

Records Management Policy



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Policy history:	November 2018
Written	March 2019
Agreed by Governing Body	March 2021
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A record is defined as: *'Information created, received and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business'*.

Commitment to records management

1. Bryn Primary School recognises that its records are collective assets.
2. Records provide evidence for protecting the legal rights and interests of the school, and are key evidence for demonstrating performance and accountability. The school is, therefore, dependent on its records to operate efficiently, carry out its statutory function as an education institution, and to account for its actions.
3. Bryn Primary School is committed to ensuring its records are maintained in accordance with the *Lord Chancellor's Code of Practice on the Management of Records issued under Section 46 of the Freedom of Information Act 2000*.

Objectives

4. Bryn Primary School will effectively manage its records from planning and creation stages through to their disposal in order to fulfil the following objectives:
 - Create and capture accurate, authentic, reliable and useable records to produce invaluable evidence and demonstrate accountability
 - Maintain records to meet the business needs of the school for as long as required to ensure operational efficiency and provide pastoral care
 - Dispose of records that are no longer required in a secure and appropriate manner in line with Principle (e) of the GDPR
 - Protect vital records of pupils, their families, and school staff
 - Conform to legal and statutory requirements relating to record-keeping

Scope

5. This policy applies to all records created, received or maintained by current and former employees, Governing Body members, volunteers or those otherwise acting as agents of the School in the course of carrying out their school business.
6. All types of records are covered, regardless of whether they are held electronically (including emails), on paper or audio-visual media, whether in English, Welsh or other formats or languages, and regardless of their age.
7. The policy covers records stored in any location, whether in office accommodation, corporate record centres, network drives, portable media (e.g. laptops and memory sticks) or held by other organisations acting on behalf of the School, for example suppliers or contractors.
8. The organisation's Record Retention and Disposal Policy should be consulted for detailed information on retention of records.

Responsibilities

All staff & volunteers

9. All permanent / temporary staff and volunteers are responsible for creating, managing, and timely disposal of accurate records to evidence the school's activities.

Governors

10. Governors create, use and manage school information on a daily basis. This may be done outside the school building within their home or constituency office environment. Therefore, it is crucial that elected members understand their responsibilities to create and maintain this information appropriately.

Headteachers

11. It is the responsibility of the Headteacher to ensure the discipline of records management is given recognition and equal profile to management of other corporate assets, such as staff and finance.
12. Headteachers are responsible for ensuring their staff manage records effectively and provide evidence of the School's activities, providing support accordingly.

Data Protection Officer (Information Governance SLA)

13. The DPO is a specialist role introduced by the General Data Protection Regulation 2016 and oversees responsible management of all personal information processed by the School. This includes making sure that records containing personal information are suitably created, updated, shared, used, stored and disposed of at the end of the records lifecycle.
14. Bryn Primary School has contracted the Corporate Information Governance Manager from Caerphilly County Borough Council Corporate Information Governance Unit as their Data Protection Officer (DPO) under the 2018/2019 Information Governance Service Level Agreement.
15. An Information Governance Officer Schools (IGOS) has been employed to undertake the day-to-day liaison with Caerphilly schools and to fulfil the SLA.
16. The IGOS will support the School with the following:
 - a) Manage reporting of data security incidents in line with the requirements of the Information Commissioner's Office once determined
 - b) Manage data protection complaints against the School
 - c) Provide advice on Data Protection Impact Assessments completed by the School
17. Advice on records management is out of scope of the SLA in place with the Corporate Information Governance Unit. However, the IGOS maintains close contact with the Education Directorate and the Schools IT Service to provide coordinated advice and support (see paragraphs 22 and 23 below).

Information Governance Lead (IGL)

18. Bryn Primary School have designated an Information Governance Lead (IGL) for their school. They have a crucial role in translating the School's records management legal duties into reality by maintaining an awareness of how records are managed within the School, being proactive in identifying potential improvements, and cascading agreed initiatives to staff. The IGL is also responsible for monitoring records management practice within the school to ensure best practice is adhered to.
19. The IGL must also ensure staff are fully supported in managing records effectively, and that appropriate arrangements are in place for contractors and other partner organisations to adhere to the School's high records management standards.

Senior Information Risk Owner (SIRO)

20. Bryn Primary School may consider adopting government best practice by introducing a SIRO to oversee Information Governance matters. The School IGL would report direct to the SIRO, who is responsible for the management of all personal information processed by the School, and would make sure records containing personal information are suitably created, updated, shared, used, stored and disposed of at the end of the records lifecycle.
21. A SIRO would take a leading role in ensuring the Governing Body are briefed in order to make decisions on key records management issues that arise. It is anticipated that the SIRO would take the lead on developing information governance policy and best practice before cascading this information across the school.

Caerphilly County Borough Council Education Directorate

22. Specialist staff within the Education Directorate at Caerphilly County Borough Council support schools and Governing Body members by providing advice and guidance on effective records management practices, including managing records systems, disposal of records, and storing records. This takes into account hard copy and electronic records.

Caerphilly County Borough Council Schools IT Service

23. IT, including the IT Security Team, advise on technical aspects of creating, maintaining and disposing of electronic records at Caerphilly County Borough Council.

24. Supporting documents

- IRMS Toolkit for Schools with example Retention Schedule
- Data Protection Policy
- Access to Unpublished Information Policy
- Publication Scheme
- Wales Accord on Sharing of Personal Information (WASPI)