that the efficient management of its records is necessary to comply with legal and regulatory obligations and to contribute to effective management by the Parish Council. This document provides the policy framework and procedures through which this effective management can be achieved.

This policy applies to all documents (both electronic and hard copy) created, received or maintained by CPC in the course of carrying out its functions. Records are defined as all those documents which facilitate the business carried out by the Parish Council and which are retained (for a set period) to provide evidence of its transactions or activities. The majority of these documents are a public record available for inspection and are also required for audit purposes, staff management, tax liabilities, and the possibility of legal proceedings.

Some of the CPC's records will be retained for permanent preservation as part of the Parish Council's archives or for historical interest.

NALC Legal Topic Notice (LTN) forty provide a general list of document and records and their recommended retention periods as required by law, general convention or by councils' needs, and forms the core of the WPC document retention policy.

Responsibilities

The Parish Council has a statutory responsibility to maintain its documents and records and record management systems in accordance with regulations. The person with the responsibility for the implementation of the policy is the Clerk to the Parish Council.

General Policy

Documents and records held by CPC are in paper and electronic form. Both are covered by this policy although their disposal methods may differ.

Electronic (digital) storage will be the primary means of document storage, dissemination and publication. Physical (paper) documents will be retained when required by law.

The storage arrangements for documents should:

- Ensure security of the records;
- Protect employees privacy;
- Facilitate access to information;
- Optimise the use of storage space;
- Be cost effective, and
- Facilitate the destruction of redundant documents.

Once adopted by CPC, this Policy is to be reviewed within 5 years or upon revision.

Part 1: storage, access and security

Two-time scales apply to the management of documents and other information:

- i. Information relating to ongoing operation of the parish council including draft documents, meeting papers and financial information for the current year. The storage, management and access to such information is covered as part of standing orders, financial regulations or other policies which include provision for the annual deposition of relevant documents into the longer-term archive.
- ii. Information not subject to change and which needs to be retained in the long term (the archive).

This section of the policy addresses means for long term retention of documents.

Cloud storage will be the primary repository for the parish council document archive. All documents (including those that must be retained in paper form) will be converted to and retained in a fixed electronic format (such as pdf) to the extent feasible and affordable. Editable versions of documents may additionally be retained where appropriate (e.g., policies and procedures that may be subject to periodic revision).

The archive will include a copy of the document register (see annex 3).

Documents that must be retained in paper form (see part 2) will be stored at the home of the parish clerk, with scanned or electronic copies added to the digital archive. As set out in the Local Government Act 1972 (229), paper records may be photographic copies.

Part 2: retention and disposal of documents

The table at Annex 2 lists each of the document and record types applicable to Coulston Parish Council. For the majority of these, NALC has provided guidance material in the form of NALC LTN 40 (see Reference material and links) that gives the minimum retention periods. For the others, minimum retention times are determined by statute or by the Parish Council.

The method of disposal is not covered by LTN 40 so is therefore at the discretion of the Parish Council. Preferred means of disposal by document type is set out at Annex 2. General principles are:

- i. where appropriate, transfer of documents to Wiltshire & Swindon Records Office, Chippenham; and
- ii. for documents that need to be destroyed, paper copies shall be shredded, and digital versions removed from the cloud-based archive.

A document register (Annex 3) will be maintained by the Clerk to record the retention and disposal of documents and records.

Part 3: Publication

Coulston Parish Council aims to publish as much information as is reasonable. This is to ensure full transparency over its operations and decisions, and to minimise the need for additional provision of information under the Freedom of Information Act.

The primary means for publication will be the Winterbourne Parish website. Information will also be published on the Parish Council noticeboard and other community noticeboards where deemed useful or required by law. To minimise duplication, information available elsewhere will not be republished on the Parish website but referred to by hyperlinks.

Annexes

1. Standard operating procedure for annual updating and backup of digital archive
2. CPC schedule of documents for retention
3. CPC Document Register
4. CPC Publication Scheme

Reference material and links

- NALC (National Association of Local Councils) LTN (Legal Topic Note) 40– Local Councils’ Documents and Records - November 2016
- Arnold-Baker on Local Council Administration - (Chapter 11) - Eleventh Edition
- [Limitation Act 1980](#)
- [The Employers’ Liability \(Compulsory Insurance\) Regulations 1998](#)
- [Local Government Act 1972](#)

Annex 1: Standard operating procedure for annual updating and backup of digital archive.

The working (cloud based) digital archive must be backed up at least annually, as soon as practicable following completion of the preparation and audit of annual accounts.

Three options are available for safe and secure back-up:

- i. Use of back-up software. This has the advantage that files are automatically copied to the backup on an additive basis, reducing the risk of inadvertent loss of existing (backed-up) files. A disadvantage is that files will be copied to backup if the file name or folder location has changed, which can result in a build-up of duplicate files.
- ii. Direct copy to the back-up drive of the current working archive. Avoids a build-up of unwanted files but carries the risk that any files lost from the working archive will consequently be deleted from backups.
- iii. Selected copy of additional files from the working archive to each backup drive. Likely to be more time consuming.

In the near term, while the document archive is being established and developed, option (ii) is recommended.

1. Each backup must be from the working (online) copy to the external drive.
2. When using option (ii), the archive should be backed up to each disc as a new copy, with the previous copy retained until the next full backup (i.e., the previous version always available).
3. Verification of successful backup should be confirmed by a councillor. Software such as Winmerge (<https://winmerge.org/downloads/?lang=en>) allows for direct comparison of two file directories and can be used to identify any differences between the archive versions/copies.

Annex 2: CPC schedule of documents for retention

DOCUMENT CATEGORY	MINIMUM RETENTION PERIOD	REASON	FORMAT	PUBLICATION	DISPOSAL
Procedural					
• Minutes of council and sub-committee meetings	Indefinite (digital) 5 years (paper, but only if digital copy retained)	Management & archive Local Government Act 1972	Digital Paper (signed)	YES	(Paper only) Wilts and Swindon archive
• Annual reports and other substantive reports to Parish Council	Indefinite	Management & archive	Digital	Annual reports YES; others discretionary	None
• Information material to council meeting proceedings (agenda, briefing and decision papers etc.)	Indefinite	Management & archive	Digital	NO	None
• Policies, procedures, standing orders etc.	While in force	Management	Digital	YES	Disposal
• Timesheets and attendance records	6 years	Audit (requirement) & liability, Limitation Act 1980	Digital	NO	Secure disposal
• Correspondence	While valid (or as dictated by other documents if related to other matters)	Audit, Management	Digital	NO	Secure disposal
Personnel/employment					
• Personnel files	Generally, 6 years post-employment	Legal and best practice, as set out in CIPD guidance ¹	Held by PC Chairman	NO	Secure disposal
Financial					

¹ See <https://www.cipd.co.uk/knowledge/fundamentals/people/hr/keeping-records-factsheet>

DOCUMENT CATEGORY	MINIMUM RETENTION PERIOD	REASON	FORMAT	PUBLICATION	DISPOSAL
<ul style="list-style-type: none"> Audited annual accounts, including internal and external audits reports & statements, other annual statements including statement of reserves 	Indefinite (digital) 5 years from publication (paper)	Audit, management and archive	Digital/Paper	YES (at least current and previous 2 years)	Digital – None Paper – Secure Disposal
<ul style="list-style-type: none"> VAT form 126 claim to HMRC and supporting documentation & records 	3 years (provided that WPC remains non-registered for VAT)	Value Added Tax Act 1994	Digital and paper	NO	Disposal
<ul style="list-style-type: none"> Quotations and tenders (contract value >£1000 as required under CPC financial regulations) 	6 years	Limitation Act 1980 (as amended)	Digital	NO	Secure disposal
<ul style="list-style-type: none"> Records of staff salary, allowances and other benefits 	12 years (annual summaries)	Pension, tax (note detailed records held by payroll manager)	Digital	NO	Secure disposal
<ul style="list-style-type: none"> Income tax and NI returns, income tax records and correspondence with HMRC 	3 years	Income Tax (Employments) Regulations 1993	Digital or paper	NO	Secure disposal
<ul style="list-style-type: none"> Members & employees allowances & expenses 	6 years	Tax, Limitation Act 1980 (as amended)	Digital	NO	Secure disposal
Insurance and risk management ²					
<ul style="list-style-type: none"> Insurance policies 	While valid ³	Management	Digital		Disposal

² Most legal documents are governed by the Limitations Act 1980 (as amended). The provisions of the 1980 Act limit the period after which legal claims can be made. If these times are longer than the retention period for any related documentation, then the retention period should be extended to the longer period.

³ Irrespective of how long policies and correspondence are retained, the recommendation is that councils ensure that they keep a permanent record of insurance company names and policy numbers for all insures risks.

DOCUMENT CATEGORY	MINIMUM RETENTION PERIOD	REASON	FORMAT	PUBLICATION	DISPOSAL
<ul style="list-style-type: none"> Risk register and risk assessments (as adopted by Council including annual reviews) 	6 years	Insurance and liability, Limitation Act 1980	Digital	YES	Disposal
<ul style="list-style-type: none"> Play equipment inspection reports 	6 years	Insurance and liability, Limitation Act 1980	Digital	NO	Disposal
<ul style="list-style-type: none"> Accident & incident reports 	6 years	Insurance and liability, Limitation Act 1980	Digital	NO	Secure Disposal
Commercial and contractual					
<ul style="list-style-type: none"> Title deeds, leases, other agreements & deeds 	Indefinite	Audit, Management	Paper (signed), digital	NO	None
<ul style="list-style-type: none"> Service contracts 	6 years (from end of service period)	Audit, Management	Digital & paper (when signed)	NO	Secure disposal
<ul style="list-style-type: none"> Investments 	Indefinite	Audit, Management	Digital	YES (as part of annual financial reports)	None
Publications					
<ul style="list-style-type: none"> Parish magazine (Village Link and predecessors) 	Indefinite (digital) 5 years (paper)	Historical interest	Digital	YES	Paper copies transfer to BV Historical Society. ⁴
General information and guidance					
<ul style="list-style-type: none"> Information from other bodies (e.g., guidance professional associations, NALC etc.) 	As long as it is useful and relevant (review each year)	Management		NO	Disposal, unless material to other WPC documents still in force or retained

⁴ The Legal Deposit Libraries Act 2003 requires that a copy of published works in print (including a pamphlet, magazine, or newspaper, map, plan or chart published by a local council) is delivered to the British Library Board (which manages and controls the British Library). Refer to NALC legal briefing L04 10 for further information

DOCUMENT CATEGORY	MINIMUM RETENTION PERIOD	REASON	FORMAT	PUBLICATION	DISPOSAL
<ul style="list-style-type: none"> Local/historical information 	None, unless covered elsewhere in this policy	Historical interest ⁴	ANY	YES	Transfer to relevant groups
Allotments					
<ul style="list-style-type: none"> Register and site plans 	6 years	Audit, Management	Digital	NO	Secure disposal
<ul style="list-style-type: none"> Contract terms and allotment rules 	6 years	Legal	Digital	YES (current only)	Disposal
<ul style="list-style-type: none"> Annual tenancy agreements 	6 years	Legal	Digital	NO	Secure disposal
Other documents					

Annex 3: Document register (template)

CATEGORY	DOCUMENT/FILE NAME	DATE	DISPOSAL DUE DATE	GDPR	PUBLISHED
Retained documents: paper					
Align with Annex 2	For multiple files of common type/format (e.g., minutes), can be listed as a group of <number> files with date range	Document date if applicable	If applicable, otherwise leave blank	Yes/no to indicate GDPR sensitivity	Yes/no

FOLDER	DOCUMENT/FILE NAME	DATE	DISPOSAL DUE DATE	GDPR	PUBLISHED
Retained documents: digital					
Align with Annex 2	For multiple files of common type/format (e.g., minutes), can be listed as a group of <number> files with date range	Document date if applicable	If applicable, otherwise leave blank	Yes/no to indicate GDPR sensitivity	Yes/no

CATEGORY/FOLDER	DOCUMENT/FILE NAME	DATE	DISPOSAL DATE	GDPR	PUBLISHED
Disposed documents					
Align with Annex 2	For multiple files of common type/format (e.g., minutes), can be listed as a group of <number> files with date range	Document date if applicable		Yes/no to indicate GDPR sensitivity	Yes/no

Annex 4: Publication scheme

Information to be published	How the information can be obtained
Class 1 - Who we are and what we do Who is who on the Council and its committees (if any) with portfolio responsibilities Contact details (name, address, telephone number, email address for Parish Clerk) Names of Council members (email address and phone numbers for Chairman and Vice-chair)	Website Parish Council noticeboard
Class 2 – What we spend and how we spend it Audited annual accounts and other annual financial statements* – most recent and previous two financial years Current year approved budget *Grants given and received *List of current contracts awarded and value of contract *Asset register *Members’ allowances and expenses *Annual statement of financial reserves	Website
Class 3 – What our priorities are and how we are doing Portfolio policies and plans (current year) Parish Council risk register (current) Chairman’s reports Annual Parish Meeting agenda and minutes	Website

Class 4 – How we make decisions Dates, agenda and minutes of Parish Council meetings (Council, any sub-committee meetings) Risk assessments	Website (all) Parish Council noticeboard (where required by law)
Class 5 – Our policies and procedures Current versions of all policies, procedures, standing orders, financial regulations and equivalent Code of conduct Register of members interests (available at https://services.wiltshire.gov.uk/TownAndParish/ROI/)	Website
Class 6 – Local development Parish Council responses to planning consultations (usually published by Wiltshire Council with planning application documents at https://planning.wiltshire.gov.uk/Northgate/PlanningExplorer/Home.aspx)	website
Class 7 – The amenities and services we offer – description and policies/procedures for use Allotments Amenity areas to include playing fields and recreational facilities	website

