



Knowsley Council

Records Management Policy for Schools

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TITLE	<p>Title: Records Management Policy for Schools</p> <p>Publication Date: December 2018</p> <p>Document Type: Policy</p> <p>Version Number: 1.0</p> <p>Brief Summary: Overarching policy which will be used to demonstrate the school's commitment to implementing records management. It provides a mandate for the records management function and a framework for supporting standards, procedures and guidelines</p>
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1. Introduction

The School's records are a vital asset that support ongoing operations and provide valuable evidence of business activities over time. They therefore form a significant part of the corporate memory.

It is the policy of the school to establish effective records management to:

- Maximise the use of all information assets
- Ensure that the integrity of the school's records is protected and that records are authentic, reliable and useable in order to meet the school's needs, now and in the future
- Ensure compliance with legislative and best practice requirements
- Support the business requirements of the school

This must be achieved by establishing a policy and procedural framework to ensure that:

- Relevant records are captured and held for the business needs of the school
- Records can be easily understood (adequate context is provided)
- Records can be trusted (they are complete, accurate, up to date and protected)
- Employees and Governors are made aware of, and trained in, the management of records within their sphere of responsibility
- Records are made accessible to those Employee's and Governors who need, and are permitted to access them to enable well informed and proper judgements to be made
- Records are kept securely and protected from accidental loss and destruction
- Records are kept for no longer than is necessary, in accordance with legal and professional obligations
- Records are disposed of appropriately, in accordance with legal and regulatory obligations

This Policy is produced in accordance with the requirements outlined in the Lord Chancellor's Code of Practice on the Management of Records, (issued under section 46 of the Freedom of Information Act 2000) and BS ISO 15489 Standard for Records Management.

2. Scope

This Policy applies to all records that are created, received, and maintained by the school, and its Employees and Governors. The records represent evidence of the school's activities. It applies to all records regardless of format or storage medium, and therefore applies to electronic records, including e-mail.

This Policy applies to all Teachers, Temporary Employees, Consultants, Contractors, Governors and others in the course of their work for and on behalf of the school. This Policy applies regardless of location of working environment, be this on school premises,

at home, or elsewhere.

Employees and Governors will be made aware of this Policy through appropriate communication methods.

3. Aims and Objectives

The key aims and objectives of the Records Management Policy are to define a framework for managing records of the school in order to ensure that:

- The quality of the record can be maintained through time so accessibility, interpretation and trustworthiness can be maintained for as long as the record is needed
- Sufficient resources are available within the school to support this Policy
- Records can be trusted to reliably represent the information that was actually used in or created by the business process and its integrity and authenticity can be demonstrated
- An effective framework exists within the school to support, implement and monitor this Policy
- Records vital to the operation of the school are identified and protected
- A culture is developed and encouraged which acknowledges the benefits and value of effective Records Management throughout the school
- Records can be easily accessed by those with appropriate authority
- Records of historical, cultural and educational significance are identified as early as possible and are permanently preserved in the school's Archive Service. (*e mail, community Librarian Lin.Rice@Knowsley.gov.uk to arrange assessment and transfer to archives*)
- Appropriate training is identified and arranged to assist in applying good Records Management practice

4. Benefits

There are a number of benefits in the school managing both its paper and electronic records in a more systematic and structured environment, including:

- | | |
|------------------|--|
| Economy | <ul style="list-style-type: none">• Value for Money efficiency savings through more effective use of office space, reduced storage costs and increased staff productivity |
| Efficiency | <ul style="list-style-type: none">• Reduced likelihood of duplicating effort as information is more easily shared where appropriate |
| Service Delivery | <ul style="list-style-type: none">• Well informed and sound decisions based on complete and relevant information enables effective performance monitoring and service planning |

Legal
Protection

- Effectively managed records will enable the school to protect not only its own interests and assets but also those of organisations, communities and individuals associated with it
- Ability to comply with relevant legislation, regulations and standards for example Data Protection Act 1998, Freedom of Information Act 2000, Local Government Acts (including Section 224 of the 1972 Act) and BS ISO 27001 Information Security

Enhanced
Image

- Improved efficiency both in terms of use of resources as well as service provision will result in an improved image of the school both to internal Employees and Governors as well as externally to the school's partners, other organisations and its communities

Business
Continuity

- Enabling identification and appropriate procedures to be put in place for key information, ensuring that the school is able to maintain its core

Archival Preservation	<p>functions in the event of a disaster</p> <ul style="list-style-type: none"> • Identification of key records and establishing procedures facilitating the development of a corporate memory and ensuring the long-term preservation of information with historical importance
Performance	<ul style="list-style-type: none"> • Demonstrate effective use of resources as part of the Ofsted Inspection
Working Environment	<ul style="list-style-type: none"> • Reduce amount of excessive and redundant information that clutters working spaces including classrooms, offices, desks and e-mail inboxes
Consistency	<ul style="list-style-type: none"> • Improved health and safety through less clutter around desks, and • Policies and procedures will provide a framework to support all school Employees and Governors in managing the information they use and create or capture

5. Relevant Legislation and Standards

Compliance with this Policy will facilitate compliance with following legislation and standards:

- Public Records Acts (1958 and 1967)
- Local Government Act (1972)
- Environmental Information Regulations (1992).
- General Data Protection Regulation (GDPR) (2018)
- Data Protection Act (1998)
- Freedom of Information Act (2000)
- Regulation of Investigatory Powers Act (2000)
- Environmental Information Regulations (2004)
- The Children Act (2004)
- Civil Contingencies Act (2004)
- The Protection of Freedoms Act 2012
- Re-use of Public Sector Information Regulations (2015)
- BS ISO 15489 British and International Standard for Records Management
- BS ISO 27001: British and International Standard on Information Technology, Security techniques, Information Security Management Systems
- BS 10008: British Standard on Evidential weight and legal admissibility of electronic information

In addition, compliance with this Policy will also facilitate compliance with other statutory and regulatory record-keeping obligations that are specific to certain school functions.

6. Responsibilities

The school 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 Head of the School, with the support and commitment from the Governors.

All Employees and Governors who create, receive and use records will have records management responsibilities at some level depending on the nature of the role they fulfil.

Failure to adhere to this Policy may result in breaches of legislation and affect the school's ability to deliver its function, and to demonstrate that it is open and accountable.

6.1 Governors

- To ensure records management is recognised as a corporate programme within The school and receives the necessary levels of support and the resources required to ensure effectiveness
- To support and enforce the Records Management Policy

6.2 Head Teacher

- To ensure proper provision for the implementation of the Records Management Policy is made throughout the school
- To nominate appropriate officers (Management Team) to oversee the implementation of and compliance with the Policy and to ensure full commitment and support is received

6.3 Management Team

- To put in place procedures to ensure records are created, captured and maintained which provide evidence of the school's functions, policies, decisions, procedures and activities
- To ensure action plans for implementation of the Policy are incorporated into appropriate business plans
- To ensure the capture of records that provide evidence of all functional activities, containing accurate and relevant information which is appropriate but not excessive
- To capture records into appropriate record keeping systems that enable easy identification, classification and accessibility to information, resulting in openness, accountability and best practice
- To ensure records, which no longer need to be retained, are only destroyed in compliance with Records Retention and Disposal Schedules and in a manner suitable to their confidentiality
- To ensure sufficient commitment of Employees time to manage records in accordance with approved and accepted records management standards

6.4 All Employees (including Temporary Employees/ Contractors)

- Individual Temporary Employees and Contractors are responsible and accountable for managing records in accordance with records management standards, especially in an authorised manner. A Non-Disclosure Agreement must be signed to ensure best practice records management principles are adhered to (see Appendix B)

- Records are created, received and used by individuals but they are the property of the school. Records must be organised and retained to meet both immediate short-term user needs and the long-term corporate requirements of the school.
- All Employees have a responsibility to maintain accurate, comprehensive and up-to-date records.

7. Policy Review

The Head Teacher with support from the Management Team will be responsible for implementing the Policy. The Policy will need to be reviewed in relation to relevant legislation, standards and practices on an annual basis.

Appendix A: Definition of key Records Management terms

Archives	Records no longer needed as evidence of business processes for operational reasons but have been identified as having long term historical significance and evidential value.
Classification Scheme	The scheme used to organise records in a structured manner. It enables records in a business information system to be managed, understood, linked to other related records and retrieved by users.
Current Records	Records used regularly and frequently in the day-to-day work of the school
Disposition	The eventual fate of records. Records are either transferred to the school's Archives Service or destroyed by shredding, deletion or some other form of physical or digital destruction.
Fileplan	The files that are allocated to the Classification Scheme.
Metadata	Metadata is structured information that describes, explains, locates, or otherwise makes it easier to retrieve, use, or manage an information resource.
Records	Information created, received and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction of business. Records must be authentic, reliable and useable, and capable of supporting business functions and activities for as long as they are required.
Record Series	Records which provide evidence of a particular process and as such may vary in size from a single document to many thousands of documents.
Taxonomy	The name given to the list of record series which can be used as a pick list in a drop down menu to classify records and attach rules such as retention period

Records Management	The efficient and systematic control of the creation, receipt, maintenance, use and disposition of records. It includes processes for capturing and maintaining evidence of and Information about business activities and transactions in the form of records. It is based on the principles of regular review and controlled retention or destruction of records with the general aim of ensuring cost-effective business processes, legal and regulatory compliance and corporate accountability.
Retention Schedule	A list of the record series in an organisation with requirements for how long they should be kept in the various stages of their life and the justification for the periods specified.
Semi-current Records	Records required for the work of the school but referred to on an infrequent basis. Includes records that must be retained for a statutory period.
Structured records	Database records held in various line of business applications.
Unstructured records	Electronic records that are created using office applications such as MS Word, PowerPoint, and so on (including email, web-pages, audio-visual records ¹) that can then be stored in a variety of locations (shared drive, personal drives, email inboxes, portal sites, intranet, databases, back-up tapes, CD/DVD's, USB sticks, et al).
Vital Records	Records considered to be vital for the continued functioning of the authority in the event of an emergency.

Appendix B: Non- Disclosure Agreement

ST JOSEPH’S CATHOLIC PRIMARY SCHOOL

Edenfield Crescent,

Huyton,

Merseyside

L36 6DS

Non-disclosure Agreement

This agreement is made on

[Redacted]

Between

[Redacted]

And

[Redacted]

It must be signed by individual staff members before any information, data, or copies of data are shared and/or any systems access is permitted and/or data is hosted externally.

This agreement will be valid from

[Redacted]

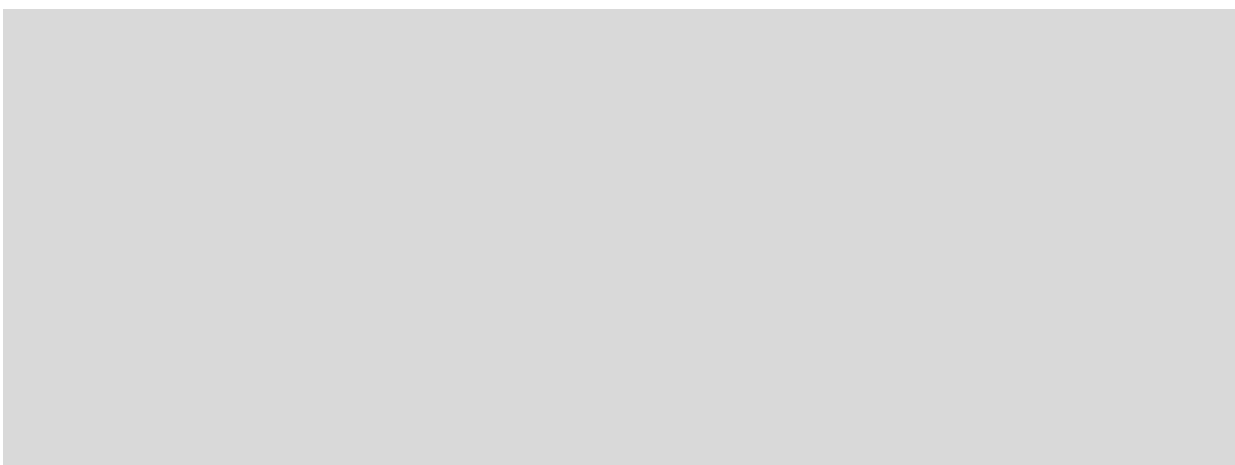
to

[Redacted]

and will then need to be renewed.

Purpose

The Purpose of this agreement is to:



All communication between the School and the Company/ Individual/s/Individual/s regarding the agreement must be with:

Parties to the agreement

School		Company/ Individual/s/Individual/s	
Name		Name	
Role		Role	
Telephone number		Telephone number	
Email address		Email address	

1. Each Party shall treat as confidential all information obtained from the other Party under or in connection with the Agreement unless otherwise agreed in writing and:

- 1.1. shall not disclose such information to any third party without the prior written consent of the other Party, except to such persons and to such extent as may be necessary for the performance of the Agreement or is otherwise required by law;
- 1.2. shall not use any of that information otherwise than for the Purpose of the Agreement;
- 1.3. the obligation of confidentiality will remain in force beyond the cessation or other termination of this agreement:
- 1.4. if the information includes data of the School relating to identifiable living individuals and is therefore subject to the provisions of the Data Protection Act 1998, the School is the responsible Data Controller. All such data must be processed only for purposes included in the School's notification to the Information Commissioner. The Company/ Individual/s must comply with its obligations under the Data Protection Act 1998;

The Company/ Individual/s must produce evidence of their Data Protection Statement and evidence of a Security Policy in place. The School reserves the right to ensure that these statements and policies are in place.

- 1.5. ensure that all such information is given to staff members and sub-contractors, only to the extent necessary for that member of staff or that sub-contractor to undertake activities necessary for the Purpose.
 - 1.6. ensure that all such information is treated as confidential and not disclosed (without prior approval of the other party) or used by any member of staff or sub-contractor otherwise than for the Purpose of the Agreement;
 - 1.7. destroy and/or delete all the information from all media, including any backup copies, archives and paper records, once the task it was originally collected for is completed;
 - 1.8. return all magnetic, optical and other media used to transfer data between the School and the Company/ Individual/s to the School on completion of the Purpose, or immediately on the expiry of this agreement.
2. The Company/ Individual/s should ensure that it holds the necessary licenses to access or view any of the information that is presented in a propriety file format.

3. The Company/ Individual/s shall be responsible for any breach of the confidentiality provisions contained herein by any members of its staff and all sub-contractors whom it engages in connection with the Purpose.

4. The Company/ Individual/s shall inform the School immediately on becoming aware or suspecting that any confidential Information has been or is threatened to be disclosed to or come into possession of a person in breach of the terms of this Agreement and the Company/ Individual/s shall co-operate with the School in taking any action to limit and remedy the breach.

5. The provisions of Clause 2 shall not apply to any information;
 - 5.1. which is or becomes public knowledge (otherwise than by breach of this condition); or
 - 5.2. which was lawfully in the possession of the Party concerned, without restriction as to its disclosure, before receiving it from the disclosing Party; or
 - 5.3. which is received from a third party who lawfully acquired it and who is under no obligation restricting its disclosure.
 - 5.4. which either Party is obliged to disclose under any legal obligation. In such circumstances, that Party will consider appropriate action in relation to such intended disclosure.

6. If the School and the Company/ Individual/s agree that access should be provided to information or systems, by a direct link, or by connection to the School's communications network or by the Internet, the following must apply
 - 6.1. The Company/ Individual/s shall use its reasonable endeavours in protecting the connection from unauthorised use.
 - 6.2. The connection details (telephone number, usernames, and passwords) will be kept confidential and made available only to members of staff who have legitimate reason to use it.
 - 6.3. Any connection is made available and used only for the Purpose.
 - 6.4. The Company/ Individual/s officially notify the School of any changes to the type or level of access required in advance of any connection. Any potential

operational issues or changes to be discussed and the appropriate action agreed by both parties.

- 6.5. No changes should be made to the operating system of any computer processor belonging to, or under the control of, the School without the prior agreement of staff in School ICT services.
- 6.6. No changes should be made to any School applications or enabling software that is shared with other systems, e.g. MS SQL instance, without the prior agreement of staff in School ICT services.
- 6.7. No attempt should be made to obtain any information about or to access any other node on the School communications network, or about any other application or database on the same node.
- 6.8. Any information obtained about School licenses or application data should be kept confidential.
- 6.9. The School's systems or network must not be used for any activity which may be reasonably regarded as unlawful or unacceptable.
- 6.10. Any equipment connected should have the appropriate level of software patches and up to date security software i.e. Anti Virus, Firewall as appropriate.
7. This Agreement does not create any rights enforceable by any other person who is not a party to it under the Contracts (Rights of Third Parties) Act 1999.
8. This Agreement is made in England and its construction, validity and performance shall be governed by English Law. The Parties hereby submit to the exclusive jurisdiction of the English Courts.
9. Any security incidents must be reported immediately to Knowsley School's Data Protection Officer

As part of the security incident response procedure, if the third party becomes or is made aware of any contravention of the information security requirements under this agreement, or of unauthorised access to the Knowsley School systems or data, the Data Processor shall (and shall ensure that its Subcontractors shall):

1. immediately report the incident to Knowsley School Information Assurance Team;
2. promptly (within 72 hours) provide Knowsley School with a detailed written report setting out the details of and reasons for the contravention of the

- information security requirements and describing in detail any School Information and/or Systems which have been accessed without authorisation;
3. provide Knowsley School, at no additional cost, with any assistance to restore the School Information and Systems and any other assistance that may be required by Knowsley School;
 4. preserve evidence to include collection, retention and presentation of such evidence to Knowsley School;
 5. promptly return to Knowsley School any copied or removed School Information;
 6. comply with all reasonable directions of Knowsley School; and
 7. take immediate remedial action to secure the Knowsley School Information and/or Systems and to prevent reoccurrences of the same or similar contravention and provide Knowsley School with details of such remedial action.

For and on behalf of
Signature

St Joseph's Catholic Primary School

Name

Role

Date

For and on behalf of

Signature

Name

Role

Date



For further information please contact the Corporate Records Manager, Liz Diack on on
0151 443 3794, or email Elizabeth.diack@knowsley.gov.uk
