

Records Management Policy

2025-2026



‘The Love of Christ impels us’

To be

Ready, Respectful, Safe

**‘To love one another as I have
loved you’**

Reviewed: Autumn 2025

11 December 2025

To be reviewed: Autumn 2026

Signed: Chair Governors

Records Management Policy

In order to be able to fulfil its responsibilities under the FoI and the Code of Practice, the public authority needs to be aware of what it needs to do to and to have committed to having sufficient resource in place to carry it out.

To do this a suitable policy framework still needs to be set out. The policy can be part of an overarching information governance or knowledge management policy framework and does not need to stand alone.

As the current Code does not specify what a records management policy should contain, public authorities are free to decide what the policy contains and how it is laid out. [BS10025-2021: "Management of records – Code of practice"](#) lays out what should be contained in a records management policy [see outline below]

It is important to remember that the policy lays out what the public authority understands to be its responsibilities and the commitment to carry them out. It will not usually contain detail about how the responsibilities are to be carried out, this will normally be outlined in a protocol or process document.

For example, the policy may say that the authority will dispose of records in line with the requirements of the Code. The detail about the company which is to be used, the protocol around suitable shredders will be found in a protocol document and the retention periods in the retention schedule.

BS10025-2021: "Management of records – Code of practice" lays out an outline of what should be included in a records management policy:

- The parts of the organisation which it covers;
- High level requirements for records management, the relationship of records to the organisation's overall business and achieving its objectives;
- The organisation's commitment to records management;
- Connections to related policies
- Roles and responsibilities
- Organisation arrangements

There should also be information about how the policy is to be managed and monitored including supplemental standards, processes, procedures and guidelines. This information should include processes for handling deviations and exceptions.

Once it has been completed the policy should be documented, formally approved and communicated across the organisation. It should be integrated

into the organisation's processes and reviewed and updated on a routine basis.

Educational establishments should be aware that the policy should cover the overarching principles. The policy will need to be supplemented with the processes and protocols which document the business rules and how these are implemented.

Template Records Management Policy

The National Archives created a template records management policy for schools when the first Code of Practice was published. The original draft policy provided by The National Archives has not been updated although the Lord Chancellor's Code of Practice under Section 46 of the Freedom of Information Act 2000 has been updated. The IRMS Schools Toolkit editorial team have amended the template as part of this toolkit review to include some of the principles laid out in the current Code of Practice.

The template could be adopted in its entirety or it could be amended to reflect the needs of individual schools. Once it has been amended, it should be approved by the governing body or other appropriate authority. Once the records management policy has been approved at the appropriate level it should be published, perhaps as part of the publication scheme.

[Name of School] Records Management Policy

The School/Trust recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the school and provide evidence for demonstrating performance and accountability.

The School/Trust undertakes to manage records in relation to the three principles laid out in the Lord Chancellor's Code of Practice issued under Section 46 of the Freedom of Information Act 2000, published in July 2021.

This policy provides the framework to achieve effective management and audit of records. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

1. Scope of the policy

1. This policy applies to all records created, received or maintained by permanent and temporary staff of the school in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the school.
2. Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronic format.

2. Responsibilities

1. The governing body of a school / Academy Trust has a statutory responsibility to maintain the records and record keeping systems in accordance with the regulatory environment specific to the school. The responsibility is usually delegated to the headteacher of the school.
2. The person responsible for day-to-day operational management in the school will give guidance on good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
3. Information will be managed in line with the Records Retention Schedule. This will help to ensure that it can meet Freedom of Information requests and respond to requests to access personal data under data protection legislation (Subject Access Requests 'SARS').
4. Individual staff and employees must ensure, with respect to records for which they are responsible, that they:
 1. Manage the school's records consistently in accordance with the school's policies and procedures;
 2. Properly document their actions and decisions;
 3. Hold personal information securely;
 4. Only share personal information appropriately and do not disclose it to any unauthorised third party;
 5. Dispose of records securely in accordance with the school's Records Retention Schedule.
5. Information will be assessed and when it is no longer required, necessary or is to be destroyed or deleted in line with the retention schedule.
6. The security of data and appropriate measures will be implemented to protect breach, loss or unauthorised sharing of the information.

3. Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information policy
- Data Protection policy
- Information Governance Policy and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

Signed: [Head of School]