St James'
Church of England School

Grow Stronger

Records Management Policy 2025-26

School Leader: **L Pancisi**

Link Governor: **E Nkwelle/A Benson-Smith**

Policy Approved **Signed:** **Date: 26th January 2026**

Introduction and principles

Management of records by a Public Authority is a legal obligation (Section 46 of the Freedom of Information Act 2000).
The Code issued on 15 July 2021 sets out key principles about records and their management. These are the:

- value of the information
- integrity of the information
- accountability for the information

There are a range of statutory, regulatory and guidance that oblige us to accept, create, use, edit, store, and dispose of records. It is necessary to establish clarity about record keeping systems.

Aims

- to effectively manage the records that are created and are integral to the operation of the school;
- to confirm a clear framework to manage records and information within the school;
- to provide an environment where records are stored securely;
- to ensure that records are accessible to those who need them;
- to ensure that the school workforce responsible for records management understand these obligations;
- to give effect to the s.46 Code of Practice our records management will take note of the principles it sets out.

Scope

This policy applies to the school workforce and to all school records, whether the records originate within the school or are shared with the school by other means.

Records that are shared with third parties as a result of consent, regulatory obligations or contractual agreements are within the scope of this policy.

In St James CofE Infant and Nursery School, the records that we access and hold originate are stored in a variety of formats, that include physical, digital, electronic audio/visual records. Some are held locally in school, others are hosted by third party providers.

All records are within the scope of this policy, records are required to be stored and retained in accordance with the document retention schedule attached to this policy.

Records may refer to individuals, financial planning tools, contracts, commercial organisations, public authorities, or charitable organisations. Some records will contain personal data.

Record retention and storage will be reviewed from time to time to ensure that the aims of this policy are met.

Responsibilities and actions

The governing board is ultimately responsible for this policy, however on a daily basis operational management of the policy is delegated to the headteacher and senior leadership team.

Management of the policy will be reviewed at governing board meetings on at least an annual basis.

The headteacher will be required to monitor compliance with this policy by undertaking at least an annual check to determine if records are stored securely and can be accessed appropriately, in accordance with requirements in this policy.

Within St James CofE Infant and Nursery School, responsibility for this policy will be with the Headteacher.

An active retention policy is applied to confirm what records are to be retained and set out a timeline for their secure disposal.

Individual school staff, contractors and volunteers and employees have personal responsibility for records within their control and day to day handling by ensuring that:

- records are to be handled in accordance with the school policies and good practice for secure storage and usage;
- keep accurate records as required;
- personal data contained in records is used in compliance with the UK GDPR and school data protection policies and protocols;
- personal information is shared appropriately and with a proper legal basis with any third party
- records are securely disposed in accordance with the school's records retention schedule.

Child Abuse Records

The Independent Inquiry into Child Sexual Abuse (Final Report 2022) recommends that any records that relate (or could relate) to sexual abuse should be retained for 75 years or 10 years past the retirement of a relevant member of staff, whichever is the longer term. We shall implement this and ensure that notification of the relevant records is made in the event of any transfer.

Creation and management of school archives

The National Archives has supplied the following information in relation to the creation and management of school archives:

The school archive is maintained as a resource to help inspire and equip current staff and pupils to understand and appreciate issues of identity, belonging and shared heritage; to prompt memories of school-life among many generations of former pupils; and to serve as a research resource for all interested in the history of St James CofE Infant and Nursery School and the community it serves.

Relationship with existing policies and obligations

This policy has been drawn up within the context of:

- Freedom of Information policy
- Data Protection policy
- Privacy Notices
- Data Sharing Agreements
- Information Security policy
- IT security and use policies
- Records retention policy/guidelines
- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school

GDPR

Data will be processed to be in line with our requirements and protections set out in the UK General Data Protection Regulation, Data Protection Act as amended by the Data (Use and Access) Act 2025.

Appendix 1

The school keeps a wide variety of records that may include (but are not limited to):

Students

- personal information
- parent/carer contact information
- school reports
- behaviour logs
- exam and testing outcomes – internal and external
- child protection information
- allegations of a child protection nature made against a member of staff (including unfounded allegations)
- attendance – attendance registers, authorised absence correspondence
- SEND – reviews, advice to parents/carers, accessibility strategy
- pupil premium
- free school meals eligibility
- services and pupil premium eligibility
- LAC status
- medical – individual health plans, first aid records
- biometric records

Management of the school

- governing board records - agendas, minutes, resolutions, reports
- governors' personal details
- declarations of interests
- CPD and training
- school development plans and school improvement plans
- leadership meetings, minutes and actions
- admission details
- school visitor logs
- health and safety records
- fire risk assessments
- risk assessments
- social media
- newsletters and external communication records

Human Resources

- job descriptions
- application forms
- personnel files for all staff – including personal contact details
- appraisals
- performance reviews
- employment suitability checks
- contracts of employment
- records of disciplinary and grievances process
- allegations and LADO referrals
- referrals to the TRA and/or DBS
- payroll and pensions – maternity/paternity pay, family leave records

Financial Management

- budgets and funding details
- risk management and insurance – employer's liability insurance certificate
- asset management records
- asset register
- all necessary financial records
- contracts
- contract management and procurement
- school payment and meals management
- property management
- condition surveys
- hire agreements
- maintenance – log books, warranties and contractor information
- health and safety information
- curriculum & attainment
- teaching and learning planning
- timetabling and resource planning
- prospectus and website
- statistics and evidence of learning outcomes, targets
- pupil work records
- trip and visit records

External Records

- central government and local authority
- local authority – census returns, attendance returns
- central government – returns made to DfE/ESFA
- Ofsted
- referrals to third party agencies
- legal action involving the school
- ICO action
- enquiries and investigations by external bodies