



Records Management and Data Quality Policy

V3.2

<p>Important: This document can only be considered valid when viewed on the Trust website. If this document has been printed or saved to another location, you must check that the version number on your copy matches that of the document online.</p> <p>Name and Title of Author:</p>	<p>Francesca Roper, Director of Trust Development and Compliance.</p>
<p>Name of Responsible Committee/Individual:</p>	<p>Audit & Risk Committee</p>
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<p>Target Audience:</p>	<p>All staff, students, parents, volunteers,</p>
<p>Related Documents:</p>	<p>Data Protection Policy ICT Acceptable Usage Policy Freedom of Information Policy Surveillance Camera Policy</p>

Contents

Section	Page
Policy Statement	2
1. Purpose and Scope	2
2. Roles and Responsibilities	3
3. Equality and Diversity	3
4. Definitions	3
5. Policy Statement	4
6. Trust School Requirements	6
7. Links to other policies and strategies	5
8. Managing Records	5
9. Data Inventory	6
10. Data Quality	6
11. Training	7
12. Outcomes and Impacts	7
13. Policy Implementation	7
14. Evaluation	7
15. References	7
Appendix 1	8

POLICY STATEMENT

We are here to make great schools and happier, stronger communities so that people have better lives. We do this by:

- Always doing what is right
- Trusting in each other and standing shoulder to shoulder
- Doing what we know makes the difference

Doing what is right means always acting with integrity, in the interests of others and being honest, open and transparent.

1. PURPOSE AND SCOPE

Records management is vital to the delivery of The Education Alliances' services. Effective records management helps ensure that we have the right information at the right time to make the right decisions.

Data quality is crucial to this and the availability of complete, accurate and timely data is vital to deliver services, evidence service improvements and provide good/effective governance.

To effectively meet the requirements of the **UK** General Data Protection Regulation, the Data Protection Act 2018 and Freedom of Information.

2. ROLES AND RESPONSIBILITIES

The Audit & Risk Committee is responsible for approving this policy and the Education Alliance is the data controller as defined by data protection legislation.

The **CEO and Executive Principal** are responsible for ensuring that staff and others adhere to this policy and that all staff are aware of the Expectations and Code of Practice.

The **Trust Executive Team** are responsible for ensuring the records management function is adequately resourced and supported.

Local Governing Bodies should ensure this policy is applied fairly and consistently within their schools, monitoring the effectiveness of this policy.

School **Senior leadership teams** holds responsibility for ensuring compliance with this policy in each school.

To ensure compliance, the Trust are responsible for ensuring that the school sites they have responsibility for have processes and procedures in places which comply with this policy.

3. EQUALITY AND DIVERSITY

The Trust is committed to:

- Promoting equality and diversity in its policies, procedures and guidelines, adhering to the Equality Act 2010.
- Delivering high quality teaching and services that meet the diverse needs of its student population and its workforce, ensuring that no individual or group is disadvantaged.
- If any aspect of this policy or procedure causes an employee difficulty on account of any disability they may have, or if the employee needs assistance because English is not their first language, the employee should raise this issue with the HR Department at the earliest opportunity and appropriate arrangements will be made.

4 Definitions for the Purposes of this Policy

For the purposes of this policy, the following definitions are in relation to records management.

Records Management - the supervision and administration of digital or paper records, regardless of format. Records management activities include the creation (including data quality), receipt, maintenance, use and disposal of records.

Record - information created, received and maintained as evidence and information by an organisation or person in pursuance of legal obligations or in the transaction of business. This includes records in all physical and electronic formats, including, but not restricted to:

- CDs, DVDs, Blu-Ray
- Databases and spreadsheets
- Electronic documents
- Messages including via text and WhatsApp
- E-mails
- Paper files/documents
- Microform, including microfiches & microfilm
- Published web content (Intranet/Internet/Extranet), including records created in social media used for business purposes
- Records stored on removable media, such memory sticks
- Visual images, such as photographs and videos
- Audio, such as voicemail

5 Policy Statement

The Education Alliance Multi Academy Trust is committed to creating, keeping and managing records which document its principal activities. Increasing reliance is placed on information and the need for reliable data has become more critical. Good quality data is essential for supporting decision making and The Education Alliance needs arrangements in place to ensure the quality of its data. These records are the Trust’s corporate memory.

To maximise our potential, records will be accurate and of a high quality, in order for staff to be able to trust the records they use. Records will be retained for as long as they are required for legislative, business, accountability, or cultural purposes. They will be stored in a manner and location that enables the Trust to have an appropriate level of control over their management and be disposed of appropriately. Where The Education Alliance’s records are shared, it will be done in a lawful and secure manner.

The Trust will follow agreed practice and comply with all legislative requirements with regard to the creation, storage and management of its records.

6 Trust School Requirements

Records and information are vital to the effective operation of the Trust. Records are the basis on which decisions are made, services provided and policies developed. Effective records management supports the Trust’s work in all areas of Trust business and supports the Trust’s priorities.

To ensure compliance, the Director of Trust Development and Compliance is designated as taking responsibility that the Trust, and staff, are responsible for and have effective management of records and data quality and adherence to this policy. The Director of Trust Development and Compliance will ensure that access to their information assets is appropriate and up to date, taking in to account the Data Protection Policy and the need to protect personal data.

The Executive Team will oversee the work of the Director of Trust Development and Compliance ensuring compliance with this policy and will also ensure that all information asset registers are completed to demonstrate compliance with data protection legislation, specifically the required records of processing activity and the Trust's Data Protection Policy.

The Director of Trust Development and Compliance should actively monitor compliance with this Policy. Ensuring that records are created and filed in line with the agreed filing convention and appropriate classification. Retention and disposal schedules, including schedules of documents for transfer to Archives, are kept up to date and all disposal decisions are properly recorded with a formal record of transfer maintained in accordance with the agreed procedure.

Managers should ensure that processes are in place to support employees in respect of creating and maintaining records. Consideration must be given to this policy, as well as to how records required for permanent preservation are transferred to Archives.

Employees are responsible for creating and maintaining records in relation to their work. All reasonable efforts must be made to ensure the quality of data, as all employees are responsible for the data they record. Employees must never knowingly record data which is inaccurate or incomplete. Records should be created and filed in line with agreed processes (including classifications, agreed file naming conventions and appropriate designation in the header and footer).

7 Links to other Policies and Strategies

This policy links to the other Trust documents:

- Data Protection Policy
- ICT Acceptable Usage Policy
- Freedom of Information Policy
- Surveillance Camera Policy
- TEAL Retention Guidelines

8 Managing Records

Records management is a core function. The Education Alliance ensures that it creates the records it will need for its business. All records are recorded and presented in line with all relevant legal provisions, regulations and central standards.

The Trust has timely access to all relevant information and records are kept only as long as is necessary to comply with legal, administrative and financial requirements.

All records are properly titled, referenced and indexed; all records are stored in accordance with the relevant storage system.

All records are authentic and reliable version controls are in place to ensure that changes are recognised and taken into account during any decision making process.

Data quality forms a fundamental part of any record. Robust processes should be in place to evidence how the Trust meets common data quality standards (Section 10).

All disposal decisions are fully recorded and authorisation for disposal evidenced in line with agreed delegations.

Records required for permanent retention for evidential and historical purposes are transferred to Archives, and the transfer decision and custody recorded.

9 Data Inventory

The Director of Trust Development and Compliance keeps an information asset register of their information assets which is used as part of the risk-assessment process.

Information asset registers are kept up to date and reflect changes including office moves, restructures, staffing changes and the procurement of new systems, and are reviewed at least annually.

Individual pieces of information should be grouped into manageable portions. There is no need to assess every individual file and database entry; by grouping a set of information at an appropriate level you identify an information asset.

The information asset register holds retention schedule information that sets out periods for which records should be retained, appropriate disposal actions and which records will be selected for permanent preservation.

Information asset registers are made available to all staff. The retention schedules are published on the internet to ensure the Trust is transparent in its use of information.

10 Data Quality

Data quality is a fundamental part of the Trust's approach to records management. Data will be regarded as high quality if it meets the following common data quality standards:

- Accurate (reflects what is being described/captured/copied)
- Valid (conforms to recognised standards, data reflects stable and consistent collection and the source is known)
- Timely (available when needed and within a reasonable time period)
- Relevant (only relevant data of value is collected, analysed and used)
- Complete (all relevant data is recorded)

Appendix 1 outlines in more detail the common data quality standards expected to ensure high quality data is recorded/used.

11 Training

It is the Trust's policy that all employees, who require it, are trained on the role of records management during induction and undertake refresher training as required. The Trust will accordingly ensure that records management training is available for employees.

In order to minimise errors and achieve good data quality, employees will be supported in their work and appropriate training will be provided to ensure common data quality standards (Section 10) are adhered to.

Records management training is a crucial part of staff awareness. All individuals need to be aware of their obligations relating to records as part of their Trust duties. Failure to adhere to this policy can result in serious misconduct and could lead to the prosecution of employees.

12 Outcomes and impacts

- All records in the Trust's possession are properly created, kept and managed and considered by all staff as an essential asset to the organisation.
- Information is held in line with data protection legislation and the Trust's data protection policy.
- Data quality is improved and processes are in place which evidence the importance placed upon data quality by the Trust.
- Ensure services and employees understand records management practices.
- That the trust has a information asset register and record of processing activities.

13 Policy Implementation

This policy applies to all Trust records during their life cycle, irrespective of the technology used to create and store them. The implementation of the Records Management and Data Quality Policy will be overseen as appropriate by:

- The Education Alliance Executive Team
- Audit and Risk Committee

14 Evaluation

The Records Management and Data Quality Policy will be subject to a biennial review to ensure that it is appropriate and responsive to all relevant legislation and guidance.

15 References

[Freedom of Information Act 2000, Section 46 Code of Practice – records management](#)
[Freedom of Information Act 2000](#)
[Data Protection Act 2018 General Data Protection Regulation](#)
[Information Commissioners Office](#)

Common Data Quality Standards Checklist

1. Accuracy

- ✓ Data is sufficiently accurate for its intended purposes.
- ✓ Data should be captured once only, although it may have multiple uses.
- ✓ Data will be checked at the point of collection.
- ✓ Evidence that data has been checked and validated for accuracy should be available.

Example - When updating a pupil's data the fields should be checked with the individual to ensure they are correct, this could include verbal communication with the individual and validation against existing data.

2. Validity

- ✓ Data should be recorded and used in compliance with relevant requirements, including the correct application of any rules or definitions.
- ✓ A consistent data collection process is used.
- ✓ Employees collecting data are suitably trained/supervised.
- ✓ Data should be from primary sources wherever possible.
- ✓ Any data quality issues are identified, assessed and rectified.

Example – A database extract contains the information which is needed for a report. The source of the extract is not clear or why it was created in the first place. In this scenario the information cannot be trusted and the information should be extracted again or checked against the source database.

3. Timeliness

- ✓ Data should be captured as quickly as possible after the event or activity and must be available for the intended use within a reasonable time period.
- ✓ Data must be available quickly and frequently enough to support information needs and to influence decision making.

Example – Having held a meeting with a parent the relevant record for the pupil is required to be updated. Should this not happen within a reasonable/pre agreed timescales the risk of unnecessary contact/intervention or inaccurate data being recorded increases.

4. Relevance

- ✓ Data captured should be relevant to the purposes for which it is used. If data is not required within a documented process it should not be recorded

Example – It is appropriate to record a pupils parents contact details within a pupils record, however it is not required, nor appropriate for the parent’s picture to be recorded/included.

5. Completeness

- ✓ Data requirements should be clearly specified based on the information needs of the organisation and data collection processes matched to these requirements.
- ✓ Monitoring missing, incomplete, or invalid records can provide an indication of the level of data quality and can also identify any recording issues.

Example – When making a request to the trust there may be a number of mandatory fields. All mandatory fields must be recorded otherwise the request may not be able to be processed.

6. Summary

Considering all of the above factors, it should be possible to give a level of assurance about data quality in the Trust.