

Records Management and Retention Policy

1. Introduction

NFTS is dependent on its records to operate efficiently and account for its actions. This policy defines a structure for the School to ensure adequate records are maintained, managed and controlled effectively.

NFTS will manage the creation, capture, filing, retrieval and disposal of all academic and non-academic records of the School with the development and implementation of a records management programme.

A record is any recorded information in all formats and media that the School creates, captures, collects, receives or uses to initiate, conduct or complete a School activity including any correspondence, map, drawing, photograph, sound recording, electronic mail and attachments or any other machine readable document that provide evidence of its transactions and activities.

All records whether paper or electronic created by NFTS are records of the School. None may be destroyed except in accordance with the NFTS Retention and Disposal Policy and its associated schedules.

2. Policy

This Policy will enable good records management practice to ensure that the School:

- (a) creates and captures authentic and reliable records in all formats, to demonstrate evidence, accountability and information about its decisions and activities,
- (b) maintains securely and preserves access to those records as long as they are required to support School operations,
- (c) confidentially destroys those records as soon as they are no longer required,
- (d) meets legal record-keeping requirements, including under the General Data Protection Regulation, the Freedom of Information Act 2000 and Environment Information Regulations,
- (e) identifies and preserves in those records deemed worthy of permanent preservation, and

- (f) protects vital records, which the School needs in order to function effectively.

The Policy applies to all records both paper and electronic created, received and maintained by all staff.

3. Implementation

The Policy is realised by the development of the following:

- (a) retention schedules to regulate how long records, including student and staff records are retained by the School,
- (b) waste disposal guidelines for destroying records so they are disposed of in a consistent manner across the School, by confidential shredding or other appropriate means of disposal, and with appropriate documented authorisation.

4. Responsibilities

The Director has overall responsibility for ensuring that records are managed responsibly within the School, but implementation and monitoring of the policy will rest with the Registrar.

Heads of Department and members of the Management team are responsible for ensuring compliance with this Policy and for promoting good records management practice within their individual areas. They will:

- (a) ensure records are held on the most appropriate medium for the task they perform,
- (b) identify those records that are vital to the operation of the School, and ensure they are preserved appropriately,
- (c) review records that have reached their retention period,
- (d) ensure appropriate disposal takes place with appropriate documentation of those records that have reached the end of their retention period.

It is the responsibility of all staff to ensure they keep appropriate records of their work for the School and manage those records in keeping with this policy and any guidance subsequently produced by the Registrar. In particular, all employees will be responsible for:

- (a) familiarising themselves with this Policy and records management procedures,
- (b) creating and maintaining records in relation to their work that are complete, authentic and reliable,

- (c) classifying those records to ensure that meaningful titles and consistent reference codes are adopted,
- (d) maintaining those records securely for as long as they are required in accordance with the retention schedule, and
- (e) ensuring that documents containing personal data or confidential information about the School are securely destroyed when no longer required or lawfully retained.

5. Retention and Disposal Schedules

Retention and Disposal Schedules are systematic listings of records created by the School that specifies how long records should be retained (the retention period) before they can be destroyed. The retention period depends on legal, financial or administrative reasons, which is why there are short and longer periods.

Information held in electronic format must be treated in the same manner as paper records.

6. Legislation

6.1 General Data Protection Regulations (GDPR)

The General Data Protection Regulations came into force on 25 May 2018 and replaces the Data Protection Act 1998. The GDPR apply to the processing of personal data wholly or partly by automated means, or as part of a filing system. The GDPR contain various principles relating to the processing of such data, including that it is processed lawfully, fairly, and, in a transparent manner. It also requires that personal data shall be kept for no longer than is necessary for the purposes for which the data are processed (Article 5).

In practice, this means that the School will:

- (a) review the length of time it keeps personal data;
- (b) consider the purpose or purposes it holds the information for in deciding whether (and for how long) to retain it;
- (c) securely delete information that is no longer needed for this purpose or these purposes; and
- (d) update, archive or securely delete information if it goes out of date.

There are various legal requirements and professional guidelines about keeping certain kinds of records – such as information needed for income tax and audit purposes, or information on aspects of health and safety. The timeframe for how long certain types of personal data should be kept may also be governed by specific business-sector requirements and agreed practices.

If records are retained without good or lawful reason, this is likely to be construed as a breach of the Regulations.

For further guidance please refer to the School's [Data Protection Policy](#).

6.2 Freedom of Information Act (FOI) 2000

The School is subject to the FOI Act which is to promote openness and accountability across the public sector. This Act allows access to all School information unless an exemption applies. Exemptions relate to national security, some commercial interests for example. Any information held by the School may be disclosable if requested. Information which is superseded, out of date or no longer required for operational or legal reasons must be destroyed in line with the agreed retention schedules.

7. Access to records and security

Access to retained records should only be given to members of staff who require access in relation to their duties. Information should not be disclosed to any individuals outside the School without authorisation from a member of the School's Management Team.

All members of School staff are responsible for ensuring that records are kept securely. Examples of appropriate security measures may include using passwords to restrict access to records held on computer, and locking filing cabinets. Records should also be kept in a clean and tidy environment, in order to prevent damage to the record.

8. Disposal of records

Disposal of paper records should follow the [Waste Disposal Guidelines – Confidential Waste and General Paper Recycling](#)

9. Related policies

- [Data Protection Policy](#)
- [Data Access Request Procedure](#)

This policy was approved in May 2018