



Records Management Policy

Document Control Information			
Records Management Policy			
Review Period Every 2 years		Review Committee Trustees	
Revision History			
Author	Summary of changes	Issue	Date Authorised
R Righini	New policy re GDPR compliance	1	31 st August 2019
Authorisation			
Approved By:	This policy was approved by the Trustees		
Date Approved:	31 st August 2019		
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Document Owner & Reviewer:	The senior manager responsible for this policy is the Head of Site		
Equality Impact			
Statement	<p>We welcome feedback on this document and the way it operates. We are interested to know of any possible or actual adverse impact that may affect any groups in respect of any of the Equality Act 2010 protected characteristics.</p>		
Screening	<p>The person responsible for equality impact assessment for this document is the Director of Equality and Diversity.</p> <p>This document has been screened by the Equality Team and the impact has been assessed as:</p> <p> <input type="checkbox"/> Not applicable <input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High </p>		

1. Purpose

- 1.1. We recognise that our records and the information contained within them are a vital school asset, and that their effective management is essential to;
 - 1.1.1. Support our core functions
 - 1.1.2. Provide evidence of transparency and accountability in decision-making
 - 1.1.3. Improve the overall management of the school
 - 1.1.4. Comply with our legal and regulatory obligations
- 1.2. We therefore have an obligation to put in place effective records management, in the shape of the necessary policies, procedures and practices, to maximise the use of our records, now and in the future.
- 1.3. This policy represents one essential component of the broader information management requirements.

2. Scope of Policy

- 2.1. In order to fulfil our statutory and operational obligations we have to collect, use, receive and share personal, special personal and crime data about living people, eg,
 - 2.1.1. Pupils and their families
 - 2.1.2. current, past, prospective employees
 - 2.1.3. clients and customers
 - 2.1.4. contractors and suppliers
 - 2.1.5. Governors
- 2.2. This policy applies to all records that are created, received and maintained by the school, and our staff, which represent evidence of our activities. It applies to all records regardless of format or storage medium, and therefore applies to electronic records, including e-mail, DVD's, CD's etc. The policy applies regardless of location of working environment

3. Reason for Review

- 3.1. This policy was introduced as part of a GDPR audit.

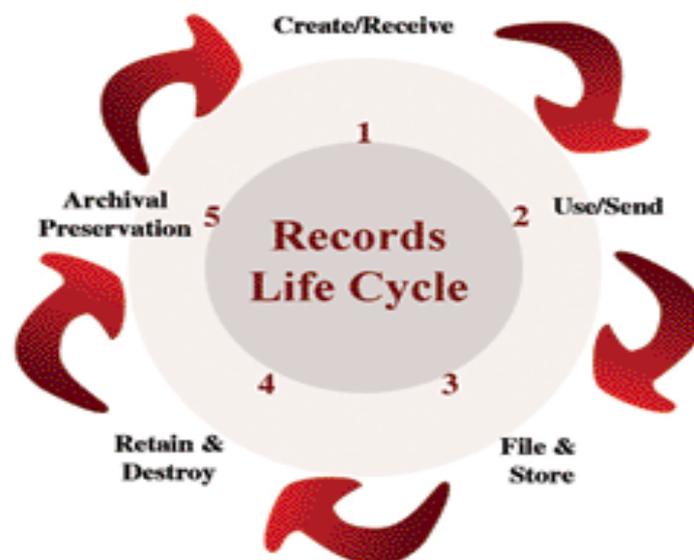
4. Aim(s)

- 4.1. This policy reflects the commitment to data protection compliance to both UK and EU legislation, in particular the Data Protection Act 2018, the EU General Data Protection Regulation 2016 (GDPR).

5. Procedures and practice

- 5.1. This framework will provide policy and process that result in meeting legal and operational requirements by:
 - 5.1.1. Creating and capturing records of a sufficient quality, ensuring the minimum records/data are kept for the business purposes they are needed for.
 - 5.1.2. Managing their operational use to protect their integrity as evidence
 - 5.1.3. Providing access in a controlled manner which allows secure sharing

- 5.1.4. Creating a log of services records, both live, dormant and archived which will include the reasons for keeping them. (records of processing activities/Asset Register)
 - 5.1.5. Storing records in an appropriate environment
 - 5.1.6. Retaining records only for as long as is necessary for operational, statutory, regulatory or cultural purposes
 - 5.1.7. Disposing of records in a timely and secure manner
 - 5.1.8. Providing for the preservation of records with long-term value
 - 5.1.9. Training and supporting staff and governors in fulfilling their records management obligations and aspirations
- 5.2. The management of records adopts the “lifecycle management” model;
- 5.2.1. Information, documents and records are created (born)
 - 5.2.2. Used (working life)
 - 5.2.3. Filed and Stored (dormant)
 - 5.2.4. Retained (retired)
 - 5.2.5. Disposed of (destroyed or permanently preserved as archives).



- 5.2.6. Records can be in any format including (but not exclusively) paper or electronic pages, files or folders; databases, e-mails; diaries; faxes; intranet and internet web pages; blogs and wikis; audio and video recordings; microfiche and microfilm; maps, plan and photographs.
- 5.2.7. Information is used to create documents which are used during the course of our business. If they need to be kept as evidence of an activity, decision or transaction carried out by or on behalf of the school they become “records”. Records are fixed, unchallengeable and kept for a specified time.
- 5.2.8. Documents and records are “information assets”, which to be of value must be relevant, accurate and accessible. By default, the school must manage documents and records to;
 - 5.2.8.1. Know what information is held, by whom and where

- 5.2.8.2. Make informed decisions
- 5.2.8.3. Deliver timely and quality services both internally and externally
- 5.2.8.4. Comply with legislation and regulation
- 5.2.8.5. Protect employees, elected members, contractors, customers and citizens
- 5.2.8.6. Make better use of resources and be open transparent and responsive
- 5.2.8.7. Assure residents that the information we hold is necessary, safe and accurate
- 5.2.8.8. Uphold people's rights of access, portability, restriction, erasure or correction
- 5.2.8.9. Inform employees, elected members, contractors or other authorised users of school systems and information, of their records management duties
- 5.2.8.10. Design and implement information architecture and technical infrastructure to the highest industry standards
- 5.2.8.11. Ensure the long term preservation of important and vital records

5.3. **Assessment and Monitoring**

5.4. An assessment of compliance with requirements will be undertaken in order to provide:

- 5.4.1. Assurance
- 5.4.2. Gap analysis of policy and practice
- 5.4.3. Examples of best practice
- 5.4.4. Improvement and training plans

5.5. Reports will be submitted to the Board of Governors.

5.6. **Responsibilities and Approvals**

5.6.1. *Governing Body:*

5.6.2. The governing body has overall responsibility for ensuring that our school complies with all relevant data protection obligations.

5.6.3. *Headteacher:*

5.6.4. The Headteacher acts as the representative of the data controller on a day-to-day basis and is responsible for the approval of this policy.

5.6.5. *Data Protection Officer:*

5.6.6. The Data Protection Officer will be the key contact for the provision of independent advice on all things data protection. The DPO will provide advice and support when dealing data subject enquiries and communications with the Information Commissioners Office.

5.6.7. *Governors/Employees:*

5.6.8. All Governors and staff, whether permanent, temporary or contracted, including students, contractors and volunteers are responsible for ensuring they are aware of the data protection legislation requirements and for ensuring they comply with these on a day to day basis. Where

necessary advice, assistance and training should be sought. Any breach of this policy could result in disciplinary action or could constitute a criminal offence.

6. Sources and references

- 6.1. Data Protection Act 1998
- 6.2. Equality Act 2010

7. Other useful documents

- 7.1. Subject Access Request Policy
- 7.2. Freedom of Information Policy
- 7.3. Equality Impact Scheme
- 7.4. Publication Scheme
- 7.5. Complaints Policy

8. Monitoring

- 8.1. This policy will be monitored through the MAT's accountability framework.