Hammersmith Academy

Records Management Policy

January 2018

1 Introduction

The Data Protection Act 1998 and General Data Protection Regulations make it clear that records should be kept for no longer than necessary. This means that school managers need to be aware of how long each type of record needs to be retained in law, where it might be judicious to retain records for a longer period, and how to destroy records that are no longer needed.

Under the Freedom of Information Act 2000, schools are required to maintain a retention schedule listing the record series which the school creates in the course of its business. The retention schedule lays down the length of time for which the record needs to be maintained and the action which is taken when it is of no further administrative use (what is destroyed, when it was destroyed and by whom).

This policy is based upon the policy recommended by the Records Management Society for schools in England. Hammersmith Academy Trust recognises that the efficient management of its records is necessary to comply with its legal and regulatory obligations and to contribute to the effective overall management of the organisation.

2 Objectives and targets

This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions. This policy also applies to all accounting records required for retention by the Charity Commission under the Charities Act 2011 and under the Companies Act 2006, as well as those records required by HMRC and others to be retained.

Records are defined as all those documents which facilitate the business carried out by the school 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 Action plan

The school keeps records under a wide variety of headings:

- Child protection
- Governors
- Management
- Students
- Curriculum
- Personnel records of staff
- Health and safety
- Administration
- Finance
- Property
- School meals
- DFE, local authority (LA), work experience and careers, family liaison.

The school has a corporate responsibility to maintain these records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher. The person responsible for records management in the school 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 fashion.

Members of staff are expected to manage their current record keeping using the retention schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems. The guidelines follow those set out in the Records Management Toolkit for schools version 5 (updated in 2016), and can be found on the Information and Records Management Society's website.

https://irms.org.uk/general/custom.asp?page=SchoolsToolkit

There are a number of benefits from the use of a complete retention schedule:

- Managing records against the retention schedule is deemed to be 'normal processing' under the Data Protection Act 1998 and the Freedom of Information Act 2000. Provided members of staff are managing record series using the retention schedule they cannot be found guilty of unauthorised tampering with files once a freedom of information request or data subject access request has been made.
- Members of staff can be confident about shredding information at the appropriate time.
- Information which is subject to freedom of information and data protection legislation will be available when required.
- The school is not maintaining and storing information unnecessarily.
- Additional guidelines specifically for academies, which have financial reporting responsibilities under the Companies Act 2006 and to the Charity Commission, are also followed and are set out in the Charity Commission's guidance document 'Retention of accounting records'

4   Archives

Old accounting and personnel records, and some other records, will be archived until being disposed of. Archived records will:

- Be treated as being as confidential as current records.
- Not necessarily be as accessible as current records, but will still be retrievable.
- Have adequate storage made available or may be kept electronically.

Before deciding on whether records will be stored electronically the school will consider: Whether the records may need to be kept in the original format (for legal reasons).

- Whether the records may need to be kept in the original format (for legal reasons).
- Whether the medium chosen to archive the records has an acceptable lifespan for records that will have to be retained for a very long time.
- Where records are archived electronically, whether there will have an adequate means for accessing and printing the record.

A record of all documents that have been archived electronically will be kept.

5   Disposal of records

When the period of retention has expired, and there is no other reason to keep them, the records may be disposed of. The records will be completely destroyed by shredding paper, cutting up CDs and similar items and dismantling and destroying hard drives. Non-sensitive papers will be bundled and disposed of to a waste paper recycling merchant.

A list is kept of records which have been destroyed is retained.

This list includes:

- The file reference.
- The file title or a brief description
- The number of files and date range
- The name of the authorising officer
- The date the file was destroyed

.
6   Policy Review

The implementation of this policy will be monitored by the governors of the Academy and will remain under constant review by the Finance and Resources Director.

This policy will be reviewed every 3 years as part of the Academy's internal review process

The approval of this policy is delegated to the Finance & Estates committee.

Date of next review: January 2021