School Records Management Policy



Learning together in a changing world, creating success for all.

Trinity Fields is a Rights Respecting School, a Healthy School, Investors in Families School, an ECO School, a MOVE school and an Inclusion Quality Mark (IQM) Flagship School.

This policy should be read in conjunction with our pupil friendly and adult version of our "Shared Values and Aims".

School context

Trinity Fields is a **Rights Respecting School**; we are committed to the principles and values of the United Nations Convention on the Rights of the Child (UNCRC) across all areas of our work. We are a school where pupils are at the heart of everything we do. We successfully achieved UNICEF's "Rights Respecting School Award" in **January 2017** and we have a well-established record of developing pupil engagement at all levels.

Refer to pupil friendly "**Pupil Participation**" policy and our whole school "**Pupil Participation**" policy for further details.

We are a **Healthy School**; we take responsibility for maintaining and promoting the health and wellbeing of the Trinity Fields team (pupils, parents/carers, staff, governors etc.). This includes teaching pupils about how to lead healthy lives by enabling them and staff to take control over aspects of the school environment that influence their health and wellbeing. We achieved the Welsh Network of Healthy School Schemes National Quality Award in **March 2018**, with re-accreditation in **December 2020**.

Refer to "Health and Well-being for Pupils" policy and our whole school "Health and Well-being" policy for further details.

We are an **Investors in Families School**. We are committed to developing active and effective relationships with parents/carers and families and recognise the value of close partnership working to improve outcomes for our pupils. We were the first Special School in Wales to achieve the Investors in Families Quality Mark, and regularly share our excellent practices with other settings.

We demonstrate our commitment to the Rights to Action agenda and value and support the important role that families play in the education of their child. We strive to promote social inclusion and a sense of wellbeing for families through positive participation in their child's education.

During the re-accreditation process (2019), the school's work was judged to be of a very high quality. Family and Community Engagement are fully embedded and it was evident that the school works hard on its journey towards excellence. The assessor was very pleased to award the school the **Diamond Standard**.

We have demonstrated through a national annual assessment that we have the capacity to play a strong leadership role in developing inclusion best practice across a network of schools; as well as being committed to extending those networks and develop classroom-based research.

Refer to "Inclusion" policy and to IQM assessment reports for further details.

In **summer 2022** we gained our **Platinum ECO Schools Award**; the Eco-Schools programme is designed to be pupil-led and looks at the impact of our actions on the environment.

Our sustained journey towards attaining the Platinum Award showcases pupils' ideas and helps to inspire others to make the right environmental choices.

More recently (2019), the school started its journey towards becoming a **MOVE school**; successfully accredited at Silver level in **December 2021**. The MOVE Programme is an activity-based practice that enables children and young people with physical disabilities to sit, stand, walk, and transition as independently as possible.

Our overarching philosophy is summarised in the following statement:

"We believe that everyone at Trinity Fields is entitled to have access to the very best learning experiences. These will be provided within a safe, caring and stimulating environment that will enable all learners to achieve their full potential through learning opportunities that meet their individual needs".

Education in Wales: Our National Mission

Our work with pupils and their families will be developed building upon Wales' National Mission. This national mission is ambitious, innovative and confident ensuring that we all take responsibility for all of our pupils to have equal opportunities to reach the highest possible standards.

Trinity Fields will continue to develop as a learning organisation to ensure it has the capacity to adapt to and explore a range of new approaches which results in improved outcomes and well-being for all of our pupils.

In order to realise our shared vision and approaches in delivering Wales' transformational curriculum that will enable all of the pupils at Trinity Fields to make the progress commensurate with their individual needs we are committed to the 4 key enabling objectives, detailed in "Education in Wales: Our national mission (2017). These are:

- Developing a high-quality education profession.
- Inspirational leaders working collaboratively to raise standards.
- Strong and inclusive schools committed to excellent, equity and well-being.
- Robust assessment, evaluation and accountability arrangements supporting a self-improving system.

Definition

A record is defined as:

"Information created, received and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business".

Commitment to records management

1. Trinity Fields School and Resource Centre recognises that its records are collective assets.

- Records provide evidence for protecting the legal rights and interests of the school, and are key
 evidence for demonstrating performance and accountability. The school is, therefore, dependent
 on its records to operate efficiently, carry out its statutory function as an education institution, and
 to account for its actions.
- 3. We are committed to ensuring its records are maintained in accordance with the Lord Chancellor's Code of Practice on the Management of Records issued under Section 46 of the Freedom of Information Act 2000.

Objectives

Trinity Fields School and Resource Centre will effectively manage its records from planning and creation stages through to their disposal in order to fulfil the following objectives:

- Create and capture accurate, authentic, reliable and useable records to produce invaluable evidence and demonstrate accountability
- Maintain records to meet the business needs of the school for as long as required to ensure operational efficiency and provide pastoral care
- Dispose of records that are no longer required in a secure and appropriate manner in line with Principle (e) of the GDPR
- Protect vital records of pupils, their families, and school staff
- Conform to legal and statutory requirements relating to record-keeping

Scope

- 1. This policy applies to all records created, received or maintained by current and former employees, Governing Body members, volunteers or those otherwise acting as agents of the School in the course of carrying out their school business.
- 2. All types of records are covered, regardless of whether they are held electronically (including emails), on paper or audio-visual media, whether in English, Welsh or other formats or languages, and regardless of their age.
- 3. The policy covers records stored in any location, whether in office accommodation, corporate record centres, network drives, portable media (e.g. laptops and memory sticks) or held by other organisations acting on behalf of the School, for example suppliers or contractors.
- 4. The organisation's Record Retention and Disposal Policy should be consulted for detailed information on retention of records.

Responsibilities

All staff and volunteers

All permanent/temporary staff and volunteers are responsible for creating, managing, and timely disposal of accurate records to evidence the school's activities.

Governors

Governors create, use and manage school information on a daily basis. This may be done outside the school building within their home or constituency office environment. Therefore, it is crucial that elected members understand their responsibilities to create and maintain this information appropriately.

Headteacher

It is the responsibility of the Headteacher to ensure the discipline of records management is given recognition and equal profile to management of other corporate assets, such as staff and finance.

Headteachers are responsible for ensuring their staff manage records effectively and provide evidence of the School's activities, providing support accordingly.

Data Protection Officer (Information Governance SLA)

The DPO is a specialist role introduced by the General Data Protection Regulation 2016 and oversees responsible management of all personal information processed by the School. This includes making sure that records containing personal information are suitably created, updated, shared, used, stored and disposed of at the end of the records lifecycle.

Trinity Fields School and Resource Centre has contracted the Corporate Information Governance Manager from Caerphilly County Borough Council Corporate Information Governance Unit as their Data Protection Officer (DPO) under the 2018/2019 Information Governance Service Level Agreement.

An Information Governance Officer Schools (IGOS) has been employed to undertake the day-to-day liaison with Caerphilly schools and to fulfil the SLA.

The IGOS will support the School with the following:

- a) Manage reporting of data security incidents in line with the requirements of the Information Commissioner's Office once determined
- b) Manage data protection complaints against the School
- c) Provide advice on Data Protection Impact Assessments completed by the School

Advice on records management is out of scope of the SLA in place with the Corporate Information Governance Unit. However, the IGOS maintains close contact with the Education Directorate and the Schools IT Service to provide coordinated advice and support (see paragraphs 22 and 23 below).

Information Governance Lead (IGL)

Trinity Fields School and Resource Centre have designated an Information Governance Lead (IGL) for their school. They have a crucial role in translating the School's records management legal duties into reality by maintaining an awareness of how records are managed within the School, being proactive in identifying potential improvements, and cascading agreed initiatives to staff. The IGL is also responsible for monitoring records management practice within the school to ensure best practice is adhered to.

The IGL must also ensure staff are fully supported in managing records effectively, and that appropriate arrangements are in place for contractors and other partner organisations to adhere to the School's high records management standards.

Senior Information Risk Owner (SIRO)

Trinity Fields School and Resource Centre may consider adopting government best practice by introducing a SIRO to oversee Information Governance matters. The School IGL would report direct to the SIRO, who is responsible for the management of all personal information processed by the School, and would make sure records containing personal information are suitably created, updated, shared, used, stored and disposed of at the end of the records lifecycle.

A SIRO would take a leading role in ensuring the Governing Body are briefed in order to make decisions on key records management issues that arise. It is anticipated that the SIRO would take the lead on developing information governance policy and best practice before cascading this information across the school.

Caerphilly County Borough Council Education Directorate

Specialist staff within the Education Directorate at Caerphilly County Borough Council support schools and Governing Body members by providing advice and guidance on effective records management practices, including managing records systems, disposal of records, and storing records. This takes into account hard copy and electronic records.

Caerphilly County Borough Council Schools IT

IT, including the IT Security Team, advise on technical aspects of creating, maintaining and disposing of electronic records at Caerphilly County Borough Council.

Supporting documents

- IRMS Toolkit for Schools with example Retention Schedule
- Data Protection Policy
- Access to Unpublished Information Policy
- Publication Scheme
- Wales Accord on Sharing of Personal Information (WASPI)

Policy review

This policy will be reviewed as detailed in the school's policy review cycle. It may also be necessary to review and amend it sooner to reflect both local and national changes.

Signed		Headteacher
Signed		Chair of Governors
This policy will be reviewed in line with the school's policy review cycle.		

As a Rights Respecting School we are committed to embedding the principles and values of the United Nation Conventions for the Rights of the Child (UNCRC). This policy enables our pupils to access and enjoy the following articles of the convention:

Article 12: Every child has the right to be heard.

Article 28: Every child has the right to an education.

Article 29: Education must develop every child's personality, talents and abilities to the full.

Article 42: Every child has the right to know their rights.