



HIGHFIELDS SCHOOL

RECORDS MANAGEMENT POLICY

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 school. Records provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.

It covers:

- Scope
- Responsibilities
- Relationships with existing policies

Scope of policy

This policy applies to all records created, received or maintained by all permanent and temporary staff of the school and volunteers.

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.

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.

The person responsible for the records management in the school (Headteacher) 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 Governors must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with this policy.

Relationships with existing policies and Legislation

This policy has been drawn up within the context:

- Freedom of Information Policy
- Data Protection Policy
- General Data Protection Regulations, Data Protection Act 2018, the Lord Chancellor's Code of Practice under Section 46 of the Freedom of Information Act 2000 and any other legislation or regulations affecting the school

Managing Student Records

The student record should be seen as the core record charting an individual student's progress through the Education System. The student record should follow the student to every school they

attend and should contain information that is accurate, objective and easy to access by those with the authorisation to access them.

These guidelines are based on the assumption that the student record is a principal record and that all information relating to the student will be found therein.

Student records

All student records are kept in electronic format in our School Information Management System (SIMS). The exception to this is the Application Pack which is in paper format. This is completed by parents/carers upon entry of the child to the school.

Recording information

A student or their nominated representative have the legal right to see their record at any point during their education and even until the record is destroyed (when the student is 25 years of age or 35 years from the date of closure for students with special education needs or disability - SEND). This is their right of subject access under the General Data Protection Legislation. It is important to remember that all the information should be recorded, objective in nature and expressed in a professional matter. The process of obtaining and recording information is documented in our Privacy Notice.

The following may be subject to shorter retention periods. If they are placed on the student record, then it will need reviewing once the student leaves the school.

- Absence notes.
- Some Parental consent forms for trips/visits (in the event of a major incident all the parental consent forms should be retained with the incident report.
- Correspondence with parents/carers about minor issues.
- Accident forms (these should be stored separately and retained on the school premises until their statutory retention period is reached. A copy could be placed on the student record in the event of a major incident).

Personal data that we may collect, use, store and share (when appropriate) about students includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Student and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Destinations
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- Biometric algorithm
- CCTV images captured on school premises

We may also hold data about students that we have received from other organisations, including other schools, local authorities and the Department for Education.

Why we use this data

We use this data to:

- Support student learning
- Monitor and report on student progress
- Provide appropriate pastoral care
- Protect student welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out education research
- Comply with the law regarding data sharing

Responsibility for the student record once the student leaves the school

The school which the student attended until statutory school leaving age (or the school where the student completed Sixth Form studies) is responsible for retaining the student record until the student reaches the age of 25 years. This retention is set in line with the Limitation Act 1980 which allows that a claim can be made against an organisation by a minor for up to 6 years from their 18th birthday.

Safe destruction of the student record

The student record should be disposed of in accordance with the safe disposal of records guidelines. The school has a detailed Document Retention Schedule – Appendix A

Transfer of a student record outside the EU area

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

Storage of student records

Student records should be kept securely at all times. Paper records should be kept in locked storage accessible only by those with authorised access rights and electronic records should be stored in official systems, again accessible only by those with authorised access rights.

Access arrangements for student 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.

Approved at Governors' Finance, Premises, Resources & Personnel Committee held on 15th May 2018



DATA RETENTION RELATING TO DATA PROTECTION ISSUES

1. Management of the School

1.1 Governing Body

| | BASIC FILE DESCRIPTION | RETENTION PERIOD | ACTION AT THE END OF THE RETENTION PERIOD |
|-------|---|--|---|
| 1.1.1 | Agendas for Governing Body meetings | One copy should be retained with the master set of minutes. All other copies can be disposed of | Secure Disposal |
| 1.1.2 | Minutes, Principal Set (signed) | Permanent | |
| 1.1.3 | Reports presented to the Governing Body | 6 years. However, if the minutes refer directly to individual reports then kept permanently. | Secure Disposal or retain with signed set of the minutes. |
| 1.1.4 | Records relating to complaints dealt with by the Governing Body | Date of resolution of the complaint + a minimum of 6 years. Review for further retention in case of contentious disputes | Secure Disposal |

1.2 Headteacher and Senior Management Team

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|-------|--|--|-----------------|
| 1.2.1 | Log Books | Date of last entry in the book + 6 years | Secure Disposal |
| 1.2.2 | Minutes of SLMT and other internal administrative bodies | Date of meeting + 5 years | Secure Disposal |
| 1.2.3 | Reports created by the Headteacher or the Management Team | Date of report + 3 years | Secure Disposal |
| 1.2.4 | Records created by headteachers, deputy headteachers, heads of year and other staff with administrative responsibilities | Closure of file + 6 years | Secure Disposal |
| 1.2.5 | Correspondence created by headteachers, deputy headteachers, heads of year and other members of staff with administrative responsibilities | Date of correspondence + 3 years then review | Secure Disposal |
| 1.2.7 | Professional development plans | Closure + 6 years | Secure Disposal |

1.3 Admissions Process

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|-------|--|---|-------------------------------|
| 1.3.1 | Admissions – if successful | Date of admission + 1 year | Secure Disposal |
| 1.3.2 | Admissions – if appeal is unsuccessful | Resolution of case + 1 year | Secure Disposal |
| 1.3.3 | Admission Registers | Date of last entry in the book + 6 years (in school) | Consider transfer to Archives |
| 1.3.4 | Casual Admissions | Current year + 1 year | Secure Disposal |
| 1.3.5 | Proof of address supplied by parents as part of the admissions process | Current year + 1 year | Secure Disposal |
| 1.3.6 | Supplementary Information form including additional information such as religion, medical conditions etc | Successful admissions – information should be added to the student file | Secure Disposal |
| | | Unsuccessful – until appeals process completed | Secure Disposal |

1.4 Operational Administration

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|-------|---------------------------------------|------------------------------------|-----------------|
| 1.4.1 | Visitors' Books and Signing in Sheets | Current year + 6 years then Review | Secure Disposal |
|-------|---------------------------------------|------------------------------------|-----------------|

2. Human Resources

2.1 Recruitment

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|-------|---|--|-----------------|
| 2.1.1 | All records leading up to the appointment of a new headteacher | Date of appointment + 6 years | Secure Disposal |
| 2.1.2 | All records leading up to the appointment of a new member of staff | Successful candidate – relevant information added to staff personal file (see below) and all other information retained for 6 months | Secure Disposal |
| | | Unsuccessful candidates – date of appointment of successful candidate + 6 months | Secure Disposal |
| 2.1.3 | Proofs of identity collected as part of the process of checking 'portable enhanced DBS disclosure | Documents checked and a note kept of what was seen and what has been checked. If retention is deemed necessary then this should be placed on the staff's personal file (see below) | |
| | Disclosure and Barring Service Checking (DBS reports) | 6 months after receipt | |
| | Disclosure and Barring Service Checking (Records of checking) | 6 years after termination of relevant contract | |
| 2.1.4 | Pre-employment vetting information – Evidence proving the right to work in the United Kingdom | Where possible documents should be kept on the Staff Personal file (see below) | |

2.2 Operational Management

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|-------|-------------------------------------|---|-----------------|
| 2.2.1 | Timesheets, sick pay | Current Year + 6 years | Secure Disposal |
| 2.2.2 | Staff Personnel Files | Termination + 6 years. <i>Note, any records falling under the Terms of Reference of an Independent Inquiry must be retained (see the entry on child protection)</i> | Secure Disposal |
| 2.2.3 | Annual appraisal/assessment records | Current year + 5 years | Secure Disposal |

2.3 Management of Disciplinary and Grievance Processes

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|-------|---|---|--|
| 2.3.1 | Allegation of a child protection nature against a member of staff including where the allegation is unfounded | Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then Review. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned. <i>Note, the exception to this is any allegation, substantiated or not, falling under the Terms of Reference of and Independent Inquiry (See the entry on child protection)</i> | Secure Disposal (these records must be shredded) |
| 2.3.2 | Disciplinary Proceedings | | |
| | Warning – oral | Date of warning + 6 months | Secure Disposal |
| | Warning – level one | Date of warning + 6 months | Secure Disposal |
| | Warning – level two | Date of warning + 12 months | Secure Disposal |
| | Warning – Final | Date of warning + 18 months | Secure Disposal |
| | Case not found | If child protection related see 1.2 otherwise immediate secure disposal | Secure Disposal |

2.4 Health & Safety

| | | | |
|-------|--|--|-----------------|
| 2.4.1 | Accident reporting | | |
| | Adults | Date of incident + 6 years | Secure Disposal |
| | Children | DOB of child + 25 years | Secure Disposal |
| 2.4.2 | Accident relating to accident/injury at work | Date of incident + 12 years. In the case of serious accidents a further retention period will need to be applied | Secure Disposal |

2.5 Payroll and Pensions

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|-------|-----------------------|------------------------|-----------------|
| 2.5.1 | Maternity pay records | Current year + 3 years | Secure Disposal |
|-------|-----------------------|------------------------|-----------------|

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|-------|---|------------------------|-----------------|
| 2.5.2 | Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995) | Current year + 6 years | Secure Disposal |
|-------|---|------------------------|-----------------|

3. Financial Management of the School

3.1 Accounts and Statements including Budget Management

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|-------|----------------------------|------------------------|-----------------|
| 3.1.1 | Student Grant applications | Current year + 3 years | Secure Disposal |
|-------|----------------------------|------------------------|-----------------|

3.2 School Meals Management

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|-------|----------------------------|------------------------|-----------------|
| 3.2.1 | Free School Meal Registers | Current year + 6 years | Secure Disposal |
| 3.2.2 | School Meals Registers | Current year + 3 years | Secure Disposal |

4. Student Management

4.1 Student's Educational Record

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|-------|---|---|--|
| 4.1.1 | Pupil's Educational Record required by The Education (Pupil Information England) Regulations 2005 | Date of Birth of the student + 25 years | Secure disposal |
| 4.1.2 | Examination Results – Student Copies | This information should be added to the student file | All uncollected certificates should be returned to the examination board |
| 4.1.3 | Child Protection information held on student file | If any records relating to child protection issues are placed on the student file, it should be in a sealed envelope and then retained for the same period of time as the student file. | Secure Disposal – these records MUST be shredded |
| 4.1.4 | Child protection information held in separate files | DOB of the child + 25 years then review. <i>Note, any records where there is mention of child sexual abuse cannot be destroyed under the requirements of the Independent Inquiry into Child Sexual Abuse (Formerly the Goddard Inquiry)</i> | Secure Disposal – these records MUST be shredded |

4.2 Attendance

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|-------|---|---------------------------------|-----------------|
| 4.2.1 | Attendance Registers | Date of entry + 3 years | Secure Disposal |
| 4.2.2 | Correspondence relating to authorised absence | Current academic year + 2 years | Secure Disposal |

4.3 Special Educational Needs

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|-------|---|---|--|
| 4.3.1 | Special Educational Needs files, reviews and Individual Education Plans | Date of Birth of the student + 31years (<i>Formerly 25 years, this is now date of birth + 31 years to allow for the age limit of the Education Health Care Plan being raised to 25 years old plus 6 years for the Limitation Act</i>) | Review after retention period. Secure Disposal |
| 4.3.2 | Statement maintained under 234 of the Education Act 1990 and any amendments made to the statement | Date of Birth of the student + 31 years (<i>as above</i>) | Secure Disposal – unless the document is subject to a legal hold |
| 4.3.3 | Advice and information provided to parents regarding educational needs | Date of Birth of the student + 31years (<i>as above</i>) | Secure Disposal – unless the document is subject to a legal hold |
| 4.3.4 | Accessibility Strategy | Date of Birth of the student + 31 years (<i>as above</i>) | Secure Disposal – unless the document is subject to a legal hold |

5. Curriculum Management

5.1 Statistics and Management Information

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|-------|--|------------------------|-----------------|
| 5.1.1 | Examination Results (Schools Copy) | Current year + 3 years | Secure Disposal |
| 5.1.2 | Published Admission Number (PAN) Reports | Current year + 6 years | Secure Disposal |
| 5.1.3 | Value Added and Contextual Data | Current year + 6 years | Secure Disposal |
| 5.1.4 | Self Evaluation Forms | Current year + 6 years | Secure Disposal |

6. Extra Curricular Activities

6.1 Educational Visits outside the Classroom

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|-------|---|--|-----------------|
| 6.1.1 | Parental Consent forms for school trips where there has been no major incident | Conclusion of the trip | Secure Disposal |
| 6.1.2 | Parental permission slips for school trips – where there has been a major incident | DOB of the student involved in the incident + 25 years | Secure Disposal |

6.2 Family Liaison Officers and Home School Liaison Assistants

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|-------|--|---|-----------------|
| 6.2.1 | Day Books | Current year + 2 years then review | Secure Disposal |
| 6.2.2 | Reports for outside agencies – where the report has been included on the case file created by the outside agency | Whilst child is attending school and then destroy | Secure Disposal |

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|-------|---------------------------|---|-----------------|
| 6.2.3 | Referral forms | While referral is current | Secure Disposal |
| 6.3.4 | Contact data sheets | Current year then review, if contact is no longer active then destroy | Secure Disposal |
| 6.3.5 | Contact data base entries | Current year then review, if contact is no longer active then destroy | Secure Disposal |
| 6.3.6 | Group Registers | Current year + 2 years | Secure Disposal |

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