

# Winterbourne Parish Council

## Document Retention & Publication Policy

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### Purpose

Winterbourne Parish Council (WPC) 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 WPC 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 WPC'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 WPC 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 WPC, this Policy is to be reviewed within 5 years or upon revision.

## Implementation

As a new policy for Winterbourne Parish Council, the sequence and timetable for its implementation is as follows:

- i. The policy will be effective from 1 April 2021. From this date all new documents will be formatted and stored in accordance with this policy.
- ii. By 1 January 2022, or within 6 months of digital and paper storage facilities being established (whichever is the later), all other existing documents will be stored according to this policy. Such documents will be stored in digital copies if already in that format.
- iii. Following completion of steps (i) and (ii) above, the Parish Council will determine what historical records currently held only in paper form should be converted to digital copies and allocated the resources needed for this to be undertaken.

## Audit

The Parish Council will audit its records and archives annually. This should take place as soon as practicable following completion of the annual governance and accountability review and audit (AGAR) and the consequent archiving of financial information from the applicable accounting year, but no later than 31 December.

The audit of records and archives should be conducted by at least two councillors with participation and support from the Clerk. A report shall be provided by the auditing councillors to the next available meeting of the Parish Council.

The scope and purpose of the annual audit shall be:

- i. To review and confirm status of document storage arrangements (digital and paper), including back-up drives.
- ii. To confirm that documents for the previous year have been added to the archives as set out in this policy and that the document register (annex 3) is up to date.
- iii. To confirm recent back-up of the digital archive
- iv. The auditors may choose to review a sample of documents (paper and digital) as a spot check on integrity of the archives.
- v. Provide a report to the Parish Council, which may include recommendations on storage, disposal, and on revisions to this policy.

## 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.

External drive 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 working copy of the archive will be an online version, with back-up copies of the archive held on two separate external drives. One will be stored in the parish fire safe cabinet located in the Glebe Hall, the other held securely by the chairperson or another designated councillor. The working copy of the digital archive will be made available to council members and officer(s) via cloud-based storage.

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 in the parish fire safe cabinet located in the Glebe Hall, 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.

The digital archive will be backed up annually, as soon as practicable following completion of the preparation and audit of annual accounts. The procedure for safe updating of the online archive and back-up drives is at Annex 1.

## **Part 2: retention and disposal of documents**

This policy applies to all documents and records dating from 1988, being the time of first decisions and agreements relating to the Glebe Hall and associated land leases. Documents prior to this date will be disposed of according to the schedule at Annex 2.

The table at Annex 2 lists each of the document and record types applicable to Winterbourne 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. Bourne Valley Historical Society should be given the opportunity to retain any documents<sup>1</sup> (except for those covered by (iii) below).
- ii. where appropriate, transfer of documents to Wiltshire & Swindon Records Office, Chippenham; and
- iii. for documents that need to be destroyed, paper copies shall be shredded, and digital versions removed from the cloud-based archive and all back-up drives.

Following each annual audit, the Clerk will bring to Council a list of documents that no longer need to be retained and which the Clerk recommends for disposal in accordance with this policy.

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The Local Government (Records) Act 1962 provides that parish councils may acquire records of local interest and accept gifts or records of general and local interest in order to promote the use of such records. Section 227 of the Local Government Act 1972 (Provision of depositories for parish and community documents) states that "shall provide proper depositories for all the specified papers belonging to the parish or community for which no provision is otherwise made" - need to consider therefore whether WPC has any statutory responsibility for records held by BV Hist. Soc., or if a need for arrangements should Historical Soc. cease to function<sup>1</sup>

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

### **Part 3: Publication**

Winterbourne 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.

The Parish Council has, up to 2021, published a village magazine (the Village Link) which was distributed to all households as a hard copy three times per year (see Annex 5). A pdf copy of the magazine is published via the website. The Parish Council intends that the publication format for the Village Link will evolve alongside redevelopment of the website through 2021/2022 to be a more dynamic web-based publication, while still meeting the needs of residents who depend on printed information. The magazine publication policy & plan (annex 5) will be replaced by a new website policy in due course.

### **Annexes**

1. Standard operating procedure for annual updating and backup of digital archive
2. WPC schedule of documents for retention
3. WPC Document Register
4. WPC Publication Scheme
5. WPC Village Link Publication Plan (2018, excluding annexes)
6. List of Parish Council filing cabinet key holders (not for publication)

### **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. Backing up to the external drives must be done sequentially with the backup on drive one verified before the backup to drive two.
2. Each backup must be from the working (online) copy to the external drive.
3. 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).
4. 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: WPC schedule of documents for retention

DOCUMENT CATEGORY	MINIMUM RETENTION PERIOD	REASON	FORMAT	PUBLICATION	DISPOSAL
Procedural					
<ul style="list-style-type: none"> <li>Minutes of council and sub-committee meetings</li> </ul>	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
<ul style="list-style-type: none"> <li>Annual reports and other substantive reports to Parish Council</li> </ul>	Indefinite	Management & archive	Digital	Annual reports YES; others discretionary	None
<ul style="list-style-type: none"> <li>Information material to council meeting proceedings (agenda, briefing and decision papers etc.)</li> </ul>	Indefinite	Management & archive	Digital	NO	None
<ul style="list-style-type: none"> <li>Policies, procedures, standing orders etc.</li> </ul>	While in force	Management	Digital	YES	Disposal
<ul style="list-style-type: none"> <li>Timesheets and attendance records</li> </ul>	6 years	Audit (requirement) & liability, Limitation Act 1980	Digital	NO	Secure disposal
<ul style="list-style-type: none"> <li>Correspondence</li> </ul>	While valid (or as dictated by other documents if related to other matters)	Audit, Management	Digital	NO	Secure disposal
Personnel/employment					
<ul style="list-style-type: none"> <li>Personnel files</li> </ul>	Generally, 6 years post-employment	Legal and best practice, as set out in CIPD guidance <sup>2</sup>	Held by PC Chairman	NO	Secure disposal
Financial					

<sup>2</sup> 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"> <li>Audited annual accounts, including internal and external audits reports &amp; statements, other annual statements including statement of reserves</li> </ul>	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"> <li>VAT form 126 claim to HMRC and supporting documentation &amp; records</li> </ul>	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"> <li>Quotations and tenders (contract value &gt;£1000 as required under WPC financial regulations)</li> </ul>	6 years	Limitation Act 1980 (as amended)	Digital	NO	Secure disposal
<ul style="list-style-type: none"> <li>Records of staff salary, allowances and other benefits</li> </ul>	12 years (annual summaries)	Pension, tax (note detailed records held by payroll manager)	Digital	NO	Secure disposal
<ul style="list-style-type: none"> <li>Income tax and NI returns, income tax records and correspondence with HMRC</li> </ul>	3 years	Income Tax (Employments) Regulations 1993	Digital or paper	NO	Secure disposal
<ul style="list-style-type: none"> <li>Members &amp; employees allowances &amp; expenses</li> </ul>	6 years	Tax, Limitation Act 1980 (as amended)	Digital	NO	Secure disposal
<b>Insurance and risk management<sup>3</sup></b>					
<ul style="list-style-type: none"> <li>Insurance policies</li> </ul>	While valid <sup>4</sup>	Management	Digital		Disposal

<sup>3</sup> 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.

<sup>4</sup> 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"> <li>Risk register and risk assessments (as adopted by Council including annual reviews)</li> </ul>	6 years	Insurance and liability, Limitation Act 1980	Digital	YES	Disposal
<ul style="list-style-type: none"> <li>Play equipment inspection reports</li> </ul>	6 years	Insurance and liability, Limitation Act 1980	Digital	NO	Disposal
<ul style="list-style-type: none"> <li>Accident &amp; incident reports</li> </ul>	6 years	Insurance and liability, Limitation Act 1980	Digital	NO	Secure Disposal
<b>Commercial and contractual</b>					
<ul style="list-style-type: none"> <li>Title deeds, leases, other agreements &amp; deeds</li> </ul>	Indefinite	Audit, Management	Paper (signed), digital	NO	None
<ul style="list-style-type: none"> <li>Service contracts</li> </ul>	6 years (from end of service period)	Audit, Management	Digital & paper (when signed)	NO	Secure disposal
<ul style="list-style-type: none"> <li>Investments</li> </ul>	Indefinite	Audit, Management	Digital	YES (as part of annual financial reports)	None
<b>Publications</b>					
<ul style="list-style-type: none"> <li>Parish magazine (Village Link and predecessors)</li> </ul>	Indefinite (digital) 5 years (paper)	Historical interest	Digital	YES	Paper copies transfer to BV Historical Society. <sup>5</sup>
<b>General information and guidance</b>					
<ul style="list-style-type: none"> <li>Information from other bodies (e.g., guidance professional associations, NALC etc.)</li> </ul>	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

<sup>5</sup> 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"> <li>Local/historical information</li> </ul>	None, unless covered elsewhere in this policy	Historical interest <sup>4</sup>		YES	Transfer custody to Bourne Valley Historical Society
<b>Allotments</b>					
<ul style="list-style-type: none"> <li>Register and site plans</li> </ul>	6 years	Audit, Management	Digital	NO	Secure disposal
<ul style="list-style-type: none"> <li>Contract terms and allotment rules</li> </ul>	6 years	Legal	Digital	YES (current only)	Disposal
<ul style="list-style-type: none"> <li>Annual tenancy agreements</li> </ul>	6 years	Legal	Digital	NO	Secure disposal
<b>Planning</b>					
<ul style="list-style-type: none"> <li>Parish Plan 2009</li> </ul>	Indefinite	Management & archive	Digital	YES	None
<ul style="list-style-type: none"> <li>Annexes and supplementary information to Parish Plan 2009</li> </ul>	Indefinite	Management & archive	Digital	NO	None
<ul style="list-style-type: none"> <li>Neighbourhood Plan 2021</li> </ul>	Indefinite	Management & archive	Digital	YES	None
<ul style="list-style-type: none"> <li>Annexes and supplementary information to Neighbourhood Plan 2021</li> </ul>	Indefinite	Management & archive	Digital	NO	None
<b>Other documents</b>					
<ul style="list-style-type: none"> <li>CCTV records</li> </ul>	As defined by WPC policy		Digital	NO	Secure disposal

### Annex 3: Document register (template)

CATEGORY	DOCUMENT/FILE NAME	DATE	DISPOSAL DUE DATE	GDPR	PUBLISHED
<b>Retained documents: paper</b>					
<b>Align with Annex 2</b>	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
<b>Retained documents: digital</b>					
<b>Align with Annex 2</b>	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
<b>Disposed documents</b>					
<b>Align with Annex 2</b>	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
<p><b>Class 1 - Who we are and what we do</b></p> <p>Who is who on the Council and its committees (if any) with portfolio responsibilities</p> <p>Contact details (name, address, telephone number, email address for Parish Clerk)</p> <p>Names of Council members (email address and phone numbers for Chairman and Vice-chair)</p>	<p>Website</p> <p>Parish Council noticeboard</p>
<p><b>Class 2 – What we spend and how we spend it</b></p> <p>Audited annual accounts and other annual financial statements* – most recent and previous two financial years</p> <p>Current year approved budget</p> <p>*Grants given and received</p> <p>*List of current contracts awarded and value of contract</p> <p>*Asset register</p> <p>*Members’ allowances and expenses</p> <p>*Annual statement of financial reserves</p>	<p>Website</p>
<p><b>Class 3 – What our priorities are and how we are doing</b></p> <p>Portfolio policies and plans (current year)</p> <p>Parish Council risk register (current)</p> <p>Parish Plan (2009)</p> <p>Chairman’s reports</p> <p>Annual Parish Meeting agenda and minutes</p>	<p>Website</p>

<p><b>Class 4 – How we make decisions</b></p> <p>Dates, agenda and minutes of Parish Council meetings (Council, any sub-committee meetings)</p> <p>Risk assessments</p>	<p>Website (all)</p> <p>Parish Council noticeboard (where required by law)</p>
<p><b>Class 5 – Our policies and procedures</b></p> <p>Current versions of all policies, procedures, standing orders, financial regulations and equivalent</p> <p>Code of conduct</p> <p>Register of members interests (available at <a href="https://services.wiltshire.gov.uk/TownAndParish/ROI/">https://services.wiltshire.gov.uk/TownAndParish/ROI/</a>)</p>	<p>Website</p>
<p><b>Class 6 – Local development</b></p> <p>The Winterbournes Neighbourhood Plan 2021</p> <p>Parish Council responses to planning consultations (usually published by Wiltshire Council with planning application documents at <a href="https://planning.wiltshire.gov.uk/Northgate/PlanningExplorer/Home.aspx">https://planning.wiltshire.gov.uk/Northgate/PlanningExplorer/Home.aspx</a>)</p>	<p>website</p>
<p><b>Class 7 – The amenities and services we offer</b> – description and policies/procedures for use</p> <p>Allotments</p> <p>Glebe hall</p> <p>Car parks</p> <p>Amenity areas to include playing fields and recreational facilities</p>	<p>website</p>

## **Annex 5: Winterbourne Parish Council Village Link Publication Plan**

Revised January 2018. Revision period: annual

### **Background**

The Village Link was originally published by Winterbourne Parish Council as the parish magazine. Its present form dates from 2004 following agreement between the Parish Council and the Winterbourne Churches to combine the parish and church magazines.

### **Editorial Policy**

The Village Link provides news and reports on village amenities, clubs and events, news and commentary from the churches in the Winterbournes and from the Parish Council, along with articles on broader topics likely to be of interest to village residents. A typical table of contents is at Annex A, and current list of contributors at Annex B.

Contributions to the magazine are always welcome and are included at the discretion of the editor. All contributions may be edited for clarity, length, and correct use of (native) English.

The Parish Council is the publisher of the magazine and is responsible for the cost of publication and appointment of the editor. The magazine is however editorially independent, and the editor has sole responsibility for the content. Roles of editor, Parish Council and Parish clerk are shown in Annex E.

Views expressed in the Village Link are those of the contributors, and not necessarily those of the Editor or the Parish Council.

### **Advertising**

The cost to the Parish Council of the Village Link is offset by advertising revenue. There is currently no restriction to the inclusion of advertisements up to one page size, as advertisements currently occupy only 15 of 72 pages. A list of current advertisers is at Annex C.

Where other material submitted for publication relates to an event, service or item for which the originator makes a charge, such contributions will normally be regarded as advertising and subject to the Village Link advertising rates. The editor has the discretion to accept such submissions without charge where there may be a wider interest to the community.

### **Publication**

The Village link is published three times per year. The deadlines for submission in 2018 are:

4 March 2018

8 July 2018

4 November 2018

The magazine is currently produced in Microsoft Word 2010, in black and white/greyscale. After completion, the magazine is converted into Adobe PDF format, and emailed to the printer. Copies are usually available for distribution within 10-14 days of the submission deadline.

Current print run is six hundred.

## **Distribution**

The magazine is distributed free of charge to all residents of the Winterbourne Parish. Copies are distributed by hand to every residence. Copies are also made available in the churches for non-resident church goers and visitors, and to some societies and clubs for members not resident in the Winterbournes. Surplus copies (17) are available from Winterbourne Stores.

The PDF file is posted on the Winterbourne Parish Council website and available for download. A copy of the file is sent by email to all advertisers, contributors, Unitary Councillor and Parish councillors.

The current distribution schedule, and list of volunteer distributors, is at Annex D.

The churches' Christmas card with Christmas church services is distributed with the November issue.

## **Developments for 2018**

- Update procedures to ensure compliance with data protection and privacy requirements
- Review the website presence for Village Link, and upload all back issues that are available in electronic format

## **Annexes:**

A: Village Link contents

B: Current contributors

C: List of advertisers for 2018

D: Village Link distribution

E: Portfolio task description

