



## **RECORDS RETENTION**

### **POLICY**

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**NOTE:** This policy document accompanies the Records Retention Working Document. Academies should personalise the working document to reflect the specific circumstances of the Academy and attach to this policy.

<b>Date of policy / last review:</b>	1 July 2019	<b>Review period:</b>	2 years
<b>Date of next review:</b>	30 June 2021	<b>Owner:</b>	Board of Directors

## DOCUMENT RETENTION

### 1. PURPOSE AND OPERATION OF THE POLICY

- 1.1. The main aim of this policy is to enable Peterborough Diocese Education Trust (the “Academy Trust”) to manage its 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 Academy 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 Records Retention Working Document (RRWD) attached 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. The RRWD sets out the legal requirements for certain categories of document. Where we have decided to keep information longer than the statutory requirement, this has been explained in the comments column.
- 1.5. Section 2 of this policy sets out the destruction procedure for documents at the end of their retention period. The Senior Management Team or the Headteacher / Executive Headteacher / Head of School / GDPR Co-ordinator (Senior Management Team) will be responsible for ensuring that this is carried out appropriately, and any questions regarding this should be referred to them.
- 1.6. 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 Senior Management Team, 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. DELETION OF DOCUMENTS**

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

### **Confidential waste**

- 2.2. This should be made available for collection in the confidential waste bins or sacks located around the office / academy or shredded.
- 2.3. Anything that contains personal information should be treated as confidential.
- 2.4. Where deleting electronically, please refer to the GDPR Co-ordinator in the academy to ensure that this is carried out effectively.

### **Other documentation**

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

### **Automatic deletion**

- 2.6. 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 GDPR Co-ordinator.

### **Individual responsibility**

- 2.7. 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:
- 2.7.1. Has the information come to the end of its useful life?
- 2.7.2. Is there a legal requirement to keep this information or document for a set period? (Refer to Working Document for more information)
- 2.7.3. 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?)
- 2.7.4. Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?
- 2.7.5. Is the document of historic or statistical significance?

- 2.8. If the decision is made to keep the document, this should be referred to the Senior Management Team and reasons given.