

DATA RETENTION POLICY

Version	Author	Dated	Status	Details
1	Compliance Officer	May 2018	Approved	
2	Compliance Officer	25.05.2021	Approved	To bring in line with new legislation
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Elevate Multi Academy Trust (Elevate) recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of Elevate and its Academies.

This document provides the policy framework through which this effective management can be achieved and audited.

Scope of the Policy

This policy applies to all records created, received or maintained by Elevate staff in the course of carrying out their functions:

- 🌿 Records are defined as those documents which facilitate the business carried out by Elevate and its Academies and which are thereafter retained (for a set period) to provide evidence of its transactions or activities;
- 🌿 These records may be created, received or maintained in hard copy or electronically;
- 🌿 A small percentage of records may be selected for permanent preservation as part of Elevate's archives and for historical research.

Responsibilities

- 🌿 Elevate has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The CEO has overall responsibility for this policy.
- 🌿 The person responsible for records management in Elevate and its Academies will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and timely.
- 🌿 Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the Elevate's records management guidelines.

Relationship with Existing Policies

This policy has been drawn up within the context of Elevate's Freedom of Information Policy and Data Protection Policy and with other legislation or regulations (including audit, equal opportunities and ethics) affecting Elevate.

Safe Disposal of Records

Where records have been identified for destruction they should be disposed of in an appropriate way. All records containing personal information or sensitive policy information should either be shredded before disposal using a cross cut shredder or be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways. Complete records will not be put in the dustbin or a skip.

There are companies who can provide confidential waste bins and other services which can be purchased to ensure that records are disposed of in an appropriate way.

The Freedom of Information Act 2000 requires Elevate and its Academies maintain a list of records which have been destroyed and who authorised their destruction.

Members of staff should record at least:

- 🌿 File reference (or other unique identifier).
- 🌿 File title (or brief description) and number of files.
- 🌿 The name of the authorising officer and the date action taken.

This should be kept in an Excel spreadsheet or similar suitable format.

Transfer of Information

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media. The lifespan of the media and the ability to migrate data where necessary should always be considered.

Academy Closures

Should an Academy close there will be records which will need to be stored until they work out their statutory retention periods.

It is the responsibility of Elevate and its Academies to manage these records until they have reached the end of their administrative life and to arrange for their disposal when appropriate. There may be a number of different reasons why an Academy has closed and this may affect where the records need to be stored.

- 🌱 If the Academy has been closed and the site is being sold or reallocated to other use, then Elevate should take responsibility for the records from the date the Academy closes;
- 🌱 If 2 academies have merged onto one site and then function as one academy, it is sensible to retain all the records relating to the two academies on the one site.

Retention Guidelines

The following retention guidelines which have been recommended by ICO, IRMS School toolkit have been adopted by Elevate and its Academies. Some of the retention periods are governed by statute. Others are guidelines following best practice. **Appendix 1:** See Data Retention Schedule

Every effort has been made to ensure that these retention periods are compliant with the requirements of the UK General Data Protection Regulations and the Freedom of Information Act 2000. Managing record series using these retention guidelines will be deemed to be 'normal processing' under the legislation mentioned above. If record series are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented.