



**ST. ANNE'S C.E.(VC) PRIMARY SCHOOL**



**RECORDS DISPOSAL + RETENTION POLICY**

**'Together With God, Making Learning a Life Long Friend'**

Approved:	27.6.2022
Review Date:	July 2025

We are a Church of England School and our policies are written with a commitment to our Christian Character, which is rooted in the Bible.

*Start children off on the way they should go and even when they are old they will not turn from it (Proverbs 22:6)*

St Anne's C.E. Primary has adopted this Records Disposal and Retention Policy from the DfE and <http://www.irms.org.uk/groups/public-sector/resources/134-records-management-toolkit-for-schools>

## **Section 1**

### **Purpose of Disposal Schedule**

This disposal schedule identifies the disposal arrangements for all manual and electronic records created by (Name of School). The Schedule complies with the requirements of the Public Records Act (NI) 1923 and the Disposal of Documents Order (S.R.& O.1925 No 167).

### **Categories of Disposal**

- Destruction
- Permanent preservation

## **Section 2 - Operation of this Records Disposal Schedule**

### **Closing a file**

Manual records should be closed as soon as they cease to be of active use other than for reference purposes. When a file is due to be closed an appropriate member of staff should consult the disposal schedule and mark the front cover of the file, indicating the date on which the file can be destroyed, or whether it should be

reviewed by a member of staff. Closing a file simply means that no further papers can be added but the file can be used for reference.

### **Minimum Retention Period**

With the exception of pupil files, the minimum retention period required for each type of record is calculated from the point the file/record is closed.

### **Destroy**

Where the disposal action states 'Destroy' the records should be kept for the period stated and then destroyed securely. A record must be maintained of the files that have been destroyed.

### **Offer to PRONI**

Where the disposal action states 'Offer to PRONI' the record must be offered to the PRONI when no longer needed for business purposes.

### **Commitment to preserving files/records**

St Anne's C.E. Primary School declares that it will take measures to ensure that the records it creates (including electronic records) will be well maintained and protected while they are in its custody.

### **Roles and Responsibilities**

The School Board of Governors is responsible for ensuring that the School complies with the commitment laid out in this Policy. The Headteacher is charged with operational compliance and will assign any specific staff responsibilities as required in order to help fulfil the School's commitment to effective records management. All members of staff are responsible for creating and maintaining records in accordance with good records management practice.

### **Section 3 - Definitions of Records held by (Name of School) in respect of its Functional Areas.**

There are six main functional areas for which St Anne's C.E. Primary School keeps records as follows:

1. Management and Organisation

2. Legislation & Guidance
3. Pupils
4. Staff
5. Finance
6. Health & Safety

The records contained within these functional areas provide evidence and information about its business activities and are important for the efficient operation of the school.

### **1. Management and Organisation**

This category comprises records held which relate to the management and organisation of the school. Typical records would include the minutes of the Board of Governors, the Senior Management Team and Parent/Teachers Association meetings which record the major decision making processes of the school. Also included are records detailing development, planning and curriculum policies as well as those that demonstrate how the school reports to its parents and other organisations. Records include the School Development Plan, the School Prospectus, Curriculum policies, Annual Report, Emergency Planning and Business Continuity Plan along with the records of meetings, minutes, and policies documenting the decisions and actions taken within this business function.

### **2. Legislation and Guidance from DE, ELBs, ESA, & CCMS**

Files maintained under this heading contain papers relating to legislation e.g. the Education (NI) Order, Circulars, Guidance, Bulletins from the Dept of Education and Education & Library Boards, CCMS etc, correspondence in connection with Statistical Returns and documents relating to Dept of Education Inspections and Reports.

### **3. Pupils**

Pupil Files contain vitally important records which, not only capture the progress of the student throughout their time at the school, but also contain personal details and information beneficial to their well-being within the school environment. Such records would include admission data, attendance of the pupils at the school, timetables and class groupings, education/progress reports of pupils, special education needs documentation, child protection information, disciplinary action taken, examination results, careers advice, school trip details and medical records (details of medical conditions where medicines are required to be administered at school).

#### **4. Staff**

Staff category refers to those records required for the Human Resources Management function within the school. These include staff personnel records (recruitment, interview notes, appointments, training, staff development etc), staff salary records, staff induction, sickness records, staff performance review, substitute teacher records and student teachers on teaching practice etc.

#### **5. Finance**

This business function maintains records for a range of financial activities such as annual budgets, budget monitoring, Annual Statement of Accounts, procurement, tender information and prices, reconciliation of invoices, audit reports etc.

#### **6. Health & Safety**

The health and safety of children and staff is of paramount importance in the school and such records to support this are kept e.g. Accident/Incident Book, legal/accident/incident forms, risk assessments, fire procedure, CCTV, security system files, health and safety policy statement.

### **Section 4 - Electronic Records**

The legal obligation to properly manage records, including compliance with Data Protection legislation, applies equally to electronic records. The main considerations for the management of electronic records are therefore the same as those for manual records. They include:

- Staff must be able to use and access electronic information effectively
- Adequate measures must be in place to ensure all information is stored securely and only available to authorised persons.
- A school must be able to demonstrate a record's authenticity by ensuring information cannot be altered when declared a record.
- A system must be in place for disposing of electronic records in line with policy once they are no longer needed.

In addition to the above, sufficient backup/recovery processes must be in place. There must also be a process through which links are created from electronic records to any associated manual records. This is to ensure a full record can be considered when

necessary i.e. when decision making, providing access or considering a record for disposal.

The School Board of Governors is ultimately responsible for records management within the School. The decision to move towards electronic records must be taken carefully and the Board of Governors must satisfy itself that the measures identified above can be achieved. Further information and advice on electronic records can be obtained from PRONI <http://www.proni.gov.uk> the lead organisation on public sector records management. A number of International Standards have also been established to help organisations follow best practice when implementing an electronic records strategy. They include:

ISO 15801:2009 - record authenticity and legal admissibility

ISO 27001 - information security management

BS 10008 - legal admissibility of electronic information standards

## **SECTION 5 - School Disposal Schedule**

Please see separate document- St Anne's Retention Schedule adopted from Information Management Toolkit for Schools Version 05- February 2016.

## **SECTION 6- Safe disposal of records which have reached the end of their administrative life**

NB: Please be aware that this guidance applies to all types of record, whether they are in paper or digital format.

### **1. Disposal of records that have reached the end of the minimum retention period.**

The fifth data protection principle states that: Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes

In each organisation, local records managers must ensure that records that are no longer required for business use are reviewed as soon as possible under the criteria set out so that only the appropriate records are destroyed.

The local review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained by the organisation for research or litigation purposes.

Whatever decisions are made they need to be documented as part of the records management policy within the organisation.

## 2. Safe destruction of records

All records containing personal information, or sensitive policy information should 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 should be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways. Do not put records in with the regular waste or a skip unless there is no other alternative.

There are companies who can provide confidential waste bins and other services which can be purchased to ensure that records are disposed of in an appropriate way. Where an external provider is used it is recommended that all records must 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 should have been trained in the handling of confidential documents.

The shredding needs to be planned with specific dates and all records should be identified as to the date of destruction. (See appendix a for proforma)

It is important to understand that 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.

Where records are destroyed internally, the process must ensure that all records are recorded are authorised to be destroyed by a Senior Manager and the destruction recorded. Records should be shredded as soon as the record has been documented as being destroyed.

The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed and who authorised their destruction. Members of staff should record at least:

- File reference (or other unique identifier);
- File title (or brief description);
- Number of files and date range
- The name of the authorising officer
- Date action taken

Following this guidance will ensure that the school is compliant with the Data Protection Act 1998 and the Freedom of Information Act 2000.

### **Transfer of records to the Archives**

Where records have been identified as being worthy of permanent preservation arrangements should be made to transfer the records to the County Archives Service.

The school should contact the local record office if there is a requirement to permanently archive the records, and the records will continue to be managed via the DPA 1998 and the FoIA 2000.

If you would like to retain archive records in a special archive room in the school for use with pupils and parents please contact the local record office for specialist advice.

### **Transfer of information to other media**

Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as microform or digital media. The lifespan of the media and the ability to migrate data where necessary should always be considered.

Consideration should also be given to the legal admissibility of records that have been converted from paper to electronic media. It is essential to have procedures in place so that conversion is done in a standard way. This means that organisations can prove that the electronic version is a genuine original and could not have been tampered with in any way. Reference should be made to 'British Standard 10008:2008 'Evidential weight and legal admissibility of electronic information' when preparing such procedures.

### **Recording of all archiving, permanent destruction and digitisation of records**

Sample appendices are provided for the recording of all records to be used. These records could be kept in an Excel spreadsheet or other database format.

***Appendix A***

