JOHN FLETCHER OF MADELEY PRIMAY SCHOOL
October 2025

RM-25

Records Management Policy (v3.1)

Definition of a Record: Recorded information (regardless of form or medium) created, received or maintained by the school to meet its legal obligations or provision of its services.

1. Purpose and Scope of Policy

1.1 The school holds records that are a vital asset, support ongoing operations and provide valuable evidence of business activities over time.

1.2 This policy commits the school to establish effective records management (RM) which will maximise the use of information assets, promote the integrity of records and ensure compliance with legislation.

1.3 This policy applies to all officers, temporary employees, consultants, contractors, Governors and others in the course of their work for and on behalf of the school whether working directly for the school or in partnership with it. It applies to all records regardless of format or storage medium, and therefore applies to handwritten notes as well as electronic records, including e-mail. This policy applies regardless of location of working environment, be this on school premises, at home, or elsewhere.

2. Roles and Responsibilities

2.1 All employees/Governors who create, receive and use records will have records management responsibilities at some level depending on the nature of the role they fulfil. There are 2 main levels of responsibility which are:

- Lead/Strategic
- Operational

Detailed below is a summary of each level of responsibility with key tasks bulleted

LEAD/STRATEGIC RESPONSIBILITY:	
Head Teacher / Governors	■ Strategic direction ■ Organisational support and resourcing for RM ■ Support and monitor enforcement of RM policy
OPERATIONAL RESPONSIBILITY:	
Head Teacher / Teaching Staff	■ Develop and implement RM policy ■ Support staff to implement RM ■ Develop and maintain the information retention schedule ■ Provide training where necessary ■ Carry out reviews of RM arrangements

- Records are accurate, relevant and not excessive
- Comply with local record keeping requirements
- Comply with information retention schedules
- Commit sufficient time to RM
- Accountable for managing records
- Records used to meet school requirements

3. Record Management Lifecycle (from creation to disposal)

3.1 Record Creation

3.1.1 All employees are responsible for school records (electronic and hard copy) that they create/use. The following requirements of record creation should be complied with:

- When a record is created it is accurate, current and complete
- Records, particularly those including personal identifiable information, should be routinely checked and updated, e.g. changes to name, address, next of kin, GP, etc
- Electronic record naming should conform to policy requirements, see *Appendix 1* for details
- Exceptions in respect to naming records should be justified
- Version control is attributed to relevant documents, see *Appendix 1* for details

3.2 Record Keeping

3.2.1 Easy retrieval of information is crucial to the school operating effectively and forms part of records management. The following requirements of record keeping should be complied with:

- Records should be organised in clearly named folders/files
- Electronic records should be held within shared drives. This means that work information that other staff may need access to should NOT be saved on the hard drive (c:\ drive), homes drive (h:\drive), OneDrive or on individuals email accounts
- Duplication of records should be avoided at all costs
- Records, where possible, should be updated at the time an activity has occurred
- Record keeping should take into account the requirements of the Freedom of Information Act 2000 in respect to individuals having the right to ask for school information
- Where records are held on EDMS (Electronic Document Management Systems) consideration should be given to their legal admissibility

3.3 Record Maintenance

3.3.1 The maintenance of records can cover a multitude of activity including movement of records, storage, contingency, etc. The following requirements of record maintenance should be complied with:

- Tracker systems implemented to control and log the movement of hard copy records
- Adequate secure storage arrangements are in place which protects the quality and accessibility of records. Access to records stored should be on a need to know basis
- Business continuity plans are in place that document the arrangements for the protection of records and detail a ‘plan B’ if records are unavailable for a prolonged period
- Adequate back up arrangements are in place to ensure a seamless resumption of service in

the event that back up copies of records are required

- Where records have not been required for live processing for a considerable time (and are still within required retention periods) consideration should be given to archiving them.

3.4 Record Access

3.4.1 Records are accessed for conducting school business or for legislative reasons (FOI, Data Protection, etc.).

The following requirements of record access should be complied with:

- Access levels to records are reviewed on a regular basis
- Access is promptly revoked when it is no longer required
- Access to records is facilitated via a secure method, e.g. electronic records via a userid and password as a minimum, hard copy records access via the use of a key, security pass, etc
- Right of access requests via FOIA, DPA and EIR (Environmental Information Regulations) should be channelled through the School Business Manager

3.5 Record Disclosure

3.5.1 There are a number of legislative provisions that limit or set conditions for the disclosure of information, particularly in respect to personally identifiable information. It is therefore important that consideration is given to whether there is a sound legal basis for disclosing records before they are actually disclosed.

The following requirements of record disclosure should be complied with:

- The schools Information Sharing Policy is adhered to
- Decisions on disclosure of records containing personal information are made by appropriately qualified staff with the Head Teacher being aware of the decision making process and/or the actual decision made
- A record should be maintained of what records have been disclosed, to who, when and on what basis disclosure was made

3.6 Record Closure

3.6.1 The closure of a record and its subsequent treatment needs to be made on a consistent basis.

The following requirements of record closure should be complied with:

- The school should set criteria for when a records status changes from live to closed
- Arrangements are in place to archive records where possible
- If there is further activity in respect to the main subject of the closed record, a decision should be made by as to whether the closed record should be reactivated or a new record set up

3.7 Record Disposal/Archiving

3.7.1 The importance of the correct secure disposal/archiving of records cannot be underestimated particularly in regard to personally identifiable information.

The following requirements of record disposal should be complied with:

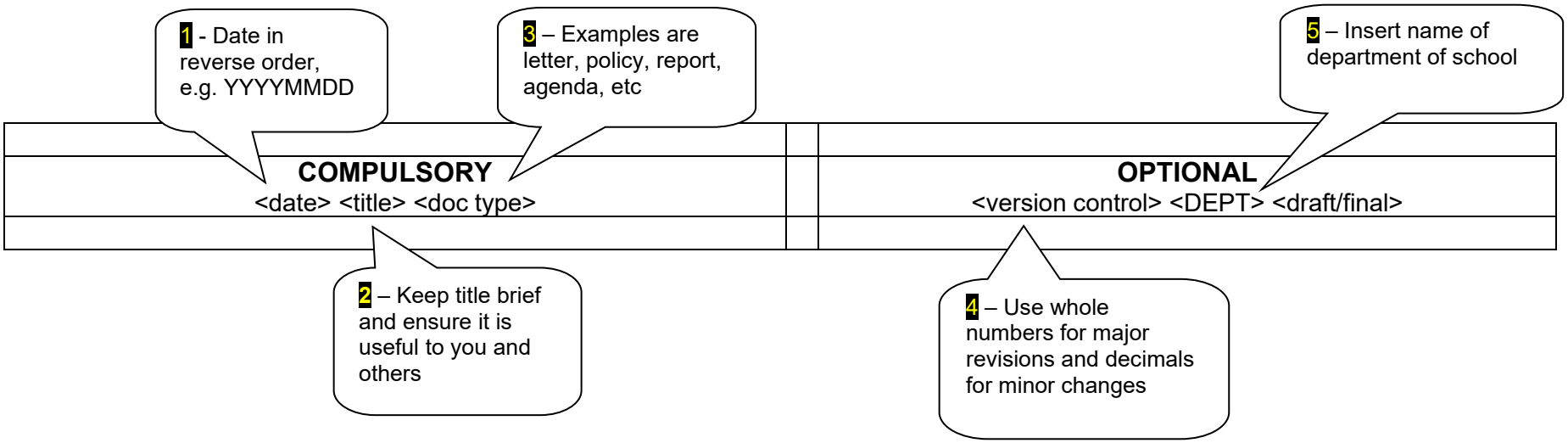
- The schools retention policy is adhered to
- Arrangements are in place to either flag up records that are due for disposal or to instigate a manual review to identify such records
- Disposal is only in a secure manner in compliance with school requirements, e.g. hard copies disposed of via school shredders, electronic records disposed of via your IT support
- Where records are archived via EDMS (Electronic Document Management Systems) consideration should be given to the legal admissibility of such documents if they were ever required to be used as legal evidence
- Access to archived records should be clearly defined and established on a need to know basis
- Archived records should be reviewed on a periodic basis to establish if these records should be maintained or permanently disposed of.

4. Policy Compliance

4.1 The DPO will, as part of its overall compliance programme, initiate record management reviews to ensure compliance with this policy, relevant codes of practice and associated legislation and standards.

4.2 All reviews will be undertaken on a risk basis and will be reported to the SBM/Headteacher.

Electronic Document Naming Convention



Examples:

20250807 Records Management Policy V3.0 Final

Document Version Control

Version	Date	Author	Sent To	Comments
2.2	23/09/21	R Montgomery	School customers	N/A
3.0	23/08/07	R Montgomery	School customers	Changes on tightening wording in policy
3.1	07/08/25	R Montgomery	School customers	Changes on tightening wording in policy