

Records Management Policy

Approval Arrangements

All statutory policies in the Trust are ultimately the responsibility of the Trust Board. To enable it to discharge this responsibility appropriately and in collaboration with the constituent schools, the Trust Board will either:

1. set a full Trust wide policy which applies in the same way to all schools,
2. require individual schools to set a policy (in most cases with Trust-provided guidance) appropriate to the needs and circumstances of an individual school

Approval Body:	CEO
Date approved:	15 September 2025
Author :	Data Protection Officer
Review period:	Every 3 years
Date of next review:	July 2028
Version:	2.1

This is a Level 1 Policy against the Trust Governance Plan.

This policy was adopted for implementation in Tenax Schools Trust on the date above and supersedes any previous policy on records management.

Aims

The vision of the Tenax Schools Trust is to achieve excellence by working together so that all may feel loved and empowered to serve a thriving society. We are committed to education providing life changing transformative opportunities

The Tenax Schools Trust and its schools recognise that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. This document provides the policy framework through which this effective management can be achieved and audited. It covers scope, responsibilities and relationships with existing policies.

This policy applies to all staff, visitors, and volunteers and other individuals who work for, or provide services on behalf of the Trust (collectively referred to as “staff” in this policy).

This policy follows the Department for Education’s guidance for data protection in schools (last updated 20 March 2025 to include guidance on record keeping and management).

1. Scope of the policy

- 1.1 This policy applies to all records created, received or maintained by staff of the school or Trust in the course of carrying out its functions.
- 1.2 Records are defined as all those documents which facilitate the business carried out by the school or Trust and 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 electronically.
- 1.3 A small percentage of the school’s or Trust’s records may be selected for permanent preservation as part of the institution’s archives and for historical research.

2. Responsibilities

- 2.1 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 implementing this policy across the Trust is the Data Protection Officer, and the Headteacher within the school.
- 2.3 Staff must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the records management guidelines.

3 Relationship with existing policies

This policy has been drawn up within the context of the Trust’s Freedom of Information publication scheme and Data Protection policy.

4 Data Retention Policy

The Data Protection Act 2018 and UK GDPR says you should only keep data for as long as you need it. Staff should check each year what data is held and if it is still needed to be kept.

If staff identify any information that is no longer needed, it should be disposed of safely.

The Trust maintains a separate schedule for record retention periods (available from the school office or Data Protection Officer).

Disposal of Records

It is important that the Trust and its schools dispose of records in a way that minimises the possibility of a data security breach. For example, all records containing personal information, or sensitive information should be made either unreadable or disposed of in a way that they could not be reconstructed (i.e. it should not be possible to reconstruct shreds to make the document).

Appropriate disposal methods

Physical records which contain personal information, sensitive information or commercially sensitive information should be shredded using a cross-cutting shredder. Ideally, they should be shredded on the premises.

Certificate of Destruction

If the school employs an external company to dispose of records, the company must supply the school with a certificate or agreement of destruction to document that the records are disposed of appropriately.