ZENITH
MULTI ACADEMY
TRUST

Records Management Policy

for use by all staff and volunteers in:
All schools in the Trust (including Castledon's Satellite)
Zenith Minds
Local Governing Bodies/Local Advisory Groups
Trust Board
Members

Approved by:	Finance, Audit, and Risk Committee
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This policy is based on a model from IGS (Essex County Council)

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1. Introduction

It is important that school information is managed in compliance with the law and in line with best practice; ensuring the efficient use of resources and lawful data sharing to support efficient business processes and maintain effective service delivery.

This policy sets out the rules all staff, governors, contractors and volunteers must follow to support secure access and effective retention, destruction, and preservation processes

2. Policy rules

1. You must **document** your work activities in line with procedures
2. You must store all work information in the format and **medium** best suited to its use in line with procedures
3. You must ensure that the information you manage is only known to an **appropriate audience**
4. All information in any format which we hold as a record of our activity must be **retained** after 'closure' in line with Retention Guidelines
5. Owners must regularly **review** information in line with Retention Guidelines to make best use of the available storage space
6. We must **monitor** the success of the review process to maintain compliance with the law
7. You must manage pupil records in line with the Retention Guidelines and specific system **guidance**
8. Schools must ensure that **emails** are stored for no longer than 3 years from date received/sent.
9. We must ensure that the **facilities** available for storing and managing information meet legal requirements and best practice
10. We must maintain a **selection procedure** for identifying, reviewing and managing records with **historical value**
11. You must not store business information on a **personal drive** or on equipment not provided by the school
12. All Information **Assets** identified on the Register must be associated with a retention period from the Retention Guidelines.
13. The Retention Guidelines must be reviewed for **changes** in legislation and the school's business needs.
14. When archiving paper records, information on ownership, retention and indexing quality must be recorded.
15. Do not use the archive storage services of any commercial company other than the **approved supplier**
16. Personal information processes must be recorded in your **Records of Processing Activity** (ROPA)

3. How must I comply with these policy rules?

We have related policies, procedures and guidance which tell you how to comply with these rules. These include:

- Data Protection Policy
- Statutory Requests Policy
- Data Handling Security Policy
- Data Breach Policy
- Biometrics Policy
- Data Protection Rights Procedure
- Publishing for Transparency Procedure

- Consent Procedure
- Minimisation of Personal Data Procedure
- Data Breach Procedure
- Data Sharing Procedure
- Subject Access Request Procedure
- Surveillance Procedure
- Retention Schedule
- Statutory Requests for Information Guidance
- Overseas Transfers & Hosting Guidance

If you are unsure how to comply you must seek advice and guidance from your Data Protection Lead.

4. What if I need to do something against the policy

If you believe you have a valid business reason for an exception to these policy points, having read and understood the reasons why they are in place, please raise a formal request by contacting the **Data Protection Lead** for your school, see table below.

If you believe the policy does not meet your business needs, you may raise this with your Data Protection Lead who, if they agree with your suggestion, may propose a policy change.

School	Senior Information Risk Officer	Data protection leads
The King John School	D. Steel	D. Deane
The James Hornsby School	T. Nicholls	R. Kemp
Castle View School	S. Durkin	C. Semple
Laindon Park Primary School & Nursery	C. Portoles	L. Chamberlain
Castledon School	S. Holliday	C. Maronie
Zenith Multi Academy Trust	A. Hodgkinson	S. Goodwin

5. References

- Data Protection Act 2018 / UK GDPR
- Article 8, The Human Rights Act 1998
- Freedom of Information Act 2000
- Code of Practice on Records Management (Under Section 46 of the FOI)

6. Breach Statement

Breaches of this will be investigated and may result in disciplinary action (see discipline policy). Serious breaches of policy may be considered gross misconduct and result in dismissal without notice, or legal action being taken against you.