

HADLEIGH INFANT & NURSERY SCHOOL



Records Management Policy 2021-2023

Version	3
Document authors	Sam Proctor
Other contributors	IGS
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Other related policies	Data Protection Policy Data Handling Security Policy Security Incident Policy Acceptable Personal Use Policy Statutory Request Policy Privacy Notice Complaints Policy

Version History Log for this document

Version	Date Published	Details of key changes from previous version
3	January 2021	Reference made to the legal requirement under the General Data Protection Act 2016 as applied by the Data Protection Act 2018 linked to Records Management. Additional section added linked to ensuring that personal information processes are recorded in the ROPA document.
2	April 2019	Data Protection Act 1998 changed to Data Protection Act 2018
1	April 2018	No policy created which superseded all previous versions.

Roles within the school

Data Protection Officer (DPO) - Ms. L. Almond

Senior Information Risk Owner (SIRO) - Mr. S. Proctor

Information Champion (IC) - Mrs. A. Cain

Information Governance Governor - Mr. I. Holroyd

What if I need to do something against the policy?

If you believe you have a valid business reason for an exception to these policy points, having read and understood the reasons why they are in place, please raise a formal request by contacting Mr. S. Proctor (Head Teacher - SIRO - head@hadleigh-inf.essex.sch.uk)

Breach Statement

Breaches of Information Policies will be investigated and may result in disciplinary action. Serious breaches of Policy may be considered gross misconduct and result in dismissal without notice, or legal action being taken against you.

What I must do	Why I must do it	How I will do it
You must document your work activities in line with procedures.	<ul style="list-style-type: none"> These measures ensure Organisation information, where appropriate to do so, is shared effectively to support efficient business processes and maintain effective service delivery to customers. 	Employees are aware of requirements contained in the retention schedule and any guidance on use of specific systems through training and communications.
You must store all work information in the format and medium best suited to its use in line with procedures.	<ul style="list-style-type: none"> Managing records in line with the best practice guidance fulfils duties under the section 46 Code of Practice on Records Management under the Freedom of Information Act 2000. Retention Guidelines are published so there is clear communication to customers over what information should still be available to them if they wish to make a request. To retain information too long or to destroy too soon leaves us open to criticisms on openness and transparency, and in some cases, compliance with the law. 	Employees are aware of requirements contained in the retention schedule and any guidance on use of specific systems through training and communications.
You must ensure that the information you manage is only known to an appropriate audience.	<ul style="list-style-type: none"> In order to comply with the Section 46 Code of Practice (see above) we must ensure that we are destroying all related information across all formats. For example, destroying a paper file on a project but keeping all the electronic documents about the project in a shared network folder can cause problems if a Freedom of Information request is received. The request co-ordinator assumes that as the paper file is destroyed then we do not hold any information and responds 	You must ensure that paper files are accessible to authorised colleagues in your absence, by ensuring others know where to find keys to lockable storage areas. You must be aware of who information should be shared with, and ensure it is only shared with that audience. You must ensure that you save electronic information in a shared environment, but with appropriate access controls if the information has a restricted audience.
All information in any format which we hold as a record of our activity must be retained after 'closure' in line with Retention Guidelines .	<ul style="list-style-type: none"> In order to comply with the Section 46 Code of Practice (see above) we must ensure that we are destroying all related information across all formats. For example, destroying a paper file on a project but keeping all the electronic documents about the project in a shared network folder can cause problems if a Freedom of Information request is received. The request co-ordinator assumes that as the paper file is destroyed then we do not hold any information and responds 	Follow the guidance contained in the retention schedule and any superseding amendments made by the school.
Owners must regularly review information in line with Retention Guidelines to make best use of the available storage space .	<ul style="list-style-type: none"> In order to comply with the Section 46 Code of Practice (see above) we must ensure that we are destroying all related information across all formats. For example, destroying a paper file on a project but keeping all the electronic documents about the project in a shared network folder can cause problems if a Freedom of Information request is received. The request co-ordinator assumes that as the paper file is destroyed then we do not hold any information and responds 	Follow the guidance contained in the retention schedule and any superseding amendments made by the school.
We must monitor the success of the review process to maintain compliance with the law.	<ul style="list-style-type: none"> In order to comply with the Section 46 Code of Practice (see above) we must ensure that we are destroying all related information across all formats. For example, destroying a paper file on a project but keeping all the electronic documents about the project in a shared network folder can cause problems if a Freedom of Information request is received. The request co-ordinator assumes that as the paper file is destroyed then we do not hold any information and responds 	Designated employees must gather performance data on activities within the scope of this policy for review by the Data Protection Officer and the Leadership Team.

	<p>accordingly. We would then be in breach of the act.</p> <ul style="list-style-type: none"> Records of Processing Activity are a legal requirement under the General Data Protection Act 2016 as applied by the Data Protection Act 2018. 	
You must manage Pupil records in line with best practice and specific system guidance.		Follow the guidance contained in the retention schedule and any superseding amendments made by the school.
You must follow school policy when storing emails as records.		Follow the guidance contained in the retention schedule and any superseding amendments made by the school.
We must ensure that the facilities available for storing and managing information meet legal requirements and best practice .		The organisation must approve and regular review facilities such as systems and physical storage as appropriate against security requirements in Data Protection Law, and all employees must help maintain security standards by following procedure.
We must maintain a selection procedure for identifying, reviewing and managing records with historical value.		Records can be identified for preservation at any point in the records lifecycle, but will not transfer until we have no ongoing administrative need (i.e. at the end of a retention period). When information is due to be destroyed, there should be a final review to select records for transfer to the Essex Record Office.
You must not store business information on a personal drive or on equipment not provided by the organisation.		By only storing all business information on the relevant systems designated by the Organisation and by using only equipment approved by the Organisation.
All Information Assets identified on the Register must be associated with a retention period from the Retention Guidelines .		The Information Asset Owner is responsible for ensuring that Information Asset Managers amend entries on the Information Asset Register to show the correct retention period from the schedule.

The Retention Guidelines must be reviewed for changes in legislation and the organisation's business needs.		A policy review (at least annually) must review the provisions of best practice retention guidance and make any necessary amendments, documenting the reasons for change and managing affected records accordingly.
When archiving paper records, information on ownership, retention and indexing quality must be recorded.		We must complete and retain archiving indexes providing the relevant information about paper records in storage, ensuring that the Organisation is aware of what information it holds at all times and when they can be reviewed.
You must not use the archive storage services of any other commercial company than the approved supplier.		Any use of a commercial storage provider must be assessed and approved to ensure the right security and financial provisions are place. Use of alternatives that have not been approved may not provide value for money and may not provide secure services.
You must ensure that personal information processes are recorded in your Records of Processing Activity (ROPA).		Records of Processing Activity must be maintained and regularly reviewed to meet our legal obligations.

Contacts

If you have any enquires in relation to this policy, please contact Mr. S. Proctor (the school's Head Teacher) on 01702557979 or head@hadleigh-inf.essex.sch.uk . The Head Teacher will also act as the contact point for any subject access requests.

Further advice and information is available from the Information Commissioner's Office - www.ico.gov.uk

References

- Data Protection Act 2018
- General Data Protection Regulations 2016
- Article 8, The Human Rights Act 1998
- Freedom of Information Act 2000.
- Code of Practice on Records Management (under Section 46 of the FoIA)