

Children, Young People and Families

School Records
Guidance to Schools

June 2012



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1 Introduction

1.1 This guide is intended to help schools to devise efficient systems for the management of their records. Schools need to manage their records because of:

- Increasing emphasis on accountability
- Delegation of powers to Governing Bodies
- Litigation by parents, pupils and staff
- Requests under the Freedom of Information Act
- Data subject enquiries under the Data Protection Act
- Accountability for finance and externally audited grants
- Parental requests for copies of their child's education records

1.2 Proper management of records is very important. Records contain information that schools need for administration, management and future planning.

1.3 Effective records management means records should only be kept for the required length of time. The majority of records are often of only short term value and don't need to be kept forever or even for more than a few years. However, some records need to be kept for historical purposes and future research (see section 8)

1.4 At a time when every effort is being made to reduce paperwork and bureaucracy, this guide is not intended to add to a school's burden. It is intended to assist in making record keeping more efficient and effective.

2 Types of School Records

These are listed in the retention schedules in **Appendix 1**.

3 Categories of records

All Record Owners have the responsibility to identify and categorise records into one of the four headings given below:

3.1 Current Records

These are records that are used regularly and frequently in the day to day work of the school.

3.2 Semi-current Records

These are not used as frequently as current records but are needed for legal or operational reasons or to be retained for compliance with procedural, statutory or financial requirements. Semi-current records must therefore be kept in a useable state until such time as they are disposed of (either by destruction or transfer to Sheffield Archives).

Semi current records can be stored using an appropriate company, which offers a records management service. Where records are not stored by this kind of company the school will have ultimate responsibility for the safekeeping, accessibility and retention of records. Semi current records should be protected from unauthorised access and/or alteration. Records need to be kept in a secure area such as a locked storage room or a safe room. They should be protected from fire and water damage and from extremes of temperature and humidity.

3.3 Records selected for Permanent Preservation

These are records that have been identified as having a long-term historical, cultural or educational significance. Sheffield Archives is the only place of deposit in Sheffield appointed under the Public Record Act where this type of record can be put on permanent deposit. Records are still accessible to the school for administrative, educational and exhibition purposes and can be consulted in order to answer queries which the school may receive. This category of records can be collected directly from schools free of charge. They will be stored in secure strong rooms and confidentiality is respected through controlled access to the records.

3.4 All other records

Records no longer required for the work of the school should be destroyed according to the retention guidelines in **Appendix 1**.

4 What is Records Management?

4.1 Records management helps organisations to manage their records in a systematic way.

4.2 Good records management should be seen as a benefit to an organisation, not a burden.

4.3 A records management system should include

- An agreed filing system – alphabetical, numerical or structural
- File discipline – agreed patterns of opening and closing files, eg on an annual or termly basis
- A loans procedure – ensuring all files loaned or taken from the filing system can be traced to the holder
- Storage – ensuring that files are stored correctly on site or in agreed storage areas
- Retention schedules – using recommended retention schedules and ensuring they are documented
- Review schedules – review processes carried out according to an agreed pattern
- Destruction schedules – records should be destroyed correctly including arrangements to dispose of confidential waste
- Preservation of records as archives – records should be transferred to secure storage for long term preservation

4.4 Each school should draw up a records management policy. This policy should ensure:

- That a consistent approach to records management exists
- That all records are managed in an efficient and cost effective manner, which meets legal and organisational requirements
- That all records are controlled throughout their lifecycle, from creation to destruction or permanent preservation
- That all pupils educational records are maintained and transferred in accordance with regulations

A [records management tool kit](#) is available to download from the Records Management Society website.

This includes a sample records management policy that schools can adopt and a set of records management guidelines.

5 Electronic Records

Each school should draw up a policy to deal with electronic records.

The policy should aim to

- Provide clear guidance on what electronic records are and why they need to be kept
- Explain how good electronic records management will serve major needs of the school
- Set out generic principles and policies on specific aspects which then form the basis of implementation
- Define responsibilities for electronic records throughout the school

6 Access to and Disclosure of Pupil Records

6.1 Introduction

This section is intended to assist schools in complying with the requirements of the law relating to disclosure of pupil records to parents and pupils. It is intended to provide general guidance only on the main requirements and is not a substitute for the detailed provisions of the relevant Regulations. Headteachers and other staff must always consider the welfare of the child and seek advice if necessary. Further information is available from:

- Children, Young People and Families Advice and Conciliation Service (general matters) Telephone 0114 2053939
- Child Protection advice Telephone: 0114 2734934. Email: safeguardingchildrenadvice@sheffield.gov.uk
- Director of Legal and Administrative Services (Legal issues) Telephone 0114 2734016 or 2734004

6.2 Definitions

6.2.1 'Curricular records' means the formal record of a pupil's academic achievements, their other skills and abilities and their progress in School – required by the Regulations to be kept and updated annually.

6.2.2 'Educational record' means effectively **any** record of information (including the Curricular record) which is processed by or on behalf of the Governing Body of or a teacher at a School, which relates to any person who is or has been a pupil of the School, and which originated from or was supplied by or on behalf of;

- an employee of the Children, Young People and Families
- the pupil
- a parent of that pupil

Letters and information from Third Parties are not generally covered by the definition but where the school uses such information, for example, as part of a disciplinary investigation or for other school purposes then it is likely to become part of the educational record. This is particularly the case if the school includes such information or repeats it in a separate record.

If the pupil or someone else at the request of the school provides a statement, then it will in any event be caught by the definition. An example might be if a school assists a pupil in providing a statement about an incident within the school which the school may or may not then take action upon.

The requirement to disclose relates only to information "processed by or on behalf of the Governing Body" or by or on behalf of a teacher at school. Any

information held by Children, Young People and Families separately (for example in relation to pupils subject to statements of Special Educational Needs) does not fall within the strict definition of educational records. However, clearly they may become educational records if copies are sent to and held by the school.

The records will not include information about other persons eg parents

6.2.3 “Parent” unless specifically stated otherwise includes:

- All natural parents, whether they are married or not
- Any person who, although not a natural parent has parental responsibility for a child
- Any person who, although not a natural parent, has a care of a child (ie the child effectively lives with them)

For more information see the guidance “Parental Responsibility and Parents’ Rights in relation to Education “ issued by Legal and Administrative Services, which forms **Appendix 3** to this guidance.

6.2.4 “Regulations” means the Education (Pupil Information)(England) Regulations 2000 (as amended).

6.3 Requirement to disclose records to parents

Under the Regulations it is the duty of the Headteacher following a written request by a parent for disclosure of a child’s educational record (including the curricular record) within 15 school days

- Where the request is for access – to allow inspection free of charge by that parent
- Where the request is for a copy – copies must be provided free of charge unless the Governing Body has prescribed fees to be paid which cannot exceed the cost of supply.

6.3.1 Points to note

- The requirements in the Regulations only apply to written requests
- There are some exceptions – see paragraph 6.6
- There is a requirement of the Headteacher to translate the information into another language if the Headteacher thinks it necessary.
- Where a solicitor or other representative requests copy records it is always good practice to request a signed form of authority from the parent. If court proceedings have been brought or may be brought advice should always be sought from Legal and Administrative Services
- Governing Bodies should consider whether to make a charge for copying

6.4 Data Protection Act right to access to records

There is an additional right under the Act for persons with parental responsibility for a child to be able to request disclosure of data within the meaning of the Data Protection Act which relate to their child. It is likely to be only exceptionally that a request is made under this right given the rights available under the Regulations previously discussed. However, under these circumstances if it is clear that the parent is requesting the information for their own purposes rather than on behalf of the child or if the child is mature enough to understand the nature of the request and could do so themselves, the request can be refused.

Disclosure must be made within 40 days of the request.

6.5 Pupils right to access records

This comes again from the Data Protection Act 1998. A child may submit a written request to see records and that child should be allowed access if it is clear they understand what they are asking for, unless the request is being made clearly on behalf of the third party (such as the parent).

6.6 Exceptions – applicable to all requests for disclosure either by parents or children

The following paragraphs lists information which should not be disclosed.

NB: The welfare of the child is the most important consideration. Where an exception applies there is no obligation to disclose that any information exists. Exceptions include:

- Information to the extent to which disclosure will be likely to cause harm to the physical or mental health or condition of any person including the child (see paragraph 6.7 below if the information is about the physical or mental health or condition of the pupil)
- If it is not covered by the paragraph above and where a parent makes a request, information as to whether the child is or has been subject of or may be at risk of child abuse if it is not in the best interests of the child for the information to be disclosed
- Exceptionally, any information if the request is by a parent and it is clear that the person making the request is making the request not in the interests of the child but for their own purposes (an example may be an estranged parent seeking information as to the whereabouts of their child to find out where the child's mother or carer lives)
- Information to the extent that it identifies a third party and they do not consent to disclosure unless it is reasonable to disclose without consent. NB this does not include teachers or other employees of the Children, Young People and Families or the Governing Body.
- Information processed by a teacher solely for a teacher's own use – there will only be limited circumstances in which this will apply. It may apply if the teacher is conducting some form of research or is holding some information for personal use in an employment context. It does

not apply if other staff have access to it or the teacher has made the record at the request of the Head teacher

- Information contained in a report to the court in certain proceedings relating to the child

6.6.1 Points to note

Perhaps the most difficult area to work through is where a request has been made and the record identifies third parties, particularly other children. As stated above this does not include a teacher or other employee of the Children, Young People and Families. The Data Protection Act provides that information identifying third parties can be disclosed without consent if it is reasonable in all the circumstances to comply with the request without consent. This would only be the case where general information is being given perhaps to identify educational activities conducted with another child or children or where it can be implied from a letter from a third party that it is acknowledged that the information will be disclosed (but care needs to be taken about any child abuse allegation).

If the above does not apply and third parties are identified there is a requirement that consent of those third parties be requested prior to disclosure. However this may well be problematic or impractical in cases such as bullying cases, where even seeking the consent from the third party may cause conflict. The School may be aware that someone who wished to remain anonymous for good reasons has provided information. In these circumstances it may be possible to modify the records by deletion of reference to that third party which may not only include name but also any other information which might lead the person to whom the record is being disclosed, or any other person, to be able to identify that third party. In such cases it may be necessary to withhold the whole of the document if persons might likely be identified from disclosure.

6.7 Information relating to the physical or mental health or condition of a pupil

This is subject to special provisions

- Before disclosure (unless the information is already known to the pupil/parent) or a conclusion disclosure would harm the physical or mental health or condition of any person including the child, an appropriate health professional must be consulted (Data Protection (Subject Access Modification)(Health) 2000)
- Where a parent requests such information, if the pupil has expressly indicated or if there is an expectation by the pupil that such information should not be disclosed it should not be disclosed.

7 Transfer of Records

7.1 When pupils transfer from one school to another, the Headteacher must send to the new school

- all educational records relating to the pupil. The pupils educational record includes copies of their reports as well as the pupils curricular record.
- The common transfer file

7.2 From 1 June 2002 all maintained schools that have the capability to transfer defined items of pupil data electronically when children change school have been expected to do so. This is known as the common transfer file. Schools without the capability to transfer data electronically should use alternative means. The old and the new school should agree between themselves the form in which the information will be transferred. The information should be transferred to the new school within 15 days of the pupil ceasing to be registered at the old school.

7.3 The information that forms part of the common transfer file for electronic transfers is as follows:

- Unique Pupil Number (UPN)
- Pupil Surname – if possible as it appears on the birth certificate. If the pupil goes by another name this can also be given
- Pupil Forenames
- Pupil Date of Birth
- Pupil Gender
- Pupil Ethnic Code – should reflect latest codes used in Pupil Level Annual Schools census
- Language Code (or Mother Tongue) – should reflect latest codes used in Pupil Level Annual Schools Census
- Pupil SEN provision (School Action, School Action Plus or statement) if relevant
- Number of possible sessions at school this year – a total number for that pupil, expressed in half days
- Number of sessions attended – expressed in half days
- Number of unauthorised absences – expressed in half days
- DCSF Number of transferring school
- Name of transferring school
- DCSF Number of destination school
- Name of destination school
- Assessment Data
 - Key Stage 1
 - Teacher Assessment levels
 - End of Key Stage task/test information

- Key Stage 2
 - End of KS1 Assessment Information
 - KS2 teacher assessment levels (either statutory end of KS2 or latest assessments)
 - End of KS2 test information
- Key Stage 3
 - End of KS1 and KS2 assessment information
 - KS3 teacher assessment levels (either statutory end of KS3 or latest assessments)
 - End of KS3 test information
- Key Stage 4
 - End of KS1, KS2 and KS3 assessment information
 - KS3 teacher assessment in non-core subjects
 - Public examination results

7.4 The common transfer file is sent through the secure file transfer service on the TeacherNet website. If the school does not know the identity of the new school to which a pupil has transferred they can send the common transfer file to a special area of the TeacherNet secure file transfer website which will form a database of “missing” pupils.

7.5 The law requires that common transfer file data are sent to the receiving school no later than 15 school days after the day on which the pupil ceases to be registered at the old school.

7.6 Headteachers must also, upon request, transfer a pupil’s curricular record to the Headteacher of another school (including an independent school) or an institution of further or higher education, where a pupil is under consideration for admission. A curricular record means a formal record of a pupil’s academic achievements, other skills and abilities and progress in school. The record must be transferred free of charge and must not include the results of any assessments of the pupil’s achievements

7.7 If a pupil transfers to an institution of further or higher education or any other place of education or training other than a school the data need not be sent and the record should only be transferred if it is requested in writing.

7.8 Relevant Guidance

- DfES/0268/2002 The Common Transfer File
- Education (Pupil Information) (England) Regulations 2000 (SI 2000/297)
- Education (Pupil Information) (England) (Amendment) Regulations 2001 (SI 2001/1212)

8 Disposal schedules

8.1 Disposal schedules form a key element of the school’s records management policy. They are timetables that set out when individual or groups of records

are due for review, transfer to records management or archives, or destruction.

8.2 Schools should survey what records they are producing and draw up a retention schedule for each set of records. A recommended set of retention guidelines are attached at **Appendix 1**

8.3 When assessing records for retention the following categories for insurance/legal claims should be taken into account:

- Accidents resulting in injury to pupils where the school is alleged to have been negligent
- Alleged failure to assess a pupil's educational needs and provide education appropriate to those needs
- Alleged failure to deal with bullying

8.4 Personal injury claims have a limitation period of 3 years after a pupil's 18th birthday. It is unlikely that many claims will be received after a pupil's 21st birthday. The Courts do however have discretion to extend this where, effectively, the person in question could not reasonably know they had a potential claim.

8.5 Other claims may be received up to age 24 or after, since there may be a 6-year limitation period in some circumstances. It is worth noting therefore that the following files should be carefully considered for retention for longer than this:

- SEN files if a pupil has been the subject of a statement of Special Educational Needs. Where the school is aware there might be an issue of personal injury claim and the child has a mental disability or learning difficulty the records should be kept until 4 years after their death.
- Cases where there has been a parental complaint about bullying or about issues arising in relation to a child who has been placed on the Special Needs Register at School Action or School Action Plus.
- Health and safety records, including any reports of the incident and the risk assessment, and in particular those cases which result in anything other than a minor injury. These should include inspection and maintenance records if the injury results from the condition of a property. Again where the school is aware there might be an issue of personal injury claim and the child has a mental disability or learning difficulty the records should be kept until 4 years after their death.
- Records in relation to any child protection issues, whether involving staff or pupils.

9 Freedom of Information Act

- 9.1 The Freedom of Information Act 2000 (FOI) gives people the right to request information from public authorities (which includes schools). It is intended to promote a culture of openness and accountability amongst public sector bodies, and therefore facilitate better public understanding of how public authorities carry out their duties, why they make the decisions they do, and how they spend public money.
- 9.2 Each public authority should adopt and maintain a publication scheme setting out details of information it will routinely make available, how the information can be obtained and whether there is any charge for it. The date by which public authorities were required to have their schemes in place varied. Schools should have had their publication scheme in place by 29th February 2004.
- 9.3 From 1 January 2005 each public authority must comply with requests for the information that it holds unless an exemption from disclosure applies. Public authorities will normally have a maximum of twenty working days to respond to the request, however there are circumstances when this time limit can be extended
- 9.4 Good records management will help schools to ensure that information is easily retrievable and properly documented. Disposal schedules make it easy for schools to establish whether or not a record exists if a request is received.
- 9.5 Further information on the Freedom of Information Act and how it relates to schools can be found on the Information Commissioner's website as follows:
www.informationcommissioner.gov.uk

Appendix 1

- Please see Records Management Society
 - [Guidance for Schools](#)

Appendix 2

Records Management Facility Procedures

1 Sending records to the Records Management Service

- 1.1 If you have never used the Council's Records Management Service please telephone the service on 2737543 or 2739395
- 1.2 Records are stored using a standard sized box and transfer sheets, both of which are supplied by the Records Management Service
- 1.3 The boxes come flat packed, and can be easily assembled.
- 1.4 The contents of every box need to be listed on a transfer sheet. The following details are required:
 - the name of the service area, and location;
 - the name and telephone number of the officer responsible for transferring the records;
 - details of the records being transferred. This can be particular file references, subject headings, batch headings or covering details. It must reflect what is being sent to the service, and must enable them to retrieve the item that you require. Further guidance should be sought if officers are unsure about the procedure;
 - the last date covered by each item or series of items within the box;
 - the required time for the retention of the document. This can be either a number of years, or a particular month and year.
- 1.5 Three hard copies of the transfer sheets are required by the Records Management Service. Place these copies on top of the records in the box.
- 1.6 Guidance for filling boxes:
 - Files in the box must have the same review date because the records are destroyed at box level rather than at individual file level
 - Do not mark the boxes on the outside in any permanent way. If you need to be able to identify the boxes prior to transferring them to the Records Management Service mark the boxes in pencil only.
 - Do not seal the lids of the boxes.
 - Do not overfill the boxes or force oversized items into them
- 1.7 If you have material that will not fit comfortably into the boxes, then please contact the Record Management Service

2 Retrieving Records

- 2.1 Records deposited can be retrieved by the depositing service area. To request material back, the Records Management Service requires the following information:
- The box number (RM number) of the box that the record will be in – this will be in the top right hand corner of the transfer sheet that was returned to the service area, usually written in red.
 - A brief description of the record, for example a file title or any file reference – see the description details on the transfer sheet.
 - A name, location and telephone number of the officer requesting the material.
- 2.2 A member of the Records Management Service will then dispatch the records.
- 2.3 The officer requesting the file or a colleague within the service area will have to sign a receipt upon delivery.
- 2.4 Each record has a yellow slip attached to it, giving the date it was loaned out and the RM box number it came from. This slip **MUST NOT** be taken off the record.
- 2.5 Records should be returned to the Records Management Service as soon as it is no longer required. Contact the Records Management Service to arrange for the material to be picked up.
- 2.6 The Record Owner withdrawing the record remains responsible for its safekeeping at all times.
- 2.7 Records should not be passed to other service areas or reactivated without notifying the Records Management Service.
- 2.8 Permanent withdrawals of records can be arranged.
- 2.9 A charge is made for storage of material. Currently the charge is £5.00 per box per year.

Appendix 3

Parental Responsibility and Parents' Rights in Relation to Education

Who is a 'Parent' under Education Law?

The Education Act 1996 for **educational purposes** defines 'parent' to include

- All natural parents whether they were married or not
- Any person who has parental responsibility
- Any person, although not a natural parent, who has actual care of a child or a young person

What is Parental Responsibility?

This is defined in law as being all the rights, duties, powers and responsibilities and authority which by law a parent of a child has in relation to the child and their property.

Who has Parental Responsibility?

Persons with parental responsibility include the following:

- The child's natural (birth) mother
- The child's natural father if the parents were married at the time the child was born or who has subsequently married the mother during the child's minority
- A person who has been granted a residence order by the court for the duration of that order
- The father if the parents were not married at the time of the child's birth, but only
 - through a court order
 - by agreement with the mother under a prescribed form of agreement under the Children Act (not just any form of agreement)
- by acquisition of parental responsibility by being registered or re-registered as the child's father on the birth certificate
- The child's appointed guardian or the child's adoptive parents
- A local authority if the child is subject to a care order
- Anyone else granted parental responsibility under a court order

What is meant by 'educational purposes'

All parents under education law have the following rights unless these are restricted by a court order (however where there is a serious concern about the welfare of the child appropriate advice should always be obtained)

- To be involved and be kept informed about matters relating to the child's education
- To receive information from the school eg Governors' annual reports, pupil reports, attendance records etc.

- To participate in activities (eg voting and standing for parent governor elections)
- To be told about meetings involving the child and to attend (at separate times if necessary)
- To express a preference for a school place
- To be informed about exclusions

If there is a dispute, what should the school do?

The school should as far as possible, remain neutral, try to resolve the problem if it affects the school's ability to provide education in the child's best interests, and if this is unsuccessful ask the parents to resolve their disputes without involving the school (through the courts if necessary). The school should respect and confirm the rights all parents have for Educational Purposes. However, when decisions are required or other matters are considered, if only one parent has parental responsibility, and there is a dispute, in the absence of a clear court order giving the other parent rights or requiring a particular course of action the school should follow the wishes of the parent with parental responsibility.

Which Parent can dictate who picks the Child up from School?

If the school is aware that only one parent has parental responsibility, then that parent is able to dictate who should pick the child up. If both parents have parental responsibility but there is a court order in place prescribing who should have residence and prescribing only limited contact for the other parent, then schools should normally respect the wishes of the parent who has residence if that parent seeks to prohibit the other parent from picking the child up from school.

Can a Parent prohibit school contact by the Other Parent?

Parental contact in school should only be accommodated at a reasonable time, ie outside session times, unless there are exceptional circumstances. The welfare of that child and other children in the school and education of all the children is important, so any parental requests for contact should only be accommodated if they are reasonable. Again, if a parent has parental responsibility they can restrict contact with the child at school by another parent without parental responsibility. If both parents have parental responsibility and contact is sought by the parent with whom the child does not reside without arrangement by the other parent, the other parent should normally be informed. Again, if there is a disagreement over whether it should take place the parents should be advised to resolve the issue outside school.

A court order may define contact arrangements either generally or on some occasions specifically and the school should not act in contravention of any order. Advice can be obtained on the terms of court orders from Legal and Administrative Services (see contact numbers below).

Can a Parent require the child's name on the roll to be changed?

Parents can always ask for their child to be known by a different name. The original information on the admissions and attendance register should, however, be retained, but can be amended to ensure how the child is now known or how the child was

formerly known. If both parents have parental responsibility and they disagree over the issue, then the status quo should be preserved until a court order determines the issue. If only one parent has parental responsibility, the school should follow that parent's wishes.

Who has the right to access to a child's Educational Record and what does this Include?

Parents have rights to access to and be given copies of their child's Educational Record.

Who can give Consent for School Trips and other Purposes?

It should normally be adequate to obtain the consent of the parent with whom the child lives unless the decision is likely to have a long term and significant effect on the child and the school is aware of another parent with parental responsibility who wishes to be involved. Strictly only a parent with parental responsibility can give a full and informed consent. However, any other person who has actual care of the child can do what is reasonable in all the circumstances of the case for the purpose of safeguarding or promoting the child's welfare. Consent should always be obtained, if possible, from someone with parental responsibility. If both parents have parental responsibility and they disagree, then unless there is a court order in place regulating such decisions, if the school is aware that one parent does not give consent then the school should treat this as a refusal of consent.

Contact numbers for schools

Legal and Administrative Services
Nadine Palmer 273 6564
Frances Woodhead 273 4004

Appendix 4

Useful numbers

Records Management Service	Advice on storage of records, procedures for depositing records, retention schedules	0114 2037543	rms@sheffield.gov.uk
Sheffield Archives	Advice on depositing records	0114 2039395	archives@sheffield.gov.uk
Information Service	Advice on this publication, retention schedules	0114 2735721	janice.robinson@sheffield.gov.uk
Advice and Conciliation Service	General matters, advice on parental rights of disclosure	0114 2053939	Ed-adviceandconciliation@sheffield.gov.uk
Safeguarding Children Service	Child Protection issues	0114 2734934	Child.protection@sheffield.gov.uk
Legal issues for schools	Advice on parental rights of disclosure	0114 2734016 or 2734004	
Records Management Society	Links to the RM Toolkit for schools, Retention guidelines for local government	0191 244 2839	http://www.rms-gb.org.uk/resources
National Archives	Information on electronic records management	020 8876 3444	http://www.nationalarchives.gov.uk/electronicrecords/default.htm
Data Protection Guidance (Information Commissioner)	Links to good practice notes, codes of practice, technical guidance and legal obligations	08456 30 60 60 or 01625 545745	http://www.ico.gov.uk/for_organisations/data_protection_guide.aspx
Freedom of Information (FOI) Act guidance (Information Commissioner)	Information and guidance your rights, responsibilities and obligations under the FOI Act	08456 30 60 60 or 01625 545745	http://www.ico.gov.uk/for_organisations/freedom_of_information_guide.aspx