Policy: **IT RETENTION POLICY**

AUM Policy Category: Institutional Regulations

Policy Title	**IT RETENTION POLICY**
Policy Ref:	2024_IT_Ret_Po_V2
Effective Date	June 2024
Responsible Office	Provost Office
Responsible Executive(s)	IT Department

Scope

This Policy is aimed at regulating the retention, maintenance and disposal of documentation, both personal and other, within the American University of Malta, and in accordance with the principles of data protection legislation, and other legal provisions in Maltese Law.

Background

The GDPR puts forward the principle that personal data and sensitive personal data should not be retained for periods that are longer than necessary. In this context, the American University of Malta will be putting forward a retention policy for all data and documentation that it collects and processes, with the purpose of ensuring compliance to the Regulation and to ensure that no resources are utilized in the processing and archiving of data which is no longer of relevance.

Objectives

 This policy aims to achieve the following objectives:

a.   Regulate the retention of and disposal of the various types of documentation whether held in manual or automated filing systems within the American University of Malta while adhering to the Data Protection principle that personal data should not be retained for a longer period than necessary.
b.   Dispose of unnecessary documentation that is no longer relevant and is taking up useful storage space.

c.   Promote the digitization of documentation as may be reasonably possible to minimize the use of storage space required to store documentation, as well as to promote sustainable use of paper and printing consumables.

Administration

Documentation is held in the Aum Network shared folder and each department has separate storage. This Policy is therefore applicable to all such documentation. It will be the responsibility of the relevant Departments, to ensure that all provisions of this Policy are adhered to.

Documentation

As part of its operating requirements the AUM requests, keeps and maintains a wide range of documentation including personal data. The various types of documentation utilized by American University of Malta may be categorized as follows:

- Personal Data & files of the Students, Faculty and staff.
- Attendance and absence records of students, Faculty.
- Financial records including payrolls and national insurance contributions, etc.
- Administrative and Policy Files.
- Lectures audio-recordings, etc.

6. Security of Documentation

Documentation is maintained in an accessible but secure location with adequate access provided to officials who have the clearance level to access the relevant documentation. In the case of documents with sensitive personal data with higher clearance levels, access control protocols are fully adhered, to ensure that only those that have the required security clearance have access to such documentation.

- In the case of personal data, the GDPR also stipulates that only those required to process personal data should have access to personal records.
- Personnel who are found to be in breach of these security protocols, and thus in breach of the GDPR, will be subject to disciplinary action.

7. Retention period

Retention of different categories of documents is governed by different requirements and different legislation and regulations.