



Broadwas CE Primary School, Broadwas on Teme, Worcester, WR6 5NE

Broadwas CE Primary School

Our Vision

As a church school, rooted in Christian values, our vision is inspired by the miracle of the loaves and the fishes. This demonstrates God's provision and care for us all through the generosity of one young child. By valuing each individual within our school family, we enable everyone to grow and flourish at Broadwas by providing a relevant, inclusive and knowledge rich curriculum in a stimulating, fun and loving environment.

At Broadwas we 'Live Our Values Everyday'.

Records Management Policy and Annual Review of Records Checklist

1. ABOUT THIS POLICY

Our School recognises that by efficiently managing our records, we will be able to comply with our legal and regulatory obligations, and to contribute to the effective overall management of our school. Maintaining good records helps us to provide the evidence needed to protect the legal rights and interests of our school, and for us to demonstrate our performance and accountability.

This policy provides the framework through which we will effectively manage our records.

It covers:

- Scope
- Responsibilities



- Safe destruction of records
- Freedom of Information Act 2000
- Relationships with existing policies

2. SCOPE

This policy applies to all records created, received or maintained by permanent and temporary staff of the school in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the school.

Records are defined as all documents which facilitate the business carried out by the school and which are thereafter retained to provide evidence of transactions or activities. These records may be created, received or maintained in hard copy or electrical format e.g. paper documents, scanned documents, e-mails, audio and video recordings, text messages, notes of telephone and spreadsheets, Word Documents, presentations, etc.

3. LEGISLATION AND GUIDANCE

This policy meets the requirements of the General Data Protection Regulation (GDPR), the Data Protection Act 2018 (DPA 2018) and the Freedom of Information Act 2000 (FOIA 2000). It is based on the IRMS Toolkit For Schools, the Department of Education – Data Protection Toolkit for Schools, Department of Education – Annual Review of School Records and Safe Destruction Checklist, and guidance published by the Information Commissioner's Office (ICO) on the GDPR.

4. RESPONSIBILITIES

4.1 The Governing Body

The governing body of the school/Academy Trust has a statutory responsibility to maintain the school's records and record keeping systems in accordance with the regulatory framework of the school.



4.2 The Data Champion/responsible person

The Head teacher, Mr James Dennis, will provide guidance on good records management practices within the school and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way.

The Data Champion (Mr J Dennis) will monitor compliance with this policy by ensuring that the 'Annual Review of School Records Checklist' is completed at least annually.

4.3 All Staff

It is the responsibility for all members of staff to ensure that our school does not keep personal information for longer than is necessary for the purpose or purposes for which it was collected.

Our school will manage and document its records disposal process in line with the guidance provided by the IRMS Toolkit for Schools.

It is the responsibility of all members of the school to ensure that they:

- Manage school records consistently in accordance with school's policies and procedures;
 - Properly document their actions and decisions;
 - Hold personal information securely;
 - Only share personal information appropriately and do not disclose it to an unauthorised third party;
 - Dispose of records securely in accordance with the guidance set out in the Information and Records Management Society's toolkit for schools/school's Records Retention Schedule which can be found here:
- Staff who do not comply with this policy may face disciplinary action.
 - This policy does not form part of any employee's contract of employment and may be amended at any time.

5. SAFE DESTRUCTION OF RECORDS



- All records containing personal information, or sensitive policy information will be made either unreadable or unreconstructable.
 - Paper records should be shredded using a cross-cutting shredder
 - CDs / DVDs / Floppy Disks should be cut into pieces
 - Audio / Video Tapes and Fax Rolls should be dismantled and shredded
 - Hard Disks should be dismantled and sanded
- Any other records will be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways.
- Do not put records containing personal information with the regular waste or a skip.
- Where an external provider is used, where possible, all records will be shredded on-site in the presence of an employee. The organisation must also be able to prove that the records have been destroyed by the company who should provide a Certificate of Destruction. Staff working for the external provider will be trained in the handling of confidential documents.
- The shredding will be planned with specific dates and all records will be identified as to the date of destruction.

PLEASE NOTE: if the records are recorded as 'to be destroyed' but have not yet been destroyed and a request for the records has been received they MUST still be provided.

6. FREEDOM OF INFORMATION ACT 2000

The Freedom of Information Act 2000 requires us to maintain a list of records which have been destroyed and who authorised their destruction

When destroying either a substantial amount of information or information which is of a particularly sensitive or important nature, members of staff should record at least:

- The information that has been destroyed
- The volume of the information that has been destroyed



- Who provided authorisation to destroy the information
- The date the information was destroyed

By following this guidance and completing the Annual Checklist, we will ensure that our school is compliant with the Data Protection rules and the Freedom of Information Act 2000.

7. RELATIONSHIP WITH EXISTING POLICIES

This policy is linked to our:

- Data Protection Policy
- Information Security Policy
- Freedom of Information Policy

DfE Proposed Data Retention Information

The following table sets out the emerging thinking from a sector working group discussing data retention in schools. This is provided as an illustration of the types of justification schools might want to consider. Further work is needed to test and iterate these justifications. Schools should continue to develop and own their own data retention policy based upon local justification and necessary task.

Data Item Group	Short Term Need (event +1 month)	Medium Term Need (pupil at school +1year)	Long Term Need (pupil at school +5 years)	Very Long Term Need (until pupil is aged 25 or older)	Justification
Admissions		X (admissions files)	X (admissions appeals)		Admissions files Admissions data is used extensively from the period of the school receiving it up until the point where children enrol. It is then used for some validation and cross checking of enrolment details. Once enrolled, the child's records in the MIS become the core record. Data about children who enrolled but didn't get in is useful, but any intelligence gathered from it (for example, where in the city children are interested in our school, or the SEN make up) is aggregated within the first year to a level being non-

					personal, after that, the detailed data within the admission file could be deleted. It is important to retain detailed data for a year, any appeals for which richer data about other successful/unsuccessful appeals may be relevant typically happen in the first year. Information about admissions appeals When dealing with appeals, having a reasonable history of any other appeals in some detail can be needed to deal with the particular appeal. The information is needed alongside the admissions policies of the time.
Attainment			X		Formative assessment data is useful as a child is building towards a particular more formal assessment. Once the child leaves the school, it has little value in terms of retention. Summative attainment is the main outcome of what children 'attain' in school. It is important that future schools where pupils go on to learn can understand previous attainment. Whilst often that information is 'passed on' smoothly

					as children move phase, it is not always the case, and thus retaining the names alongside the main attainment data for 1 year after the pupil has left the school feels proportionate. Trend analysis is important, 3 to 5 years is often the 'trend' people look at, but longer may be relevant. Whilst this must be fully flexible in reporting small sub groups, and the data would wish to be retained at individual level, some personal data (for example, name) could be removed from the data to reduce sensitivity. After 3 to 5 years, then aggregated summaries that have no risk of identifying individuals are all that are typically needed to be retained.
Attendance		X			Attendance data probably resides in some 'operational' systems in schools, such as cashless catering. In these systems, the data should only be retained until the associated business processes have concluded (for example, payment of meals). The start of the next academic

					year once all bills are settled feels proportionate. Attendance is related to individual attainment and so being able to relate attendance to attainment whilst in our care is important. Keeping it in detailed, individual form for one year after the pupil leaves school support conversations about detailed attendance that may be needed to best support that child. After that period, non-identifiable summary statistics are all that is required to support longer term trend analysis of attendance patterns. We noted another GDPR principle here that may apply to attendance. Under data minimisation, where 'paper records' capture attendance, this paper record duplicates the electronic version and is probably required once the paper has been transferred to a stable electronic format.
Behaviour		X			This is all relevant for managing children when with at your school. 1 year allows a period of 'handover' to next institution with conversations supported by rich data if relevant.

Exclusions		X			Exclusion data should be 'passed on' to subsequent settings. That school then has responsibility for retaining the full history of the child. If a private setting or the school is unsure on where the child has gone, then the school should ensure the LA already has the exclusion data.
Identity management and authentication	X (images used for identity management)				
Catering and free school meal management		X (meal administration)	X (free school meal eligibility information)		A short historic record of what a child has had may be useful in case of any food-related incidents at school, or parental queries about the types of meals their children are choosing. Keeping for up to one year also allows time to do accounting work associated with catering. Typically 'one month' may not be enough, but 'one year' feels enough. Due to the way school funding works, free school meal eligibility is a financial matter, and thus keeping this data for 6+1 feels appropriate. This 7- year record also needs to be portable with the pupil, as historic dates can be used for funding.
Trips and activities	X (field file)		X (financial information related to trips)	X (major medical events)	Financial information related to trips should be retained for 6 years + 1 for audit purposes. This would include enough child identifiers to be able to confirm contributions.

	X (educational visitors into school)				A 'field file' is the information that is taken on a trip by a school. This can be destroyed following the trip, once any medicines administered on the trip have been entered onto the core system. If there is a minor medical incident on the trip (for example, a medical incident dealt with by staff in the way it would be dealt with 'within school'), then adding it into the core system would be done. If there is a major incident (for example, a medical incident that needed outside agency) then retaining the entire file until time that the youngest child becomes 25 would be appropriate. Permission to go on the trip slips will contain personal data, and destroying them after the trip unless any significant incident arises is appropriate, otherwise refer to the policies above. Schools sometimes share personal data with people providing 'educational visits' into school. There should be good policies in place to ensure that the sharing is proportionate and appropriately deleted afterwards.
Medical information and administration	X (permission slips)	X (medical conditions and ongoing		X medical incidents (potentially)	To support any handover work about effective management of

		management)			medical conditions to a subsequent institution. Permission forms that parents sign should to be retained for the period that medication is given, and for 1 month afterwards if no issue is raised by child/parent. If no issue is raised in that time, that feels a reasonable window to assume all was administered satisfactorily. Adding this policy to the permission slip would seem prudent. Medical 'incidents' that have a behavioural or safeguarding angle (including the school's duty of care) should refer to the retention periods associated with those policies.
Safeguarding				X	All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address) that are needed to identify children with certainty are needed to be retained along with those records.
Special educational needs					Refer to IRMS toolkit

Personal identifiers, contacts and personal characteristics	X (images used in identity systems) X (biometrics) X (house number and road)	X (images used in displays in school)	X (postcodes) X (names) X (characteristics)	Images are used for different reasons, and the reason should dictate the retention period. Images used purely for identification can be deleted when the child leaves the setting. Images used in displays etc. can be retained for educational purposes whilst the child is at the school. Other usages of images (for example, marketing) should be retained for and used in line with the active informed consent, captured at the outset of using the photograph. Biometric data (typically fingerprints used in things like catering) should be used and retained as set out in the active informed consent gained at the outset, but typically this should not be retained long after the activity that requested its use has finished (for example, the child no longer attends the school to have a meal). As set out in other sections, names are needed for smooth handover to subsequent schools for up to one year. Postcode data is useful in analysing longer-term; performance trends or how catchment/pupil populations are
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					shifting over time, but full address data (house number and road) is not required for that activity. Schools may well provide references for pupils for up to 3 years after they leave, and so retaining the name in the core pupil record is important (this doesn't mean it needs to be retained in all systems). Keeping names attached to safeguarding files for longer than this may be entirely appropriate – see safeguarding section. Characteristics form an essential part of trend analysis, and so retention is in line with those needs.
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