

The Sherwood Psychotherapy Training Institute  
**INFORMATION MANAGEMENT POLICY**

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**1.0 Purpose**

SPTI maintains strategic oversight of the processes for, and outcomes of, programme design, development and approval, to ensure processes are applied systematically and operated consistently. The purpose of this policy is to provide guidance and direction on the creation and management of information and records and to clarify staff responsibilities.

SPTI publishes information that describes their mission, values and overall strategy and SPTI is committed to establishing and maintaining information and records management procedures that meet its business needs and accountability requirements.

The benefits of compliance with this policy will be trusted information and records that are well described, stored in known locations and accessible to staff and clients when needed.

This policy is supported by complementary policies, additional guidelines and procedures which include:

- SPTI Data Protection Policy
- SPTI Moodle Site Policy
- SPTI E-mail Policy
- SPTI DBS Policy Statement on the Recruitment of Students Declaring a Relevant Criminal Conviction
- SPTI DBS Handling Policy
- SPTI DBS Policy & Procedure on Monitoring of Criminal Records of Trainees
- SPTI Publishing Policy
- SPTI Privacy Notice
- SPTI Data Security Protocols

**2.0 Policy statement**

SPTI's information and records are a corporate asset, vital both for ongoing operations and also in providing valuable evidence of business decisions, activities and transactions.

SPTI makes use of reference points and expertise from outside the institute in programme design and in their processes for development and approval. This policy has been in line with the professional requirements of its accrediting and validating partners, currently UKCP, BACP and Staffordshire University and with the requirements of the Data Protection Act 2018 and Freedom of Information Act 2000.

SPTI aims to implement fit-for-purpose information and records management practices and systems to ensure the creation, maintenance and protection of reliable records. All information and records management practices in SPTI are to be in accordance with this policy and its supporting procedures. SPTI maintains record (by type and category) of all collaborative activity that is subject to a formal agreement.

**3.0 Scope**

SPTI defines processes, roles and responsibilities for programme design, development and approval and communicate them to those involved. This policy applies to all SPTI staff, both employed staff and self-employed contractors, to all aspects of the business and all business information created and received. It covers information and records in all formats including electronic and paper documents, applications, email, voice messages, memoranda, minutes,

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audio-visual materials and business system data. The policy also covers all business applications used to create, manage and store information and records including official records management systems, email, websites, VLE, social media applications, databases and business information systems. This policy covers information and records created and managed both in-house and off-site.

**4.0 Creation and maintenance of information and records**

The following types of information and records need to be created captured and managed to support agency business and legal requirements:

**4.1 Student records**

including student details, records of attendance, electronic and paper correspondence with students, assignments and submissions, ethical approval forms, marking records, student feedback, financial information, student learning agreements and fitness to practice contracts, disability assessments and DSA reports, membership details of all SPTI members, details of all approved therapists, placement providers and approved supervisors.

**4.2 Marketing and recruitment information**

Prospective student details and correspondence, applications, references, proof of qualifications and identity, DBS disclosures and declarations, equal opportunities monitoring information, lists of potential business customers, advertising and advertising plans.

**4.3 Staff information**

Staff financial and emergency/personal details, CVs/applications and references, staff development records

**4.4 Financial information**

Details of all financial transactions, accounts, invoices, bank statements, student fee payments and financial information, financial correspondence, funding information and applications (bursaries, SLC, ELCAS etc.), fees information for students and prospective students.

**4.5 Programme relevant information**

Course-specific information, Programme handbooks, forms, tutor evaluation and assessment forms, correspondence with tutors, validating partners and accrediting partners, quality monitoring reports and submissions, policy documents.

**4.6 Records of all meetings of committees and team meetings**, including supervision records, Directors'/ Senior Leadership Team Meetings, Staff Meetings, Programme Team Meetings

Business information and records must be created and captured by everyone subject to this policy. Business information and records created should provide a reliable and accurate account of business decisions and actions. All business information and records created and received should be captured into endorsed information and records systems unless they can be disposed of under a normal and agreed administrative practice.

**5.0 Systems used to maintain information and records**

SPTI maintains strategic oversight of the processes for, and outcomes of, programme monitoring and programme review to ensure processes are applied systemically and operated consistently.

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Information is produced by SPTI for prospective and current students which is fit for purpose, accessible and trustworthy.

Establish clearly which locations are endorsed for the capture and storage of records and information and which should not be used.

The following business and administrative databases and software applications are endorsed for the capture and storage of specific information and records. These include:

- SPTI Access Databases
- Outlook where appropriate
- SharePoint and other secure shared folders

In addition, where paper-copies/records are kept, these are stored in designated, secure areas, such as lockable offices and filing cabinets.

### **6.0 Version Control and checking**

The current system for checking and version control of records is:

All updates of documents and policies manually have the dates on the footer changed to the current version. When a document is saved the final version is saved as 'document title' 'final' [or version number as v01]. If relevant the date can also be included in the file name. A pdf version is normally saved for all final versions and stored in central designated area in appropriate folder.

All of the above records are checked on an annual basis by designated members of staff, content changes advised to both the administration and marketing and recruitment team and monitored to ensure that cross checking of information occurs. Information is stored in identified areas which are accessible to appropriate staff.

### **7.0 Record retention and destruction**

As an education and specifically HE provider it is necessary for SPTI to manage its records effectively and to retain them in accordance with accrediting and validating bodies and company law requirements and as long as necessary to meet business needs. Appropriate and proportionate safeguards to manage the risks of the various arrangements are determined and put in place.

Staff have responsibility for retention of and for destruction of records in accordance with this policy.

Some facilitative or short-term information generated can be destroyed as a normal administrative practice. Examples include rough working notes, drafts not needed for future use or copies of records held for reference only.

Other academic, financial and personal records should only be destroyed when they reach the end of the retention period and with the approval of the responsible Director.

### **8.0 Retention periods**

A retention period is a specific period after which a document or record can be disposed. The relevant retention periods to meet SPTI business requirements and statutory requirements and arrangements with validating and accrediting partners.

Agreed retention period for SPTI records are:

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- Student records - all records maintained for 6 years after award of qualification. After 6 years (7 years for Counselling Concepts) only student details and attainment records are maintained. The Limitation Act 1980 limits the time for bringing a case for breach of contract or negligence to six years from the date of the alleged incident. Certain records may therefore need to be retained for six years (following a student's graduation or withdrawal) in case they are required for evidential purposes.
- Marketing and recruitment information – Enquirer and applicant details (prospect details) maintained for 1 year on database as live. Records of prospect details retained for information and analysis only for 6 years. Exception is when prospect requests removal of information.
- Membership information maintained whilst membership ongoing then for 6 years post withdrawal.
- Financial information. Accounts and finance records for the business are maintained for a minimum of 6 years to meet legal requirements following the accounting year. For business purposes all business financial records maintained for 10 years.
- Student finance records are maintained in line with student records i.e. for 6 years post qualification. Exceptions: financial information received as part of bursary applications maintained in line with this policy i.e. evidence destroyed once decision made.
- PDF copies of all documents, policies and reports are to be retained in archives for business purposes for a minimum of 10 years or to be reviewed upon instruction of current company Directors.
- Students submitted work / assessments are maintained for a maximum period of 5 years as required by the Office for Students

Staff should be informed as to when, how and why these retention periods are in place as part of their formal induction. SPTI sets their framework for managing academic standards, and quality assurance and enhancement, and describe the data and information used to support its implementation.

### **9.0 Storage of records**

Public records are to be stored on the SPTI website or other communication channels (for instance social media). Relevant, non-sensitive data open to all students will be stored on the VLE. This practice, in partnership with the student body, defines and promotes the range of opportunities for any student to engage in educational enhancement and quality assurance.

A pdf version is normally maintained for all up to date documents.

### **10.0 Access to records of a confidential or sensitive nature**

It is expected that at all times staff will ensure the security of all records and communications with clients, staff or validating partners or other confidential records and information in accordance with the Data Protection Act, therefore:

- substantive records should be stored in endorsed electronic locations or placed in secure paper files
- accumulation of non-substantive communications should be minimised to ensure effective access to relevant information
- Computers which access SPTI records should always be locked and password protected when not in use by the staff member.

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- Confidential information should not be left available in publicly accessible locations or shared through insecure channels
- Access to shared information may require password encryption to documents/files

### **11.0 Roles and Responsibilities**

**All staff** are responsible for the creation and management of information and records as defined by this policy. They should ensure that comprehensive records are kept of all SPTI activities, in accordance with current guidelines for business accountability, and for as long as required by the retention schedules above. SPTI defines the processes, roles and responsibilities for programme design, development and approval and communicate them to those involved.

Additional responsibilities for certain staff are listed below:

- **Company Directors:** The Company directors are ultimately responsible for the management of information and records within SPTI, for contributing to the development of strategic documents such as the information and records management framework and strategy and **for promoting a culture of compliant records management within the organisation**. The Company Directors have authorised this policy.
- **Programme Leaders are responsible for the creation and management of information and records relating to their programme and students and for promoting a culture of compliant records management within their Facilitator teams.** They should advise the directors of any barriers to complying with this policy. They should also advise of any changes in the business environment which would impact on information and records management requirements.
- **IT Support:** The IT Support team is responsible for maintaining the technology for SPTI's business information and records systems, including maintaining appropriate system accessibility, security and back up. The IT Support team should support staff to ensure that any actions, such as removing data from systems or folders, are undertaken in accordance with this policy. IT and information and records management/administrative staff have an important joint role in ensuring that systems support accountable and effective information and records management across the organisation.
- **Self-employed Facilitators:** self-employed Facilitators should create and manage records in accordance with this policy to the extent specified in the contract.

### **12.0 Communication and training**

This policy will be communicated to all staff and Facilitator teams provided to the relevant aspects of the policy as part of induction and ongoing staff development.

### **13.0 Monitoring and review**

SPTI takes deliberate steps to use the outcomes of programme monitoring and review processes for enhancement purposes. This policy will be updated as needed if there are any changes in the business or regulatory environment. Reviews will be initiated by the Director team and conducted in collaboration with the Senior Leadership and Administrative teams.

Compliance with this policy will be monitored by the Director team via supervision and monitoring of working practices, any concerns related to non-compliance should be reported to the Director team.