



ICT Write Offs and Disposal Policy & Procedures

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Document Control

Review Frequency	Annual
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Ratified By	Audit & Risk Committee
Date of Ratification	28.11.2025
Lead/Owner	COO
Target Audience	Internal staff and leaders within Plymouth CAST schools and Trust central team, with oversight from the Audit & Risk Committee, and with external processors as regulated partners.
Document Version	1.4

The electronic version is the definitive version of this document.

The content of this procedure may be subject to revision from time to time in line with the policy review schedule or when legislation changes or operational reasons arise. Consultation with the recognised trade unions will be completed before any changes are made.

Version Changes

Version	Page Number	Details of Change	Agreed By	Date
1.4	4	Plymouth CAST Vision & Values added to policy	Audit & Risk Committee	December 2025
1.4	6	Hyperlink to ICO Retention & Disposal Policy updated	Audit & Risk Committee	December 2025

Vision and Values

Plymouth CAST is a multi-academy trust of Catholic schools which is part of the mission of the Catholic Church dedicated to human flourishing and the building of a kingdom of peace, truth and justice. The Trust is to be conducted in all aspects in accordance with canon law and the teachings of the Roman Catholic Church and at all times to serve as a witness to the Catholic faith in Our Lord Jesus Christ.

Our vision and values are derived from our identity as a Catholic Trust. Central to our vision is the dignity of the human person, especially the most vulnerable. Our academies are dedicated to providing an education and formation where all our pupils and young people flourish in a safe, nurturing, enriching environment. All governors in our academies are expected to be familiar with the vision, mission, values and principles of the Trust and not in any way to undermine them. They should support and promote the vision and conduct themselves at all times in school and on school business according to the vision and principles of the Trust.

Plymouth CAST expects all its employees to recognise their obligations to each school within the Multi-Academy Trust, the public, pupils and other employees and to provide consistently high standards of education and performance at all times and in accordance with Plymouth CAST's vision, mission and principles.

1. Scope & Purpose

- 1.1. This policy relates to all schools and settings across Plymouth CAST Multi Academy Trust and supersedes any local policies and procedures that have been in use prior to the academy conversion. Where required, an individual Plymouth CAST Multi Academy Trust school or setting - in agreement with the Trust's Chief Operating Officer - may publish a supplementary policy guidance document or procedure in line with this policy, to ensure that any idiosyncrasies associated with that specific school are covered in their local policy library.
- 1.2. The purpose of this Write offs and Disposal Policy is to ensure that the Trust's balance sheet correctly reflects the assets and liabilities of Plymouth CAST Multi Academy Trust and ICT assets are disposed of in line with the ICO's guidelines. This Policy will be reviewed by the Trust's Audit & Risk Committee annually.
- 1.3. The policy defines the treatment and disposal of Fixed Assets and any write offs. All ICT assets costing more than £1000 are capitalised. A Fixed Assets Register is maintained by each school and reconciled to the financial statements. The Fixed Asset Register consists of a list of items (or specific groups of items purchased within the accounting period) valued over £1,000 that are considered to have a life longer than the financial year they were purchased in.

- 1.4. Assets excluded from the Fixed Asset Register are Current Assets which would be defined as ICT items with an individual or group purchase price lower than £1000. The term “Non-fixed Assets” will be used within this policy to identify “Current Assets”.

2. Context

- 2.1. Regardless of the netbook value of an asset, **no ICT asset should be disposed of** in any of our schools or settings, **without sign off from the Trust’s Data Protection Officer or their designated deputy.**
- 2.2. If a school or setting wants to dispose of an ICT asset, the ICT Asset Disposal procedure at **Appendix A and B** must be followed in full.
- 2.3. For Assets that were purchased under an operational lease, proof of settlement must be provided before disposal will be authorised by the Trust. This includes both **fixed assets** and **non-fixed assets**.
- 2.4. Depreciation of ICT assets is as follows;
 - 20% ICT – straight line method – 5 years
- 2.5. Any assets requiring disposal should be categorised as: Beyond Economical Repair (BER), deemed as Obsolete (O) or PAT Failed (PF).
- 2.6. Hard drives must be left in devices to ensure the disposal company can conduct their process in full.

3. Data Protection Act 2018 and the disposal of ICT Assets

- 3.1. **The UK General Data Protection Regulation (UK GDPR) came into effect on January 1, 2021, as part of the Data Protection Act 2018 (DPA 2018), incorporating most of the EU GDPR provisions while introducing UK-specific adaptations. The UK GDPR regulates how personal data is processed, ensuring individuals' rights over their data are protected while imposing strict obligations on organisations.** Under the regulations, any business (including Multi Academy Trusts) that falls victim to a data breach only has 72 hours to report it, and if they are found to be in breach of the GDPR guidelines, they could be fined 4% of the business’ annual turnover or €20 million (whichever is greater).
- 3.2. Clearly, it’s crucial that Plymouth CAST Multi Academy Trust is fully compliant with the GDPR and the way in which we handle and dispose of personal information. The Data Protection Act 1998 (the DPA) is based around eight principles of ‘good information handling’. These give people specific rights in relation to their personal information and place certain obligations on those organisations that are responsible for processing it. This

is relevant in the ICT asset disposal and recycling processes. For further reference please see the following linked document;

<https://ico.org.uk/media2/anifdsms/retention-and-disposal-policy.pdf>

3.3. The ICO states the following in relation to ICT assets and disposals.

You should:

- Ensure that the responsibility of asset disposal is assigned to a member of your staff with a suitable level of authority;
- Complete a full inventory of all equipment that you have marked for disposal;
- Be clear about what will happen with devices when you no longer need them;
- Consider the security vulnerabilities associated with each method of disposal;
- Ensure you delete personal data before recycling devices, so that data is not accessible to others after the device has left your ownership;
- Be aware that any specialist service provider you use will be considered to be a 'data processor' under the DPA; and
- Have a written contract in place between you and the data processor, ensuring that there is an appropriate level of security in place.

Appendix A: Asset Disposal Procedure

Roles

At School/Setting level, the Assets Processor (SBM) follows or delegates the internal disposal process, as set, or agreed by the Controller (Head Teacher/Nursery Manager).

At Trust level, the Chief Operating Officer is nominated as Processor and will ensure procedures are followed on behalf of the Trust's Controller, Mrs Zoe Batten (CEO).

XXXXXXX (Reg no:XXXXXX) has been selected as our chosen External Data Processor for ICT asset disposals with the Trust and XXXXX School.

Process

1. Asset Processor (SBM) ensures that the **Asset Disposal Form** – Parts **A** and **B** are completed in full and where proof of financial settlement is required, a copy is attached.
As asset processor, the SBM should only pass the Asset Disposal Form to the Headteacher for signature when they are fully satisfied that Part **A** and **B** is completed correctly and the disposal is justified.
2. Asset Controller (Headteacher), once satisfied that Part **A** and **B** is completed to fill in Part **C**.
3. Asset processor (SBM) submits the completed Asset Disposal Form via email to the Chief Operating Officer (rose.colpus-fricker@plymouthcast.com).
4. The Chief Operating Officer checks the form for accuracies and rationale and will then give authorisation to dispose of the equipment.

NB: Where Fixed assets are identified within the disposal list, the Chief Operating Officer will then, alongside the CFO seek approval from the Audit & Risk Committee at the earliest convenience. This would be processed by means of completing a form available from the central finance team.

5. Following approval from the Audit & Risk Committee, Chief Finance Officer writes to the Headteacher, copying in the Chief Operating Officer and SBM to inform them that the Assets can be disposed of.
6. For ICT disposals, the ICT engineer in the academy will then contact the disposals company to arrange a suitable collection date, ensuring the Assets are stored securely and are fully accountable at the time of collection.

Note: the collection company may wish to know the amount and type of equipment they are collecting. ICT engineers to receive a formal disposal letter on completion;

this should be provided to the schools SBM for Asset records. The ICT inventory should be updated.

7. The Headteacher to ensure the Local Governing Body are informed of all ICT disposals within the appropriate LGB Meetings



Our mission is to be a community of outstanding schools in which our pupils flourish in safe, happy and stimulating environments and leave us with the knowledge and skills, personal qualities and aspirations, to make the world a better place, inspired by the gospel.



Collaboration

We are one team, being the best we can be. We achieve more altogether - one Trust, one family of schools, one community.

We are united through our faith, families and staff.



Ambition

We want our children to be happy and to flourish, achieving well.

Across all areas, we work as one team to drive up standards. We are courageous in our decision making and aspirations.

Through the strength of our ambition, we create a distinct brand and culture.



Stewardship

Justice, forgiveness and integrity are central to the gospels and drive our decision-making. Underpinning this is a relentless approach to safety, reliability and consistency.

As key influencers of our children's impact on society and the environment, we encourage sustainable and brave decision-making, based on a beliefs-led approach.



Trust

We are authentic, transparent, open and honest.

Through compassion and kindness, we show humility to each other.