

ST ATHAN COMMUNITY COUNCIL RECORDS RETENTION, DISPOSAL AND MEETING RECORDING POLICY



Including Audio Recording Privacy Notice and Retention Arrangements

Adoption

Adopted by St Athan Community Council at the Full General Council meeting held on Tuesday 7th July 2026.

Version: 1.0.

Minute reference: 3504

Review date: May 2027

Signed:

Name:

Chair of St Athan Community Council

Note: This document should be read alongside the Council's Standing Orders, Financial Regulations, UK GDPR and Data Protection Policy, Privacy Notices, Publication Scheme, Complaints Policy, Social Media and Digital Communications Policy, Welsh Language Policy and other adopted governance procedures.

1. Purpose and scope

1.1 This policy sets out how the Council retains, reviews, stores and disposes of records, and how it may record and use AI transcription for meetings solely to assist the Proper Officer in preparing accurate draft minutes.

1.2 The approved written minutes are the formal record. Audio recordings, AI transcripts and working notes are temporary working records only, unless a lawful exception applies.

1.3 This policy applies to Council records in paper or electronic form, including minutes, agendas, reports, financial records, contracts, policies, correspondence, employment records, complaints, FOI/EIR and data protection records, planning, consultation, grant, event, asset, insurance, risk, audio recording, AI transcript and deletion records.

1.4 The recording and AI transcription rules apply to Council, Committee, Sub-Committee and authorised working group meetings held in person, remotely or by multi-location/hybrid arrangements.

1.5 This policy does not apply to lawful private recordings made independently by the public or press, but such recording must not disrupt the meeting or continue during confidential or exempt business where the public and press have been excluded.

2. Legal framework and principles

Area	Council position
Relevant framework	Local Government Act 1972; Public Bodies (Admission to Meetings) Act 1960; Local Government and Elections (Wales) Act 2021 and Welsh Government statutory guidance; UK GDPR; Data Protection Act 2018; Data (Use and Access) Act 2025 where relevant; Freedom of Information Act 2000; Environmental Information Regulations 2004; and equality, Welsh language, safeguarding, employment, audit, confidentiality and legal privilege requirements.
Minutes	The Council must draw up minutes of proceedings. Recordings and AI transcripts support draft minute preparation but do not replace the approved minutes.
Personal data	Voices, names, roles, opinions, declarations and contextual information may identify individuals. Processing must be lawful, fair, transparent, secure, minimised and time-limited.
Lawful basis	For meeting recording and AI transcription, the Council will normally rely on UK GDPR Article 6(1)(e) public task and/or Article 6(1)(c) legal obligation. Consent is not the usual basis.
Special category data	The Council does not seek to collect special category data. If captured incidentally, access must be restricted and the data deleted in line with this policy unless a lawful reason requires retention.

3. Responsibilities

Role	Main responsibilities
Council	Adopts this policy, authorises recording/AI transcription arrangements, approves any supplier or platform, provides proportionate resources and reviews significant risks, costs or issues.
Chair of meeting	Announces recording/transcription, manages meeting conduct, confirms pauses/stops where required and protects confidential or sensitive business.
Proper Officer	Maintains records, operates/supervises recording and transcription, keeps logs, stores files securely, uses outputs only for draft minutes, arranges deletion and reports breaches or issues.
RFO	Manages equipment, storage or service costs in line with Financial Regulations and procurement requirements.

Councillors/staff/contractors	Follow this policy, protect confidentiality, avoid unnecessary personal data, and do not request or use recordings/transcripts outside this policy.
Public and press	Will be informed where Council recording/transcription is taking place and should avoid unnecessary personal or sensitive information during public business.

4. Records storage, disposal and retention

4.1 Records must be kept securely, accessible only to authorised persons, retained only for as long as necessary, reviewed where practical, and securely destroyed when no longer required.

4.2 Paper records containing personal, confidential or financial information should be shredded or disposed of using confidential waste. Electronic records should be securely deleted from folders, devices, cloud storage, recycle bins and deleted-item folders where practicable.

4.3 Records must not be destroyed if relevant to an active complaint, audit, investigation, legal claim, FOI/EIR request, subject access/data protection request, safeguarding concern or other ongoing Council matter.

4.4 The Council should keep a simple disposal record for significant records destroyed, showing the record, date, method and authorising person.

Record type	Normal retention	Disposal/action
Signed Council, Committee and Sub-Committee minutes	Permanent	Keep permanently as the formal record.
Annual accounts, Annual Returns, internal/external audit reports, deeds, leases and land ownership records	Permanent	Keep permanently.
Agendas, summonses, reports, supporting papers, policies, procedures, Standing Orders and Financial Regulations	6 years after superseded or no longer required	Review before secure destruction; keep historically significant records.
Bank statements, reconciliations, invoices, receipts, VAT, payroll and accounting records	6 years after financial year-end	Secure destruction after retention period unless audit/legal reason applies.
Pension records	6 years after employment ends, or longer where required	Review before disposal.
Employee personnel files	6 years after employment ends	Secure destruction.
Recruitment records for unsuccessful applicants	6 months after appointment	Secure destruction.
Councillor declarations of interest	Current term plus 6 years	Review before disposal.

Asset register	Permanent or current version plus 6 years	Keep key records permanently.
Insurance policies and claims	Policies: 6 years after expiry; claims: 6 years after settlement	Review before disposal.
Contracts, agreements, procurement and quote records	6 years after contract/completion	Secure destruction unless land, deed, dispute or long-term issue.
Grant applications and award records	6 years after grant closure	Secure destruction.
Complaints records	6 years after closure	Secure destruction unless ongoing or recurring issue.
FOI/EIR requests and subject access/data protection requests	Normally 3 years after closure	Preserve while request, review or appeal is live.
General correspondence and planning consultation responses	Up to 6 years depending on importance	Review and destroy if no longer required.
Event records	3 years after event	Review and destroy if no longer required.
Accident/incident records	6 years after incident	Review before disposal.
Risk assessments	Current version plus 3 years	Review and destroy.
Audio recordings and AI-generated transcripts used for minutes	Delete within 14 days after minutes are approved and corrections made; normally no longer than 3 months from meeting date	Secure deletion unless a recorded lawful exception applies.
Recording/transcription log and disposal record	Current financial year plus 6 years	Keep metadata only; do not retain audio/transcript content in the log.

5. Audio recording and AI transcription

5.1 The Council may authorise the Proper Officer to audio record and/or use an approved AI transcription tool for Council and Committee meetings solely to assist accurate draft minute preparation.

5.2 Recording/transcription must be open, proportionate and clearly notified on the agenda or joining instructions, at the venue where practicable, in the Chair's opening announcement and in the Council's privacy information.

5.3 Recording method

The Council's usual method will be audio recording using Council-owned or Council-controlled equipment, such as a Council digital recorder, Council laptop, approved meeting platform or approved AI transcription platform. Recordings and transcripts must be saved only to secure Council-controlled storage. Personal phones, personal laptops, private cloud accounts, WhatsApp or unmanaged platforms must not be used except as an unavoidable emergency backup, and any such use must be logged, transferred promptly to Council storage and deleted from the device or account once transfer is confirmed.

5.4 Recordings/transcripts must not be published, webcast, broadcast, circulated generally, used for monitoring councillor behaviour, used for performance management, or retained permanently unless the Council has separately approved a lawful and necessary reason.

5.5 The Council should record only the meeting business. It should not routinely record informal conversations, breaks, private discussions, training, social conversations or matters outside the meeting.

5.6 The default position is to stop recording and transcription during confidential or exempt business. If a limited recording/transcript is necessary for confidential minutes, it must be marked confidential, access-restricted and deleted once those minutes are approved and any correction period has passed, unless a lawful exception applies.

5.7 Recording/transcription must stop for private legal advice, staffing, grievance, disciplinary, safeguarding, highly sensitive personal discussions or complaints about identifiable persons unless the Council has a specific lawful reason and appropriate safeguards.

5.8 A person concerned about being recorded may submit written comments in advance where permitted, avoid unnecessary personal details, or speak to the Proper Officer before the meeting. Recording must not prevent reasonable public participation.

Requirement	Control
Equipment/storage	Use Council-owned or Council-controlled equipment and secure Council storage. Avoid personal devices, private cloud accounts, WhatsApp and unmanaged platforms. Emergency backup on a personal/unmanaged device must be logged, transferred promptly to Council storage and deleted from the device.
AI transcription approval	AI transcription may be used only where the Council has approved the tool, provider or platform; checked supplier terms, security and data protection arrangements; and updated privacy information where needed.
Supplier safeguards	The approved AI service must be suitable for Council business, with clear UK GDPR controller/processor arrangements where applicable, appropriate security, restricted access, retention controls and no use of Council recordings/transcripts to train external AI models unless the Council has expressly approved a lawful basis.
Human review	AI output is a draft aid only. The Proper Officer must review and edit draft minutes using professional judgement. The Council, not the AI transcript, approves the minutes.

Access	Access is limited to the Proper Officer and anyone specifically authorised by the Council for a defined lawful purpose. General circulation to councillors or the public should be avoided.
Deletion	Audio files, AI transcripts, temporary extracts and working notes must be deleted within 14 days after minutes are approved and corrections made, normally no later than 3 months from the meeting date, unless a recorded exception applies.
Exceptions	Retention may be extended for an unresolved minutes dispute, complaint, audit, legal claim, standards issue, safeguarding concern, FOI/EIR request, subject access/data protection request or other lawful Council reason.

6. Requests, rights and disclosure

6.1 Audio recordings and AI transcripts are temporary working records and will not normally be published or supplied routinely.

6.2 If the Council receives a data protection request, FOI request, EIR request, complaint, investigation, legal matter or audit query involving a recording or transcript, the Proper Officer must preserve relevant records while the matter is handled.

6.3 Before any disclosure, the Council must consider personal data of third parties, confidentiality, legal professional privilege, prejudice to Council business, exemptions, redaction and whether a transcript or extract is more appropriate than a full audio file.

6.4 If the record was lawfully deleted before the request was received, the Council should explain that it is not held and refer to the approved minutes where appropriate.

6.5 Individuals may have data protection rights including access, rectification, restriction and objection. These rights are not absolute and must be balanced with Council duties and the rights of others.

7. Privacy notice: meeting recording and AI transcription

Privacy item	Council position
Controller/contact	St Athan Community Council is the controller. Contact: Proper Officer / Clerk, clerk@stathancommunitycouncil.gov.uk .
What we process	Voices, meeting contributions, names, roles, opinions, declarations of interest, actions, decisions and incidental background comments captured in recordings or AI transcripts.
Purpose	To help the Proper Officer prepare accurate draft minutes and check wording of decisions, resolutions, public representations and actions.
Lawful basis	Public task and/or legal obligation under UK GDPR Article 6. Consent is not the usual basis.

Special category data	The Council does not seek to collect it. If incidentally captured, access will be restricted and it will be deleted in line with this policy unless a lawful reason requires retention.
Access/sharing	Access is limited to the Proper Officer and authorised persons. Sharing will occur only where lawful and necessary, for example with legal advisers, auditors, insurers, ICO, Public Services Ombudsman for Wales, police, a court or another body with lawful authority.
Retention	Normally deleted within 14 days after minutes are approved and corrections made; normally no longer than 3 months from the meeting date unless a recorded lawful exception applies.
Rights/complaints	You may have data protection rights. Contact the Proper Officer first. You may also complain to the Information Commissioner's Office if dissatisfied.

8. Breaches, review and related documents

8.1 Any suspected loss, unauthorised access, accidental disclosure, misdirected email, insecure disposal, device loss or unlawful use of records, recordings or transcripts must be reported immediately to the Proper Officer and considered under the Council's UK GDPR and Data Protection Policy.

8.2 The Proper Officer should review retained records at least annually where practical and identify records to keep permanently, retain further, dispose of, archive or refer to Council for approval.

8.3 Records of long-term historical or public interest may be retained permanently or considered for deposit with an appropriate archive service.

8.4 This policy should be reviewed annually, or sooner if legislation, guidance, Council procedures, technology, supplier arrangements, audit recommendations, complaints or data protection risks change.

Appendix A - Notices and standard wording

Use	Wording
Agenda / website / joining instructions	Please note that St Athan Community Council may audio record this meeting and may use approved AI transcription solely to assist the Proper Officer in preparing accurate draft minutes. The approved written minutes remain the formal record. Recordings and transcripts will not normally be published and will be securely deleted after the minutes are approved, unless required for a formal query, complaint, legal matter, audit issue or information request. Attendees are asked not to share unnecessary personal or sensitive information during public business.

Chair's announcement	This meeting is being audio recorded and may be AI transcribed by St Athan Community Council solely to help prepare accurate draft minutes. The approved written minutes will remain the formal record. Please avoid sharing unnecessary personal or sensitive information during public business.
Room notice	Audio recording / AI transcription in progress: St Athan Community Council is recording this meeting for minute-taking accuracy only. Please speak to the Proper Officer before the meeting if you have a concern about being recorded.

Appendix B - Meeting recording and AI transcription checklist

Stage	Check
Before meeting	Recording/transcription notice included on agenda or joining instructions; equipment/platform approved; battery, storage, microphone and access settings checked; log opened and file name prepared.
Start of meeting	Chair announces recording/transcription and purpose.
During meeting	Record/transcribe only meeting business; pause for breaks and confidential/sensitive matters where required; note failures, pauses, restarts or sound issues.
After meeting	Transfer recording/transcript to secure Council storage; delete from device/platform after confirmed transfer; use only to prepare/check draft minutes.
After approval	Delete recording, transcript, extracts and temporary working notes within 14 days unless a recorded exception applies; update the log.

Appendix C - Recording / transcription log

Meeting / committee	Date	Storage location	Minutes approved	Deletion due	Deleted / reason extended

Reference sources

Prepared by reference to current Wales local government meeting requirements, UK data protection law and information access legislation, including the Local Government Act 1972; Public Bodies (Admission to Meetings) Act 1960; Local Government and Elections (Wales) Act 2021 and Welsh Government statutory guidance for community and town councils; UK GDPR; Data Protection Act 2018; Data (Use and Access) Act 2025 where relevant; Freedom of Information Act 2000; and Environmental Information Regulations 2004.

