

Record Management Policy



Approved by: Governing Body **Date:** 19/10/2022

Last reviewed on: 14th October 2022 by Deb Thwaites & Claire Seddon

Next review due : October 2025



Record Management Policy

The school recognises that by effectively managing its records it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the school. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability.

This policy provides the framework through which this effective management can be achieved and audited. It covers:

- Scope
- Responsibilities
- Storage
- Retention and Disposal
- Monitoring and Compliance
- Relationships with existing policies

1. Scope of the Policy

- a. This policy relates to all records created, received or maintained by permanent and temporary staff of the school in the course of carrying out its functions. It also relates to records held by any agents, contractors, consultants or third parties acting on behalf of the school.
- b. Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronic format e.g. paper documents, scanned documents, emails which document business activities and decisions, audio and video recordings, text messages, notes of telephone conversations, spreadsheets, word documents and presentations.

2. Responsibilities

- a. The governing body of the school has a statutory responsibility to maintain the school records and record keeping in accordance with the regulatory environment specific to the school. This head teacher has overall responsibility for this policy.
- b. The head teacher will give guidance on good records management practice and will promote compliance with this policy so that information can be retrieved easily, appropriately and in a timely way. She will also monitor compliance with this policy by surveying at least annually to check that records are stored securely and can be accessed appropriately.
- c. The school will manage and document its records disposal process in line with the published IMRS records retention schedule. This will help to ensure that it can meet Freedom of Information Requests and respond to requests to access personal data under the data protection legislations (subject access requests, SARS).

- d. Individual staff and governors must ensure that records for which they are responsible are accurate and are maintained and disposed of in accordance with this policy.

3. Storage:

- a. Records must be appropriately stored with regard for efficiency, cost effectiveness, security, durability and access. Appropriate procedures and processes are in place to ensure the physical and intellectual security of the records.
- b. The retention of records for longer than necessary is in breach of the General Data Protection Regulation 2016 [GDPR], duplication of records should be limited to optimise the use of space for storage purposes and to aid data accuracy.

4. Retention and Disposal

- a. Information held for longer than is necessary carries additional risk and cost, therefore records and information shall only be retained when there is a business or legislative need to do so. Under the GDP row 2016 and the Data Protection Act 2018 personal data processed by an organisation must not be retained for longer than is necessary for its lawful purpose.
- b. The retention of specific documents may be necessary to:
 - i. Fulfil statutory or other regulatory requirements
 - ii. Evidence events/agreements in the case of disputes
 - iii. meet operational needs
 - iv. Ensure the preservation of documents of historical other value
 - v. Evidence child protection matters
- c. The untimely destruction of documents could cause the school:
 - i. Difficulty in defending litigious claims
 - ii. Operational problems
 - iii. Failure to comply with the Freedom of Information or data protection laws
- d. The permanent retention of all documents where there is no business need or other legal basis to retain them, poses regulatory and security risks.
- e. Appropriate secure disposal is accordingly implemented at the school in accordance with this policy for the following reasons:
 - i. To comply with the published IMRS records retention schedule on data protection principles;
 - ii. to comply with article five of the GDPR which states that personal data must not be kept in an identifiable form for longer than is necessary;
 - iii. to free up storage space
 - iv. to reduce the risk of fire
 - v. to lessen the risk of data breach through data loss or unauthorised access
 - vi. to increase the efficiency of the exercising of data subject rights.
- f. The school will dispose of all records securely. The school will keep a log of all records that have been disposed of. Electronic files are securely overwritten, in accordance with government guidance, and other media is shredded, incinerated, or otherwise disintegrated for data.

5. Monitoring and compliance

- a. This policy will be reviewed biennially.
- b. Compliance with this policy should be monitored through a review process undertaken by the person with overall responsibility for records management within the school. This will be supported by an annual compliance cheque.
- c. Should it be found that this policy has not been complied with, or if an intentional breach of the policy has taken place, the head teacher, in consultation with the data protection officer, shall have full authority to take immediate steps including disciplinary action.

6. Relationship with Existing Policies

This policy has been drawn up within the context of:

- a. The Freedom of Information Policy
- b. The Data Protection Policy

Reviewed 14th October 2022

Debra Thwaites, Head Teacher

Claire Seddon, School Business Manager