

# Retention and Destruction Policy

Policy reviewed by Academy Transformation Trust on	June 2018
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This policy links to:	Located:
<ul style="list-style-type: none"><li>• Data Protection Policy</li><li>• HR Policies</li><li>• Freedom of Information Policy</li><li>• Subject Access Request Procedure</li></ul>	

Review Date – May 2021



## **Our Mission**

To provide the very best education for all pupils and the highest level of support for our staff to ensure every child leaves our academies with everything they need to reach their full potential.

We promise to do everything we can to give children the very best education that gives them the best opportunity to succeed in life. All of our academies have it in them to be outstanding and achieving this comes down to our commitment to our pupils, staff and academies.

## **Our commitment**

We are committed to taking positive action in the light of the Equality Act 2010 with regard to the needs of people with protected characteristics. These are age, disability, pregnancy and maternity, religion and belief, race, sex, sexual orientation, gender reassignment and marriage and civil partnership.

We will continue to make reasonable adjustments to avoid anyone with a protected characteristic being placed at a disadvantage.

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## **1 Policy statement**

- 1.1 Everyone has rights with regard to the way in which their personal data is handled. During the course of our activities as a Trust we will collect, store and process personal data about our pupils, parents, workforce and others.
- 1.2 This policy sets out how Academy Transformation Trust manages the retention and destruction of records containing personal data.

## **2 Retention periods**

- 2.1 In line with Article 5(1)(e) of the GDPR the Trust will not retain data for any longer than necessary.
- 2.2 The standard default period for retaining various types of personal data held by the Trust are set out in the Retention Schedule within the Information Management Toolkit for Schools produced by the Information and Records Management Society. This can be found at <https://irms.org.uk/general/custom.asp?page=SchoolsToolkit>

## **3 Destruction procedures**

- 3.1 As set out in the Data Protection principles data will not be kept for any longer than is necessary for the purpose for which it has been collected.

- 3.2 The Retention Schedule within the Information Management Toolkit for Schools also contains direction regarding how data should be disposed of. Academy Transformation Trust will adhere to these recommendations and be guided by the Data Protection Policy.

## 4 Exceptions to destruction procedures

- 4.1 There may be circumstances which prevent the Trust from adhering to the recommendations for data destruction. These include:
- The data is subject to a current Subject Access Request
  - There is an ongoing legal action which may require access to relevant data
  - There is an ongoing investigation which may require access to relevant data  
Advise on changes to this policy.
  - The data subject has exercised their right to restrict the processing of the data in accordance with Article 18 of the GDPR
  - The data is processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes and ATT has put in place appropriate technical and organisational measures.

## 5 Storage of data

- 5.1 Data will be stored in accordance with the Data Protection Policy.