

## RECORDS MANAGEMENT POLICY AND PROCEDURE

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## 1. Introduction

SHARE Multi-Academy Trust is committed to maintaining the confidentiality of its information and ensuring that all records within the trust and its academies are only accessible to the appropriate individuals. The trust also has 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.

This document complies with the requirements set out in the UK GDPR and Data Protection Act 2018.

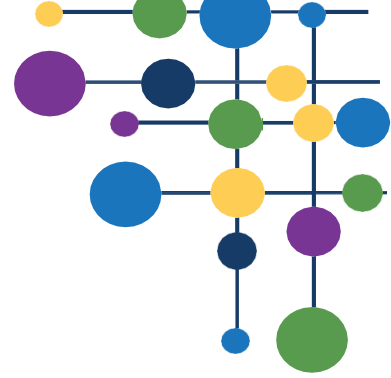
## 2. Procedures

In accordance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 data controllers should not retain personal data for any longer than necessary. In addition, under the Freedom of Information Act 2000 public bodies are required to maintain a data retention schedule.

All records of SHARE MAT, as the data controller, are subject to the retention requirements in this policy. Academies and staff, as data processors, are also subject to the retention requirements in this policy. Examples of documents collecting personal data within SHARE MAT include, but is not limited to:

- Emails
- Hard [paper] copy documents
- Electronic documentation
- MIS systems
- Video and Audio recordings
- Photographic or video data
- Data generated by physical access control systems
- Biometric data
- CCTV systems





The creation and maintenance of records is essential to SHARE MAT for:

- Managing the relationship between all stakeholders including students, and staff
- Providing support and other services and facilities to students and staff
- Controlling academic progress and measuring achievement
- Providing support to students after they leave our academies
- Complying with statutory duties.

In addition to complying with legislative requirements there are additional benefits to SHARE MAT of effective records management, these are:

- Protecting our critical records and improving organisational resilience
- Ensuring information can be found and retrieved quickly and efficiently
- Complying with legal and regulatory requirements
- Reducing the risk of data breach or litigation
- Minimising storage requirements therefore reducing costs.

This Records Management Policy & Procedure sets out the limits that apply to the various types of personal data held by SHARE MAT, to establish the criteria by which those limits are set, and to outline how personal data should be disposed of.

### **3. Responsibilities**

The trust central team and each academy will adhere to this Records Management Policy & Procedure.

The trust will publish and maintain a Data Retention Schedule in accordance with this policy and in line with the Information and Records Management Society (IRMS).

Within the management and governance of SHARE MAT the following roles are responsible for the retention, storage, and collection of data:

- The Governance Professional & DPO is responsible for the retention of all statutory and regulatory records.
- The Finance Director is responsible for the retention of financial and related records.
- The Executive Principals are responsible for ensuring that retained records are included in business continuity and disaster recovery plans.
- The Admin Manager in each academy, along with the Data Protection Officer, is responsible for monitoring storage, retention, and disposal of data in accordance with this policy.

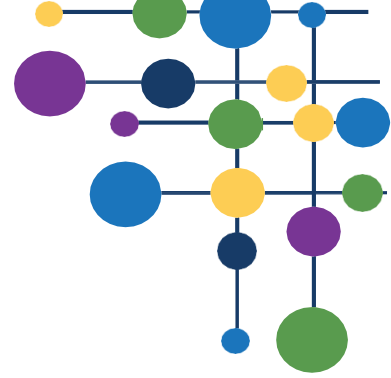
All other members of staff are expected to manage their current record keeping systems using the SHARE MAT Data Retention Schedule laid out by this policy and to take account of differing retention periods when creating new record keeping systems.

All staff of SHARE MAT should liaise with the Admin Manager in their academy or the DPO when disposing of data to ensure that accurate records are kept, and disposal is carried out in an appropriate manner.

### **4. Policy document**

New colleges and/or schools joining SHARE MAT may continue to use their existing Records Management Policy and Data Retention Schedule for a maximum of 12 months after their official joining date before transferring to the SHARE MAT Records Management Policy & Procedure and





the SHARE MAT Data Retention Schedule.

### Reference Toolkits

- UK General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- National Archives
- Freedom of information Act 2000
- IRMS – Academies Toolkit
- Department for Education - Data Protection Toolkit

## 5. Data Retention

### Retention General Principle

For any category of documents not specifically defined elsewhere in this policy or the SHARE MAT Data Retention Schedule and unless otherwise mandated differently by applicable law, the required retention period for such documents will be deemed to be 3 years from last use. However, the trust is required to keep some records for much longer than 3 years, for example, some pupil records need to be kept until the young person reaches their 25<sup>th</sup> birthday. The details can be found in the SHARE MAT Data Retention Schedule

Where teaching and learning materials contain no personal data, these teaching materials will have no retention period applied, unless mandated differently.

### Data Retention Schedules

The Data Protection Officer in conjunction with the trust's ICT Manager, Admin Managers and other managers of SHARE MAT, will define the time period for which SHARE MAT documents and electronic records should be retained. Full details are made available to staff through this policy and the SHARE MAT Data Retention Schedule.

As an exemption, retention periods within the SHARE MAT Data Retention Schedule can be prolonged in cases such as legal investigations, court proceedings, safeguarding or medical investigations.

### Protection of Data During Retention

SHARE MAT and academies will take reasonable measures to ensure retained data is stored in a way that safeguards against loss as a result of environmental factors and technological changes.

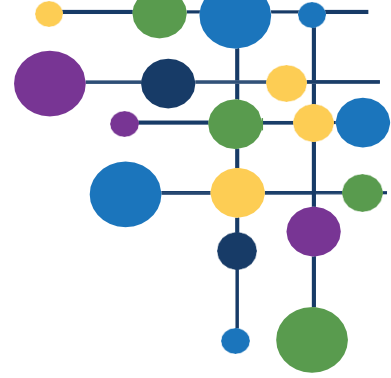
### Destruction of Data

SHARE MAT academies and all staff should review the data they hold on a regular basis whether the data is held electronically, stored on the network, or filed in paper format. The purpose of the review will be to decide whether to destroy or delete any data once the purpose for which the documents were created is no longer relevant and in accordance with the SHARE MAT Data Retention Schedule. Staff should then coordinate with the DPO or Admin Manager in their academy on the safe destruction and recording destruction of the data. The trust ICT Manager will provide support and guidance when reviewing the retention of electronic documents.

Once a decision is made to dispose of personal data according to the SHARE MAT Data Retention Schedule, the data should be deleted, shredded, or otherwise destroyed to a degree equivalent to their value to others, the risk to SHARE MAT and the level of confidentiality. The method of disposal will be dependent upon the nature of the document, and this is summarised in the SHARE MAT Data Retention Schedule.

The Admin Manager in each academy shall document and approve the destruction process and





record and store data destruction records in the designated file for the Data Protection Officer to monitor.

The applicable statutory requirements for the destruction of information shall be fully observed at all times.

### Breach, Enforcement and Compliance

The Data Protection Officer in conjunction with the support of Admin Managers in each academy has the responsibility to ensure all academies and staff comply with this policy. It is also the responsibility of the Data Protection Officer to assist with enquiries from the Information Commissioners Office (ICO) in matters regarding data protection and data retention.

Any suspicious breach of this policy must be reported immediately to the Data Protection Officer via email [jayne.newson@sharemat.co.uk](mailto:jayne.newson@sharemat.co.uk). All instances of suspected breaches of this policy will be investigated and appropriate action taken.

## 6. Document Disposal

### Routine Disposal Schedule

Records may be routinely destroyed when personal data is not a factor, or unless required to be retained as part of a larger record set, archive, or subject to an ongoing subject access request, legal, safeguarding, medial or regulatory inquiry. Examples of these records are:

- Announcements and notices of day-to-day meetings and other events including acceptances and apologies
- In-house publications which are obsolete or superseded
- Manual hand-written notes when relevant electronic documents are created
- Message slips
- Duplicate documents such as CC and FYI copies, unaltered drafts, snapshot printouts or extracts from databases and files. Staff are advised to check with relevant managers before disposal.

## 7. Archive

SHARE MAT maintains archives centrally and in each of its academies. The lawful basis for processing and retaining data is archiving in the public interest. Archives include, but are not limited to:

- Photographs and video of past events
- Press releases
- Prospectus
- Exam Results.

The archives are maintained as a resource to help inspire and equip current staff and students to understand and appreciate issues of identity, belonging and shared heritage; to prompt memories among many generations of past students and staff; and to serve as a research resource for all interested in the history of SHARE MAT and its academies and the communities they serve.

## 8. Training

We will ensure that staff are appropriately trained or experienced and that they understand the need for effective record keeping and their record management responsibilities as set out in this



policy. In addition, our staff undertake annual GDPR training and we ensure that users are appropriately trained to use any new technology or ICT systems and can manage records within them effectively.

## 9. **Linked policies**

Whilst this list is not exhaustive, the policies below are linked to this policy and the SHARE MAT Data Retention Schedule:

- SHARE MAT GDPR Policy & Procedure & Privacy Notices
- SHARE MAT CCTV Policy & Procedure
- SHARE MAT First Aid Policy & Procedure
- SHARE MAT Complaints Policy & Procedure

