



Data Retention and Erasure Policy

Date	People involved	Notes
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Contents

1. Introduction	3
2. Scope of the policy	3
3. Responsibilities.....	3
4. Personal Information and Data Protection	4
5. Record retention.....	4
6. Disposal schedule.....	5
7. Destruction and disposal of records and data.....	5

Introduction

The purpose of this policy is to detail the procedures for the retention and disposal of information to ensure that the trust carries this out consistently and fully document any actions taken. Unless otherwise specified the retention and disposal policy refers to both hard and soft copy documents.

By efficiently managing its data and records, the trust 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 trust, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

Information held for longer than is necessary carries additional risk and cost and can breach data protection rules and principles. The Cardinal Newman Catholic Educational Trust only ever retains records and information for legitimate or legal business reasons and always complies fully with the data protection laws, guidance and best practice.

Scope of the policy

This policy applies to all records created, received or maintained by staff of the trust in the course of carrying out its functions.

Records are defined as all those documents which facilitate the business carried out by the trust 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 the trust's records will be selected for permanent preservation as part of the institution's archives and for historical research.

Responsibilities

The trust has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the CEO.

The person responsible for records management in the trust will give guidance for 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.

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 trust's records management guidelines.

Personal Information and Data Protection

The Cardinal Newman Catholic Educational Trust collects and uses personal information about staff, pupils, parents and other individuals who come into contact with the trust. This information is gathered in order to enable it to provide education and other associated functions. In addition, there may be legal requirements to collect and use information to ensure that the trust complies with its statutory obligations.

This information can include, but is not limited to, name, address, email address, date of birth, IP address, identification number, private and confidential information, sensitive information and bank details.

The trust is committed to collecting, processing, storing and destroying all information in accordance with the combined UK data protection laws (UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018)).

Our Data Retention Policy and processes comply fully with the fifth key principle of Article 5 of the UK GDPR:

kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with [Article 89\(1\)](#) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation')

Record retention

Records should be kept for as long as they are needed to meet the operational needs of the trust, together with legal and regulatory requirements. Retention schedules will govern the period that records will be retained and will be found [in the Disposal of Records schedule published on the trust's website].

Records should be assessed to:

- Determine their value as a source of information about the trust, its operations, relationships and environment
- Assess their importance as evidence of business activities and decisions

- Establish whether there are any legal or regulatory retention requirements (including: Public Records Act 1958, UK General Data Protection Regulation, Data Protection Act 2018, the Freedom of Information Act 2000, the Limitation Act 1980).
- Where records are likely to have a historical value, or are worthy of permanent preservation, we will transfer them to the County Archives Service if appropriate.

Disposal schedule

Records should not be kept longer than is necessary for the purposes for which the personal data are processed.

The trust's records manager will ensure that records are regularly reviewed and that once a record or data has reached its retention period date, the owner should refer to the retention schedule for the action to be taken. Not all data or records are expected to be deleted upon expiration; sometimes it is sufficient to anonymise the data in accordance with the combined UK data protection laws (UK GDPR and DPA 2018) requirements or to archive records for a further period.

Destruction and disposal of records and data

All information of a confidential or sensitive nature must be securely destroyed when it is no longer required to ensure compliance with the combined UK data protection laws (UK GDPR and DPA 2018) and the duty of confidentiality that the trust owes its staff, pupils and parents.

The Freedom of Information Act 2000 requires the trust to maintain a list of records which have been destroyed including the date the action was taken and who authorised their destruction.

Paper records

The trust uses a professional shredding service provider to dispose of all paper records. Confidential waste sacks are made available and regular collections take place to ensure that confidential data is disposed of appropriately.

Electronic and IT records and systems

The deletion of electronic records must be organised in conjunction with the IT company who will ensure the removal of all data so that it cannot be reconstructed. When disposing of IT equipment or systems, information should be wiped where possible through use of software and formatting. It is the responsibility of the asset owner and the IT Company to ensure that relevant data has been sufficiently removed from the IT device before requesting disposal.

CDs / DVDs / Floppy Disks

These should be cut into pieces to ensure that the information cannot be reconstructed.

Transfer of records to the Archives

Where records have been identified as being worthy of permanent preservation arrangements should be made to transfer the records to the County Archives Service. The trust should contact the local record office if there is a requirement to permanently archive the records, and the records will continue to be managed via the Data Protection Act 2018 and the Freedom of Information Act 2000.