

The Rural Enterprise Academy



Records Management Policy

Approved by Governors: **October 2018**

Review Period: **2 years**

Review by: **October 2020**

1. Introduction

The Academy recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations under GDPR (May 2018) and contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the Academy, 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 created, received or maintained by staff of the Academy 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 Academy and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

3. Responsibilities

3.1 The Academy has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Principal of the Academy.

3.2 The person responsible for records management in the Academy will give guidance for 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

i) 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).

ii) Applying retention periods is straightforward provided files are closed on a regular basis.

iii) 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 Academy or in another appropriate place until it has reached the end of the retention period.

iv) Information security is very important, especially when dealing with personal information or sensitive policy information. There are a number of basic rules:

- All personal information should be kept in lockable filing cabinets which are kept locked when the room is unattended;
- 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;
- Files containing personal or sensitive information should not be left out on desks overnight;
- Where possible sensitive personal information should not be sent by e-mail;
- If files need to be taken off the premises, they should be secured in the boot of a car or in lockable containers;
- Teachers may carry data on memory sticks or other removable data carriers in order to access their files at home or at Academy. Any data carried in this way must be encrypted using appropriate encryption software, eg TrueCrypt;
- All computer information should be backed up regularly and the back-up should be stored off the site.

v) Information contained in email should be filed into the appropriate electronic or manual filing system once it has been dealt with.

5 The Safe Disposal of Information Using the Retention Schedule

5.1 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.

5.2 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. CDs/DVDs/Floppy disks should be cut into pieces. Audio/video tapes and fax rolls should be dismantled and shredded.

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

6 Monitoring and Review

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

1. Management of the Academy

1.1 Principal and Senior Management Team					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
1.1.1	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refer to individual pupils or members of staff		Date of the meeting + 3 years then review	SECURE DISPOSAL
1.1.2	Reports created by the Principal or the Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then review	SECURE DISPOSAL
1.1.3	Records created by the Principal, Vice Principal, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then review	SECURE DISPOSAL
1.1.4	Correspondence created by the Principal, Vice Principal, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then review	SECURE DISPOSAL
1.1.5	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
1.1.6	Academy Development Plans	No		Life of the plan + 3 years	SECURE DISPOSAL

1.2 Admissions Process					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
1.2.1	All records relating to the creation and implementation of the Academy Admissions Policy	No	Academy Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, Academy's adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then review	SECURE DISPOSAL
1.2.2	Admissions – if the admission is successful	Yes	Academy Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, Academys adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL
1.2.3	Admissions – if the appeal is unsuccessful	Yes	Academy Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, Academys adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL
1.2.4	Register of Admissions	Yes	Academy attendance: Departmental advice for maintained Academies, academies, independent Academies and local authorities October 2014	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made	REVIEW The Academy will keep the admission register in the event of a past pupil asking for confirmation of dates attended.
1.2.5	Admissions – Secondary Academies – Casual	Yes		Current year + 1 year	SECURE DISPOSAL
1.2.6	Proofs of address supplied by parents as part of the admission process	Yes	Academy Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, Academys adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL

1.2 Admissions Process					
	Basic file description	Data	Statutory	Retention Period	Action at the end of the

		Prot Issues	Provisions	(Operational)	administrative life of the record
1.2.7	Supplementary information form including additional information such as religion, medical conditions etc	Yes			
	For successful admissions			This information should be added to the pupil file	SECURE DISPOSAL
	For unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL

1.3 Operational administration					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
1.3.1	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
1.3.2	Records relating to the creation and publication of the Academy brochure or prospectus	No		Current year + 3 years	STANDARD DISPOSAL
1.3.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	STANDARD DISPOSAL
1.3.4	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
1.3.5	Visitors' Books and Signing In sheets	No		Current year + 6 years then REVIEW	SECURE DISPOSAL
1.3.6	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Association	No		Current year + 6 years then REVIEW	SECURE DISPOSAL

2. Human Resources

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2.1 Operational Staff Management					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
2.1.1	Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years	SECURE DISPOSAL
2.1.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.1.3	Annual appraisal/assessment records	Yes		Current year + 5 years	SECURE DISPOSAL

2.2 Management of Disciplinary and Grievance Processes					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
2.2.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	No	"Keeping children safe in education". Statutory guidance for Academies and Colleges March 2015", "Working Together to Safeguarding Children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015	Until the person's normal retirement age or 10 years from the date of the allegation	SECURE DISPOSAL
2.2.2	Disciplinary proceedings	Yes			
	Oral warning			Date of warning + 6 months	SECURE DISPOSAL (If warnings are placed on personal files then they must be weeded from the file)
	Written warning – Level 1			Date of warning + 6 months	
	Written warning – Level 2			Date of warning + 12 months	
	Final warning			Date of warning + 18 months	
	Case not found			If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL

2.3 Health and Safety					
	Basic file description	Data	Statutory	Retention Period	Action at the end of the

		Prot Issues	Provisions	(Operational)	administrative life of the record
2.3.1	Health and Safety Policy Statements	No		Life of policy + 3 years	SECURE DISPOSAL
2.3.2	Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
2.3.3	Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
2.3.4	Accident Reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980.		
	Adults			Date of the incident + 6 years	SECURE DISPOSAL
	Children			DOB of the child + 25 years	SECURE DISPOSAL
2.3.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18(2)	Current year + 40 years	SECURE DISPOSAL
2.3.6	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
2.3.7	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.3.8	Fire Precautions log books	No		Current year + 6 years	SECURE DISPOSAL

3. Financial Management

3.1 Risk Management and Insurance					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
3.1.1	Employer's Liability Insurance Certificate	No		Closure of the Academy + 40 years	SECURE DISPOSAL

3.2 Accounts and Statements including Budget Management					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
3.2.1	Invoices, receipts, order books and requisitions, delivery notices	No		Current financial year + 6 years	SECURE DISPOSAL
3.2.2	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL

3.3 Property Management					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
3.3.1	Records relating to the letting of Academy premises	No		Current financial year + 6 years	SECURE DISPOSAL

4. Pupil Management

4.1 Pupil's Educational Record					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
4.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No 1437		
	Secondary		Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	SECURE DISPOSAL
4.1.2	Examination Results – Pupil Copies	Yes			
	Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board
	Internal			This information should be added to the pupil file	
4.1.3	Child Protection information held on pupil file	Yes	“Keeping Children Safe in Education Statutory Guidance for Academies and Colleges March 2015” “Working Together to Safeguard Children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015”	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file.	SECURE DISPOSAL – these records MUST be shredded
4.1.4	Child protection information held in separate files	Yes	“Keeping Children Safe in Education (2018) Statutory Guidance for Academies and Colleges 2018 and “Working Together to Safeguard Children (2018)	DOB of the child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record	SECURE DISPOSAL – these records MUST be shredded
4.2 Attendance					
	Basic file description	Data Prot	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record

Issues					
4.2.1	Attendance Registers	Yes	Academy attendance: Departmental advice for maintained Academics, academies, independent Academics and local authorities October 2014	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made	SECURE DISPOSAL
4.2.2	Correspondence relating to authorised absence		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL

4.3 Special Educational Needs					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
4.3.1	Special Educational Needs files, reviews and Pupil Passports	Yes	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.
4.3.2	EHCP maintained under Section 234 of the Education Act 1990 and any amendments made to the EHCP	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth of the pupil + 25 years. (This would normally be retained on the pupil file)	SECURE DISPOSAL unless the document is subject to a legal hold
4.3.3	Advice and information provided to parents regarding educational need	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years (This would normally be retained on the pupil file)	SECURE DISPOSAL unless the document is subject to a legal hold
4.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years (This would normally be retained on the pupil file)	SECURE DISPOSAL unless the document is subject to a legal hold

5. Curriculum Management

5.1 Statistics and Management Information					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
5.1.1	Curriculum returns	No		Current year + 3 years	SECURE DISPOSAL
5.1.2	Examination Results (Academy's copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	Examination Papers			The examination papers should be kept until any appeals/validation process if complete	SECURE DISPOSAL
5.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	SECURE DISPOSAL
5.1.4	Value Added and Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
5.1.1	Self Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL

5.2 Implementation of Curriculum					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
5.2.1	Schemes of Work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL
5.2.2	Timetable	No		Current year + 1 year	
5.2.3	Class Record Books	No		Current year + 1 year	
5.2.4	Mark Books	No		Current year + 1 year	
5.2.5	Record of homework set	No		Current year + 1 year	

5.2.6	Pupils' Work	No		Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the Academy's policy then current year + 1 year	SECURE DISPOSAL
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6. Extra Curricular Activities

6.1 Educational Visits outside the classroom					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
6.1.1	Records created by Academics to obtain approval to run an Education Visit outside the classroom (Secondary)	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specially Section 3 – "Legal Framework and Employer Systems" and Section 4 "Good Practice"	Date of visit + 10 years	SECURE DISPOSAL
6.1.2	Parental consent forms for Academy trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most Academies do not have the storage capacity to retain every single consent form issued by the Academy for this period of time.
6.1.3	Parental permission slips for Academy trips – where there has been a major incident	No	Limitation Act 1980 (Section 2)	DOB of the pupil involved in the incident + 25 years. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	

7. Central Government

7.1 Central Government					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period (Operational)	Action at the end of the administrative life of the record
7.1.1	Attendance Returns	Yes		Current year + 1 year	SECURE DISPOSAL
7.1.2	Academy Census Returns	No		Current year + 5 years	SECURE DISPOSAL
7.1.3	OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL
7.1.4	Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL
7.1.5	Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL