

SOUTH DARLEY C.E.
PRIMARY SCHOOL



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SOUTH DARLEY C of E PRIMARY SCHOOL

RECORDS MANAGEMENT POLICY

Person/Committee responsible for reviewing/updating this plan	Full Governing Body
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South Darley CE Primary School

Records Management Policy

1 Introduction

South Darley CE Primary School recognizes the necessity for the efficient management of its records to comply with its legal and statutory obligations, and to contribute to the effective overall management of the school.

The school is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible by the appropriate individuals. In line with the requirements of the GDPR, the school also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended. If records are to be kept for any longer or shorter than as set out in the Derbyshire County Council Retention Guidelines, the reason for any deviation will be kept.

This policy has been created to outline how records are stored, accessed, monitored, retained and disposed of, in order to meet statutory requirements.

2 Scope

This policy applies to all records that are created, received or maintained by staff of the school in the course of carrying out its functions regardless of media or format. The policy also covers the management, storing and disposal of data, whether they are held in hard copy or electronic format.

Records are defined as all 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. Examples include all paper-based records as well as records that exist, or will exist, solely in electronic form, audio/visual form and photographs. Emails are also covered under this policy.

Due to the national ongoing Independent Inquiry into Child Sexual Abuse no pupil and staff record shall be destroyed until further notice. Where records are not destroyed for this purpose, full details for the deviation will be kept. For further information please contact the council's Corporate Records Manager at records.management@derbyshire.gov.uk on 01629 539203.

A small percentage of the school's records may be selected for permanent preservation as part of the school's archives and for historical research.

3 Objectives

- To ensure that staff at South Darley CE Primary School have timely access to all relevant information.
- To ensure records are kept only for as long as necessary to comply with legal, administrative and financial requirements.
- To ensure that records are managed effectively and efficiently to appropriate standards
- To ensure that all records are maintained in accordance with the Derbyshire County Council Records Retention Summary.
- To ensure that the school is accountable and transparent about what data is held and the purpose of holding the data
- To ensure that data providers can amend, delete or transfer data
- To ensure that the school can respond to Subject Access Requests

- To ensure that the School complies with all legislation and regulations concerning the proper management of records. This includes Freedom of Information (2000) and Data Protection (1998) GDPR (2018).

4 Responsibilities

The person with overall responsibility for this policy is the Headteacher of the School.

The Data Protection Officer (DPO) and the Headteacher is responsible for the management of records.

The Headteacher is responsible for promoting compliance with this policy and reviewing the policy on a 4 year cycle.

The School Business Assistant will give guidance for good records management practice and will promote compliance with this policy so that information can be retrieved easily, appropriately and in a timely manner.

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 in conjunction with the latest version of the Derbyshire County Council Records Retention Summary and the General Data Protection Regulations 2018. Should staff need to deviate from this policy, including the early or late destruction of records, they should first discuss this with the Headteacher.

5 Recording Systems

Information created by the school will be managed against the same standards regardless of the media in which it is stored.

All retention periods will be adhered with as stipulated in the Derbyshire County Council Records Retention Summary.

Recording Systems in use at South Darley CE Primary School include

Pupil and Staff Records

Pupil and Staff records are held in hard copy and electronic format. A buff folder is created for each child or staff member which is stored in a locked filing cabinet in the School Office. The file holds hard copies of information about the pupil or staff member including personal and sensitive data. In addition to this, specific pupils may also have additional hard copy information including Special Educational Needs Folders or Safeguarding Folders. These are stored in a locked filing cabinet in the Headteacher Office. Some of the data held in pupil buff folders is also held electronically.

Filing will be carried out on a regular basis. Extraneous information will be removed from files on a regular basis with the exception of any information relating to a live Freedom of Information request (which would be a criminal offence during the live request. Once the request has been dealt with, information can be dealt with as part of the normal removal cycle).

Electronic Pupil and staff files are held in the Records Management Information System – RM Integris. In addition, staff information is also held on the 'SAP' system. The data includes personal and sensitive information including payroll and NI reference numbers, pay details, Pupil Premium Status, medical information, receipt of

additional funding and looked after children information. In addition, financial records are maintained and held on Parentpay.

Accident and Incident information

Accident and incident information for staff members and pupils is kept in hard copy format only and are held in line with the retention periods outlined by Derbyshire County Council. In the case of a serious accident or incident a hard copy may also be placed in the staff/pupil folder.

Pupil records, hard or electronic copies, are passed to each school that a pupil attends and includes all personal information relating to them e.g. dates of birth, home addresses as well as progress and achievement.

Emails, Texts, Diaries, Instant Messages or Social Media.

Where individuals use diaries, information should be transferred to the relevant pupil file, either hard copy or electronic, at the earliest opportunity and the information contained in diaries removed as these are not considered part of school records.

Confidentiality of information contained in diaries must be maintained at all times and even though the diary does not form part of the school record, the information contained should be destroyed securely (treated as confidential waste). Where diaries are used, they should be kept secure at all times as the data contained within could be classed as personal and sensitive.

Email is not considered as a way of storing information and should be forwarded to the appropriate storage facility at the earliest opportunity e.g. printing a hard copy off and placing it on the correct staff/pupil file. If the information contained within the e-mail contains personal or sensitive data or falls under any one of the categories outlined in the DCC Records Retention Guidelines then it should be treated as such, removed from the email system and destroyed in the appropriate manner at the appropriate time as outlined in the guidelines.

Texts, Instant Messages (such as Whatsapp), message boards or forums are subject to the Data Protection and Freedom of Information legislation. South Darley CE Primary School does not use these formats for the transferring of personal or sensitive data.

South Darley CE Primary School does not use Social Media as a method of communication or storing of information.

6 Information Security

Information Security is critical when dealing with personal information or sensitive data. The school takes its duties under the GDPR seriously and any unauthorized disclosure may result in disciplinary action. The DPO and Headteacher are responsible for any recovery measures in place to ensure the security of protected data. Any damage to or theft of data will be managed in accordance with the Schools Code of Conduct.

School staff should ensure

- All personal information in hard copy format is kept in a locked cabinet. The cabinet should be locked when the room is unattended.
- Electronic personal information should be adequately password protected.
- Personal or sensitive information should never be left on a screen if the computer is unattended.

- Files or information sheets containing personal or sensitive data should not be left out unattended on desks or in classrooms overnight. A 'clear desk' policy is encouraged.
- Under no circumstances are visitors allowed access to confidential or personal information. Should a visitor need to go in an area of the school containing personal or sensitive information they should be accompanied at all times.
- Personal or sensitive information will not be sent electronically by e-mail unless the document has been encrypted or password protected. The preferred way of sending personal or sensitive information to Derbyshire County Council or Local Authority employee is by the use of 'Perspective Lite'.
- Encryption keys or passwords to unlock personal or sensitive information should be sent under separate cover or separate email.
- Where files are to be removed from school premises they should be secured in a lockable case/not left unsecured. Files should be sent by way of 'orange bag' or delivered in person when transferring school to school within Derbyshire. Files being sent to schools outside of Derbyshire will be sent using the recorded delivery service. CTF transfers will be sent using Collect/Secure Access.
- Where information is transferred to another school, the receiving school must sign to confirm receipt of all information or files and a copy of this confirmation must be retained by South Darley CE Primary School.
- The school will not keep any copies of information stored within a pupil hard copy record unless there is ongoing legal action at the time during which the pupil leaves the school. The responsibility for these records will then transfer to the next school that the pupil attends.
- Teachers may carry information on memory sticks or other removable data carrier in order to access their files at home and at school. Any information carried in this way must be encrypted using appropriate software/sticks.
- Where memory sticks or other removable data carrier devices are used, personal or sensitive information must not be stored on personal PC's or tablets.
- All computer based information must be backed up regularly and the back-up must be stored off site.
- Information contained in e-mails will be filed into the appropriate electronic or manual filing system once it has been dealt with.
- Staff do not use their personal laptops or computers for school purposes.
- All members of staff are provided with their own secure login and password, and every computer or system regularly prompts users to change their password.
- Circular e-mails to others are sent blind carbon copy (bcc) so email addresses are not disclosed to other recipients.
- Where sending confidential information by e-mail, the sender must always double check that the recipient and recipient address is correct before sending.
- Taking personal or sensitive data off site is discouraged where possible. Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the GDPR, either in an electronic or paper format, staff take extra care to follow the same procedures for security e.g. keeping devices under lock and key, not storing computer encryption keys with the computer. The person taking the information from the school premises accepts full responsibility for the security of the data.
- Before sharing data, staff ensure that they have consent from data subjects to share it, adequate security is in place to protect it and the data recipient has been outlined in a privacy notice.

7 Accessing Data

South Darley CE Primary School is transparent with data subjects, the information held and how it can be accessed.

All members of staff, parents/carers of registered pupils and other users of the school and its facilities are entitled to know what information the school holds and processes about them or their child and why, understand how to gain access to it, understand how to provide and withdraw consent to information being held and understand what the school is doing to comply with its obligations under the GDPR.

Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents. Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

The school will adhere to the provisions outlined in the school's Data Protection Policy when responding to requests seeking access to personal information.

Teaching staff and office staff will have access to both RM Integris and pupil buff folders. The Headteacher and office staff will have access to staff folders. The SENCO/Safeguarding Lead and the Headteacher will have access to Safeguarding and SEN folders. The Headteacher can allow access to school files to others at his discretion. A full log of any additional access rights will be maintained including who, the reason/request why the file was required, which files were accessed and the date and time of the additional access.

8 Disposal of information

Personal data processed for any purpose, or purposes, shall not be kept longer than is necessary for that purpose or purposes.

Information will be disposed of in line with the guidance provided within the Derbyshire County Council Retention Guidelines. The school will undertake an annual review of information during the school summer holidays.

Not all information should be destroyed. Specific information may be transferred for safekeeping to the Derbyshire Records Office. If an individual is in doubt as to whether records should be transferred here, then they should contact the Records Office for guidance and advice.

All personal or sensitive information will be shredded before disposal. Other files will be bundled up and disposed of through an approved trade waste supplier. Loose papers will not be put into a skip.

Electronic data will be archived from electronic media and deleted appropriately at the end of the specified retention period.

CD's, DVD's or disks should be cut into pieces and hard-drives should be cleared before disposal. Clearance of hard-drives (including memory sticks or internal/external hard drives) should be certified and records kept at the school.

A list will be maintained and held in the school office of information that has been destroyed or transferred. The individual destroying or transferring the information is responsible for compiling a list of items destroyed. The list will stipulate on whose authority the information was either destroyed or transferred. A destruction record certificate can be obtained from the school office

9 Retention Periods

South Darley CE Primary School follows the Derbyshire County Council Retention Guidelines.

10 Information Audit

The school conducts information audits on an annual basis against all information held by the school to evaluate the information held, how that information is received and how it uses that information, and to ensure that it is correctly managed in accordance with the GDPR. The Headteacher and the School Business Officer are responsible for conducting the audit but may seek assistance from other staff members in completion to ensure that the information is accurate.

11 Relationship with existing Policies

This policy has been drawn up within the context of

- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- Freedom of Information Policy
- e-Safety Policy
- Data Protection Policy
- Security Policy
- General Data Protection Regulations 2018
- And with other legislation or regulations (including audit, equal opportunities) affecting the school.

The policy also has due regard to the following guidance;

- DfE (2018) Data protection – a toolkit for Schools.

12 Policy monitoring and review

Compliance with this policy and related standards and guidance will be monitored by the Headteacher with support from the School Business Assistant. The DPO, in conjunction with the school, is responsible for monitoring its use and effectiveness and resolving and queries in implementing it.

The policy will be reviewed and approved by the Governing Body of South Darley CE Primary School on a 4-year cycle unless changes are required earlier.