Records Management Policy

(previously included in Data Protection and Information Management Policy)

Version 1

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References	www.ico.org.uk IRMS Schools Toolkit

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Introduction and Scope

Brighter Futures Learning Partnership Trust recognises records management as a core corporate function that supports the effective management of the organisation. A records management programme improves accountability, transparency, continuity, decision-making, and compliance with relevant legislation and regulations.

This policy provides a framework for ensuring that we comply with the requirements of the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, and information access legislation, including the Freedom of Information Act and other associated guidance and codes of practice.

This policy applies to our entire workforce. This includes employees, governors or trustees, contractors, agents and representatives, volunteers and temporary staff working for or on our behalf. Individuals found to knowingly or recklessly infringe this policy may face disciplinary action.

The Records Management Policy applies to all records created, received or maintained by us while carrying out our functions, whether in paper or electronic format. It should be read alongside the other policies within our information governance policy framework.

Roles and Responsibilities

Overall responsibility for ensuring that we meet the statutory requirements of any legislation lies with the Board of Governors or Trustees. The following roles will have day-to-day responsibility for records management compliance and providing the necessary assurance to the Board.

Senior Information Risk Owner (SIRO)

The SIRO is responsible for overseeing the implementation of this policy and ensuring that effective records management practices are in place across the organisation. The SIRO is also responsible for operational management and will ensure that staff are appropriately trained in records management, supported by the SPOC and IAOs. In our organisation, this role lies with the Chief Executive Officer.

Single Point of Contact (SPOC)

The SPOC will support the SIRO in day-to-day operational management. This includes providing guidance on effective records management practices and promoting compliance with this policy so that information can be retrieved easily, appropriately, and in a timely way. In our organisation, this role lies with the Chief Operating Officer.

Information Asset Owner (IAO)

The IAO is responsible for the security and maintenance of a particular record during its lifecycle. IAOs need to understand how information is created, amended, or added over time, who has access to the records, and why. They are also responsible for the

appropriate disposal of information when it is no longer required. A record of IAOs is included in our Information Asset Register.

All staff

All staff, including governors or trustees, contractors, agents and representatives, volunteers, and temporary staff working for or on our behalf, will be responsible for managing records consistently in accordance with this policy. Complete and accurate records must be held that adequately document their work.

Records Management

A record is 'information created, received, and maintained as evidence and an asset by an organisation in pursuit of legal obligations or in the transaction of business.' Records are retained for a period determined by legal, regulatory, and functional requirements.

A programme will be developed to manage our records throughout their lifecycle. This will include using methods such as version control, naming conventions, and file plans to ensure that records can be easily searched and accessed in the event of an information request.

We will ensure that our records are authentic, reliable, useable and have integrity to fulfil and retain their evidentiary value. Regular reviews of the records management programme will be conducted to ensure compliance and check that records are stored securely and can be accessed appropriately.

Pupil Records

We are required to maintain records for each pupil. This record is the core evidence of an individual's progress through the education system and will accompany them throughout their school career.

Pupil records are held electronically within our management information system (MIS) whenever possible. Information not forming part of the core record may be held outside the MIS in either electronic or paper format. This includes information with shorter retention periods, such as attendance registers, consent forms, medical forms, accident forms, absence notes, and pupil work.

Records relating to pupils involved with child protection or safeguarding are held securely in a designated system accessible to the Designated Safeguarding Lead and designated staff members. These records are stored separately from the core pupil record to ensure confidentiality and restricted accessibility. They may be retained for longer than the core pupil file.

We will ensure that the information in the pupil file is accurate, objectively recorded, expressed in a professional manner, and kept up to date.

Pupil records will be transferred electronically to any new setting the pupil attends. Once securely transferred, we will not keep copies of the pupil record unless there is ongoing legal action. The setting the pupil attends until the statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25.

Staff Records

Records relating to our workforce will be held securely electronically, wherever possible, or in paper format. Appropriate security measures are in place to ensure confidentiality and restricted access.

Information related to child protection allegations against staff will be held separately from the core employee record to ensure confidentiality and restricted accessibility. This information may be held for longer than the core employee file.

Information Asset Register (IAR)

In accordance with Article 30 of UK GDPR, we will have an Information Asset Register (IAR) that maintains a record of our processing activities. The IAR will document what records we hold, where they are stored, who has access to the information, and the retention periods in place. It will be reviewed, at least annually, to ensure it remains accurate.

Email Management

We will have a process in place to ensure that emails are managed in accordance with this policy and our retention schedule. Emails discussing business or reflecting significant actions or decisions concerning our pupils or staff will not be stored in personal email inboxes. These emails must be filed into an appropriate electronic filing system, and the original email deleted.

Where possible, emails are automatically deleted in accordance with our retention schedule. Where this is not possible, staff review personal email inboxes manually to ensure any unnecessary emails are deleted.

Security and Access

All records, especially those containing personal data, will be stored securely to maintain confidentiality while keeping the information accessible to those authorised to see it. Electronic records will have appropriate security and access controls, and systems will have robust audit functionality wherever possible.

Paper records will be stored in secure, lockable storage areas with restricted access to key roles.

When sharing or transferring records containing personal information, we will ensure appropriate transmission security controls are in place and align with our Information Security Policy.

Information Requests and Data Subject Rights

Requests for information under Data Protection, Freedom of Information, Environmental Information, or other legislation will be handled in line with our Data Protection Policy.

Retention and Disposal

Retention is the period a record is kept after it stops being actively used but before it is destroyed. It is a vital part of records management as it allows organisations to retain records only for as long as needed and discourages records being held for long periods 'just in case'.

Legal, regulatory, or functional requirements determine the retention period for particular types of records. We use the Information and Records Management Society (IRMS) Schools Toolkit as our retention and disposal schedule. Please refer to the IRMS Schools Toolkit for the specific retention periods that apply to each record type. We will review our use of the toolkit at least annually to ensure that the version we follow remains current.

We will ensure that any records containing personal or confidential information are disposed of appropriately and securely in line with our retention schedule.

Records held in databases or electronic management systems, with the functionality to automatically destroy records after a specified period, will be used wherever possible. A review of the records will be carried out before destruction, where practical.

Where automatic disposal is not in place, for example, for paper records, we will conduct a manual review annually to ensure they are destroyed in line with retention guidelines.

The disposal of all information is documented to ensure that we maintain a record of when it has been deleted and by whom. This allows us to evidence that a record no longer exists or has been transferred to another setting in the event of an information request being received.

Archiving

A small percentage of our records may be selected for permanent preservation. This 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; and to serve as a research resource for all interested in the history of the school and the community it serves.

Records containing personal information will only be selected for archive with appropriate safeguards in place to protect the rights and freedoms of individuals. This will include anonymisation or pseudonymisation wherever possible.

Where we retain records for archiving purposes on-site, we will ensure that we have an archiving policy in place setting out how this operates.

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