

# RECORDS MANAGEMENT POLICY

## 1 Introduction

The Trust recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the Trust and its academies, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

## 2 Scope of the Policy

**2.1** This policy applies to all records that are created, received or maintained by staff of the Trust in the course of carrying out its functions.

**2.2** Records are defined as all those documents which facilitate the business carried out by the Trust and its academies and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created or received, and then stored, in hard copy or electronically.

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

## 3 Responsibilities

**3.1** The Trust has a corporate responsibility to maintain its records and record keeping systems to comply with the regulatory environment. The person with overall responsibility for this policy is the Chief Executive (CEO) of the Enhance Academy Trust.

**3.2** The CEO is responsible for records management in the academy and will give guidance about good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

**3.3** 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 academy's records management guidelines.

## 4 Recording Systems

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

### 4.1 Maintenance of Record Keeping Systems.

- It is important that filing information is properly resourced and is carried out on a regular basis. It is equally important that the files are weeded of extraneous information where appropriate on a regular basis. Removing information from a file once a freedom of information request has been made will be a criminal offence (unless it is part of normal processing).

- Applying retention periods is straightforward provided files are closed on a regular basis.
- Once a file has been closed, it should be moved out of the current filing system and stored either in a record room in the Trust or in another appropriate place until it has reached the end of the retention period.
- Information security is very important especially when dealing with personal information or sensitive policy information. There are a number of basic rules:
  - i. All personal information should be kept in lockable filing cabinets which are kept locked when the room is unattended;
  - ii. Personal information held on computer systems should be adequately password protected. Information should never be left up on a screen if the computer is unattended; iii. Files containing personal or sensitive information should not be left out on desks over night; iv. Where possible sensitive personal information should not be sent by e-mail;
  - v. If files need to be taken off the premises they should be secured in the boot of a car or in lockable containers;
  - vi. Teachers may carry data on memory sticks or other removable data carriers in order to access their files both at home and at the academy. Any data carried in this way must be encrypted using appropriate encryption software. vii. All computer information should be backed up regularly and the back-up should be stored off the site.
  - viii. Information contained in email, fax should be filed into the appropriate electronic or manual filing system once it has been dealt with.

#### 4 The Safe Disposal of Information Using the Retention Schedule

**4.1** Files should be disposed of in line with the attached retention schedule (see appendix). This is a process which should be undertaken on an annual basis during the month of August.

**4.2** Paper records containing personal information should be shredded using a cross-cutting shredder. Other files can be bundled up and put in a skip or disposed of to the waste paper merchant. Loose papers should not be put in skips unless the skip has a lid. CD's/DVD's/Floppy disks should be cut into pieces. Audio/Video tapes and fax rolls should be dismantled and shredded.

**4.3** Electronic data should be archived on electronic media and 'deleted' appropriately at the end of the retention period.

#### 5 Monitoring and Review

This policy has been reviewed and approved by Trustees. The Records Management Policy will be reviewed and updated as necessary every 2 years.

**Date of Review: September 2024 Date of Next Review: September 2025**

<b>Child Protection</b> The retention and use of records relating to child protection matters concerning pupils, and child protection allegations against staff requires specific guidance in this schedule.				
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Child Protection files	Yes	Education Act 2002, s175, related guidance 'Safeguarding Children in Education', September 2004	DOB + 25 years	SECURE DISPOSAL

<b>Allegation of a child protection nature against a member of staff, including where the allegation is unfounded</b>	Yes	Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance) Education Act 2002 guidance 'Dealing with allegations of Abuse against teachers and Other Staff' November 2005	Until the person's normal retirement age, or 10 years from the date of the allegation if that is longer	SECURE DISPOSAL
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## Trustees

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Minutes set (signed)	No		Permanent	Retain in trust for 6 years from date of meeting
Inspection Copies	No		Date of meeting + 3 years	SECURE DISPOSAL [If these minutes contain any sensitive personal information they must be shredded]
<b>Agendas</b>	No		Date of meeting	SECURE DISPOSAL
<b>Reports</b>	No		Date of report + 6 years	Retain in trust for 6 years from date of meeting
<b>Action Plans</b>	No		Date of action plan + 3 years	SECURE DISPOSAL
<b>Policy documents</b>	No		Expiry of policy	Retain in trust whilst policy is operational (this includes if the expired policy is part of a past decision making process)
<b>Complaints files</b>	Yes		Date of resolution of complaint + 6 years	Retain in trust for the first six years. Review for further retention in the case of contentious disputes. SECURE DISPOSAL routine complaints.
<b>Annual Reports required by the Department for Education</b>	No		Date of report + 10 years	

## Management

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
<b>Log Books/Diaries</b> [	Yes		Date of last entry in the book + 6 years	Retain in the trust for 6 years from the date of the last entry
<b>Minutes of the Senior Management Team and other internal administrative bodies</b>	Yes		Date of meeting + 5 years	Retain in the trust for 5 years from meeting
<b>Reports made by the management team</b>	Yes		Date of report + 3 years	Retain in the trust for 3 years from meeting

<b>Records created by members of staff with administrative responsibilities.</b>	Yes		Closure of file + 6 years	SECURE DISPOSAL
<b>Correspondence created by members of staff with administrative responsibilities</b>	No		Date of correspondence + 3 years	SECURE DISPOSAL
<b>Professional development plans</b>	Yes		Closure + 6 years	SECURE DISPOSAL
<b>School Development Plans</b>	Yes		Closure + 6 years	Review

<b>Personnel</b>				
<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
<b>Timesheets, sick pay</b>	Yes	Financial Regulations	Current year + 6 years	SECURE DISPOSAL
<b>Staff Personal files</b>	Yes		Termination + 7 years	SECURE DISPOSAL
<b>Interview notes and recruitment records</b>	Yes		Date of interview + 6 months	SECURE DISPOSAL
<b>Pre-employment vetting information (including unsuccessful DBS checks)</b>	No		DBS guidelines Date of check + 6 months	SECURE DISPOSAL [by the designated member of staff]
<b>Disciplinary proceedings</b>	Yes	Where the warning relates to child protection issues see 1.2. If the disciplinary proceedings relate to a child protection matter please contact your safeguarding children officer for further advice.		
Oral warning			Date of warning + 6 months	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
Written warning – level 1			Date of warning + 6 months	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
Written warning – level 2			Date of warning + 12 months	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
Final warning			Date of warning + 18 months	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
Case not found			If child protection related please see 1.2, otherwise SECURE DISPOSAL immediately at the conclusion of the case	
<b>Records relating to accident/injury at work</b>	Yes		Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied.	SECURE DISPOSAL

<b>Annual appraisal/assessment records</b>	No		Current year + 5 years	SECURE DISPOSAL
<b>Maternity pay records</b>	Yes	Statutory Maternity Pay (General Regulations 1986 (SI 1986/1990), revised 1999 (SI 1999/567)	Current year + 3 years	SECURE DISPOSAL
<b>Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995</b>	Yes		Current year + 6 years	SECURE DISPOSAL
<b>Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure</b>	Yes		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff's personal file.	

<b>Health and Safety</b>				
<b>Basic File Description</b>	<b>Data Protection Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
<b>Accessibility Plans</b>		Disability Discrimination Act	Current year + 6 years	SECURE DISPOSAL
<b>Accident Reporting</b>		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980.		
Adults	Yes		Date of incident + 7 years	SECURE DISPOSAL
Children	Yes		DOB of child + 25 years <sup>(3)</sup>	SECURE DISPOSAL
<b>COSHH</b>			Current year + 10 years [Where appropriate an additional retention period may be allocated]	
<b>Incident reports</b>	Yes		Current year + 20 years	SECURE DISPOSAL
<b>Policy Statements</b>			Date of expiry + 1 year	SECURE DISPOSAL
<b>Risk Assessments</b>	Yes		Current year + 3 years	SECURE DISPOSAL
<b>Process of monitoring of areas where employees and persons are likely to have come in contact with asbestos</b>			Last action + 40 years	SECURE DISPOSAL

Process of monitoring of areas where employees and persons are likely to have come in contact with radiation			Last action + 50 years	SECURE DISPOSAL
Fire Precautions log books			Current year + 6 years	SECURE DISPOSAL
(A child may make a claim for negligence for 7 years from their 18 <sup>th</sup> birthday. To ensure that all records are kept until the pupil reaches the age of 25 this retention period has been applied.)				
<b>Administrative</b>				
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Employer's Liability Certificate			Closure of the school + 40 years	SECURE DISPOSAL
Inventories of equipment and furniture			Current year + 6 years	SECURE DISPOSAL
General file series			Current year + 5 years	Review to see whether a further retention period is required
School brochure/prospectus			Current year + 3 years	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
Circulars (staff/parents/pupils)			Current year + 1 year	SECURE DISPOSAL
Newsletters, ephemera			Current year + 1 year	Review to see whether a further retention period is required
Visitors' book			Current year + 2 years	Review to see whether a further retention period is required
PTA/Old Pupils' Associations			Current year + 6 years	Review to see whether a further retention period is required

<b>Finance</b>				
Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Annual Accounts		Financial Regulations	Current year + 6 years	Archive
Loans		Financial regulations	Date of last payment on loan + 12 years	Review to see whether a further retention period is required
Contracts				
Under seal			Contract completion date + 12 years	SECURE DISPOSAL
Under signature			Contract completion date + 6 years	SECURE DISPOSAL

Monitoring records			Current year + 2 years	SECURE DISPOSAL
Copy orders			Current year + 2 years	SECURE DISPOSAL
Budget reports, budget monitoring etc.			Current year + 3 years	SECURE DISPOSAL
Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year + 6 years	SECURE DISPOSAL
Annual Budget and background papers			Current year + 6 years	SECURE DISPOSAL
Order books and requisitions			Current year + 6 years	SECURE DISPOSAL
Delivery Documentation			Current year + 6 years	SECURE DISPOSAL
Debtors' Records		Limitation Act 1980	Current year + 6 years	SECURE DISPOSAL
Petty cash books		Financial Regulations	Current year + 6 years	SECURE DISPOSAL

## Property

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Title Deeds			Permanent	These should follow the property unless the property has been registered at the Land Registry
Plans			Permanent	Retain in school whilst operational
Maintenance and contractors		Financial Regulations	Current year + 6 years	SECURE DISPOSAL
Leases			Expiry of lease + 6 years	SECURE DISPOSAL
Lettings			Current year + 3 years	SECURE DISPOSAL
Burglary, theft and vandalism report forms			Current year + 6 years	SECURE DISPOSAL
Maintenance log books			Current year + 6 years	SECURE DISPOSAL
Contractors' Reports			Current year + 6 years	SECURE DISPOSAL

## Department for Education

Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
HMI reports			These do not need to be kept any longer	
OFSTED reports and papers			Replace former report with any new inspection report	Review to see whether a further retention period is required
Returns			Current year + 6 years	SECURE DISPOSAL
Circulars from DFE			Whilst operationally required	Review to see whether a further retention period is required

**\*\*For Data Protection purposes the following information should be kept on the file for the following periods:**

All documentation on the personal file	Duration of employment
Pre-employment and vetting information	Start date + 6 months
Records relating to accident or injury at work	Minimum of 12 years
Annual appraisal/assessment records	Minimum of 5 years

Records relating to disciplinary matters (kept on personal files)

- oral warning 6 months
- first level warning 6 months
- second level warning 12 months
- final warning 18 months