Worlingham CEVC Primary School
RECORDS MANAGEMENT POLICY

Like a tree firmly planted by streams of living water we will grow in knowledge, love, faith and wisdom. Based on Psalm 1:3

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. It covers:

- Scope
- Responsibilities
- Relationships with existing policies
- Managing pupil records
- Managing staff records
- Retention schedule

1.   Scope of the policy

1.1   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.

1.2   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 e.g. paper documents, scanned documents, e-mails which document business activities and decisions, audio and video recordings, text messages, notes of telephone conversations, spreadsheets, Word documents, presentations etc.

2.   Responsibilities

2.1   The governing body of the school has a statutory responsibility to maintain the school 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.

2.2   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.

2.3   The school will manage and document its records disposal process 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").

2.4   Individual staff and employees must ensure, with respect to records for which they are responsible, that they:

2.4.1   Manage the school's records consistently in accordance with the school's policies and procedures;
2.4.2   Properly document their actions and decisions;
2.4.3   Hold personal information securely;
2.4.4   Only share personal information appropriately and do not disclose it to any unauthorised third party;
2.4.5   Dispose of records securely in accordance with the school's Record Retention Schedule.

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.
•   Accessibility Plan;
•   Admissions Policy;
•   Business continuity and critical incident management plans;
•   Human Resources policies;
•   SEND Policy

4.   Managing Pupil Records

4.1   The pupil record should be seen as the core record charting an individual pupil's progress through the education system. The pupil record should accompany the pupil to every school they attend and should contain information that is accurate, objective and easy to access.

4.2 Recording information

4.2.1   Pupils have a right of access to their educational record under the General Data Protection Regulation. This right exists until the point that the record is destroyed. Therefore, it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

4.3 Opening a file

4.3.1   These guidelines apply to information created and stored in both physical and electronic format.

4.3.2   The pupil record starts its life when a file is opened for each new pupil as they begin school. This is the file which will follow the pupil for the rest of his/her school career. If pre-printed file covers are not being used then the following information should appear on the front of the paper file:

• Surname
• Forename
• DOB
• Unique Pupil Number

4.3.3   The following information is held on the front cover so that it is easily accessible to authorised staff; this is not necessary if accessible on the school information management system:

• The name of the pupil's doctor
• Emergency contact details
• Gender
• Preferred name
• Any allergies or other medical conditions
• Names of adults who hold parental responsibility with home address and telephone number (and any additional relevant carers and their relationship to the child)
• Name of the school, admission number and the date of admission and the date of leaving.

4.3.4   It is essential that these files, which contain personal information, are managed against the school's information security and business continuity policies.

4.4   Items which should be included on the pupil record

• Record of transfer from Early Years setting
• Admission Form
• Data Collection/Checking Form – current
• Annual written report to parents
• Any information relating to a major incident involving the child
• Any information relating to exclusions (fixed or permanent)
• Specific correspondence with parents or outside agencies relating to major issues
• Summary details of complaints made by the parents or the pupil relevant to the child's on-going education/ behaviour
• Examination Results – pupil copy

- SATS Results
- Photography (image) consents (this is the school's record)

4.4.1 The following records should be stored separately to the pupil record as they are subject to shorter retention periods and if they are placed on the file then it will involve a lot of unnecessary weeding of the files before they are transferred to another school.

- Attendance Registers and Information
- Absence (authorised) notes and correspondence
- Parental consent forms for trips/outings
- Accident forms (a copy can be placed on the pupil record if it is a major incident)
- Medicine consent and administering records (this is the school's record)
- Copies of birth certificates, passports, etc.
- Generic correspondence with parents about minor issues (i.e. 'Dear Parent')
- Pupil work, drawings, etc.
- Previous data collection forms which have been superseded

4.5 Transferring the pupil record between schools

4.5.1 The pupil record should not be weeded before transfer between schools 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.

4.5.2 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.
4.5.3 Records can be delivered or collected in person, with signed confirmation for tracking purposes.

4.5.4 Pupil Records should not be sent by post. If the use of post is absolutely necessary, they should be sent by 'Special Delivery Guaranteed' or via a reputable and secure courier to a pre-informed named contact, along with a list of the enclosed files. The new school should sign a copy of the list to confirm receipt of the files and securely return to the previous school.

4.5.5 If held electronically, records may be sent to a named contact via secure encrypted e-mail, or other secure transfer method.

4.6 Responsibility for the pupil record once the pupil leaves the school

4.6.1 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

4.7 Safe destruction of the pupil record

•   Pupil records will contain personal and confidential information and so must be destroyed securely
•   Electronic copies must be securely deleted, and hard copies disposed of as confidential waste

4.8 Transfer of a pupil record outside the EU area

If a request is received to transfer the Pupil Record or other information about a pupil to a school outside of the European Union (EU), schools should contact the Local Authority or their Data Protection Officer for further advice

5. Storage of pupil records

5.1   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.

5.2   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.

6. Managing staff records

6.1   The principles applied to pupil data equally apply to personal information held and stored about the school's workforce.

6.2   In general, the school holds information about staff that relates to:

•   Recruitment and selection
•   Employment records
•   Pay and pensions
•   Monitoring at work, including performance management
•   Information about workers health

6.3   The definitive staff file will be retained [insert location/who by]. This will facilitate disposal and will safeguard sensitive information.

6.4   Employee records held in electronic databases will be retained for the same periods as that for the equivalent paper records.

7. Retention guidelines

Our records retention schedule outlines the school's specific policy and procedures for holding personal data and to ensure that it is securely disposed of when no longer needed, to reduce the risk that it will become inaccurate, out of date or irrelevant.

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