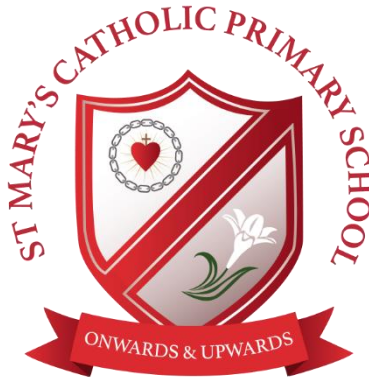# St Mary's Catholic Primary School

Data & Records Management and Retention Policy

Date adopted: Summer 2019

Review date: Spring 2022

Staff responsible: Isobel Vassallo and David McCabe

Governor responsible: Matthew Appleton

Introduction

St Mary's Catholic Primary School (the School) recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the school. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability.

This document provides the policy framework through which this effective management can be achieved and audited, and is based upon a model policy published by the Information and Records Management Society, with minor alterations by Stone King LLP, plus additional content from the Judicium Education model data retention policy.

In this policy 'we' and 'us' mean the School.

1.   Data Protection

 1.1 This policy sets out how long employment-related and pupil data will normally be held by us and when that information will be confidentially destroyed in compliance with the terms of the General Data Protection Regulation (GDPR) and the Freedom of Information Act 2000.

 1.2 Data will be stored and processed to allow for the efficient operation of the School. The School's Data Protection Policy outlines its duties and obligations under the GDPR.

2.   Scope of the policy

    2.1 This policy applies to all records created, received or maintained by the school 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 school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created or received, and then stored, in hard copy or electronically.

3.   Responsibilities

    3.1 The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The Governing Body of the School has overall responsibility for this policy, with the Headteacher Mrs Vassallo having overall responsibility for its implementation. The Data Protection Officer (DPO) Judicium Education, in conjunction with the School, is responsible for monitoring its use and effectiveness and dealing with any queries on its interpretation. The DPO will consider the suitability and adequacy of this policy and report improvements directly to management. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in creating, maintaining and removing records.

    3.2 The School Business Manager Mr McCabe has day-to-day responsibility for records management in the School. He will give guidance about good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way.

    3.3 Individual staff must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management guidelines.

4.   Retention of Records

 4.1 Records will be retained or disposed of appropriately in accordance with the School's statutory obligations and the attached retention schedule, which is based upon the Retention Guidelines for schools published by the Information and Records Management Society, a toolkit for which can be found at:

    http://irms.org.uk/page/SchoolsToolkit

 4.2 Both paper and electronic records will be regularly monitored by Mr McCabe.

5. Destruction of Records

Confidential waste

5.1 This should be made available for collection in the confidential waste bins or sacks located in the lockable storage cupboards near the Office or shredded on site (shredding machine located in the Medical Room).

5.2 Anything that contains personal information should be treated as confidential and securely destroyed.

5.3 When using the shredding machine reference should be made to the Site Manager or a member of the Office Team to ensure that this is carried out effectively.

Other documentation

5.4 Other documentation can be deleted or placed in recycling bins where appropriate.

Automatic deletion

5.5 Certain information will be automatically archived by the computer systems. Should it be necessary to retrieve any information, or prevent this happening in a particular circumstance, the matter should be referred to the Headteacher or School Business Manager for action. A clear explanation of the need to retrieve the information will need to be made and duly recorded.

5.6 The School maintains a database of records which have been destroyed and who authorised their destruction. When destroying documents, the appropriate staff member should record in this list at least: -
-   File reference (or other unique identifier);
-   File title/description;
-   Number of files; and
-   Name of the authorising officer.

6. Archiving

Where records have been identified as being worthy of preservation over the longer term, arrangements should be made to transfer the records to the archives. A database of the records sent to the archives is maintained by Mr McCabe. The appropriate staff member, when archiving documents should record in this list the following information: -

-   File reference (or other unique identifier);
-   File title/description;
-   Number of files; and
-   Name of the authorising officer.

7. Transferring 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 digital media or virtual storage centres (such as cloud storage). The lifespan of the media and the ability to migrate data where necessary should always be considered.

8. Relationship with existing policies

This policy must be read and implemented in conjunction with the following policies:
-   Freedom of Information Policy
-   Data Protection Policy
and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school from time to time.