



# FRAYS

*Academy Trust*

## **Frays Academy Trust Records Management Policy**

**Date Ratified: May 2024**

**Review Date: May 2026**

## Version History

Version	Date	Status and Purpose	Document Author	Changes Overview
1	May 2021	New Policy	Business Support Co-ordinator	New policy based on guidance from the Institute of Records Management (IRMS) and DfE. To support the Trust in meeting its duties under the Data Protection Act and Freedom of Information Act.
2	April 2022	Policy review	Business Support Co-ordinator	Policy reviewed. No major changes.
3	May 2024	Policy review	Operations Manager	Policy reviewed and updated in line with changes to cyber and IT policies and best practice from our Data Protection provider (SchoolPro).

## Approval

<b>Signed by Chair of Directors</b>	
<b>Date of Approval/Adoption</b>	May 2024
<b>Date of Review</b>	May 2026

## Notes on Document

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Once issued, as a minimum this document shall be reviewed every two years or as necessary by the Trust.

To enable continuous improvement, all readers are encouraged to notify the author of errors, omissions and any other form of feedback.

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## **1 Introduction**

Frays Academy Trust recognises that by efficiently managing our records, we will be able to comply with our legal and regulatory obligations and to contribute to the effective overall management of the Trust.

Records provide evidence for protecting the legal rights and interests of the Trust and provide evidence for demonstrating performance and accountability.

This document provides the policy framework through which effective management of records can be achieved and audited.

## **2 Scope**

This policy applies to all records created, received or maintained by all staff in the course of carrying out our functions, as well as records created by any agents, contractors, consultants or third parties acting on behalf of the Trust.

Records are defined as all those documents which facilitate the business carried out by the Trust which are thereafter 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 electronic format such as paper documents, scanned documents, emails which document business activities and decisions, audio and video recording, text messages, notes of telephone and teleconferencing conversations, spreadsheets, Word documents, presentations etc. This list is not exhaustive.

A small percentage of our records may be selected for permanent preservation as part of our archives. This should be done in liaison with the Frays Central Team.

Please see the Information Security Policy for guidance for all users who deal with information and information systems in order to protect our information assets to a consistently high standard.

## **3 Responsibilities**

Frays Academy Trust has a corporate responsibility to maintain the records and record keeping systems in accordance with the regulatory environment specific to multi-academy trusts. Day-to-day responsibility is delegated to the Headteacher of each of our schools. Advice can also be sought from our Data Protection Officer.

### **3.1 Information Asset Owners (IAOs)**

IAOs ensure that all information under their control follow retention schedule rules. They have ownership of the assets and are therefore responsible for ensuring adherence to the Record Management Schedule. IAOs are responsible for authorising the destruction of information when required. They must be consulted in relation to any decisions on retention or disposal, but other staff will be involved in the day to day creation and management of data/records. For example, for school finance, day to day management will be the responsibility of the bursar/school finance officer.

Each school will manage and document its records disposal process in line with the Trust's Records Management Schedule (see separate document). This will help to ensure that schools can meet Freedom of Information requests and respond to requests to access personal data under data protection legislation (subject access requests, known as SARS).

The Frays Central Team will similarly manage and document the disposal process for Trust records.

### **3.2 All staff**

All staff must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the Records Management Schedule. We follow the Information

and Records Management Society (IRMS) record retention schedule found in the [Records Management Toolkit for Academies](#).

#### **4 Advice and Guidance to Schools**

The Data Protection Officer and/or Frays Central Team will give guidance on good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. The DPO and/or Frays Central Team will also monitor compliance as part of a regular audit process.

#### **5 Records Management Schedule**

The Records Management Schedule is designed to enable all staff to carry out an efficient annual review and safe destruction of school records and information as well as a point of reference when dealing with specific information or data.

Where there is legislation or regulation behind a requirement this is detailed in the schedule. The Schedule also outlines the Information Asset Owner.

#### **6 Safe Destruction and Disposal of Records**

##### **6.1 Disposal of records that have reached the end of the minimum retention period allocated**

In each school, the Headteacher (or their nominee) must ensure that records that are no longer required for business use are reviewed as soon as possible, so that only the appropriate records are destroyed.

Each school will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format, or retained by the school for research or litigation purposes in consultation with the Frays Central Team. Whatever decisions are made they need to be documented as part of the records management process within the school. Templates are available for this purpose.

The Frays Central Team will similarly manage and records disposal process, overseen by the Chief Operating Officer.

##### **6.2 Safe destruction of records**

All records containing personal information, or sensitive policy information should be made either unreadable or unreconstructable.

- Paper records should be shredded using a cross-cutting shredder
- CDs/DVDs/Floppy Disks should be cut into pieces
- Audio/Video Tapes and Fax Rolls should be dismantled and shredded
- Disposal of IT equipment is outlined in the Information Security Policy.

Any other records should be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways. Do not put records in with the regular waste or a skip unless there is no other alternative. There are companies who can provide confidential waste bins and other services which can be purchased to ensure that records are disposed of in an appropriate way.

Where an external provider is used it is recommended that all records must be shredded on-site in the presence of an employee. The organisation must also be able to prove that the records have been destroyed by the company who should provide a Certificate of Destruction. Staff working for the external provider should have been trained in the handling of confidential documents. A processing agreement should be in place with the provider and advice on this can be sought from the Data Protection Officer.

The shredding needs to be planned with specific dates and all records should be identified as to the date of destruction.

It is important to understand that if the records are recorded as to be destroyed but have not yet been destroyed and a request for the records has been received they **MUST** still be provided.

Where records are destroyed internally, the process must ensure that all records are authorised to be destroyed by the Headteacher (or another school leader nominated by the Headteacher) and the destruction recorded. Records should be shredded as soon as the record has been documented as being destroyed.

### **6.3 Freedom of Information Act 2000**

The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed and who authorised their destruction.

Members of staff should record at least:

- File reference (or other unique identifier)
- File title (or brief description)
- Number of files and date range
- The name of the authorising officer
- Date action taken

Following this guidance will ensure that the school is compliant with the data protection regulations and the Freedom of Information Act 2000.

## **7 Related policies**

- Data Classification Policy
- Information Security Policy
- Freedom of Information Policy
- Data Protection Policy
- Records Management Policy
- Records Management Schedule