



GCC Records Retention Policy

Purpose

This policy sets out how the GCC manages records and information.

It ensures compliance with UK data protection and records management laws and follows guidance from the Information Commissioner's Office (ICO). For a full list of relevant legislation and guidance, see paragraph 25.

The policy supports transparency, accountability, and good governance. It sets out how long we keep records, when we review them, and how we dispose of them securely.

We keep personal and non-personal data only for as long as necessary and destroy it safely.

Scope

1. This policy applies to all records held by the GCC, across all statutory functions:
 - Registration, Education, and Quality Assurance
 - Fitness to Practise and Protection of Title
 - Corporate and Governance Matters
2. It covers all record formats – paper, digital, email, and cloud-based systems. It includes both personal and non-personal data, such as Council papers and minutes.

Roles and responsibilities

3. Clear roles help ensure consistent record management and accountability across the GCC.
 - The Governance Coordinator owns this policy and ensures compliance across the GCC.
 - All staff must follow this policy and report any concerns about record retention or disposal to the Data Protection Officer (DPO).

Principles

4. We follow these principles:

- Purpose limitation: We collect data only for clear and lawful purposes.
- Data minimisation: We keep only the data we need.
- Storage limitation: We keep data only as long as necessary.
- Security: We protect records from unauthorised access, loss, or destruction.

See also the [ICO's data protection principles](#).

Retention periods

5. We keep most records for six years, in line with the [Limitation Act 1980](#).
6. We keep tax records – including payroll and financial statements — for six years plus the current year, as required by [HMRC rules](#).
7. We keep personal data only as long as necessary, in line with UK data protection law (see paragraph 25 for full details).
8. We review all retention periods regularly.
9. A separate *Document Retention Schedule* sets out the retention period for each record type (see the Annex).

Storage and security

10. All records (electronic and paper) must be stored securely and be accessible only to authorised staff.
11. Paper records must be kept in locked cabinets or secure areas.
12. Access to records is restricted on a “need to know” basis.

Email records

13. Emails count as informal records unless:
 - they are stored in the GCC's central database, or
 - they are saved in GCC's cloud systems.
14. When stored in these systems, emails follow the same retention rules as formal records.

Secure disposal

15. We destroy records securely and keep evidence of destruction.
 - Paper records: cross-cut shredding or secure destruction by an approved contractor
 - Electronic records: data wiping, degaussing, or hardware shredding

16. All retention, disposal and risk management processes follow the [ICO's guidance on disposal and deletion personal data](#).

Risk management

17. We base retention and disposal decisions on risk.

18. We assess:

- the sensitivity and legal value of records
- the risks of data breaches, legal claims, or non-compliance
- the controls in place for higher-risk records

Archiving and historical records

19. Some records may have long-term historical or research value.

20. Before destruction, the GCC will review these records and consider transfer to an approved archive or secure storage location, in line with the [National Archives' records management code](#).

Legal holds and exceptions

21. If a record is subject to investigation, audit, or legal proceedings, we suspend destruction until the matter concludes.

22. The DPO and Governance Coordinator must authorise any suspension of the retention schedule.

Training and awareness

23. All staff must complete mandatory training on data protection and records management at induction and every two years.

24. Managers must ensure that staff understand and apply this policy.

Related legislation and guidance

25. This policy aligns with the following UK laws and guidance.

- [Data Protection Act 2018](#)
- [UK General Data Protection Regulation \(UK GDPR\)](#)
- [Data \(Use and Access\) Act 2025](#)
- [Freedom of Information Act 2000](#)
- [Public Records Act 1958](#)
- [Limitation Act 1980](#)
- [National Archives' records management code](#)
- [ICO's guidance on disposal and deletion personal data](#)

Existing records

26. This policy applies to all records currently held.
27. Records that have passed their retention period will be reviewed and, where appropriate, destroyed securely.

Governance and review

28. Council approved this policy and the retention schedule in June 2022.
29. The Governance Coordinator will review the policy at least every three years, or sooner if laws or operational needs change.

Accessibility

30. The GCC publishes this policy on its website to support openness and accountability.
 31. Accessible formats are available on request, in line with the [Public Sector Bodies Accessibility Regulations 2018](#).
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		Document Version Control			
Version No.	Date	Author	Reviewed by	Approved by	Changes made
1.0	Aug-2012	GCC Executive	Audit & Risk Committee (ARC)	Council	New policy
2.0	Oct-2025	Director of Corporate Services	ARC, March 2026	Council, June 2026	Changes made to the whole policy to align with DPA 2018 and GDPR 2018