

# **Records Management and Retention Policy**

## Scope

The policy set out in this document applies to all United Church Schools Trust (UCST) and United Learning Trust (ULT) schools and offices. The two companies (UCST and ULT) and its subsidiaries are referred to in this policy by their trading name, 'United Learning'.

Where this policy refers to 'School' or 'Head Teacher', within Central Office this should be interpreted to refer to the department where a member of staff works and their Head of Department.

#### Introduction

The United Learning recognises 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.

This policy applies to all records created, received or maintained by staff of United Learning in the course of carrying out its functions.

Records are defined as all those documents which facilitate the business carried out by United Learning 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.

A small percentage of United Learning's records will be selected for permanent preservation as part of the institution's archives and for historical research.

### Responsibilities

United Learning and its schools have a corporate responsibility to maintain records and record keeping systems in accordance with the regulatory environment and in particular Article 5 of the General Data Protection Regulation, which states that personal data shall be kept for no longer than necessary for the purposes for which it was processed. Each school and central office department will put in place processes to:

- 1. ensure that records are kept for the time periods specified in the United Learning Records Retention Schedule
- 2. ensure data is stored appropriately and in line with United Learning's record management guidance.
- 3. either anonymise or securely destroy records (as appropriate) at the end of the specified time period

The school's Data Protection Lead will give guidance to staff for good records management practice and will promote compliance with this policy. If any records are created which are not covered by the records retention schedule the school will notify the Company Secretary, <a href="mailto:company.secretary@unitedlearning.org.uk">company.secretary@unitedlearning.org.uk</a> so that the schedule can be updated.

Individual staff and employees must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with the school's records management procedures.

## Relationship with existing policies

This policy should be read in conjunction with the

- Group Data Protection policy
- · Records of Processing Activities procedure
- Records retention schedule
- Guidance on managing data retention Placing Office 365 Account data on 'Litigation Hold'

| Version number:      | 3          |  | Target Audience:                           | All staff                     |
|----------------------|------------|--|--|-------------------------------|
| UCST/ULT/Both:       | Both       |  | Reason for version change:                 | GDPR                          |
| Date Authorised:     | March 2018 |  | Name of owner/author:                      | Alison Hussain                |
| Authorised by:       | FIC        |  | Name of individual/department responsible: | Group Data Protection Officer |
| Date reviewed:       | March 2025 |  |  |                               |
| Reviewed by:         | FIC        |  |  |                               |
| Date of next review: | March 2026 |  |  |                               |

