



## **Record Management Policy**

**2022-2023**

**Definition of a Record: Recorded information (regardless of form or medium) created, received or maintained by the school to meet its legal obligations or provision of its services.**

## **1. Purpose and Scope of Policy**

- 1.1 The school holds records that are a vital asset, support ongoing operations and provide valuable evidence of business activities over time.
- 1.2 This policy commits the school to establish effective records management (RM) which will maximise the use of information assets, promote the integrity of records and ensure compliance with legislation.
- 1.3 This policy applies to all school staff, temporary employees, consultants, contractors, board members and others in the course of their work for and on behalf of The Fitzroy Academy whether working directly for the school or in partnership with it. It applies to all records regardless of format or storage medium, and therefore applies to hand written notes as well as electronic records, including e-mail. This policy applies regardless of location of working environment, be this on school premises, at home, or elsewhere.

## **2. Roles and Responsibilities**

- 2.1 All employees who create, receive and use records will have records management responsibilities at some level depending on the nature of the role they fulfil. There are 4 main levels of responsibility which are:
  - Head Teacher, those with responsibility
  - Teachers
  - Care staff/Teaching Assistants

Detailed below is a summary of each level of responsibility with key tasks bulleted

### 3. Record Management Lifecycle (from creation to disposal)

#### 3.1 Record Creation

3.1.1 All employees are responsible for school records (electronic and hard copy) that they create/use. The following requirements of record creation should be complied with:

- When a record is created it is accurate, current and complete
- Records, particularly those including personal identifiable information, should be routinely checked and updated, e.g. changes to name, address, next of kin, GP, etc
- Electronic record naming should conform to policy requirements, see *Appendix 1* for details
- Exceptions in respect to naming records should be justified

#### 3.2 Record Keeping

3.2.1 Easy retrieval of information is crucial to services operating effectively and forms part of records management. The following requirements of record keeping should be complied with:

- Records should be organised in clearly named folders/files
- Electronic records should be held on the school server. This means that work information that other officers may need access to should NOT be saved on the hard drive, (my documents) or on individuals email account
- Duplication of records should be avoided
- New Reflexions file sharing facilities such as Seafile should be used to avoid copies of documentation being emailed across the company and/or to partners
- Records, where possible, should be updated at the time an activity has occurred
- Records should be accurate and factual. If records contain opinion then the basis for the opinion should be clearly stated. In respect to Privacy Impact Assessment (PII), it should be remembered that an individual has the right under the DPA to see information the school holds about them
- Record keeping should take into account the requirements of the Freedom of Information Act 2000 in respect to individuals having the right to ask for school information
- Where records are held on Schoolpod, consideration should be given to their legal admissibility

### **3.3 Record Maintenance**

3.3.1 The maintenance of records can cover a multitude of activity including movement of records, storage, contingency, etc. The following requirements of record maintenance should be complied with:

- Adequate secure storage arrangements are in place which protects the quality and accessibility of records. Access to records stored should be on a need to know basis
- Business continuity plans are in place that document the arrangements for the protection of records and detail a 'plan B' if records are unavailable for a prolonged period
- Adequate back up arrangements are in place to ensure a seamless resumption of service in the event that back up copies of records are required
- Where records have not been required for live processing for a considerable time (and are still within required retention periods) consideration should be given to archiving them. For hard copy records this would mean scanning them to be saved as soft copy.

### **3.4 Record Access**

3.4.1 School records are accessed for conducting School business or for legislative reasons (FOI, Data Protection, etc.).

The following requirements of record access should be complied with:

- Access levels to records are reviewed on a regular basis
- Access is promptly revoked when it is no longer required
- Access to records is facilitated via a secure method, e.g. electronic records via a user-ID and password as a minimum, hard copy records access via the use of a key, etc
- Right of access requests via SAR should be channelled through human resources

### **3.5 Record Disclosure**

3.5.1 There are a number of legislative provisions that limit or set conditions for the disclosure of information, particularly in respect to personally identifiable information. It is therefore important that consideration is given to whether there is a sound legal basis for disclosing records before they are actually disclosed.

The following requirements of record disclosure should be complied with:

- The Schools Information Sharing procedure (Data Protection policy) is adhered to
- Decisions on disclosure of records containing personal information are made by appropriately qualified staff with the Head teacher having delegated, being aware of the decision making process and/or the actual decision made.

### **3.6 Record Closure**

3.6.1 The closure of a record and its subsequent treatment needs to be made on a consistent basis.

The following requirements of record closure should be complied with:

- The school should set criteria for when a records status changes from live to archived
- Arrangements are in place to archive records where possible, for hard copy records this means the scanning of paperwork onto file
- If there is further activity in respect to the main subject of the closed record, a decision should be made by as to whether the closed record should be reactivated or a new record set up

### **3.7 Record Disposal/Archiving**

3.7.1 The importance of the correct secure disposal/archiving of records cannot be underestimated particularly in regards to personally identifiable information.

The following requirements of record disposal should be complied with:

- The school retention plan is adhered to
- Arrangements are in place to either flag up records that are due for disposal or to instigate a manual review to identify such records
- Disposal is only in a secure manner in compliance with corporate requirements, e.g. hard copies disposed of via School shredders, electronic records disposed of via ICT
- Accounts (including email boxes and h:\ - homes drive) will be deleted by ICT after a set period after the employee/holder leaves the School
- Where records are archived via EDMS (Electronic Document Management Systems) consideration should be given to the legal admissibility of such documents if they were ever required to be used as legal evidence
- Access to archived records should be clearly defined and established on a need to know basis
- Archived records should be reviewed on a periodic basis to establish if these records should be maintained or permanently disposed of.

#### 4. Policy Compliance

- 4.1 The Head teacher along with the school line managing director and board will be responsible for checking that records are being managed in line with this guidance.

Last Reviewed	May 2021
Next Review	May 2024
Reviewed by	Head Teacher and DPO

**Electronic Document Naming Convention**

**For files relating to teaching and learning:**

Subject, detail, date e.g. Geography Rainforests 4 020418

**For files relating to learners:**

Type of file, learner initials, date e.g. EHCP annual review FG 030718

**Other files**

Detail that allows easy access followed by date e.g. Coverplans 0507