TSC STAFF RETIREMENT BENEFITS SCHEME

TEACHERS SERVICE COMMISSION STAFF RETIREMENT BENEFITS SCHEME

Your future secured

DATA MANAGEMENT POLICY

2024

VISION

An exceptional pension scheme offering comfort in retirement

MISSION

To ensure prudent utilization of Scheme Funds and provide timely benefits to members and their beneficiaries

CORE VALUES

- **Integrity**
- **Equity and fairness**
- **Respect for members**
- **Accountability**
- **Innovativeness**

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1.0 Introduction

The Teachers Service Commission Staff Retirement Benefits Scheme Data Management Policy provides a comprehensive framework for the responsible handling of all types of data within the Scheme. This policy covers the entire data lifecycle, from collection to disposal, ensuring that data is managed efficiently, securely, and in compliance with organizational standards. The focus of this policy is on data governance, data quality, data storage, and data accessibility, rather than on the specific protection of personal data, which is addressed in the complementary Data Protection Policy.

This policy acknowledges the existing Teacher Service Commission Data Management, Classification, and Protection Policy. The Board of Trustees is committed to ensuring that the Scheme's data management practices are consistent with the sponsor's policies.

2.0 Objectives

- To establish clear guidelines for the collection, storage, use, and disposal of all data.
- To ensure data integrity, accuracy, and availability.
- To define roles and responsibilities for data management within the Scheme.
- To support data-driven decision-making through effective data governance.
- To ensure that data is managed in compliance with applicable laws and regulations, with a focus on operational efficiency and data quality.

3.0 Scope

This policy applies to all types of data managed by the Scheme, including but not limited to financial data, operational data, member data, and any other information critical to the Scheme's operations. It encompasses the entire data lifecycle, from creation and storage to usage and disposal.

4.0 Data Governance and Responsibilities

4.1 Data Governance Framework

- **Data Stewards:** Appointed individuals responsible for ensuring data quality and governance within their departments.
- **Data Custodians:** IT personnel responsible for maintaining and securing the technical infrastructure where data is stored.
- **Data Users:** Secretariat who access and use data for their daily operations, responsible for maintaining the integrity and confidentiality of data.

4.2 Audit and Risk Committee

The Audit & Risk committee shall be responsible for overseeing data management practices, establishing data standards, and ensuring compliance with the Data Management Policy.

5.0 Data Collection and Quality

5.1 Data Collection Standards

- Relevance: Only data necessary for the Scheme's operations will be collected.
- Accuracy: Data shall be accurate and verified at the point of collection.
- Timeliness: Data should be collected in a timely manner to ensure its relevance.

5.2 Data Quality Management

- Validation: Regular checks will be performed to validate data accuracy.
- Correction: Inaccurate data will be corrected as soon as discrepancies are identified.
- Consistency: Data should be consistent across all platforms and systems.

5.3 Data Security

Suitable technical measures shall be put in place to ensure the security and confidentiality of data, in line with the Scheme's Data Protection Policy. These measures encompass encryption, access controls, and regular security assessments.

6.0 Data Storage and Access

6.1 Data Storage

- Secure Storage: Data will be stored in secure environments with appropriate access controls.
- Data Backup: Regular backups will be conducted to ensure data availability in case of system failure.
- Cloud Storage: The use of cloud storage solutions shall comply with the Scheme's data security standards.

6.2 Data Access

- Role-Based Access Control: Access to data will be granted based on the user's role and responsibilities within the Scheme.
- Monitoring Access: All data access activities will be logged and monitored to detect unauthorized access.

7.0 Data Usage and Sharing

7.1 Data Usage

- Authorized Use: Data shall only be used for its intended purpose and within the boundaries set by the Scheme.
- Access Controls: Strictly limit data access, use and/or processing to authorized personnel based on their job roles and for the purpose for which it was collected, preventing unrelated or unforeseen uses.
- Data Confidentiality: All users shall ensure the confidentiality of data during usage.

7.2 Data Sharing and Transfer

- Internal Sharing: Data can be shared internally within the Scheme with proper authorization.
- External Sharing: Sharing data with external parties shall comply with the Data Protection Policy and relevant legal requirements.

8.0 Data Retention and Disposal

8.1 Data Retention

- Retention Schedules: The Scheme will establish retention schedules that specify how long different types of data will be kept.
- Compliance: Retention schedules shall comply with legal and regulatory requirements.

8.2 Data Disposal

- Secure Disposal: Data that is no longer required shall be securely disposed of using methods such as shredding for physical documents and secure digital deletion.
- Audit Trail: Records of data disposal activities shall be maintained to ensure accountability.

9.0 Compliance and Monitoring

9.1 Audits

Regular internal and external audits will be conducted to ensure compliance with the Data Management Policy and to identify areas for improvement.

9.2 Non-Compliance

Any instances of non-compliance shall be reported to the Audit and Risk Committee and addressed promptly.

10.0 Training and Awareness

The Board of Trustees, Secretariat and stakeholders will receive regular training on data management best practices, including data governance, data quality, and secure data handling.

11.0 Review and Revision of Policy

This policy will be reviewed every three years or as required by changes in legal, regulatory, or business requirements. Any revisions shall be approved by the Board of Trustees.

12.0 Adoption and Sign Off

This policy is adopted by the Teachers Service Commission Staff Retirement Benefits Scheme and is effective from the date of approval by the Board of Trustees.

Signed by the Trustees of **Teachers Service Commission Staff Retirement Benefits Scheme** on this..20TH..day of SEPTEMBER 2024

COMMISSIONER MBAGE NJUGUNA NG'ANG'A ______________

MR. FRANKLIN KIPRONO CHOGE ______________

MR. GEORGE MUNENE GICHONJO ______________

MS. JENNIFER WAITHIRA NDEGE ______________

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MR. GEORGE ONYANGO ODAWO ______________

MR. SAMUEL MWENDA KITHINJI ______________

MR. JOSHUA KITHUNU KAMANA ______________

In the presence of the Trust Secretary

MRS. SALOME KARAMBURI MWITI ______________