

Cavendish Close Infant and Nursery School

Records Management Policy

Introduction and principles

Management of records by a Public Authority is a legal obligation (Section 46 of the Freedom of Information Act 2000).

The Code issued on 15 July 2021 sets out key principles about records and their management. These are the:

- value of the information
- integrity of the information
- accountability for the information

There are a range of statutory, regulatory and guidance that oblige us to accept, create, use, edit, store, and dispose of records. It is necessary to establish clarity about records keeping systems.

Aims

- to effectively manage the records that are created and are integral to the operation of the school
- to confirm a clear framework to manage records and information within the school
- to provide an environment where records are stored securely
- to ensure that records are accessible to those who need them
- to ensure that the school workforce responsible for records management understand these obligations
- to give effect to the s.46 Code of Practice our records management will take note of the principles it sets out

Scope

This policy applies to the school workforce and to all school records, whether the records originate within the school or are shared with the school by other means.

Records that are shared with third parties as a result of consent, regulatory obligations or contractual agreements are within the scope of this policy.

In school, the records that we access and hold originate are stored in a variety of formats, that include physical, digital, electronic audio/visual records. Some are held locally in school, others are hosted by third party providers.

All records are within the scope of this policy, records are required to be stored and retained in accordance with the document retention schedule attached to this policy, see Appendix 1.

Records may refer to individuals, financial planning tools, contracts, commercial organisations, public authorities, or charitable organisations. Some records will contain personal data.

Record retention and storage will be reviewed from time to time to ensure that the aims of this policy are met.

Responsibilities and actions

The governing board is ultimately responsible for this policy, however on a daily basis operational management of the policy is delegated to the headteacher and senior leadership team.

Management of the policy will be reviewed at governing board meetings on at least an annual basis.

The Headteacher will be required to monitor compliance with this policy by undertaking at least an annual check to determine if records are stored securely and can be accessed appropriately, in accordance with requirements in this policy.

Within school, responsibility for this policy will be with Mrs Tusa, School Business Manager, supported by the School Business Officers.

An active retention policy is applied to confirm what records are to be retained and set out a timeline for their secure disposal.

Individual school staff, contractors and volunteers and employees have personal responsibility for records within their control and day to day handling by ensuring that:

- records are to be handled in accordance with the school policies and good practice for secure storage and usage
- keep accurate records as required
- personal data contained in records is used in compliance with the UK GDPR and school data protection policies and protocols
- personal information is shared appropriately and with a proper legal basis with any third party
- records are securely disposed in accordance with the school's records retention schedule.

Child Abuse Records

The Independent Inquiry into Child Sexual Abuse (Final Report 2022) recommends that any records that relate (or could relate) to sexual abuse should be retained for 75 years or 10 years past the retirement of a relevant member of staff, whichever is the longer term. We shall implement this and ensure that notification of the relevant records is made in the event of any transfer.

Relationship with existing policies and obligations

This policy has been drawn up within the context of:

- Freedom of Information policy
- Data Protection policy
- Privacy Notices
- Data Sharing Agreements
- Information Security policy
- IT security and use policies
- Records retention policy/guidelines

- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school

Appendix 1

The school keeps a wide variety of records that may include (but are not limited to):

Students

- personal information
- parent/carer contact information
- school reports
- behaviour logs
- exam and testing outcomes – internal and external
- child protection information
- allegations of a child protection nature made against a member of staff (including unfounded allegations)
- attendance – attendance registers, authorised absence correspondence
- SEND – reviews, advice to parents/carers, accessibility strategy
- pupil premium – evidence of eligibility
- free school meals eligibility
- services and pupil premium eligibility
- LAC status
- medical – individual health plans, first aid records
- biometric records

Management of the school

- governing board records - agendas, minutes, resolutions, reports
- governors personal details
- declarations of interests
- CPD and training
- statutory documents for companies house (if applicable)
- accounts (if applicable)
- school development plans and school improvement plans
- admission details
- school visitor logs
- health and safety records
- fire risk assessments
- risk assessments
- social media
- newsletters and external communication records

Human Resources

- job descriptions

- application forms
- personnel files for all staff – including personal contact details
- appraisals
- performance reviews
- employment suitability checks
- contracts of employment
- records of disciplinary and grievances process
- allegations and LADO referrals
- referrals to the TRA and/or DBS
- payroll and pensions – maternity/paternity pay, family leave records

Financial Management

- budgets and funding details
- risk management and insurance – employer’s liability insurance certificate
- asset management records
- asset register
- all necessary financial records
- contracts
- contract management and procurement
- school payment and meals management
- property management
- condition surveys
- hire agreements
- maintenance – log books, warranties and contractor information
- health and safety information
- curriculum and attainment
- teaching and learning planning
- timetabling and resource planning
- prospectus and website
- statistics and evidence of learning outcomes, targets
- pupil work records
- trip and visit records

External Records

- central government and local authority
- local authority – census returns, attendance returns
- central government – returns made to DfE/ESFA
- Ofsted
- referrals to third party agencies
- legal action involving the school
- ICO action
- enquiries and investigations by external bodies

Appendix 1 - Data Protection Retention Schedule – May 2023

Basic file description	Who is responsible for managing this data?	Retention Period	Destruction Method	System	Additional Notes
Pupil Management					
Admissions and Attendance					
Admission Registers		Permanent			
Records relating to the admissions process – if the admission is successful		Admission + 1 year			
Admissions – if the appeal is unsuccessful		Resolution of case + 1 year			
Admissions – Secondary Schools – Casual		Current year + 1 year			
Exclusions & Suspension		DOB of the pupil + 25 years			
Pupil Educational Record					
Proofs of address supplied by parents as part of the admissions process		Current year + 1 year			
Attendance registers		Date of register + 3 years			
Medical and allergy information (including IHCP & PEEP)		DOB of pupil + 25 years then review unless legal action is pending. If so, it may be appropriate to add an additional retention period.			
Letters authorising absence		Date of absence + 2 years			

Pupil Files and/or record cards - 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			In the case of exclusion it may be appropriate to transfer the record to the Local Authority Behaviour Service. If the pupil has left the school and there is no information about which school that the pupil has moved onto, or they have moved onto elective home education, or the pupil has moved abroad or to an independent school, then a recorded conversation with the LA about where the records are to be stored must take place.
Pupil Files and/or record cards - Secondary		DOB of the pupil + 25 years			See above
Examination results - Public		Year of examinations + 6 years			Any certificates left unclaimed should be returned to the appropriate Examination Board.
Examination results - Internal examination results		Current year + 5 years If these records are retained on the pupil file or in their National Record of Achievement they need only be kept for as long as operationally necessary			
Any other records created in the course of contact with pupils		Current year + 3 years then review			
Images held of pupils together with any consents and permissions to publish		All records relating to the image should be retained for the life of the image. The length of time the image is to be retained should be included on the privacy statement			
Special Educational Needs					

Special Educational Needs files, reviews and Individual Education Plans		DOB of the pupil + 35 years			
Statement of Special Educational Needs or EHCP		DOB + 35 years Unless legal action is pending			
Proposed EHCP or Draft Plan		DOB + 35 years Unless legal action is pending			
Advice and information to parents regarding educational needs		DOB + 35 years Unless legal action is pending			
Pupil SEN Files		DOB of pupil + 35 years then review unless legal action is pending. If so, it may be appropriate to add an additional retention period.			
School Trips and Extra Curricular Activities					
Educational Visits outside the Classroom					
Day Trips					
Parental permission slips for school trips – where there has been no major incident		Conclusion of the trip			
Parental permission slips for school trips – where there has been a major incident. Major incident e.g. reportable to HSC, potential claim injury.		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			
Residential Trips					
All records relating to the organization of school residential trips		Date of the residential visit + a minimum of 6 years then review			
Walking Bus					

Walking Bus registers		Date of register + 3 years			This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting
Management of School - Safeguarding					
Adults					
Records of allegations about workers who have been investigated and found to be without substance		These records should not normally be retained once an investigation has been completed.	-		There are some exceptions to this where for its own protection the employer has to keep a limited record that an allegation was received and investigated, for example where the allegation relates to abuse and the worker is employed to work with children or other vulnerable adults
Outcome of an allegation made against a staff member		Until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer			
Children					
Child abuse records (IISCA)		retained for 75 years			any record that relate or could relate to sexual abuse
Local Authority					
Secondary transfer sheets (Primary)		Current year + 2 years			
School Management - Teaching and Curriculum					
Senior Management Team					
Minutes of the Senior Management Team and other internal administrative bodies		Date of meeting + 5 years			
Reports made by the Head Teacher or the management team		Date of report + 3 years			

Records created by Head Teachers, Deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities		Closure of file + 6 years			
Correspondence created by Head Teachers, Deputy Head Teachers, Heads of Year and other members of staff with administrative responsibilities		Date of correspondence + 3 years			
Professional development plans		Closure + 6 years			
Curriculum Management					
SATS records including examination results. Exam papers should only be retained if they are required to evidence the results		Current year + 6 years			
School Management - HR, Administration, Finance, Premises and Health & Safety					
Personnel Management					
Staff Personal files		Termination + 6 years			This includes online recruitment checks.
Interview notes and recruitment records (successful candidates)		Termination + 6 years			These should be kept in staff personnel files and also include online recruitment check.
Interview notes and recruitment records (unsuccessful candidates)		Date of interview + 6 months			This includes online recruitment checks.
Pre-employment vetting information (including DBS checks). Retain DBS certificate number on SCR. (successful candidates)		Date of check + 6 years			Please note that schools must not keep copies of the documents which are checked for DBS purposes.

Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure		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.			
Online presence pre-employment check		Termination of employment + 2 years			Please note this will not be conducted for every employee.
Right to Work in the UK checks		Termination of employment + 2 years			
Disciplinary proceedings: case not found		Take advice from HR Team if the proceedings were child protection related otherwise destroy immediately at the conclusion of the case			
Disciplinary proceedings: written warnings		The duration of the warning	-		If this information has been added to an individual’s personnel file, it must be weeded from the file once the retention period has elapsed
Annual appraisal or assessment records		Current year + 5 years			
Low level concerns		Dependant on the nature of the incident - minimum 24 months of the record			
Images held of members of staff together with any consents and permissions to publish		Specify in Privacy Notice how photos of members of staff will be used and duration of use.	When no longer in use.		
Staff personal information - e.g. medical appointments		Review in line with HR guidance and school policy			
Health and Safety					
Accessibility Plans		Current year + 6 years			

Records relating to accident/injury at work		Date of incident + 12 years			
Accident Reporting – Children		Date of birth + 22 years where the injured person is a minor at the time of the accident. Severity of incident needs to be considered.			
Accident Reporting – Adults		Date of the accident + 4 years where the injured person is an adult at the time of the accident;			
Incident reports		Current year + 20 years			
Work Experience					
Work experience and volunteer records		6 years from end of placement.			
Work Experience/Placement Records (secondary schools)					
Records created by schools in relation of offsite pupil work experience.		Date of birth + 25 years			
Payroll and Pensions					
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995		Current year + 6 years			
Maternity pay records		Current year + 3yrs			
Timesheets, sick pay		Current year + 6 years			
Financial Records					
Debtors' Records		Current year + 6 years			
Applications for free school meals, travel, uniforms etc		Whilst child is at school			
Other financial records		Current year + 6 years			
Student grant applications		Current year + 3 years			
School Meals					
Dinner Register		Current year + 3 years			
Free school meals registers		Current year + 6 years			
Visitors book		Current year + 2 years			

Images held of pupils together with any consents and permissions to publish		Part of pupil record. Duration of pupil's attendance at school, if SEN or safeguarding duration of that whole record.			
Records relating to the management of PTA/Old Pupils Associations		Current year + 6 years			
Records relating to the management of data subject access requests		Current year + 3 years			
Records relating to the management of freedom of information requests		Current year + 3 years			
Governing Board					
Governance Documents					
Records relating to the appointment of foundation directors or governors		Permanent			
Records relating to the election of parent governors		Date of election + 6 months			
Records relating to the election of chair and vice chair		Once the decision has been recorded in the minutes, the records relating to the election can be destroyed			
Trust and LGB Minutes - Principal set (signed)		Permanent			
Reports made to the Trust/LGB Meeting which are referred to in the minutes		Permanent			
Register of attendance at Trust and LGB meetings		Date of last meeting in the book + 6 years			
Minutes - Inspection copies		Date of meeting + 3 years			
Records relating to Governor Monitoring Visits		Date of the visit + 3 years			

Records relating to complaints made to and investigated by the Governing Body (ie stage 3 complaints)		Date of resolution of complaint + 6 years then review for further retention in the case of contentious disputes			
Correspondence sent and received by the Governing Body		Current year + 6 years			
Appointment and termination of Trustees/Directors/Governors		Maintain all records from date of termination + 6 years			
Records relating to the appointment of a clerk to the Trust/Governing Body		Date appointment as clerk ceases + 6 years			
Records relating to the terms of office of serving directors/governors including evidence of appointment		PERMANENT			
Records relating to Director/Governor Declaration against disqualification criteria		Until the Governor steps down			
Register of Business Interests		PERMANENT			
Director/Governors Code of Conduct signed		This is expected to be a dynamic document, one copy of each version should be kept permanently			
Records relating to the training required and received by Director/Governors		Until the Governor steps down			
Records relating to the induction programme for new directors/governors		Until the Governor steps down			

Records relating to DBS checks carried out on clerk, directors and members of the governing body (certificate number to be retained)		Date of DBS check + 6 months			
School Social Media					
Twitter, Facebook & Instagram (or similar)		Rolling delete every 24 months			A school use of social media policy is required
Basic policies					
Policy name	Who is responsible for managing the policy?	Commencement date	Review date	Policy location	Additional Notes

Summary of changes made	Date
Reviewed – no changes made	May 2024 CManners
<p>Responsibilities and actions</p> <p>School Business Officers added.</p> <p>Appendix 1</p> <p>Data Protection Records Retention Schedule added.</p>	05.06.24 NTusa