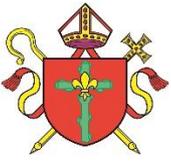


St Thérèse of Lisieux Catholic Multi Academy Trust

Records Management Policy

October 2019

Audience:	Central Team and all other CMAT employees
Approved:	Directors – 14/10/2019
Policy Owner:	Louise Wilson – Chief Executive Officer
Policy Model:	Compliance – all CMAT academies use this policy
Review:	3 Years
Version Number:	1.0 (October 2019)



Scope of this policy

The policy applies to St Thérèse of Lisieux Catholic Multi Academy Trust “The Trust” and each academy within the Trust.

Objective

This policy sets out the policy framework through which the Trust will manage its records in order to protect its legal rights and interests and to demonstrate compliance with regulatory bodies.

Ownership

This policy is owned by the Trust Board and will apply to all academies within the Trust.

Monitoring

Effectiveness of the policy will be monitored by the Governance Lead reporting to the Trust Board.

Relevant Legislation

This policy has due regard to legislation including, but not limited to, the following:

- General Data Protection Regulation (2016)
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)

This policy also has due regard to the following guidance:

- Information Records Management Society ‘Information Management Toolkit for Schools’ 2016

The regulatory framework includes:

- Academies Financial Handbook
- School Information Regulation

Related Policies and Procedures

Records Retention Schedule

Data Protection & Freedom of Information Policy

Business Continuity and Disaster Recovery Plan

Risk Management Framework



Policy Statement

The Trust is committed to maintaining the confidentiality of its information and ensuring that all records within our academies are only accessible by the appropriate individuals. In line with the requirements of the General Data Protection Regulation (GDPR), the Academies also have a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

The Trust has created this policy to outline how records are stored, accessed, monitored, retained and disposed of, in order to meet the school's statutory requirements.

The 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 Trust.

Definition of Records

Records are defined as all those documents which facilitate the business carried out by the Trust and which are 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.

Records include personal and sensitive data as defined by the GDPR.

Information Asset Register

An Information Asset Register will be drawn up and maintained as part of the Trust's GDPR policy and procedure. See separate policy.

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 Accounting Officer.

The Governance Lead (who is also the Data Protection Controller and Company Secretary for the Trust) is responsible for records management and will give guidance for good records management practice and will promote compliance with this policy in line with Information and Records Management Society (IRMS) guidelines so that information will be retrieved easily, appropriately and in a timely way.

A model Retention Schedule will be used across the Trust to ensure that records are retained as appropriate. The Governance Manager will monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately in line with the Retention Schedule.

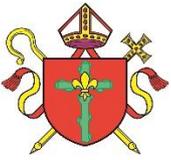
Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained, stored and disposed of in accordance with the records management guidelines.

Where records comprise personal or sensitive data then the collection, manipulation and storage of such data must be according to the Trust's Data Protection (GDPR) policy.

Records Retention

Records will be retained in line with the Records Retention Schedule. There may be exceptions when records are retained for longer periods. Where this is the case the Trust will record the reasons for doing so.

A small percentage of the records may be selected for permanent preservation as part of the institution's archives and for historical research. This should be done in liaison with the Trust and/or the relevant County Archives Service.



Transfer of Records

Primary Academies

The academy will not retain copies of information stored within a pupil's record, unless there is ongoing legal or safeguarding action at the time the pupil leaves the academy. The responsibility for these records will then transfer to the next school that the pupil attends. Transfer of the records will be by secure transfer – usually a Common Transfer File (CTF) or in exceptional circumstances paper records may be transferred by registered post.

Secondary academies

If any pupil attends the academy until statutory school leaving age, the school will keep the pupil's records until the pupil reaches at least the age of 25 years. If a pupil leaves before statutory school leaving age to attend another school then the pupil's record will be transferred to the next school. See the retention schedule for exceptions where longer retention is necessary.

The academy will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent to will be required to sign a copy of the list to indicate that they have received the files and return this to the academy.

Disposal of Records

The Trust will dispose of records according to the retention schedule. Disposal will be carried out securely and confidentially. Physical records which contain personal information, sensitive policy information or commercially sensitive information should be shredded using a cross-cutting shredder. Ideally they should be shredded on the premises. For large quantities of the above documents an external authorised specialist disposal company may be used. If the academy employs an external company to dispose of records, the company must supply a certificate of destruction to document that the records have been disposed of.

If the academy is unsure about which category records for disposal fall into then it is safer to adopt the secure and confidential disposal methods described above.

CDs / DVDs / Floppy Disks should be cut into pieces or alternatively can be put through the shredder. Most shredders have an attachment which will allow for the disposal of CDs and DVDs.

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