Data Retention Policy

Start Date: **Autumn 2021**

Date of Next Review: **Autumn 2024**

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Responsible Committee: **Finance & Resources Committee**

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Haileybury Academy Trust Records Management Policy

1. Policy statement and objectives

1.1 The academy/trust recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the academy, and provide evidence for demonstrating performance and accountability.

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

- Scope
- Responsibilities
- Digital continuity
- Relationships with existing policies

2. Scope of the policy

2.1 This policy applies to all records created, received or maintained by permanent and temporary staff of the academy in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the academy.

2.2 Records are defined as all those documents which facilitate the business carried out by the academy 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 electronic format e.g. paper documents, scanned documents, e-mails which document business activities and decisions, audio and video recordings, text messages, notes of telephone and Skype conversations, spreadsheets, Word documents, presentations etc.

3. Responsibilities

3.1 The governing body of an academy has a statutory responsibility to maintain the academy records and record keeping systems in accordance with the regulatory environment specific to the academy. The responsibility is usually delegated to the Principal of the academy.

3.2 The person responsible for day-to-day operational management in the academy will give guidance on good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

3.3 The person responsible for records management will also ensure that:

- records are adequately stored and backed up
- a tracking system is in place that controls the movement and location of records so that they can be easily retrieved
- access controls are in place
- a business recovery plan is in place

3.4 The academy will manage and document its records disposal process in line with the Records Retention Schedule *https://irms.org.uk/page/AcademiesToolkit* This will help to ensure that it can meet Freedom of Information requests and respond to requests to access personal data under data protection legislation (subject access requests "SARS").

3.5   Individual staff and employees must ensure, with respect to records for which they are responsible, that they:

3.5.1   Manage the academy's records consistently in accordance with the academy's policies and procedures;

3.5.2   Properly document their actions and decisions;

3.5.3   Hold personal information securely;

3.5.4   Only share personal information appropriately and do not disclose it to any unauthorised third party;

3.5.5   Dispose of records securely in accordance with the academy's Records Retention Schedule.

4.   Digital continuity

4.1   Computerised data that must be kept for six or more years will be identified, and stored appropriately:

4.1.1   This data will be stored in online backup systems.

4.1.2   The data will be archived to a dedicated location on the academy's server, which is password-protected.

4.1.3   This data will not be stored on flash drives.

4.2   Where possible, files will be converted to appropriate supported file formats for long-term preservation e.g. Word and Excel files may be converted to PDF files.

5.   Relationship with existing policies

5.1   This policy has been drawn up within the context of:

- •   GDPR Data Protection policy
- •   Legislation or regulations (including audit, equal opportunities and ethics) affecting the academy.

6.   Enquiries

6.1   Further information about the academy's Data Retention Policy is available from the DPO. dpo@haileyburyturnford.com.

6.2   General information about data protection regulations can be obtained from the Information Commissioner's Office: www.ico.gov.uk