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|  | <b>Name of School</b>      | <b>Corbets Tey School</b>   |
|   | <b>Policy Adopted Date</b> | <b>06/02/2019</b>   |
|   | <b>Next Review Date</b>    | <b>06/02/2020</b>   |
|   | <b>Reviewed by</b>         | <b>Governors Name: Jeff Stafford</b><br><b>Governors Signature:</b>  |

## Records Management Policy

### Equality Impact Assessment

The school aims to design and implement services, policies and procedures that meet the diverse needs of our provision, population and workforce, ensuring that none are placed at an unreasonable or unfair disadvantage over others. We are confident that this policy does not place anyone at an unreasonable or unfair disadvantage, and is compliant with relevant equalities legislation.

The School recognises that by efficiently 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 institution. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

This policy meets the requirements of the GDPR and the provisions of the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the GDPR and the ICO's code of practice for subject access requests.

1. Scope of the policy
  - 1.1. This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions.
  - 1.2. 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 electronically.
  - 1.3. A small percentage of the school's records will be selected for permanent preservation as part of the institution's archives and for historical research. This should be done in liaison with the County Archives Service.
2. Responsibilities
  - 2.1 The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher.
  - 2.2 The person responsible for records management in the school will give guidance for

good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

- 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 school's records management guidelines.

### 3. Relationship with existing policies

3.1 This policy has been drawn up within the context of:

- Freedom of Information Policy
- Data Protection Policy
- Business Continuity Policy
- Information Security Policy
- Information Management Toolkit for Schools – Version 5 (February 2016)  
[www.irms.org.uk](http://www.irms.org.uk)

### 4. Document Retention Schedule

4.1 The retention schedule has been drawn up by the Records Management Society of Great Britain and is Version 5 dated February 2016. The schedule covers the main categories of document/records held in school, the appropriate retention period and type of disposal required

### 5. Storage of Records

5.1 The storage of records should involve:

- identifying information for retention
- creating, approving and enforcing policies and practices regarding records, including their organisation and disposal
- identifying, classifying and storing of records
- co-ordinating access to records internally and outside of the organisation, balancing the requirements of confidentiality, data protection and public access
- Records must be stored in such a way that they are accessible and safeguarded against environmental damage.
- All files in current use must be stored appropriately.
- All pupil records should be kept securely at all times. Paper records should be kept in locked filing cabinets/storage areas and the contents should be secure within the file. Equally, electronic records should have appropriate security.
- Access arrangements for pupil records should ensure that confidentiality is maintained whilst equally enabling information to be shared lawfully and appropriately, and to be accessible for those authorised to see it.
- Current staff records are stored in locked filing cabinet in the HR Officer's office and on the school network in a secure folder accessed only by persons authorised by the Headteacher/School Business Manager.
- Financial records to be stored appropriately by relevant staff
- Management Information Systems – SIMS and FMS use is restricted to relevant staff members and password protected. Passwords should not be divulged to other persons and should be changed regularly.
- Closed records are either boxed up, clearly labelled and stored in the loft storage by the site manager or scanned and stored electronically on the school secure network. Files for archiving:
  - All records to be archived as per the Document Retention Schedule will be stored in appropriate boxes in the Loft Storage. Boxes will indicate contents and date of disposal.
  - Where applicable boxes will contain a contents list.

- The Loft Storage is kept locked and access to these files is restricted to authorised personnel.

6. Safe disposal of records which have reached the end of their administrative life

- 6.1 The Data Protection Act 1998 stipulates that records should be kept for no longer than necessary. Where records have been identified for destruction they should be disposed of in an appropriate way.
- 6.2 All records containing personal information or sensitive policy information will be shredded before disposal using a cross cut shredder. Any other records should be bundled up and disposed of via a waste paper merchant or disposed of in other appropriate ways. There are companies who can provide confidential waste bins and other services which can be purchased to ensure that records are disposed of in an appropriate way.
- 6.3 CDs/DVDs should be cut into pieces. Hard disks should be dismantled and wiped.

**A full list of school based records for retention and retention periods can be found at:**  
<http://irms.org.uk/page/SchoolsToolkit>

Records can be kept in hard copy and digitally. Please ask admin office staff for further guidance on scanning documents.

Please see below for a shortened list of general **class based** records for retention (full list available at link above in the IRMS Toolkit for Schools 2016):

| Record description   | Retention period  | Action at end of retention period  |
|--|---|--|
| Schemes of Work  | Current year + 1 year   | SECURE DISPOSAL  |
| Pupils' Work   | Where possible pupils' work should be returned to the pupil at the end of the academic year. Levelled work folders remain with the pupil throughout school. Once pupil leaves, work is passed onto new provision or disposed. | SECURE DISPOSAL  |
| Record of homework set   | Current year + 1 year   | SECURE DISPOSAL  |
| Day Books (Home School Diary)  | Current year + 2 years (to be passed to school office to be stored at the end of the academic year)   | SECURE DISPOSAL  |
| Parental consent forms for school trips where there has been no major incident     | Conclusion of the trip  | SECURE DISPOSAL  |
| Parental permission slips for school trips – where there has been a major incident | DOB of the pupil involved in the incident + 25 years  | The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils<br>SECURE DISPOSAL   |
| Special Educational Needs files, reviews and Individual Education Plans            | Date of Birth of the pupil + 25 years   | NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum |

|  |   |  |
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|  |   | retention period and this should be documented.                |
| Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement        | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold |
| Advice and information provided to parents regarding educational needs   | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold |
| Accessibility records relating to specific pupil   | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold |
| Reports for outside agencies - where the report has been included on the case file created by the outside agency | Whilst child is attending school and then destroy   | SECURE DISPOSAL  |

Please see below for a shortened list of general **administration based** records for retention (full list available at link above):

| Record description   | Retention period   | Action at end of retention period |
|--|--|-----------------------------------|
| Attendance Registers   | Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.   | SECURE DISPOSAL                   |
| Correspondence relating to authorised absence (medical appointments, holiday requests etc)   | Current academic year + 2 years  | SECURE DISPOSAL                   |
| Staff bulletin, parent newsletters and any other information/circulars                       | Current year + 1 year  | STANDARD DISPOSAL                 |
| Visitors' Books and Signing in Sheets  | Current year + 6 years then REVIEW   | SECURE DISPOSAL                   |
| All records leading up to the appointment of a new member of staff – unsuccessful candidates | Date of appointment of successful candidate + 6 months   | SECURE DISPOSAL                   |
| All records leading up to the appointment of a new member of staff – successful candidate    | All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months  | SECURE DISPOSAL                   |
| Pre-employment vetting information – DBS Checks  | The school does not keep copies of DBS certificates.   | SECURE DISPOSAL                   |
| Proofs of identity collected as part of the process of checking DBS disclosure               | These are checked and a note kept of what was seen and what has been checked on the single central record. Copies of proof of right to work in the UK is kept in a secure location | SECURE DISPOSAL                   |

The school will hold and maintain an internal data map and audit record list of all personal data that we hold of the type of data, data subject, how and why we are using the data, any third-party

recipients, how and why we are storing the data, how and why we are sharing the data and who with, retention periods and how we are keeping the data secure.

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