**VICTORIA COLLEGE BELFAST**

**(incorporating Richmond Lodge School)**

**Day Care**

**Management of Records- referencing Standard 15**

**1.** **Rationale**

This policy provides for the systematic review, retention, and destruction of documents received or created by Victoria College Day Care. The policy complies with the requirements in the Public Records Act (NI) 1923 and by the Disposal of Documents Order (S.R.& O.1925 No 167). This policy covers all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept and how records should be destroyed.

The destruction of records is an irreversible act and can have serious consequences. At the same time the process of retention and storage of records can be expensive. This policy provides guidance on how long records should be kept for legal compliance purposes and on the identification of records which may be of permanent value.

**Relationship with the Data Protection Act**

Data and records should not be kept for longer than is necessary. This principle finds statutory form in the Data Protection Act 1998, which requires that personal data processed for any purpose “shall not be kept for longer than is necessary for that purpose”. To comply with the principles of the Data Protection Act, records containing personal data must be:

* stored appropriately, having regard to the sensitivity and confidentiality of the material recorded;
* retrievable and easily traced;
* retained for only as long as necessary;
* disposed of appropriately to ensure that copyrights are not breached and to prevent them falling into the hands of unauthorised personnel.

Reference should be made to Appendix B, which sets out retention periods which must be complied with for specified records.

**Any records in C2K MIS System (SIMS) are managed by C2K. Minimum retention periods for these records in SIMS are being adhered to. It is not necessary for schools to delete specific items of data from the SIMS system at this time.**

**2. Aims**

* To provide a framework to assist Day Care employees with the retention and disposal of records.
* To ensure that records that are no longer required are destroyed according to the agreed retention schedules and to the disposal policy.
* To ensure that adequate storage accommodation is provided for the records and that these are kept safely and securely in an appropriate environment.
* To support the setting in demonstrating accountability to its stakeholders.

**3. Definitions**

* 1. **Categories of Disposal are**
* destruction
* review
* permanent preservation
  1. **These will take place within the six main functional business areas for which Victoria College Day Care keeps records as follows:**
* Management and Organisation
* Legislation and Guidance
* Pupils
* Staff
* Finance
* Health and Safety

The records contained within these functional areas provide evidence and information about its business activities that are important for the efficient operation of the school.

**3.2.1 Management and Organisation:**

This category includes the main records which the setting holds in relation to the management and organisation of the school. Typical records would include the minutes of the Day Care meetings which record the major decision making processes of the school. Also included are records detailing development, planning and curriculum policies as well as those that demonstrate how the setting reports to its parents and other organisations.

**3.2.2 Pupils:**

Pupil Files contain vitally important records which, not only, capture the progress of the student throughout their time at the school, but also document their personal details and information beneficial to their wellbeing within the school environment.

Such records would include:

Admission Data,

Attendance of the pupils at the school,

Timetables and Class Groupings,

Education/Progress Reports of pupils,

Special Education Needs documentation,

Child Protection information

and Disciplinary Action taken.

**3.2.3 Staff:**

Records in this category refer to be those required for the Human Resources Management function within the school. These include:

Staff Personnel records (recruitment, interview notes, appointments, training, staff development etc),

Staff Salary Records,

Staff Induction,

Sickness Records,

Staff Performance Review and students on placement.

**3.2.4 Finance:**

This business function within the school maintains records for a range of finance activities such as:

Annual Budgets,

Budget Monitoring,

Annual Statement of Accounts,

Procurement,

Tender Information and Prices,

Reconciliation of Invoices,

Audit Reports etc.

**3.2.5** **Health & Safety:**

The health and safety of children and staff are of paramount importance in the school and such records to support this are kept e.g. Accident/Incident Book, Risk Assessments, Fire Procedure and Health and Safety Policy Statement.

**4. DISPOSAL OF RECORDS**

Records should be reviewed annually for destruction in line with the Disposal Schedule by the appointed member of staff within each functional business area as set out in the Disposal Schedule (Appendix B).

Whenever there is the possibility of litigation, the records and information that are likely to be affected should not be amended or destroyed until the threat of litigation has been removed.

Similarly, where a request is received from a member of the public under the Freedom of Information Act, 2000 then any records associated with that request must be retained until a satisfactory response has been provided, or in the case of a refusal to provide the information, until any complaint/appeal process has been concluded.

**Operation of this Disposal of Records Schedule**

**4.1 Close:**

Manual records should be closed as soon as they have ceased to be of active use other than for reference purposes. When a file is due to be closed the appropriate member of staff should consult the disposal schedule and mark the front cover of the file, indicating the date on which the file can be destroyed, or whether it should be subject to the normal review procedures. Closing a file simply means that no further papers can be added but the file can be used for reference.

**4.2 Minimum Retention Period:**

The minimum retention period required for each type of record is calculated from the point the file/record is closed.

* 1. **Destroy:**
* Where the disposal action is ‘Destroy’ the records should be kept for the period stated and then destroyed by the school in accordance with the directions below on recycling and shredding. A record must be maintained of the files that have been destroyed.
* Paper based records. If the paper record does not contain sensitive material, it can be disposed of through normal waste procedures, for example, in a recycling bin. When disposing of paper based person identifiable information or confidential information always use confidential waste sacks or shredders. Keep the waste in a secure place until it can be collected for secure disposal.
* Computer print outs should either be shredded or disposed of as paper based confidential waste.
* CDs containing confidential information must be either reformatted or destroyed. Computer files with confidential information no longer required must be deleted from both the PC and the server if necessary.
* Computer hard disks are usually destroyed/disposed of by the setting’s IT technician.
* Electronic records identified for destruction should be completely destroyed in such a way that they are non-recoverable. Reasonable steps should be taken to ensure the information is not retrievable by normal methods such as using back up tapes which also need to be properly controlled.
* Special care must be taken with staff copies of personal records stored on USB pen drives or portable hard disk drives. The deletion of electronic records must be organised in conjunction with the College’s IT technician, who will ensure the removal of all data from the medium so that it cannot be reconstructed.

## 4.4 Review:

Where the disposal action is ‘Normal Review’ the file will be subject to the normal review processes. The First Review of the file takes place 5 years from the date of the last paper on the file and should not be later than 10 years from the opening of the file. Records of long-term administrative use need not be brought forward for the First Review. This will be initiated by an appropriate official at the discretion of the school. The review procedures are as follows: -

1. A member of staff should carry out a first review of each file based solely on its administrative value.
2. The reviewing officer should keep a record of files that he/she wishes to keep for administrative purposes. This first review monitoring procedure will help to ensure that all types of files or file series have been covered in the disposal schedule or, if such files have been created since the disposal schedule was established, they can be added to a revised schedule.

## 4.5 Permanent Preservation:

Where the disposal action is Permanent Preservation the records are exempt from the normal review procedures. In some cases the Public Record Office will seek transfer of files that are marked for permanent preservation.

**4.6 Commitment to preserving files/records:**

**Victoria College Day Care** declares that it will take measures to ensure that the records it creates will be physically well maintained and cared for while they are in its custody (i.e. until either destroyed or retained for permanent preservation).

**5. Record of Disposal**

When records are disposed of it is necessary to record the disposal. The attached Records Disposal Notification Form (Appendix A) should be completed and filed in the appropriate folder within the relevant business area.

**6. Retention of Records**

The attached Disposal Schedule (Appendix B) is intended to give guidance on how long records should be retained. These retention periods/notes must be adhered to at all times.

**7.** **Transfer of Records to Archives**

Where records have been identified as being worthy of permanent preservation as indicated in the Disposal Schedule, arrangements should be made to transfer the records to the Public Records Office of Northern Ireland by contacting the Records Management, Cataloguing and Access Department.

**8. Roles and Responsibilities**

The Day Care Manager is responsible for ensuring that records and information systems in their areas conform to this policy and to the requirements of legislation. **All members of staff** are responsible for documenting their actions and decisions in the records and for maintaining the records in accordance with good records management practice.

The role of the **appointed member of staff** is to ensure compliance with Records Management standards within their area of responsibility, and to co-ordinate activities aimed at ensuring that information is recorded, stored, managed and disposed of both effectively and legally.

The Day Care Manager has a particular responsibility for ensuring that the setting corporately meets its legal responsibilities, and internal and external governance and accountability requirements.

Individual departments and line managers must ensure that the records for which they are responsible are accurate and are maintained and disposed of in accordance with the College’s Disposal Schedule. All records within a department or business area should have an identified owner responsible for their management whilst in regular use.

**9. Review and Evaluation:**

This schedule will be reviewed at least once a year by the Board of Governors. The schedule will be kept under review by senior members of staff who will keep Governors informed should any changes become necessary.

**Appendix A**

Records Disposal Notification Form – this can be formatted as an Excel spreadsheet.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Disposal of Records** | | | | |
| Business Area: | Name: | | Date: | |
| Title of Record |  | |  | |
| Format: |  | |  | |
| Reason for disposal: |  | |  | |
| Method of disposal:  (tick relevant box) | Destruction |  | Transferred to archive |  |
| If destroyed, method of destruction: |  | | | |
| Date of disposal: |  | | | |
| Authorising signature: |  | | | |
| Not subject to current information request:  (tick once checked) |  | | | |

**Appendix B**

**Disposal Schedule**

**1. Management & Organisation:**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Record** | **Person responsible for maintaining record** | **File Action** | **Minimum Retention Period** | **Action After Retention** |
| Early Year Meetings  Minutes | Early Years Co-ordinator | Close at end of current school year | Normal Review | Determination on Review |
| School Development Plan | Day Care Manager | Retain whilst valid – close when superseded | Permanent | Archive |
| Curriculum Policies etc | Day Care Manager |  | Until superseded- annual review for all Day Care policies | Keep 1 copy of previous policies and destroy all others |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Record** | **Person responsible for maintaining record** | **File Action** | **Minimum Retention Period** | **Action After Retention** |
| Policy Statements (Data Protection, Internet, Health & Safety, Child Protection, Equality etc) | Day Care Manager |  | Review regularly & retain latest version | Keep 1 copy of previous policies after revision –review as appropriate |
| Visitors’ Book | School secretary | Ongoing |  | Destroy |
| Circulars to Staff, Parents and Pupils | School secretary | Close at end of current school year | 3 school years | Destroy |
| Comments/Complaints | Day Care Manager | Close at end of current school year | Normal Review | Determine on Review |

**3. Pupils:**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Record** | **Person responsible for maintaining record** | **File Action** | **Minimum Retention Period** | **Action After Retention** |
| Pupil Admission Data | School secretary | Close when register ceases to be used | Permanent | Permanent preservation of basic pupil admission details |
| Applications for enrolment | School secretary | Close at end of school year in which application received | 3 years after enrolment | Destroy |
| Pupil Education Records - School/Progress Reports etc | School secretary | Close when pupil leaves school | Until pupil is 25 years old | Destroy |
| Special Education Needs | School secretary | Close when pupil leaves school | Until Pupil is 25 years old | Destroy |
| Child Protection | Day Care Manager | Retain in secure, confidential storage | Normal Review | Permanent Preservation |
| Assessment information | N/A | Close at end of current academic year | 6 years | Destroy |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Record** | **Person responsible for maintaining record** | **File Action** | **Minimum Retention Period** | **Action After Retention** |
| School Meals returns | School secretary | Close at end of current financial year | Current financial year + 6 years | Destroy |
| School Trips – Financial & Administration details | Deputy Manager | Close at end of current financial year | Current financial year + 6 years | Destroy |
| School Trips-Attendance/Staff Supervision etc | Deputy Manager | Close on completion of trip | 8 years | Destroy |
| Reports of Stolen/Damaged Items | Day Care Manager | Close at end of current academic year | 7 years | Then destroy |
| Medical Records – records of pupils with medical conditions and details for the administration of drugs when necessary. | School secretary | Close when pupil leaves school | Until pupil is 22 years old or in the case of a Special Needs pupil, until 25 years old | Destroy |

**4. Staff:**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Record** | **Person responsible for maintaining record** | **File Action** | **Minimum Retention Period** | **Action After Retention** |
| Staff Personnel Records (including recruitment, interview notes, appointment details, training, staff development etc.) | Day Care Manager | Close when member of staff leaves school | During validity +7 years after leaving employment | Destroy |
| Staff Salary Records | Day Care Manager | Close at end of current financial year | Until teacher is 65 years old or 7 years after leaving employment | For Pension purposes |
| Staff Sickness Records (copies of Medical Certs) | Day Care Manager | Close at end of current academic year | Current academic year + 6 years | Destroy |
| Substitute Teacher Records | Day Care Manager | Close at end of current academic year | Current academic year + 6 years | Destroy |
| Substitute Staff Records-non teaching (cover for nursery assistants) | Day Care Manager | Close at end of current academic year | Current academic year + 6 years | Destroy |
| Student Records-non teaching (e.g. nursery assistant students & pupils from schools on work experience) | Deputy Manager | Close at end of current academic year | Current academic year + 6 years | Destroy |
| Student Teachers on Teaching Practice – student teacher progress | Deputy Manager | Close at end of current academic year | Current academic year + 6 years | Destroy |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Record** | **Person responsible for maintaining record** | **File Action** | **Minimum Retention Period** | **Action After Retention** |
| Procedures for Induction of Staff | Day Care Manager |  | Until superseded | Destroy |
| Staff/Teachers’ Attendance Records | Day Care Manager | Close after leaving employment | 7 years after leaving | Destroy |
| Staff Performance Review | Day Care Manager | Close at end of review period covered | During validity + 7 years after leaving employment | Destroy |

**5. Finance:**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Record** | **Person responsible for maintaining record** | **File Action** | **Minimum Retention Period** | **Action After Retention** |
| Annual Budget | Day Care Manager | Close at end of current financial year | Current financial year + 6 years | Destroy |
| Budget Monitoring | Day Care Manager | Close at end of current financial year | Current financial year + 6 years | Destroy |
| Annual Statement of Accounts (Outturn Statement) | Financial controller | Close at end of current financial year | Current financial year + 6 years | Destroy |
| Order Books, Invoices, Bank Records, Cash Books, Till Rolls, Lodgement books etc | Financial controller | Close at end of current financial year | Current financial year + 6 years | Destroy |
| Postage Book | Office manager | Close at end of current financial year | Current financial year + 6 years | Destroy |
| Purchasing – Tender Information & Prices | Financial controller |  | Until superseded | Destroy contract schedules when they expire. |
| Audit Reports | Financial controller | Close at end of current financial year | Current financial year + 6 years | Destroy |

**6. Health & Safety:**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Record** | **Person responsible for maintaining record** | **File Action** | **Minimum Retention Period** | **Action After Retention** |
| Accident / Incident Book | Deputy Manager | Close after last entry in book | 15 years | Destroy |
| Legal /Accident/Incident Forms | Deputy Manager |  | Until pupil is at least 22 years old or in the case of an adult 4 years from the date of the accident | Destroy |
| Risk Assessments – work experience locations/pupils | Deputy Manager |  | 7 years | Destroy |
| H & S Reports | Day Care Manager |  | 15 years | Destroy |
| Fire Procedure | Day Care Manager |  | Until superseded | Retain copies of earlier versions |
| Security System File | Head of Corporate Services |  | For the life of the system | Then Destroy |
| HS Policy Statement | Day Care Manager |  | Until superseded | Retain earlier versions up to 15 years and review as necessary |