

**Learning Accord Multi Academy Trust**  
**Trust IT Data Destruction Policy**



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## **Learning Accord Multi Academy Trust IT Department Data Destruction Policy**

This policy applies to all data owned by the Learning Accord Multi Academy Trust IT Department and any data for which the IT Department acts as a custodian on behalf of Academies within the Trust. It covers all information managed by the Trust IT Department, including electronically stored data on on-site servers and off-site cloud facilities, as well as information held on paper and other media. This includes files, emails, images, audio, video, and backup data.

This policy should be read in conjunction with the Learning Accord Multi Academy Trust Data Protection Policy.

### **1. Policy Objectives**

The objectives of this policy are to:

- Prevent the premature destruction of data that must be retained for legal, financial, or operational purposes.
- Provide guidance to staff on managing the data lifecycle within IT services.
- Ensure consistency in data destruction after specified retention periods.
- Promote effective data management practices across the Trust.

### **2. Categories of IT Data**

The following categories of data are managed by the Trust IT Department and Academies:

#### **a) Data with Statutory Retention Periods**

This includes data stored on academy and Trust servers, devices, and backups (cloud and on-site).

#### **b) Personal Data**

In accordance with GDPR Article 5(1)(e), personal data should not be kept longer than necessary and must be securely deleted when no longer required. The Learning Accord Multi Academy Trust IT Department and Academies must:

- Regularly review retention periods for personal data.
- Assess the purpose of data storage and determine appropriate retention periods.
- Securely delete data once it is no longer needed.
- Update, archive, or remove outdated data.

### **c) Non-Identifiable Data**

This includes data not linked to individuals, such as bandwidth monitoring, event logs, and system reports. Such data is retained until a task is completed or storage capacity is reached, as it is not subject to specific legal requirements.

## **3. Freedom of Information and Data Retention**

Under the Freedom of Information Act 2000, it is an offense to destroy records in response to an FOI request. This policy ensures compliance and prevents the arbitrary deletion of data.

## **4. Commercial and Contractual Data**

The Learning Accord Multi Academy Trust IT Department works with third-party suppliers under contractual agreements. To safeguard the integrity of procurement and contractual processes, data retention periods are as follows:

- Pre-contract advice: 2 years
- Specification and contract development: 6 years after contract expiry
- Evaluation of tenders: 6 years after contract expiry
- Unsuccessful tender documents: 1 year after contract commencement
- Post-tender negotiation: 1 year after contract commencement
- Contract management records: 2 years after contract expiry
- Contract amendments: 6 years after contract expiry

## **5. Backup Data Retention**

The Learning Accord Multi Academy Trust IT Department maintains backups on behalf of our academies with the following retention periods:

- External USB hard drives: Rolling 1-year retention
- Cloud backups: Rolling 31-day retention

Additionally, the Trust IT Department may create ad hoc backups for system testing or recovery following a system change. These backups are destroyed immediately upon successful implementation and a maintained backup is taken of the related system.

## **6. Legacy Computer Equipment**

Obsolete IT equipment that contains storage devices or disks is securely stored until it is recycled by a third-party provider. Once received by the recycling company, data is permanently destroyed within 28 days.

## **7. User Account Management**

- Inactive User Accounts: User accounts for email and system access that become inactive during the academic year are retained for up to 6 months after closure.
- Outgoing Pupil Accounts: At the end of each academic year, all outgoing pupil accounts, including profiles and files, are deleted in bulk. Backup retention periods are:
  - Cloud backups: 31 days
  - USB hard drive backups: 12 months
- The Learning Accord Multi Academy Trust IT Department maintains a record of all deleted user accounts.

## **8. Bulk Data Destruction**

The Learning Accord Multi Academy Trust IT Department may be requested to delete significant volumes of files and folders for regulatory compliance or general housekeeping. When performing bulk deletions:

- Only the date, file server name, location, file security group, and parent folder names are recorded.
- Individual files are not recorded.
- Backup retention delays apply:
  - Cloud backups: 31 days
  - USB hard drive backups: 12 months

## **9. Data Recovery and Cleansing**

Restored backups may contain previously deleted data. To prevent unauthorised data recovery, Learning Accord Multi Academy Trust IT Department will use records from Sections 7 and 8 to cleanse restored data within 1 to 2 working days following a system restore.