

THUNDERSLEY PRIMARY SCHOOL

Records Management Policy



Member of staff Responsible	<i>Emma Dawson</i>
Policy produced	<i>December 2017</i>
Policy agreed/last reviewed	<i>March 2020</i>
To be reviewed	<i>March 2023</i>
Other Policies Related	<i>Freedom of Information policy, Data Protection policy and other legislation or regulations (including audit, equal opportunities and ethics) affecting the school, General Data Protection Requirement May 2018</i>
Other Paperwork Attached (appendix)	<i>Appendix 1: Records Retention Schedule Appendix 2: Pupil records guidance Appendix 3: Personal file and Retention Guidance Essex HR.</i>

Introduction

The School 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. This document provides the policy framework through which this effective management can be achieved and audited.

1. Scope of the Policy

This policy applies to all records that are created, received or maintained by staff of the school in the course of carrying out its functions.

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 or received, and then stored, in hard copy or electronically.

A small percentage of the school's records may be selected for permanent preservation as part of the institution's archives and for historical research.

2. Responsibilities

The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Headteacher of the School.

The person responsible for records management in the school will give guidance about 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.

Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management guidelines.

3. Recording Systems

Information created by the school must be managed against the same standards regardless of the media in which it is stored.

Maintenance of Record Keeping Systems

- It is important that filing information is properly resourced and is carried out on a regular basis. It is equally important that the files are weeded of extraneous information where appropriate on a regular basis. Removing information from a file once a freedom of information request has been made will be a criminal offence

(unless it is part of normal processing).

- Applying retention periods is straightforward provided files are closed on a regular basis.
- Once a file has been closed, it should be moved out of the current filing system and stored either in a record room in the school or in another appropriate place until it has reached the end of the retention period.
- Information security is very important especially when dealing with personal information or sensitive policy information. There are a number of basic rules:
 - ✓ All personal information should be kept in lockable filing cabinets which are kept locked when the room is unattended;
 - ✓ Personal information held on computer systems should be adequately password protected. Information should never be left up on a screen if the computer is unattended;
 - ✓ Files containing personal or sensitive information should not be left out on desks over night;
 - ✓ Where possible sensitive personal information should not be sent by e-mail;
 - ✓ If files need to be taken off the premises they should be secured in the boot of a car or in lockable containers;
 - ✓ Teachers may carry data on memory sticks or other removable data carriers in order to access their files both at home and at school. Any data carried in this way must be encrypted using appropriate encryption software, e.g. TrueCrypt.
 - ✓ All computer information should be backed up regularly and the back-up should be stored off the site.
- Information contained in email or fax should be filed into the appropriate electronic or manual filing system once it has been dealt with.

4. The Safe Disposal of Information Using the Retention Schedule

Files should be disposed of in line with the attached retention schedule (see appendix). This is a process which should be undertaken on an annual basis.

Paper records containing personal information should be shredded using a cross-cutting shredder. Other files can be bundled up and put in a skip or disposed of to the waste paper merchant. Loose papers should not be put in skips unless the skip has a lid. CD's/DVD's should be cut into pieces. Audio/Video tapes and fax rolls should be dismantled and shredded.

Electronic data should be archived on electronic media and 'deleted' appropriately at the end of the retention period.

5. Monitoring and Review

This policy has been reviewed and approved by the head teacher and governors. The Records Management Policy will be reviewed and updated as necessary every 2 years.

Appendix 1: Retention Schedule

Child Protection				
The retention and use of records relating to child protection matters concerning pupils, and child protection allegations against staff requires specific guidance in this schedule.				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Child Protection files	Yes	Education Act 2002, s175, related guidance 'Keeping Children Safe in Education' (DfE, 2016), Annex B	Until transfer paperwork has been completed by a school the child has transferred to (senior school or new school) then all files should be destroyed. Senior schools DOB + 25 years	SECURE DISPOSAL
Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Section 175 of the Education Act 2002 • Section 157 of the Education Act 2002 and the Education (Independent School Standards) (England) Regulations 2010 • The Children Act 2004 • Section 11 of the Children Act 2004 (other agencies) • Sections 141F, 141G and 141H3 of the Education Act 2002.	Until the person's normal retirement age, or 10 years from the date of the allegation if that is longer	SECURE DISPOSAL
Governors				
Basic File Description	Data Prot Issues	Statutory Provisions		Action at the end of the administrative life of the record
Minutes				
▪ Principal set (signed)	No		Permanent	Retain in school for 6 years from date of meeting
▪ Inspection Copies	No		Date of meeting + 3 years	SECURE DISPOSAL [If these minutes contain any sensitive personal information they must be shredded]
Agendas	No		Date of meeting	SECURE DISPOSAL
Reports	No		Date of report + 6 years	Retain in school for 6 years from date of meeting
Instruments of Government	No		Permanent	Retain in school whilst school is open
Trusts and Endowments	No		Permanent	Retain in school whilst operationally required
Action Plans	No		Date of action plan + 3 years	SECURE DISPOSAL
Policy documents	No		Expiry of policy	Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)
Complaints files	Yes		Date of resolution of complaint + 6 years	Retain in school for the first six years. Review for further retention in the case of contentious disputes. SECURE DISPOSAL routine complaints.

Management				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Minutes of the Senior Management Team and other internal administrative bodies	Yes		Date of meeting + 5 years	Retain in the school for 5 years from meeting
Reports made by the headteacher or the management team	Yes		Date of report + 3 years	Retain in the school for 3 years from meeting
Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities.	Yes		Closure of file + 6 years	SECURE DISPOSAL
Correspondence created by headteachers, deputy headteachers, heads of year and other members of staff with administrative responsibilities	No		Date of correspondence + 3 years	SECURE DISPOSAL
Professional development plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
School Development Plans	Yes		Life of the plan + 3 years	Review
Pupils				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Admission Registers	Yes		Date of last entry in the book (or file) + 6 years	Retain in the school for 6 years from the date of the last entry then consider transfer to the archives.
Attendance registers	Yes		Date of register + 3 years	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]
Pupil record cards	Yes			
▪ Primary			Retain for the time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school.
Pupil files	Yes			
▪ Primary			Retain for the time which the pupil remains at the primary school	Transfer to the Secondary school (or other primary school) when the child leaves the school.

Special Educational Needs files, reviews and Individual Education Plans	Yes		DOB of the pupil + 25 years then review. NOTE: This retention period is the minimum period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case.	SECURE DISPOSAL
Correspondence Relating to Authorised Absence and Issues	No		Date of absence + 2 years	SECURE DISPOSAL
Examination results	Yes			
▪ Public	No		Year of examinations + 6 years	SECURE DISPOSAL
▪ Internal examination results	Yes		Current year + 5 years	SECURE DISPOSAL
Any other records created in the course of contact with pupils	Yes/No		Current year + 3 years	Review at the end of 3 years and either allocated a further retention period or SECURE DISPOSAL
Statement maintained under The Education Act 1006 - Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	SECURE DISPOSAL unless legal action is pending
Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	SECURE DISPOSAL unless legal action is pending
Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Closure + 12 years	SECURE DISPOSAL unless legal action is pending
Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12 years	SECURE DISPOSAL unless legal action is pending
Parental permission slips for school trips - where there has been no major incident	Yes		Conclusion of the trip	SECURE DISPOSAL
Parental permission slips for school trips - where there has been a major incident	Yes	Limitation Act 1980	DOB of the pupil involved in the incident + 25 years. The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils.	SECURE DISPOSAL
Curriculum				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
School Development Plan	No		Current year + 6 years	SECURE DISPOSAL

Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
Mark Books	No		Current year + 1 year	SECURE DISPOSAL
Samples of Pupils work	No		Current year + 1 term	SECURE DISPOSAL
Examination results	Yes		Current year + 6 years	SECURE DISPOSAL
SATS records - Examination Papers and Results	Yes		Current year + 6 years	SECURE DISPOSAL
Value Added & Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
Self-Evaluation forms	Yes		Current year + 6 years	SECURE DISPOSAL
Personnel				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	SECURE DISPOSAL
Staff Personal files	Yes	See Essex Personal files and record retention guidance	Termination + 7 years	SECURE DISPOSAL
Interview notes and recruitment records	Yes		Date of interview + 6 months	SECURE DISPOSAL
Pre-employment vetting information (including unsuccessful DBS checks)	No	DBS guidelines	Date of check + 6 months	SECURE DISPOSAL [by the designated member of staff]
Disciplinary proceedings	Yes	Where the warning relates to child protection issues see 1.2. If the disciplinary proceedings relate to a child protection matter please contact your safeguarding children officer for further advice.		
▪ Oral warning			Date of warning + 6 months	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
▪ Written warning – level 1			Date of warning + 6 months	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
▪ Written warning – level 2			Date of warning + 12 months	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
▪ Final warning			Date of warning + 18 months	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
▪ Case not found			If child protection related please see 1.2, otherwise SECURE DISPOSAL immediately at the conclusion of the case	

Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied.	SECURE DISPOSAL
Annual appraisal/assessment records	No		Current year + 5 years	SECURE DISPOSAL
Maternity pay records	Yes	Statutory Maternity Pay (General Regulations 1986 (SI 1986/1990), revised 1999 (SI 1999/567))	Current year + 3 years	SECURE DISPOSAL
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SECURE DISPOSAL
Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure	Yes		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff's personal file.	

Health and Safety

Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Accessibility Plans		Disability Discrimination Act	Current year + 6 years	SECURE DISPOSAL
Accident Reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980.		
▪ Adults	Yes		Date of incident + 7 years	SECURE DISPOSAL
▪ Children	Yes		DOB of child + 25 years ⁽¹⁾	SECURE DISPOSAL
COSHH			Current year + 40 years [Where appropriate an additional retention period may be allocated]	
Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL
Policy Statements			Date of expiry + 3 years	SECURE DISPOSAL
Risk Assessments	Yes		Current year + 3 years	SECURE DISPOSAL
Process of monitoring of areas where employees and persons are likely to have come in contact with asbestos			Last action + 40 years	SECURE DISPOSAL

Process of monitoring of areas where employees and persons are likely to have come in contact with radiation			Last action + 50 years	SECURE DISPOSAL
Fire Precautions log books			Current year + 6 years	SECURE DISPOSAL
Administrative				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Employer's Liability Certificate			Closure of the school + 40 years	SECURE DISPOSAL
Inventories of equipment and furniture			Current year + 6 years	SECURE DISPOSAL
General file series			Current year + 5 years	Review to see whether a further retention period is required
School brochure/prospectus			Current year + 3 years	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
Newsletters, ephemera			Current year + 1 year	Review to see whether a further retention period is required
Visitors' book			Current year + 6 years	Review to see whether a further retention period is required
PTA/Old Pupils' Associations			Current year + 6 years	Review to see whether a further retention period is required
Finance				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Annual Accounts		Financial Regulations	Current year + 6 years	Archive
Loans and grants		Financial regulations	Date of last payment on loan + 12 years	Review to see whether a further retention period is required
Contracts				
▪ Under seal			Contract completion date + 12 years	SECURE DISPOSAL
▪ Under signature			Contract completion date + 6 years	SECURE DISPOSAL
▪ Monitoring records			Current year + 2 years	SECURE DISPOSAL
Copy orders			Current year + 2 years	SECURE DISPOSAL
Budget reports, budget monitoring etc.			Current year + 3 years	SECURE DISPOSAL
Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year + 6 years	SECURE DISPOSAL

Annual Budget and background papers			Current year + 6 years	SECURE DISPOSAL
Order books and requisitions			Current year + 6 years	SECURE DISPOSAL
Delivery Documentation			Current year + 6 years	SECURE DISPOSAL
Debtors' Records		Limitation Act 1980	Current year + 6 years	SECURE DISPOSAL
School Fund - Cheque books			Current year + 3 years	SECURE DISPOSAL
School Fund - Paying in books			Current year + 6 years then review	SECURE DISPOSAL
School Fund - Ledger			Current year + 6 years then review	SECURE DISPOSAL
School Fund - Invoices			Current year + 6 years then review	SECURE DISPOSAL
School Fund - Receipts			Current year + 6 years	SECURE DISPOSAL
School Fund - Bank statements			Current year + 6 years then review	SECURE DISPOSAL
School Fund - School Journey books			Current year + 6 years then review	SECURE DISPOSAL
Student grant applications			Current year + 3 years	SECURE DISPOSAL
Petty cash books		Financial Regulations	Current year + 6 years	SECURE DISPOSAL

Property

Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Title Deeds			Permanent	These should follow the property unless the property has been registered at the Land Registry
Plans			Permanent	Retain in school whilst operational
Maintenance and contractors		Financial Regulations	Current year + 6 years	SECURE DISPOSAL
Leases			Expiry of lease + 6 years	SECURE DISPOSAL
Lettings			Current year + 3 years	SECURE DISPOSAL
Burglary, theft and vandalism report forms			Current year + 6 years	SECURE DISPOSAL
Maintenance log books			Current year + 6 years	SECURE DISPOSAL
Contractors' Reports			Current year + 6 years	SECURE DISPOSAL

Department for Education

Basic File Description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
HMI reports			These do not need to be kept any longer	
OFSTED reports and papers			Replace former report with any new inspection report	Review to see whether a further retention period is required
ISI reports and paper			Replace former report with any new inspection report	Review to see whether a further retention period is required
Returns			Current year + 6 years	SECURE DISPOSAL

School Meals				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Dinner Register			Current year + 3 years	SHRED
School Meals Summary Sheets			Current year + 3 years	SHRED
Free school meals register			Current year + 6 years	SHRED

Appendix 2: Pupil Records Guidance

These guidelines are intended to help provide consistency of practice in the way in which pupil records are managed. These will assist schools about how pupil records should be managed and what kind of information should be included in the file. It is hoped that the guidelines will develop further following suggestions and comments from those members of staff in schools who have the most contact with pupil records.

These guidelines apply to information created and stored in both physical and electronic format. These are only guidelines and have no legal status.

Managing Pupil Records

The pupil record should be seen as the core record charting an individual pupil's progress through the Education System¹. The pupil record should accompany the pupil to every school they attend and should contain information that is accurate, objective and easy to access. These guidelines are based on the assumption that the pupil record is a principal record and that all information relating to the pupil will be found in the file. The exception to this will be sensitive Child Protection or SEN information which will be held in a different place and transferred separately.

Recording information

Pupils have a right of access to their educational record and so do their parents under the Education (Pupil Information) (England) Regulations 2005. Under the Data Protection Act 1998 a pupil or their nominated representative has a right to see information held about them. This right exists until the point that the file is destroyed. Therefore, it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

Transferring the pupil record to the secondary school

The pupil record should not be weeded before transfer to the secondary school unless any records with a short retention period have been placed in the file. It is important to remember that the information which may seem unnecessary to the person weeding the file may be a vital piece of information required at a later stage.

Primary schools do not need to keep copies of any records in the pupil record except if there is an ongoing legal action when the pupil leaves the school. Custody of and responsibility for the records passes to the school the pupil transfers to.

Files should not be sent by post unless absolutely necessary. If files are sent by post, they should be sent by registered post with an accompanying list of the files. The secondary school should sign a copy of the list to say that they have received the files and return that to the primary school. Where appropriate, records can be delivered by hand with signed confirmation for tracking and auditing purposes.

Electronic documents that relate to the pupil file also need to be transferred, or, if duplicated in a master paper file, destroyed.

Responsibility for the pupil record once the pupil leaves the school

The school which the pupil attended until statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25 years. [See the retention schedule for further information].

Safe destruction of the pupil record

The pupil record should be disposed of in accordance with the safe disposal of records guidelines.

Transfer of a pupil record outside the EU area

If you are requested to transfer a pupil file outside the EU area because a pupil has moved into that area, please contact the Local Authority for further advice.

Storage of pupil records

All pupil records should be kept securely at all times. Paper records, for example, should be kept in lockable storage areas with restricted access, and the contents should be secure within the file. Equally, electronic records should have appropriate security.

Access arrangements for pupil records should ensure that confidentiality is maintained whilst equally enabling information to be shared lawfully and appropriately, and to be accessible for those authorised to see it.