

Embrace Multi Academy Trust Records Management

Management of records is a legal obligation (Section 46 of the Freedom of Information Act 2000). By ensuring that our records are well managed and controlled we can provide a better service to staff, pupils, parents/carers and others. The legal and regulatory obligations from many sources rely on effective record management. Information management is also a part of the IT strategy, Data Protection and UK GDPR compliance obligations. This policy provides a framework that covers records management in the trust and the academies.

It covers:

- Scope
- Responsibilities
- Relationships with existing policies

1. Scope

- 1.1. This policy applies to all records created, received or maintained by staff of the Embrace Multi Academy Trust whether centrally or in individual schools, in the course of carrying out its functions.
- 1.2. Records exist in Embrace Multi Academy Trust and originate from a variety of sources. Trust staff will create some. Others are provided by parents/carers and pupils, others are shared with the trust and its schools by external professionals. The policy applies to all records and the management of the records in the trust and its schools. See Appendix 1 for examples of records in Embrace Multi Academy Trust.
- 1.3. Records may be hard copy, electronic, digital, images, audio recordings or any other source that can be viewed, heard or interrogated. They may relate to individuals, financial planning, contracts, commercial organisations, public authorities or charitable organisations. Some will include personal data about individuals.
- 1.4. How the trust and schools use, maintain and manage records will be dependent on the purpose, origin and source of the records. Other policies will govern this in many instances.
- 1.5. Some records will be retained for historical and archiving purposes.

2. Responsibilities

- 2.1. The trust has a corporate responsibility to maintain, use, store and delete its records to comply with regulatory requirements. The person with overall responsibility for this policy is the Trust Leader and this will be delegated to individuals in each school.
- 2.2. Good record management practice will be the responsibility of all staff. Individual responsibility will be determined by job description and practice. A senior leader (head, principal or head of school) will also monitor compliance with this policy at least annually.
- 2.3. 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 trust's policies and records management guidelines.

3. Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information policy
- Data Protection policy
- Information Security policy
- IT security and use policies
- Retention of Information & Records Policy /guidelines.

and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the trust and schools.

Estates & Compliance Manager, Embrace Multi Academy Trust

August 2026

Appendix 1

The trust and schools keep a wide variety of records that may include (but are not limited to):

- students
- personal information
- parent/carer contact information
- school reports
- behaviour logs
- exam and testing outcomes – internal and external
- child protection information
- allegations of a child protection nature made against a member of staff (including unfounded allegations)
- attendance – attendance registers, authorised absence correspondence
- SEND – reviews, advice to parents/carers, accessibility strategy
- Pupil Premium / Sixth Form Bursary – evidence of eligibility
- Free School Meals eligibility
- Services and Pupil Premium eligibility
- LAC status
- medical – Individual Health Plans, first aid records.

Management of the Trust and Schools

- trust and governing board records - agendas, minutes, resolutions, reports
- trustee and governor personal details
- declarations of interests
- CPD and training
- statutory documents for Companies House
- accounts and trust report
- school development plans and school improvement plans
- leadership meeting minutes and actions
- admission details
- school visitor logs
- Health and Safety Records
- fire risk assessments
- risk assessments
- social media
- newsletters and external communication records.

Human Resources

- job descriptions
- application forms
- personnel files for all staff – including personal contact details
- appraisals
- performance reviews
- employment suitability checks
- contracts of employment
- records of disciplinary and grievance processes
- allegations and LADO referrals
- referrals to the TRA and/or DBS
- payroll and pensions – maternity/paternity pay, family leave records.

Financial Management

- budgets and funding details as required by the Funding Agreement, Academy Trust Handbook and company law
- risk management and insurance – employer's liability insurance certificate
- asset management records
- asset register
- all necessary financial records
- contracts
- contract management and procurement
- school payment and meals management.

Property Management

- property management
- condition surveys
- hire agreements
- maintenance – logbooks, warranties and contractor information
- health and safety information.

Curriculum & Attainment

- teaching and learning planning
- timetabling and resource planning
- prospectus and website
- statistics and evidence of learning outcomes, targets
- pupil work records
- trip and visit record.

External Records

- central government and local authority
- local authority – census returns, attendance returns
- central government – returns made to DfE
- Ofsted
- referrals to third party agencies
- legal action involving the trust and schools
- ICO action
- enquiries and investigations by external bodies.

Reviewed August 2026