APPENDIX D: GDPR DATA AUDIT

Bowes Parish Council

November 2025

Introduction

The Council agreed a GDPR Compliance Plan at its meeting on 14 October 2025. The first stage of this plan is to "*map data, why held, where held and how long it has been held for*."

Since 2007 most data has been created and stored electronically, with a hard copy printed and retained for important records that may be required for audit or legal purposes, agenda papers, records requiring signature or records that are easier to read in paper format. This electronic data is stored securely in appropriately catalogued folders on the Clerk's laptop. Accordingly, a data map of electronic records is considered unnecessary.

Conversely, paper records are stored in two large crates and a tall filing cabinet in the Clerk's garage and go back over 100 years. The crates contain a variety of records that are too big for the filing cabinet and are stacked in no order. Accordingly, the extent of paper records held prior to this audit was unknown, posing a significant GDPR risk.

The tables below map the paper data held by location.

Data held in Crate 1

Description of Paper Records	How long held?	Why held?	Personal Data?
Register of Burials since 1962	63 years	Current record	Yes
Exclusive Rights of Burial register of purchased graves 1903-1919	122 years	Legal requirement – Local Authorities Cemeteries Order (1977)	Yes
Exclusive Rights of Burial register of purchased graves 1919-1946	106 years	As above	Yes
Exclusive Rights of Burial register of purchased graves since1996	29 years	Current record	Yes
Exclusive Rights of Burial counterfoils 1919-1935	106 years	As above	Yes
Exclusive Rights of Burial counterfoils 1936-1959	89 years	As above	Yes
Exclusive Rights of Burial counterfoils 1960-1985	65 years	As above	Yes
Exclusive Rights of Burial counterfoils 1986-2011	39 years	As above	Yes
Exclusive Rights of Burial counterfoils since 2011	14 years	Current record	Yes

Receipts and Payments Book 1915-1938	105 years	Policy based on NALC guidance.	Yes
Receipts and Payments Book 1938-1959	87 years	Policy based on NALC guidance.	Yes
Receipts and Payments Book 1960-1982	65 years	Policy based on NALC guidance.	Yes
Cemetery Fees Book 1946-2000	79 years	Legal requirement – Local Authorities Cemeteries Order (1977)	Yes
Signed minutes 2002 - 2008	23 years	Legal requirement Local Government Act 1972 S228	Yes
Signed minutes 2009-2015	16 years	As above	Yes
Parish Paths Grant Bids 1995-1998	30 years	Unknown	Yes
Parish Footpath maps	30 years	Unknown	No
Bowes Publications (invoices, receipts, correspondence re sale of booklets and walking maps)	22 years	Unknown	Yes
Bowes Hutchinsons School Correspondence and Minutes	28 years	Unknown	Yes
Bowes Moor MOD correspondence and surveys	36 years	Unknown	Yes

Data held in Crate 2

Register of Burials 1903 - 1961	122 years	Legal requirement – Local Authorities Cemeteries Order (1977)	Yes
Exclusive Rights of Burial register of purchased graves 1946-1996	79 years	As above	Yes
Signed minutes of Annual Parish Meeting 1896 - 1955	129 years	Legal requirement Local Government Act 1972 S228	Yes
Signed minutes of Annual Parish Meeting 1956 - 1992	69 years	As above	Yes
Signed minutes 1894 - 1919	131 years	As above	Yes
Signed minutes 1920 - 1956	105 years	As above	Yes
Signed minutes 1956 - 1987	69 years	As above	Yes
Signed minutes 1987 - 1999	38 years	As above	Yes
Signed minutes 1999 - 2003	26 years	As above	Yes
Signed minutes 2003 – 2006	22 years	As above	Yes
Signed minutes of the former Bowes & Gilmonby Joint Burial Committee 1900 - 1957	125 years	As above	Yes

Signed minutes of the former Bowes & Gilmonby Joint Burial Committee 1957 - 1982	68 years	As above	Yes
Cemetery Fees Book 1903-1945	122 years	As above	Yes
Receipts and Payments Book 1982 - 1995	43 years	Policy based on NALC guidance.	Yes
JBC Receipts and Payments Book 1902-1948	123 years	As above.	Yes
JBC Receipts and Payments Book 1949 - 1983	76 years	As above.	Yes
Accounts 1998 - 2002	27 years	As above.	Yes
Rate Book 1845 - 1847	170 years	Unknown.	Yes
Allotment Rent Book 1896 - 1954	129 years	Unknown.	Yes
Allotment Rent Book 1972-1991	53 years	Unknown.	Yes
Receipt Books 1902 -1976	123 years	Unknown.	Yes
Paid invoices 2000 -2004	25 years	Unknown.	Yes
Bank Statements (current account) 2005-2012	22 years	Unknown.	Yes
Bank Statements (reserve account) 2005-2012	22 years	Unknown.	Yes
Castle Maintenance Contracts 1996-2007	29 years	Unknown.	Yes
Other Contracts 1996-2007	29 years	Unknown.	Yes

Data held in Top Drawer of Filing Cabinet

Sale of land conveyancing, legal advice, correspondence 2021-23	4 years	Legal requirement Limitation Act 1980	Yes
Bowes Moor surveys, letters, and booklets 2007	18 years	Unknown	Yes
Clint Gardens lessor and lessee rent agreements 2009-2021	16 years	Current record	Yes
Summary of minutes 1894-1911 archived with DCC	129 years	Useful summary	Yes
Burial & Cremation certificates 1999-2025	26 years	Legal requirement – Local Authorities Cemeteries Order (1977)	Yes
Memorial applications and designs 1999-2025	26 years	As above	Yes
Planning applications and approvals for cemetery tree felling (2000) and pruning (2021)	25 years	Policy based on NALC guidance.	Yes
Grass-cutting contracts and caretaker employment contracts and application 2012-2017	13 years	Unknown	Yes
Cemetery correspondence 2000-2016	25 years	Unknown	Yes
John Bousfield Charity will, annual returns and letters 1893	132 years	Will current record, others unknown.	Yes

Kipling Charity will, annual returns and letters 1762	263 years	As above	Yes
Charities Commission de-registration and analysis 2021	4 years	Current record	No
John Thomas Roper Charity will and correspondence 1865	160 years	Unknown	Yes
Bowes & Romaldkirk Charity will and correspondence 1911	114 years	Unknown	Yes
Gilmonby & Boldron Nursing Charity will and letters 1951	74 years	Unknown	Yes
Bowes Cross Charity will and letters 1879	146 years	Unknown	Yes
Hutchinsons Endowed School Charity will and letters 1899	126 years	Unknown	Yes
Bowes & Gilmonby Village Hall Charity registration 1996	29 years	Unknown	Yes
Employment contracts and applications 2014-2024	11 years	Current record and unknown (ex-clerk)	Yes
Declarations of acceptance of office and interests and councillor letters 2003-2025	22 years	Current record and unknown (letters & ex-councillors)	Yes
Insurance policies 2005-2024	18 years	Unknown.	Yes
Asset acquisitions, title deeds, land registry notices 1853 - 1925	172 years	Current record (asset register)	Yes
Maps and publications	Unknown	Reference	No
Footpath Grant applications 1999-2011	26 years	Unknown	Yes
Playground installation contract, invoices, and letters 2006-2007	19 years	Current record (asset register)	Yes
Police Correspondence 2003-12	22 years	Unknown	Yes
Path Diversion Order 2007	18 years	Unknown	Yes
Precept and budgeting papers 2000-2023	25 years	Unknown	No
VAT Claims 1997-2021	28 years	Unknown	Yes
Planning objection 2013	12 years	Unknown	Yes

Data Held in Middle Drawer of Filing Cupboard

Bank Statements 2005 - 2025	20 years	2024/25 NALC Guidance, previous unknown.	Yes
Charity Bank Statements 2008-2025	17 years	As above	Yes
Cheque and Paying in Books 1995-2025	30 years	As above	Yes
Signed minutes 2015 - 2021	10 years	Legal requirement Local Government Act 1972 S228	Yes
Invoices and remittance advices 2000-2001	25 years	Unknown	Yes

Receipt Books 1988 - 2001	37 years	Unknown	Yes
Allotment Receipt Books 1993-2000	32 years	Unknown	Yes
SLCC Welcome Pack 2012	13 years	Unknown	No

Data Held in Bottom Drawer of Filing Cupboard

AGARs, Annual Returns, Accounts and Audit Correspondence 2002 -2025	23 years	Last 5 years – legal requirement Accounts and Audit Regulations 2015. Previous – unknown.	Yes
Invoices, orders, GRNs and receipts 2002 - 2024	23 years	Last 6 years NALC guidance for VAT. Previous- unknown.	Yes
Payment Authorisation Sheets 2015-2024	10 years	Unknown.	Yes
Signed Allotment Agreements 2005 -2025	20 years	Unknown	Yes

Data Held in Stationery Drawer of Filing Cupboard

Signed Minutes 2021-2024	4 years	Legal requirement Local Government Act 1972 S228	Yes
Signed Minutes 2024-2025	1 year	As above	Yes
Clerk's Current Record File	2 years	Current Record	Yes
Clerk's Current Agenda Paper File including signed minutes and bank reconciliations	1 year	Current Record	Yes
Bank Mandate Change and Account Switch Forms & letters	1 year	Current record	Yes
Memory stick with back-up of electronic files on clerk's laptop	N/A	Current record	Yes

Conclusion

The GDPR audit confirms that at 31 October 2025 there are large volumes of personal data held for unknown reasons, which represents a risk of GDPR non-compliance and audit challenge. During the rest of the 2025 / 2026 financial year the Council will update its data retention policy, securely dispose of documents held contrary to the policy, update the data protection policy, delete electronic files held longer than necessary and ensure that all retained personal data is stored securely in new lockable cabinets.