



# **Retentions policy**

**Adoption and amendments to the Retentions Policy**

Section	Trust Meeting or Committee
Whole document	Board of Directors, March 2019
Whole Document	Board of Directors, March 2021
Whole Document	Board of Directors, March 2022
Whole Document	Board of Directors, March 2024
Whole Document	Board of Directors, March 2026
Next review: 2027/2028	

**DOCUMENT RETENTION**

**1. INTRODUCTION**

1.1. The main aim of this policy is to enable Kingsbridge Educational Trust (the Trust) to manage our hard and electronic records effectively and in compliance with data protection and other regulation. As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.

1.2. The Trust is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.

1.3. The table below sets out the main categories of information that we hold, the length of time that we intend to hold them, and the reason for this.

1.4. Section 3 of this policy sets out the destruction procedure for documents at the end of their retention period. The Data Controller shall be responsible for ensuring that this is carried out appropriately, and any questions regarding this policy should be referred to them.

1.5. If a document or piece of information is reaching the end of its stated retention period, but you are of the view that it should be kept longer, please refer to The Data Controller, who will make a decision as to whether it should be kept, for how long, and note the new time limit and reasons for extension.

**2. DOCUMENT RETENTION PERIOD**

DOCUMENT CATEGORY	REASON	RETENTION PERIOD
<b>Corporate / Constitutional</b>		
Company Articles of Association, Rules / bylaws	Companies Act 2006 Charities Act 2011	Permanent
Academy funding agreement and any supplemental agreements	Charities Act 2011	Permanent
Documents of clear historical / archival significance	Data Protection regulation	Permanent if relevant data protection regulation provisions are met.
Contracts e.g. with suppliers or grant makers	Limitation Act 1980	Length of contract term plus 6 years
Contracts executed as deeds	Limitation Act 1980	Length of contract term plus 12 years
Intellectual property (IP) records and legal files re provision of service	Limitation Act 1980	Life of service provision or IP plus 6 years
Directors- Appointment		Life of appointment plus 6 years
Directors- Disqualification	Company Directors Disqualification Act 1986	Date of Disqualification plus 15 years
Directors- Termination of Office		Date of termination plus 6 years

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Appointment of Trustees, Governors and Directors		Life of Appointment plus 6 years
Board of Directors Meeting Minutes	Companies Act 2006 Section 248	Minutes must be kept at least 10 years from the date of the meeting
Board of Directors Decisions		Date of the meeting plus a minimum of 10 years
Board of Directors Meeting: Annual Schedule of Business		Current year
Board of Directors Meeting: Procedures for conduct of meeting	Limitation Act Section 2	Date of procedures superseded plus 6 years
Minutes relating to any committees set up by the Board of Directors		Date of meeting plus a minimum of 10 years
Records relating to the management of the Annual General Meeting	Companies Act 2006 Section 248	Minutes must be kept for a minimum of 10 years
Agenda relating to Governing Body Meetings		One copy should be retained with the master set of minutes. All other copies can be disposed of.
Minutes of, and papers considered at, meetings of the Governing Body and its committees:		
Principal Set (Signed)		Life of academy
Inspection Copies		Date of meeting plus 3 years
Reports presented to Governing Body		Reports should be kept for a minimum of six years. However, if the minutes refer directly to individual reports, then the individual reports should be kept for the life of the Academy
Register of Gifts, Hospitality and Entertainment	Companies Act 2006	Life of the Academy plus 6 years
<b>Insurance</b>		
Employer's Liability Insurance	Employers' Liability (Compulsory Insurance Regulation) 1998	40 years
Policies	Commercial	6 years after lapse
Claims correspondence	Commercial	6 years after settlement
<b>Health &amp; Safety</b>		
General records	Limitation Act 1980	Minimum 3 years
Records re work with hazardous substances	Control of Hazardous Substances to Health Regulations 2002	Permanent
Accident books / records and reports	Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995	3 years after last entry or end of investigation

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Medical Scheme documentation	Commercial	Permanent unless personal data is included
Closed Circuit Television (CCTV)	Data Protection Act 2018	Maximum 31 Days, unless there is a specific reason to retain for longer.
COSHH	COSHH regulations 2002. Not applicable to records created under 1994-99 regulations.	40 years after year of creation.
Reporting of Accidents to Children	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 section 8. Limitations Act 1980.	21 years from date of incident
Reporting of Accidents to Adults	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 section 8. Limitations Act 1980.	Three years from date of incident
Fire Regulations Log	Fire Safety Order 2005	Six years from log of entry
Policy Statements	Limitations Act 1970	Three years from retirement of policy
Health and Safety Risk Assessments	Limitations Act 1970	Reviewed annually and if no longer required to be destroyed. If an incident has occurred the associated Health and Safety Risk Assessment should be retained for a period of three years and a copy kept in the incident folder.
<b>Property</b>		
Original title deeds		Permanent / to disposal of property
Leases	Limitation Act 1980	12 years after lease has expired
Building records, plans, consents and certification and warranties etc	Limitations Act 1980	6 years after disposal or permanent if of historical / archival interest.
Lettings Records	Limitations Act 1980	Six years from creation of record.
Records of maintenance by Contractors	Limitations Act 1980 Building contracts requirements	Six years from completion of the works contract signed and 12 years from Deed.
Records and logs of maintenance by School or Trust Staff	Limitations Act 1980	Six years from creation of log/record.
<b>Pension Records</b>		
Records about employees and workers	For all categories see:	Records must be kept for a minimum of six years (except for
Records re the Scheme		

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Records re active members and opt in / opt out	Detailed Guidance for Employers: (April 2017) pensions regulator.gov.uk	records of opt-outs which they must keep for four years).
Trust Deed / Rules and HMRC approvals		
Trustees' Minutes and annual accounts		
Policies including investment policies		
<b>Tax and Finance</b>		
Annual accounts and review (including transferred records on amalgamation)	Companies Act 2006 Charities Act 2011	Permanent record
Loans and grants	Requirement of the DFE Academies Financial Handbook and HMRC	12 years from last payment of loan or grant then review annually
Tax and accounting records	Finance Act 1998 Taxes Management Act 1970	6 years from end of relevant tax year
Information relevant for VAT purposes	Finance Act 1998 and HMRC Notice 700/21	Minimum 6 years from end of relevant period
Banking records / receipts book/sales ledger	Companies Act 2006 Charities Act 2011	6 years from transaction
<b>Employees / Administration</b>		
Payroll / Employee / Income Tax and NI records: P45; P6; P11D; P60, etc.	Taxes Management Act 1970 / IT (PAYE) Regulations	6 years from end of current year
Maternity pay	Statutory Maternity Pay Regulations	3 years after the end of the tax year
Sick pay	Statutory Sick Pay (General) Regulations	3 years after the end of the tax year
National Minimum wage records	National Minimum Wage Act	3 years after the end of the tax year
Foreign national ID documents	Immigration (Restrictions on Employment) Order 2007 Independent School Standards Regulations	Minimum 2 years from end of employment
HR files and training records	Limitation Act 1970 and Data Protection regulation	Maximum 6 years from end of employment
Records re working time inclusive of time sheets	Working Time Regulations 1998 as amended	2 years
Job applications (CVs and related materials re unsuccessful applicants)	ICO Employment Practices Code (Recruitment & Selection) Disability Discrimination Act 1995 & Race Relations Act 1976	6 months from start date of the role.
Pre-employment / volunteer vetting	ICO Employment Practice Code Independent School Standards Regulations	6 months

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Right to Work	An employer’s guide to Right to Work Check (Home Office January 2019)	Evidence of RTW should be kept during employment and retain for the period as the personnel file post leaving for six years.
Disclosure & Barring Service checks	Single Central Record Requirements under For independent schools, (including academies and free schools and alternative provision academies and free schools): Part 4 of the Schedule to the Education (Independent School Standards) Regulations 2014;	Record only satisfactory / unsatisfactory result and delete other information. If copy is kept, not to be retained beyond 6 months.
Volunteer records		Undertake assessment to decide on retention period taking account of risk (e.g. safeguarding re work with children)
Allegation of a child protection nature against a member of staff including where the allegation is unfounded.	Keeping Children Safe in Education (KCSIE) guidance, September 2025	Until the persons normal retirement or 10 years from the date of allegation (whichever is longer)
Management Instruction	Operational purposes	12 months from date of Management Instruction
Unfounded Disciplinary Action	Operational purposes	4 months from the date of allegation unless related to safeguarding
Disciplinary Proceedings Level 1 – Oral and Written Warning	Employment Practices Code and supplementary guidance	Six months from date of warning
Disciplinary Proceedings Level 2- Written Warning	Employment Practices Code and supplementary guidance	A year from date of warning
Disciplinary Proceedings Final Warning	Employment Practices Code and supplementary guidance	18 months from date of warning
Disciplinary Proceedings- Case not found	Employment Practices Code and supplementary guidance	Dispose at conclusion unless related to safeguarding
<b>Pupils</b>		
Child Protection information (on child’s file)	Keeping Children Safe in Education (KCSIE) guidance, September 2025	RETAIN UNTIL FURTHER RECOMMENDATIONS  Subject to moratorium on destruction due to historic child abuse enquiry.
Child Protection Information in other files	Keeping Children Safe in Education (KCSIE) guidance, September 2025	RETAIN UNTIL FURTHER RECOMMENDATIONS Subject to moratorium on destruction due to historic child abuse enquiry.

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Educational Record	Pupil information Regulations 2005 (maintained schools only) Same approach applied in academy context. Data Protection regulation	The file must follow the pupil when he/she leaves the school this will include: <ul style="list-style-type: none"> <li>To another primary/secondary school</li> <li>Transition from a primary to a secondary school</li> <li>To a pupil referral unit</li> <li>If the pupil dies whilst at primary school the file should be returned to the local authority to be retained for the statutory retention period</li> </ul> Secondary Pupil the record is retained until the pupil reaches 25 years of age
<b>Special Educational needs</b>		
SEN files	Limitation Act 1980	25 years from date of birth of the pupil. If kept longer show good justification.
Education Health and Care Plans	Special Educational Needs and Disability Regulations 2014 Children and families Act 2014, part 3	25 years from date of birth of the pupil
Statements of Special Educational Needs (now historic)	Originally under Special Educational Needs and Disability Regulations 2001	25 years from date of birth of pupil unless passed to new school (usually on the pupil's file)
Attendance registers	Pupil Registration Regulations 2006 Regulation 14	3 years from when the register entry was made if made in paper registers For computerised registers retain until 3 years after the end of the school year during which the entry was made. This applies to every back up copy.
Other items e.g. curriculum related, photographs, video recordings	Case by case basis	Look at why you are processing this and how long you need it for. Make sure you have a good justification for keeping it as long as you do. Set out the items and the justification.

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Parents		
Parents	<p>Pupil Registration Regulations 2006 For basic name and contact details.</p> <p>Otherwise usually operational in accordance with the statutory functions of the school</p>	<p>Usually, for the duration that the parent has a pupil at the school. Otherwise subject to case by case justification.</p>

### 3. DELETION OF DOCUMENTS

3.1. When a document is at the end of its retention period, it should be dealt with in accordance with this policy.

#### Confidential waste

3.2. Recognised confidential waste collection services should be used on a regular basis and confidential waste should be made available in the sacks as provided by the collection company.

3.3. Anything that contains personal information should be treated as confidential.

3.4. Where deleting any of the above documents electronically, please refer to the Trust Head of IT to ensure that this is carried out effectively.

#### Other documentation

3.5. Other documentation can be deleted or placed in recycling bins where appropriate.

#### Automatic deletion

3.6. Certain information will be automatically archived by the computer systems, details of which are set out below. Should you want to retrieve any information, or prevent this happening in a particular circumstance, please contact the Trust Head of IT.

#### Individual responsibility

3.7. Much of the retention and deletion of documents will be automatic, but when faced with a decision about an individual document, you should ask yourself the following:

- 3.7.1. Has the information come to the end of its useful life?
- 3.7.2. Is there a legal requirement to keep this information or document for a set period?
- 3.7.3. Would the information be likely to be needed in the case of any legal proceedings? In particular, is it potentially relevant to an historic child abuse enquiry? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)
- 3.7.4. Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?
- 3.7.5. Is the document of historic or statistical significance?

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3.8. If the decision is made to keep the document, this should be referred to Data Controller and reasons given.

**4 RETENTION OF ELECTRONIC FILES**

4.1 Electronic files must only be retained for as long as necessary for operational, legal or regulatory purposes, in accordance with the data protection principles set out in Section 2.

4.2 Electronic files include, but are not limited to:

- SharePoint documents
- OneDrive Files
- Google Drive Files
- Network Drives
- Files stored on local devices (where permitted)
- Files in third-party applications storage
- Email records (including attachments)
- Digitised/scanned versions of paper records

4.3 Files that fall into a statutory or defined category listed in Section 2 must follow that category’s retention period. Where a file contains more than one category, the longest relevant retention period will apply.

4.4 Staff must review and delete obsolete, duplicate or unnecessary files regularly. Line managers are responsible for ensuring compliance within their teams.

4.5 Personal data must not be retained for longer than necessary. Files containing personal data must be deleted once the purpose for processing has been fulfilled and no lawful basis for retention remains.

4.6 The Trust may implement automated retention, archiving and deletion on digital storage systems. Further information is available from Trust Head of IT.

4.7 Where files need to be kept longer than the standard retention period (e.g. legal action, complaints, safeguarding enquires), this must be approved by the Data Controller, with justification documented.

4.8 Deletion of electronic files must include removal from active systems and, where technically feasible, from backups and archives in accordance with system retention cycles. Backup retention cycles will operate in accordance with the Trust’s IT disaster recovery procedures.

4.9 Shared drives and digital storage areas will be subject to periodic review and automated clean-up in accordance with the Trust’s procedures.

Where a file does not fall in to a category listed in Section 2, the following recommended maximum retention periods apply:

FILE TYPE	REASON	RETENTION PERIOD
Administrative working documents (drafts, temporary versions, notes, duplicates)	Prevent unnecessary retention of data	1 year

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Final operational documents (policies, local procedures, non-statutory reports)	Consistent with Limitation Act 1980	6 years
Strategic Trust or School documentations	Historical or operational significance	6 years or permanent
Internal project files	Audit and closure purposes	Project durations + 3 years
Financial working documents not covered elsewhere	HMRC compliance	Current financial year + 6 years

**5. RETENTION AND DELETION OF EMAILS**

5.1. Email must only be retained for as long as stipulated in the Kingsbridge Educational Trust ICT Policy, data protection principles and the retention rules in this document.

5.2. Email services have an operational function and are not provided for the storage or filing of documents and as such emails must be reviewed regularly and deleted when no longer required.

5.3. Emails that contain information that exists elsewhere (e.g. MIS, HR System, safeguarding system, finance system, SharePoint, OneDrive, Google Drive, network drives & local drive) must be deleted once the information has been saved to the correct location.

**Recommended retentions periods for email**

5.4. Unless a statutory or Section 2 Category applies, the following retention periods apply to email:

EMAIL TYPE	REASON	RETENTION PERIOD
Routine / Administrative emails (arrangements, queries, general correspondence)	Reduces personal data risk	90 days
Operational / Project emails not forming part of a formal record	Support continuity	1 year
Emails containing documents that fall under statutory retention rules	Compliance	Same retention period as the document
Complaint related emails	Limitation Act 1980	6 years
Safeguarding related emails	Confidentiality & Statutory compliance	Deleted once transferred to official safeguarding system
Financial / Audit relevant emails	HMRC compliance	Current financial year + 6 years

5.5. Routine emails must be deleted promptly once dealt with.

5.6. Emails that constitute formal records must be transferred to the appropriate system and retained for the relevant statutory period.

5.7. Automated email archiving or deletion rules may be applied. Staff must save important messages outside email before the automated deletion deadline.

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5.8. Email accounts belonging to staff leaving the Trust will be locked immediately. Within 90 days, the mailbox will be reviewed, necessary emails transferred to secure storage, and the remaining content deleted.

5.9. Personal data within emails must be kept to the minimum required and deleted as soon as it is no longer needed.

## **6. DELETION AND RETENTION OF USER ACCOUNTS, INCLUDING EMAIL AND OTHER THIRD-PARTY SERVICES**

### 6.1. Network Accounts

6.1.1. Accounts will be locked as soon as the user leaves the Trust.

6.1.2. A decision on the retention of data should be decided within 90 days. The files and emails must be moved to the required appropriate storage during this period.

### 6.2. Third-Party Services

6.2.1. A list of third-party access for each user should be known or easily identifiable.

6.2.2. All third party access must be removed immediately upon the user leaves the Trust.

Kingsbridge Educational Trust  
March 2026