



Records Management Policy and Retention Schedule

Reviewed: Summer 2023

Review Date: Summer 2025

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Chair of Governors

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Date

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Head Teacher

.....
Date

Featherstone Wood Primary School



INCLUSION AND SAFEGUARDING STATEMENT

We are committed to building futures in a welcoming and supportive learning environment in which pupils feel valued and challenged to be resilient thinkers and active learners with transferable skills and an appetite for world learning.

At Featherstone Wood Primary School all pupils are valued, inspired and respected within our happy, welcoming School community.

We set high expectations for all our pupils. Practitioners give every pupil the opportunity to experience success in their learning by providing a relevant and challenging curriculum with an emphasis on personalised learning.

All children have unique experiences to share. At Featherstone Wood Primary School we celebrate this diversity by valuing the contribution of all pupils and providing an environment that encourages independence and autonomy in their learning.

Our School is committed to inclusion and safeguarding, and promoting welfare of children. We expect everyone to share this commitment.

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. The school has adopted the **Information Management Toolkit for Schools** created by the IRMS (Information and Records Management Society) and adheres to its principles and guidance.

Toolkit for Schools

2019



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From the Chair - IRMS Scott Sammons



Dear Reader,

It is my pleasure to welcome you to this revised Information and Records Management Toolkit for Schools Version 6.0.

This toolkit has been made free of charge to non-members, however, if you would like a word version, you can sign up to IRMS for less than a £100 a year at www.irms.org.uk/join. Signing up as a member also entitles you to ask the author questions plus a lot of other benefits. So why not join your colleagues in the information field today and help us fund more useful toolkits like this one?!

I am a little biased (as an Information Geek and as Chair of the IRMS), but I firmly believe in the importance and value of good information and records management practices and this publication looks to assist in this important sector for a number of years to come. I am proud that the Information and Records Management Society (IRMS) has been able to review and maintain the accuracy of this document from the help of our volunteers.

If you're about to embark on reading through this toolkit and getting information handling right for your organisation I wish you all the very best and ensure you that you are in trusted hands. This toolkit is the combination of the knowledge, experience and brain wizardry of the IRMS and Kent County Council's Elizabeth Barber.

My thanks go to the Department for Education for their support of the free PDF toolkit that enables such greater access to records management advice on such an important topic especially with GDPR making schools realise they need this information.

My thanks also go to some key people that have been involved in the development of the toolkit, firstly, is Elizabeth Barber who has helped shape and drive the toolkit forward with such limited resource and we are forever in her debt.

Second is Keith Batchelor, he is known to many in the profession, has offered his experience, expertise and time free of charge to review the content for this toolkit.

My thanks also go to the wider content team for their time and input into ensuring the amazing content is up to date, the reviews and the critiques to getting the toolkit where it is today.

As a result, I look forward to hearing your stories of your information and records management journeys, both personally and for your organisations. May this toolkit be as useful to you as it has been to many others.

All the very best,

A handwritten signature in black ink that reads "Scott". The letters are cursive and fluid.

Scott Sammons FIIM, AMIRMS,
Cert.NLP

Chair, IRMS 2019

From the Sponsor - Groupcall Andrew Mulholland



It is our great pleasure to welcome you to the latest edition of the IRMS Records Management Toolkit for Schools. As a leader in data protection services for schools, trusts and local authorities, we are delighted to be sponsoring such a fantastic resource. Good records and information management is part and parcel of running a successful school - from the legal obligations around collection and retention right through to having solid, robust processes in place to keep that data safe whilst ensuring it is still accessible and manageable for the staff who need it.

Groupcall has a strong interest in helping schools develop robust data protection systems and processes. As well as having trained thousands of school leaders in data protection best practice, we also recently conducted a national survey to better understand how those practices have been embedded. This research highlighted that there are still gaps in data protection processes in many schools, with the most concerning being the number who still haven't appointed an appropriate data protection officer, with many school DPOs having conflicts of interest from their other roles in school. The research also revealed that many still struggle with data protection impact assessments and properly understanding the use of consent under the GDPR and DPA 2018.

The education industry also continues to be a major source of data breaches - often due to simple carelessness. Data protection is everybody's responsibility and having good records management structures in place for people to work with is key.

The situation is starting to become real from an enforcement standpoint, with the ICO already conducting audits in multi-academy trusts - and while large fines are unlikely to be imposed on educational organisations, the threat of reputational damage from mislaid data is real.

That's not to say it's all bad news. While there are concerns in a number of areas, we find schools are generally good at records management, especially when it comes to safeguarding and other statutory requirements. Schools also generally have good physical security in place, which is an important part of keeping information safe.

But - things can always be improved! And the fact that you've taken the time to download and digest this toolkit shows you are on the right track to better data management.

The IRMS is a fantastic organisation and we are thrilled to be able to help them make this best practice information available. We trust you will find it useful and wish you all the best in your continuing records management journey.

A handwritten signature in black ink that reads "A Mulholland". The signature is fluid and cursive, written in a professional style.

Andrew Mulholland
Director of Marketing
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Introduction

The Information Management Toolkit for Schools has been created to assist schools with managing their information in line with the current legislative frameworks.

Module 1 consists of the base toolkit designed to assist schools, which are under local authority control, in their compliance with the Freedom of Information Act 2000.

Module 2 (currently under development) will consist of additional information which is designed to assist Academies in their compliance with the Freedom of Information Act 2000 and other business requirements.

Module 3 (currently under development) will consist of additional information which is designed to assist independent schools with managing their records in line with legislative requirements.

The Information Management Toolkit for Schools is being made available to schools free of charge in PDF format. The Toolkit is available in MSWord format at no additional charge to IRMS members and at a fixed charge to non-members. For more details about this please contact IRMS (info@irms.org.uk).

All questions, suggestions and amendments to the toolkit should be sent to schooltoolkit.irms.org.uk. We will only undertake to answer questions from IRMS members, so please include your IRMS membership number when sending the question.

The Information Management Toolkit for Schools is designed as guidance and should not be quoted to users as being a "standard". All local authorities should seek the advice of their own legal departments before using the toolkit. Local authorities should not refer members of the public to the IRMS for clarification about the toolkit. The IRMS is not a public body and therefore is not subject to the Freedom of Information Act 2000. All requests for information relating to the toolkit used by individual authorities must be addressed by that authority.

The review group consisted of the following members:

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Note from the Editor

The Information Management Toolkit for Schools contains a number of different fact sheets which have been compiled by various working groups within the Review Group. This means that there is not a consistency of language or presentation across the toolkit. For example, one working group may have written in the third person where another may not. It has been decided to retain the original format of the documents as they were supplied to the editor to reflect the diversity of the working groups.

Users of the toolkit should be aware that this toolkit was compiled for use by local authority schools. The IRMS is aware that local authority schools are fast becoming a thing of the past and the intention is to amalgamate this toolkit with the toolkit for Academies at the next review to reflect this.

Users of the toolkit should also be aware that this guidance was compiled whilst the Independent Inquiry Into Child Sexual Abuse (IICSA) was still sitting. At the time of writing there is a moratorium on the disposal of any material which may be required by the Inquiry, and instructions have been issued to organisations explaining what they need to do. If a school is unsure about how IICSA impacts a particular group of documents then they should seek advice from their local authority or legal advisers.

The Information Management Toolkit for Schools contains the following sections, which are hyperlinked from the contents page for ease of reference:

Records Management Policy

Each public authority (including individual schools) should have a records management policy. The Toolkit contains a Policy Document which can be adopted in its entirety or adapted to reflect the different needs of individual schools.

Pupil Records

Guidelines about what should be included in the main pupil record, plus advice about what information should be transferred on to the next school as well as how this information should be transferred.

Records Management Programme

The Information Management Toolkit aims to assist individual schools with managing records throughout their lifecycle. There is advice about managing e-mail so as to ensure that it becomes part of the core record. There is also advice about how to conduct an information audit, along with some templates.

The 2018 revision of this toolkit contains three completely new sections. There is a section on managing compliance with GDPR for schools based on frequently asked questions, along with some templates. There is a section relating to the monitoring of electronic communication and the management of Social Media. The section on Information Security, Business Continuity and Digital Continuity has been completely remastered as part of this review.

There are also guidelines about what needs to be considered when a school closes or changes status. There is a checklist covering requirements for physical storage areas.

Records Management Policy

Background

Section 46 of the Freedom of Information Act 2000 requires schools, as public authorities, to follow a Code of Practice on managing their records. Under section 7 of the Code of Practice on the Management of Records, it states that:

“Authorities should have in place a records management policy, either as a separate policy or as part of a wider information or knowledge management policy.”

This policy needs to:

1. Be endorsed by senior management, for example at board level, and should be readily available to staff at all levels. (section 7.1)
2. Provide a mandate for the records and information management function, and a framework for supporting standards, procedures and guidelines. The precise contents will depend on the particular needs and culture of the authority, but it should as a minimum:
 - a. Set out the authority’s commitment to create, keep and manage records which document its principal activities;
 - b. Outline the role of records management and its relationship to the authority’s overall business strategy;
 - c. Identify and make appropriate connections to related policies, such as those dealing with e-mail, information security and data protection;
 - d. Define roles and responsibilities, including the responsibility of individuals to document their work in the authority’s records to the extent that, and in the way that, the authority has decided their work should be documented, and to use those records appropriately;
 - e. Indicate how compliance with the policy and the supporting standards, procedures and guidelines will be monitored. (7.2)
3. The policy should be kept up-to-date so that it reflects the current needs of the authority, particularly given the rapidly changing technological environment and the embedding of the new data protection legislation. One way of ensuring this is to review it at agreed intervals, for example: annually; following an

event which may require a review of practice (e.g. a subject access request); or after major organisational or technological changes, in order to assess whether it needs amendment. (7.3)

4. The authority should consider publishing the policy so that members of the public can see the basis on which it manages its records. (7.4)

[For a full copy of the Lord Chancellor’s Code of Practice see <http://www.nationalarchives.gov.uk/documents/information-management/foi-section-46-code-of-practice.pdf>]

Having a records management policy will support the school in meeting its responsibilities under the Data Protection Act 2018 and the General Data Protection Regulation.

Policy Template

The following extract forms part of a policy statement template which could be adopted by individual schools. It has been extracted from a model action plan for developing records management compliant with the Lord Chancellor’s Code of Practice under Section 46 of the Freedom of Information Act 2000 Model Action Plan for Schools. <https://www.nationalarchives.gov.uk/documents/schools.rtf>

The policy statement template can be adopted in its entirety or can be amended to reflect the needs of individual schools. Once it has been amended, it should be approved by the governing body or other appropriate authority. Once the records management policy has been approved at the appropriate level it should be published, perhaps as part of the publication scheme.

[Name of School] Records Management Policy

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.

Records Management Policy Continued

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

- Scope
- Responsibilities
- Relationships with existing policies.

1. Scope of the policy

1.1 This policy applies to all records created, received or maintained by permanent and temporary staff of the school in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the school.

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 electronic format e.g. paper documents, scanned documents, e-mails which document business activities and decisions, audio and video recordings, text messages, notes of telephone and Skype conversations, spreadsheets, Word documents, presentations etc.

2. Responsibilities

2.1 The governing body of a school has a statutory responsibility to maintain the school records and record keeping systems in accordance with the regulatory environment specific to the school. The responsibility is usually delegated to the headteacher of the school.

2.2 The person responsible for day-to-day operational management in the school will give guidance on 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 The school will manage and document its records disposal process in line with the 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 data protection legislation (subject access requests "SARS").

2.4 Individual staff and employees must ensure, with respect to records for which they are responsible, that they:

- 2.4.1 Manage the school's records consistently in accordance with the school's policies and procedures;
- 2.4.2 Properly document their actions and decisions;
- 2.4.3 Hold personal information securely;
- 2.4.4 Only share personal information appropriately and do not disclose it to any unauthorised third party;
- 2.4.5 Dispose of records securely in accordance with the school's Records Retention Schedule.

3. Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information policy
- Data Protection policy
- Information Governance Policy and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

Signed: [Head of School]

Creation and Management of School Archives

The National Archives has supplied the following information in relation to the creation and management of school archives:

If your school is keeping an archive (e.g. of old photographs/ registers), either at your local Record Office or at your school, it would be right to include a statement in your school's Data Protection Policy to advise the public that such archive is in place. This will help separate the personal data your school keeps for operational reasons and those for archive reasons and in turn a much more manageable way to deal with data subject requests. The following paragraph could be included:

The XXX school archive is maintained as a resource to help inspire and equip current staff and pupils to understand and appreciate issues of identity, belonging and shared heritage; to prompt memories of school-life among many generations of Old XXXians; and to serve as a research resource for all interested in the history of XXX school and the community it serves.

Acknowledgements

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Pupil Records: Guidance

Introduction

All schools, with the exception of independent schools, are under a duty to maintain a pupil record for each pupil. Early Years settings will have their own record keeping requirements.

The 'Pupil Record' comprising the educational and curricula record, should be seen as the core record charting the individual pupil's progress through the education system, and should accompany them throughout their school career. This record will serve as the formal record of their academic achievements, other skills and abilities, and progress in school.

The aim of this guidance is to provide some consistency of practice in the way in which pupil records are managed across all schools. It includes suggestions on the content of the pupil record, advice on transferring to the next school, and retention and disposal arrangements for both paper and electronic records.

Pupil Record

Recording and disclosure of information

Pupil records may be held in paper form, or else electronically (for instance as part of the school management information system (MIS)). Schools will have their own systems for maintaining pupil records, which may be a combination of electronic and hard copy files.

All information must be easy to find, accurately and objectively recorded and expressed in a professional manner as pupils and parents have a right of access to their educational record via two possible routes:

1. A request for an educational record.
The Education (Pupil Information) (England) Regulations 2005, states that the pupil record must be provided to parents within 15 school days of a request where the pupil is enrolled in a maintained school. This provision does not apply to Academies, independent schools etc;
2. Requests for information by pupils, or their parents are to be treated as subject access requests under Data Protection legislation.

Paper Files

The following information is useful on the front of a paper file, if one is held:

- Surname and forename
- Date of birth
- Unique Pupil Number
- Date file was started/opened

It may be useful to have the following information inside the front cover so that it is easily accessible to authorised staff; this is not necessary if accessible on the school information management system:

- Emergency contact details
- Preferred name
- Names and contact details of adults who have parental responsibility/care for the pupil
- Reference to further information held on allergies/medical conditions
- Other agency involvement e.g. SEN, speech and language therapist, etc.
- Reference to any other linked files

Contents of the pupil record

The table below lists common and potential record types that may form part of the Pupil Record.

Record Type	Notes
Record of transfer from Early Years setting	If applicable
Admission Form	
Data Collection/Checking Form – current	This should be checked regularly by parents to ensure details are accurate
Annual written report to parents	
National Curriculum and Religious Education locally agreed syllabus record sheets	
Any information relating to a major incident involving the child	
Statements/Plans, reports, etc. for educational support, e.g. SEN, Speech and Language	Store in a separate area of the record or keep in a separate linked file
Medical information relevant to the child's on-going education/behaviour	Store in a separate area of the record or keep in a separate linked file
Child protection reports/disclosures and supporting documentation	Store in a separate area of the record or keep in a separate linked file so as to limit access to specific staff
Any information relating to exclusions (fixed or permanent)	
Specific correspondence with parents or outside agencies relating to major issues	This may be in e-mail form. Once matter is closed save any correspondence that records sequence of events, pertinent issues and outcomes to pupil record
Summary details of complaints made by the parents or the pupil relevant to the child's on-going education/behaviour	This may be in e-mail form, see note above. Most complaints records are retained by the school and not as part of the pupil record
Examination Results – pupil copy	Send uncollected certificates back to exam board after all reasonable efforts to contact the pupil have been exhausted
SATS Results	A note of the result should be recorded

Pupil Records: Guidance Continued

Records not forming part of the pupil record

The following record types should be stored separately to the main pupil record, as they are usually subject to shorter retention periods (please see the Retention Schedule section); they should not be forwarded to the pupil's next school:

- Attendance Registers and Information
- Absence (authorised) notes and correspondence
- Parental consent forms for trips/outings
- Accident forms (a copy can be placed on the pupil record if it is a major incident)
- Medicine consent and administering records (this is the school's record)
- Copies of birth certificates, passports, etc.
- Generic correspondence with parents about minor issues (i.e. 'Dear Parent')
- Pupil work, drawings, etc.
- Previous data collection forms which have been superseded (there is no need to retain these)
- Photography (image) consents (this is the school's record).

Information stored electronically

Those principles relevant to paper records will apply to those pupil records stored electronically. School information management systems may incorporate features to enable elements of the electronic pupil record to be deleted in accordance with retention schedules, whilst the remainder of the record remains intact.

Storage and Security

All pupil records and associated information should be stored securely to maintain confidentiality whilst keeping information accessible to those authorised to see it. Electronic records should have appropriate security and access controls in place; equally paper records should be kept in lockable storage areas with restricted access. Not everyone in a school has a need to access all of the information held about a pupil; this is particularly relevant to child protection information. [see also the section on Information Security in this toolkit]

Transferring Pupil Records

It is vital to ensure swift transfers of information to the new school to ensure appropriate decisions can be made regarding a pupil, using relevant and accurate information.

Weeding

The pupil record should not be weeded before transfer, unless any duplicates or records with a short retention period have been included; these can be removed and securely destroyed.

Transfer Process

The following should be transferred to the next school within 15 school days of receipt of confirmation that a pupil is registered at another school:

- Common Transfer File (CTF) from the School Information Management System via the school2school system when used
- Any elements of the Pupil Record, held in any format, not transferred as part of the CTF
- SEN or other support service information, including behaviour, as only limited information may be included in the CTF
- Child Protection information; this must be sent as soon as possible by the Designated Safeguarding Lead (DSL) or a member of their team to their equivalent at the new school.

Schools must ensure the information is kept secure and traceable during transfer:

- Records can be delivered or collected in person, with signed confirmation for tracking purposes
- Pupil Records should not be sent by post. If the use of post is absolutely necessary, they should be sent by 'Special Delivery Guaranteed' or via a reputable and secure courier to a pre-informed named contact, along with a list of the enclosed files. The new school should sign a copy of the list to confirm receipt of the files and securely return to the previous school
- If held electronically, records may be sent to a named contact via secure encrypted e-mail, or other secure transfer method.