



**AXE BRUE, PARRETT &
NORTH SOMERSET LEVELS
INTERNAL DRAINAGE BOARDS**

GOVERNANCE

DOCUMENT RETENTION AND DISPOSAL POLICY

Version 3.0

Approved by the Boards:		
Axe Brue IDB	24/03/2026	<i>W.C. Williams</i> Vice Chairman
Parrett IDB	24/03/2026	<i>Rob. Bell</i> Chairman
North Somerset Levels IDB	24/03/2026	<i>De Bur</i> Chairman

To be reviewed every 5 years

1.0. Introduction:

1.1. Records are vital assets, which need careful management to enable the Boards to conduct their business and comply with statutory obligations. This policy sets out the arrangements for records management.

1.2. The effective management of records in all formats depends as much on their efficient disposal as well as their long-term preservation. The untimely destruction of records may adversely affect service delivery but so will the unnecessary retention of outdated and potentially inaccurate records. Disposal is necessary not only to reduce administrative burdens but also to ensure that information is not retained for longer than necessary and that accurate records are maintained for appropriate periods to satisfy applicable operational and legal requirements.

1.3. The Land Drainage Act 1991 does not make specific reference to requirements for document retention or archiving. This Policy is important to contribute to compliance with the Public Records Act 1958, General Data Protection Regulations (GDPR), The Data Protection Act 2018, the Freedom of Information Act 2000 and the Environmental Information Regulations. It is assumed that the Boards' records of water levels, water level management operations and new works form part of an environment data set.

1.4 The seven GDPR Principles relating to the processing of personal data:

- a) Lawfulness, fairness and transparency
- b) Purposed limitation
- c) Data minimisation
- d) Accuracy
- e) Storage limitation
- f) Integrity and confidentiality
- g) Accountability

1.5 The Freedom of Information Act 2000 (FOIA) provides rights of access to information held by public bodies and the Boards comply with the Code of Practice on the management of records under Section 46 of the FOIA. The quality of the records which are held will affect the ability to respond to requests under the Act. If records are not created and managed effectively then they will not be found when needed.

2.0. Retention Periods

2.1. The Retention Schedule which forms part of this policy sets out the length of time that records should be retained, irrespective of the media on which they are created or held including:

- Paper
- Electronic files (including databases, Word documents, spreadsheets, web pages and e-mails); and
- Photographs and videos

2.2. Retention periods are determined based upon the nature of the information held, not the medium in which it is maintained. For example, information which is held in electronic form should only be retained for the same period as it would be kept if it was in paper form. However, it is not necessary to retain both paper and electronic versions of the same record, nor to retain duplicate copies of records. Retention arrangements for electronic records should ensure that they will remain complete, unaltered and accessible throughout the retention period.

2.3. The value of information tends to decline over time, so the majority of records should only be retained for a limited period of time and eventually be destroyed. A recommended minimum retention period, derived from operational or legal requirements, is provided for each category of record and applies to all records within that category. After 20 years the Board aims to transfer any documents for permanent retention to the Somerset Heritage Centre (SHC). Otherwise documents will normally be held at the Boards archive in Highbridge.

2.4 During their retention period, operational needs may require records to be held in different locations and on different media, but they should always be properly managed in accordance with this policy.

2.5 A small proportion of records, which are considered to be of permanent historical significance, will be preserved in the archives. The Chief Executive is responsible for the selection of records for permanent preservation and the maintenance of the archives and is considered the Information Asset Owner.

2.6 No data file or record should be retained for more than six years after it is closed unless a good reason for longer retention can be demonstrated. It may well be appropriate having regard to the nature of the record to opt for a shorter period.

Reasons for longer retention will include the following:

- Statute requires retention for a longer period;
- the record contains information relevant to legal action which has been started or is in contemplation;
- whenever there is a possibility of litigation, the records and information that are likely to be affected should not be amended or disposed of until the threat of litigation has been removed;
- the record should be archived for historical or research purposes, e.g. the record relates to an important policy development or relates to an event of local or national purpose;
- the records are maintained for the purpose of retrospective comparison; and
- the records relate to individuals or providers of services who are judged unsatisfactory. The individuals may include employees who have been the subject of serious disciplinary action;
- a legal agreement between the Boards and third parties.

3.0. Storage

3.1. All data and records should be stored as securely as possible in order to avoid potential misuse or loss. All data and records will be stored in the most convenient and appropriate location having regard to the period of retention required and the frequency with which access will be made to the record.

3.2. Data and records, which are active, should be stored in the most appropriate place for their purpose. Data and records, which are no longer active due to their age or subject, should be stored in the most appropriate place for their purpose.

3.3. The degree of security required for file storage will reflect the sensitivity and confidential nature of any material recorded. Any data file or record which contains personal data of any form can be considered as confidential in nature.

4.0. Disposal

4.1. Records should be reviewed as soon as possible after the expiry of the retention period. It need not be a detailed or time-consuming exercise but there must be a considered appraisal of the contents of the record.

4.2. A record should not be destroyed without verification that:

- no work is outstanding in respect of that record and it is no longer required;
- the record does not relate to any current or pending complaint, investigation, dispute or litigation; or
- the record is unaffected by any current or pending request made under the Freedom of Information Act, the General Data Protection Regulations, or The Data Protection Act 2018.

4.3. A record must be made of all disposal decisions and destruction should be carried out in a manner that preserves the confidentiality of the record. Confidential paper records should be either placed in confidential waste bags or shredded and electronic records will need to be either physically destroyed or erased to the current standard. Deletion of electronic files is not sufficient.

5.0. Variation

5.1. Information needs are dynamic and therefore this policy is a “living document” which will be amended as the need arises.

5.2. Any review of retention periods should take account of relevant statutory and legal requirements and consideration of the overall operational value of records including:

- on-going operational, accountability and audit needs;
- best practice in the applicable professional field;
- the probability of future use;
- the long-term historical or research value of the record;
- the costs of retention or destruction; and
- the risks associated with retaining or destroying the record.

6.0. Other Records

6.1 Many records have no significant operational or evidential value and are not subject to retention under this policy but may be destroyed once they have served their primary purpose. These include:

- requests for forms and brochures;
- compliment slips and similar items which accompany documents;
- superseded distribution or mailing lists;
- drafts of documents;
- working papers which are the basis of the content of other documents;
- notices of meetings and other events;
- invitations and notices of acceptance or apologies; and
- magazines, marketing materials, catalogues, directories, etc.

This is not an exhaustive list but merely indicates the types of record which have no significant operational or evidential value and may be destroyed once their effective use has ended.

7.0. Record Retention Schedule

Democratic Process Record	Legislation/Guidance	Retention Period	Retention Policy after Retention Period	Location (IDB or SHC)	Reason for permanent retention (to SHC after 20 years)
Electoral Register	Common Practice	Permanent	Archive		
Nomination papers	Common Practice	6 years from election	Destroy		
Ballot Papers	Statutory	6 months from close of poll	Destroy		Statutory
Consolidated returns of votes received	Statutory	6 months from close of election	Destroy		
Board minutes	Common Practice	Permanent	Archive		
Board Agenda & Papers	Common Practice	Permanent	Archive		
Committee Minutes	Common Practice	Permanent	Archive		
Management & Administration					
Statutory Returns Report to DEFRA	Common Practice	Permanent	Archive		
Disaster Recovery Plan	Common Practice	Until superseded	Destroy		
Policies & Procedures	Common Practice	Permanent	Archive		
Byelaws	Common Practice	Permanent	Archive		
Articles of Incorporation	Common Practice	Permanent			
Tax & Payroll Records					
Payroll Data other than End of Year and Pension data		6 years plus current	Archive		
Payroll End of Year and Pension data		Permanent	Archive		
Human Resources					
Job Announcements and Advertisements		2 years	Destroy		

Documentation on Individuals not hired		6 months	Destroy	
Employee manuals / Handbook		Permanent	Archive	
Employee personal files/documentation		Duration of employment plus 2 years	Destroy	
Employee's Emergency Contact Details		Duration of employment	Destroy	
Salary Documentation		Duration of employment plus 2 years	Destroy	
Insurance Records				
Certificates of Employer's Liability		Permanent	Archive	
Public Liability Policies and Schedules		40 Years	Archive	
Sundry Insurance Policies and Schedules		7 years or as per HMRC requirements (whichever is greater)		
Legal & Contracts				
Board and Legal Records		Permanent	Archive	
Licenses				
Deeds and Legal Agreements		7 years after expiration	Destroy	
Leases		7 years after expiration	Destroy	
Land Drainage Consents		Permanent	Archive	
Assets/Environmental information				
Water level data		Permanent	Archive	
Scheme final drawings		Permanent	Archive	
Project records		Permanent	Archive	
Project correspondence		Permanent	Archive	
Site diaries		7 years	Retain at Officers discretion	

Health & Safety								
Training records				Duration of employment plus 2 years			Destroy	
Health assessments				Duration of employment plus 2 years			Destroy	
Accident Book				Permanent			Archive	
Health and Safety Records				Permanent			Archive	
Freedom of Information Requests				2 years			Destroy	
Complaints, Compliments and Feedback				2 years			Archive	
Accounts and Financial Records								
Sales and Purchase Ledger Records				6 years plus current			Destroy	
VAT Returns				6 years plus current			Destroy	
Year End accounting records				6 years plus current			Destroy	
Nominal Ledgers				6 years plus current			Destroy	
Account Ledgers				6 years plus current			Destroy	
Auditor's reports				6 years plus current			Destroy	
Bank Statements/Short Term investments				6 years plus current			Destroy	
Cheque book/stubs				6 years plus current			Destroy	
Bank Account Deposit Books				6 years plus current			Destroy	
Bank Reconciliations				6 years plus current			Destroy	
Expired Supplier BACs Details				1 Year			Destroy	
Assets on Asset Register				6 years after Asset sold or scrapped			Destroy	
Rating /Land Records								
Land maps				Permanent			Archive	
Land Valuation				Permanent			Archive	
Ratepayer Active				Permanent			Archive	
Ratepayer Expired				2 years			Destroy	

