

## REAY PRIMARY SCHOOL



Reay school policies support our aims to:

- offer a breadth of experiences to all children inside and outside school
- reach the highest standards across the curriculum
- build self esteem
- develop social and emotional intelligence
- demonstrate a quality of leadership which embodies inclusion and respect

### Safe disposal of records which have reached the end of their administrative life

Please be aware that this guidance applies to all types of record, whether they are in paper or digital format.

#### 1. Disposal of records that have reached the end of the minimum retention period allocated

The fifth data protection principle\* states that:

*“Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes”*

The Headteacher must ensure that records that are no longer required for business use are reviewed as soon as possible under the criteria set out so that only the appropriate records are destroyed.

A local review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained by the organisation for research or litigation purposes. (refer to the Retention Schedule Policy)

All decision needs to be documented as part of the records management policy.

#### 2. Safe destruction of records

All records containing personal information, or sensitive policy information should be made either unreadable or unreconstructable.

- Paper records should be shredded using a cross-cutting shredder
- CDs / DVDs / Floppy Disks should be cut into pieces
- Audio / Video Tapes and Fax Rolls should be dismantled and shredded
- Hard Disks should be dismantled and sanded

Any other records should be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways. Do not put records in with the regular waste or a skip.

#### 3. Where an external provider is used, all records must be shredded on-site in the presence of an appropriate employee, and the Certificate of Destruction must be retained as proof.

Staff working for the external provider should have been trained in the handling of confidential documents. Shredding needs to be planned with specific dates and all records should be identified as to the date of destruction.

It is important to understand that if the records are recorded as to be destroyed but have not yet been destroyed and a request for the records has been received they MUST still be provided.

**4. Where records are destroyed internally, the process must ensure that all records are recorded and authorised to be destroyed by the Headteacher and the destruction recorded.**

Records should be shredded as soon as the record has been documented as being destroyed.

**Freedom of Information Act 2000 (FoIA 2000)**

The Freedom of Information Act 2000 requires the school to maintain a list of records which have been destroyed and who authorised their destruction<sup>10</sup>. Members of staff should record at least:

- File reference (or other unique identifier);
- File title (or brief description);
- Number of files and date range
- The name of the authorising officer
- Date action taken

Following this guidance will ensure that the school is compliant with the Data Protection Act 1998 and the Freedom of Information Act 2000.

**5. Transfer of records to the Archives**

Where records have been identified as being worthy of permanent preservation, arrangements should be made to transfer the records to the appropriate storage area.

**6. Transfer of information to other media**


If appropriate members of staff may convert paper records to other media such as microform or digital media. The lifespan of the media and the ability to migrate data where necessary should always be considered.

Consideration should also be given to the legal admissibility of records that have been converted from paper to electronic media. It is essential to standardise conversion, to ensure it can be proved the electronic version is a genuine original and could not have been tampered with in any way. (Refer to 'British Standard 10008:2008 'Evidential weight and legal admissibility of electronic information' when preparing such procedures.)

**7. Recording of all archiving, permanent destruction and digitisation of records**

Records will be maintained of the disposal of documents on a Disposal Register.

<sup>\*10</sup> Lord Chancellor's Code of Practice on the Management of Records issued under section 46 of the Freedom of Information Act 2000 sections 12.13 and 12.14

<b>Date agreed by governing board on</b> 18 <sup>th</sup> July 2018	<b>Signature of Chair <del>or Vice Chair</del></b> 
<b>Date agreed for review</b> Summer 2021	<b>Frequency of Review</b> Annual / Bi-annual / Three-year cycle (unless required earlier)
<b>Review Responsibility</b> Resources Committee	