RECORD RETENTION POLICY

1. INTRODUCTION

Data and records should not be kept for longer than is necessary. This principle finds statutory form in the Data Protection Act 2018, which requires that personal data processed for any purpose "shall not be kept for longer than is necessary for that purpose". Please read this policy in conjunction with the Improving Lives Plymouth Data Protection Policy. Improving Lives Plymouth will hold records for the periods stated
below.

Some records may need to be retained for longer where this is required by law, contract, insurance requirements, safeguarding, audit, funder or commissioner requirements, or for the management of complaints, incidents, investigations or potential legal claims. Where records are retained for longer than the standard retention period, the reason should be documented, and access should be restricted to those who need it.

2. STATEMENT OF INTENT

We will:

- Comply with the retention periods as outlined in this policy
- Annually review this policy

3. RESPONSIBILITIES

A. The Improving Lives Plymouth Strategy Delivery Group (SDG) and Trustee Board will adopt and review the implementation of this policy.

B. The Chief Executive retains overall responsibility for the implementation and review of this policy.

C. Project Managers are responsible for the implementation of this policy within their project area, including ensuring records are stored, retained, reviewed and securely destroyed in line with this policy.

D. All staff and volunteers are required to adhere to this policy and ensure that records are accurate, securely stored, only retained for as long as necessary, and disposed of safely when no longer required.

E. Where records relate to complaints, safeguarding, incidents, insurance matters, legal claims, funder or commissioner requirements, staff must seek advice from their manager before destroying records.

Some retention periods are set by legislation. Others are based on organisational need, regulatory expectations, contractual requirements, insurance requirements, safeguarding, audit, limitation periods or good practice. Where no specific legislation applies, ILP has set a proportionate retention period based on the purpose of the record and the risks associated with early destruction or over-retention.

Document	**Retention Period**	**Basis**	**Legislation / Notes**
Sick Pay	6 years after end of tax year	Statutory	Related payroll records. Legislation unspecified.
Sickness Declaration Forms	6 years	Statutory	Part of staff personnel files.
Maternity Leave, pay records, Mat B1s	6 years	Statutory	The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960) as amended.
Parental Leave	6 years	Not Statutory	The Maternity/Paternity Leave etc. and the Paternity & Adoption Leave (Amendment) Regulations 2008 (SI 2008/1966).
Wages / Salary	6 years after end of tax year	Statutory	Taxes Management Act 1970.
National Minimum Wage Records	6 years after the end of the relevant pay reference period	Statutory	National Minimum Wage Act 1998 and associated regulations.
Working Time Records	2 years or 6 years (if part of personnel file)	Statutory	The Working Time Regulations 1998 (SI 1998/1833).
Unsuccessful Candidate Interview Notes	1 year	Not Statutory	For potential discrimination challenges.
DBS Certificates	Certificate copies should not be retained for longer than 6 months. A record of the check, date, certificate number, level of check and recruitment decision may be retained on the personnel or volunteer file	DBS Code/Safer Recruitment	No photocopies or scanned copies of certificates should be retained unless there is an exceptional, documented reason.
Personnel Files	6 years after employment ceases	Not Statutory	Organisational retention period based on employment records, potential claims, references and audit requirements.
Volunteer Files	2 years after volunteering ceases	Not Statutory	Organisational retention period based on safeguarding, references, role history, supervision and potential concerns or claims.

Student Files	4 years after placement ceases	Not Statutory	To enable reference provision.
Records relating to people who use our services	6 years after case closure or death	Not Statutory	Organisational retention period based on service delivery, audit, safeguarding, complaints, funder requirements and potential claims.
Complaints received, complaint investigation records, outcomes and related correspondence	25 years from closure of the complaint, or longer where required by insurer, legal advice, safeguarding concern, funder, commissioner, ongoing claim or unresolved matter	Insurance / Legal Claims / Legitimate Interest	Required by ILP's insurer. Retention supports investigation of historic complaints, insurance notification, legal defence, organisational learning, safeguarding assurance and quality improvement. Records should be reviewed before destruction and retained longer only where there is a documented reason.
Safeguarding concerns, referrals, investigations and outcomes	25 years from closure, or longer where required by legal advice, safeguarding guidance, commissioner requirement or ongoing risk	Safeguarding / Legal Claims / Legitimate Interest	Access should be restricted. Records should be retained where required to evidence decision-making, protect individuals, support future safeguarding enquiries or respond to historic concerns.
Training Records	6 years after employment ceases	Not Statutory	Retained to evidence induction, mandatory training, role-specific training, competence and compliance.
Disciplinary Records	6 years after employment ceases	Not Statutory	Retained to evidence employment decisions, conduct management, safeguarding concerns where relevant, and potential claims.
Redundancy Records	6 years after employment ceases	Not Statutory	Retained to evidence consultation, selection, decision-making and potential employment claims.
Company Accounting Documents	7 years	Statutory	Companies Act 2006 / charity accounting requirements. Retained to evidence financial management, audit and statutory reporting
Tax Records	7 years	Statutory	Retained to meet HMRC, payroll, audit and statutory reporting requirements.
Litigation Records	10 years minimum	Legal Advice	Review after 10 years; extend if litigation continues.
Contracts, service level agreements, grant agreements and funding agreements	6 years after contract or agreement ends, or 12 years where executed as a deed	Contract / Legal Claims / Audit	Retain longer where required by funder, commissioner, insurer, legal advice or ongoing dispute.

Property leases, deeds, licences, asset transfer documents and major property agreements	Permanently while relevant, then 12 years after expiry, disposal or termination	Property / Legal Claims / Governance	Includes records relating to ownership, leasehold interest, landlord responsibilities, tenant arrangements and property liabilities
Employers Liability Insurance	60 years recommended	Recommended	Tracing Code of Practice.
Insurance policies, claim notifications, claims correspondence and supporting evidence	Policy documents: 6 years after expiry. Claims records: 25 years from closure, or longer where required by insurer, legal advice or unresolved claim	Insurance / Legal Claims / Legitimate Interest	Includes records needed to evidence cover, notify insurers, defend claims and respond to historic matters
RIDDOR Records	3 years (or until age 21 if under 18)	Statutory	RIDDOR Regulations 1995, Limitation Act 1980.
Accident, incident and hazard records	3 years from the date of the incident, or longer where involving a child, safeguarding concern, insurance claim, RIDDOR report, complaint or potential legal claim	Statutory / Insurance / Legal Claims / Legitimate Interest	Review before destruction and retain longer where required for insurance, safeguarding, legal or organisational learning purposes.
Building Risk Assessments	3 years	Not Statutory	Retained to evidence health and safety risk management and review history.
Fire Risk Assessments	3 years	Not Statutory	Retained to evidence fire safety risk management, review history and actions taken.
Lone Working Risk Assessments	6 years	Not Statutory	Retained to evidence risk assessment, control measures, staff safety and service delivery decisions.
Event Risk Assessments	3 years	Not Statutory	Retained to evidence risk assessment, planning, control measures and post-event review where relevant.
Fire Safety Checks	5 years	Not Statutory	Retained to evidence routine fire safety monitoring, testing, maintenance and remedial action.
COSHH Test Records	5 years	Statutory	COSHH Regulations 1999 & 2002.
Children and young people’s records	Until age 21	Statutory	Limitation Act 1980.

Data protection incidents, breaches and near misses	6 years from closure	UK GDPR / Data Protection Act 2018 / Legitimate Interest	Includes internal investigation records, decisions about whether to report to the ICO, actions taken and learning identified.
Subject Access Requests and information rights requests	3 years from closure, or 6 years where complex, disputed or linked to a complaint or claim	UK GDPR / Data Protection Act 2018 / Legitimate Interest	Includes request, response, exemptions applied, identity checks and decision-making record.
Law enforcement disclosure requests and information-sharing decisions	6 years from closure	Legal / Legitimate Interest	Includes requests from police or statutory bodies, decision-making records and copies of information disclosed where appropriate.
CCTV footage	Usually 30 days unless required for an incident, complaint, safeguarding concern, insurance matter, investigation or legal claim	Legitimate Interest / Safety / Security	Footage retained beyond the standard period should have the reason documented and be access controlled.
CCTV access logs, disclosure records and law enforcement requests	3 years from closure, or longer if linked to a complaint, safeguarding concern, incident or claim	UK GDPR / Data Protection Act 2018 / Legitimate Interest	Records who accessed footage, why, what was disclosed, to whom and under what authority.
Health & Safety Assessments	Permanently	Recommended	Retained for organisational history, long-term health and safety assurance and potential latent claims. Review periodically.
HMRC Approvals	Permanently	Recommended	Retained permanently as evidence of tax, payroll, pension or organisational approval status.
Money Purchase Details	6 years after transfer	Recommended	Retained to evidence pension contributions, transfers and employee benefit decisions.
Pension Records	12 years after benefit ceases	Recommended	Retained to evidence pension entitlement, contributions, benefit decisions and potential pension-related queries.
Senior Executive Records	Permanently	Recommended	Retained permanently for organisational, governance and historical record.
Trust Deeds and Rules	Permanently	Recommended	Permanent constitutional and governance record

Trustee Minute Books	Permanently	Recommended	Permanent governance record and evidence of trustee decision-making.
Conflict of interest declarations, registers and related decision records	6 years after the end of the relevant role, relationship, contract or decision, or longer where linked to a complaint, safeguarding concern, audit issue or legal claim	Governance / Legal Claims / Legitimate Interest	Includes staff, volunteers, trustees, contractors and decision-making relating to people who access services.

To ensure compliance with UK GDPR and the Data Protection Act 2018, all information destroyed from any Improving Lives Plymouth location, in any format, must be destroyed securely and in a way that protects the confidentiality of employees, volunteers, trustees, people who use our services, customers, partners and other stakeholders.

All paper that contains sensitive information will be shredded using the shredder in each building.

The destruction of confidential or sensitive information held electronically, including records held on Charity Log, Office 365, BrightHR (and associated apps), Xero, Zahara, USB devices, hard drives, CDs, DVDs or other electronic storage media, must be completed securely and with appropriate advice from the IT Manager.

Destruction of backup copies of such data will also be dealt with in the same manner.

Before records are destroyed, staff should consider whether there is any reason to retain them for longer, including an active complaint, safeguarding concern, insurance matter, legal claim, audit, funder requirement, commissioner requirement, investigation or organisational learning review. Where records are retained beyond the normal period, the reason should be recorded.

This policy will be reviewed annually to ensure compliance with current legislation and best practice. Improving Lives Plymouth will ensure that all employees have access to this policy in multiple formats to accommodate different needs.

Staff and volunteers with additional needs will be offered support to understand and implement the policy effectively.

As part of the normal annual policy review process, the impact of this policy on staff, volunteers and people who use our services has been considered, ensuring its implementation does not discriminate against, or adversely affect anyone.

We will ensure equal access to all our policies, including this one. We will assess capability to understand the policy and provide support when it is required.

In applying this policy, Improving Lives Plymouth will have due regard for the need to eliminate unlawful discrimination, promote equality of opportunity, and provide for good relations between people of diverse groups, in particular on the grounds of the characteristics protected by the Equality Act 2010.

An Equality Impact Assessment is used for all policies and procedures.

SIGNED:

DATE: May 2026 **REVIEW DATE:** May 2027

Version Control/Change Log			
Version	**Date**	**Author/s**	**Changes Made**
1.0	2015	Not Recorded	Original Policy Adopted
2.0	May 2026	Lee Sewrey and Chris Burnett	Annual review. Updated responsibilities, data protection references, complaints retention, retention categories, explanatory notes and secure disposal wording