

# SEVEN FIELDS PRIMARY SCHOOL RECORDS MANAGEMENT POLICY

Person responsible for policy: Revised: Review Date: Karen Luker, Data Protection Lead May 2021 May 2023

## **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 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:

- 1. Scope
- 2. Responsibilities
- 3. Relationships with other policies

Appendix Retention Schedule

### 1 Scope of the policy

- 1.1 This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions.
- 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 or received, and then stored, in hard copy or electronically.
- 1.3 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

- 2.1 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.
- 2.2 The Business Manager, who has day to day responsibility 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. S/he 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 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 Relationship with existing policies

This policy should be read in association with the following policies:

- Freedom of Information
- Data Protection

and with other legislation or regulations (including audit and equal opportunities and ethics) affecting the school. It should also be read in conjunction with the IRMS Toolkit for Schools 2019.

## **Appendix: Retention Schedule**

This schedule contains retention periods for the different record series created and maintained by the School in the course of its business. The schedule refers to all information regardless of the medium in which it is stored. Some retention periods are governed by statute. Others follow best practice guidance. Every effort has been made to ensure that these retention periods are compliant with the requirements of the <u>General Data Protection</u> Regulation (GDPR) and the provisions of the Data Protection Act 2018 (DPA 2018) as set out in the <u>Data Protection</u> Bill, and the Freedom of Information Act 2000.

### Retention periods for documents with data protection issues and/or with statutory provisions

#### Management of the school

Governing Body

| Description   | Retention period   | Action at end   | Role responsible          | Location of records  |
|---|--|-----------------|---------------------------|--|
| Records relating to<br>complaints dealt with<br>by the Governing Body | Date of the resolution<br>of the complaint + a<br>minimum of 6 years<br>then review for<br>further retention in<br>case of contentious<br>disputes | Secure disposal | Clerk to the<br>Governors | Historic - filing<br>cabinet in admin<br>office<br>Current - google<br>drive |

#### Headteacher, Leadership Team, Middle Leadership

| Description   | Retention period                                   | Action at end   | Role responsible                    | Location of records  |
|---|--|---|-------------------------------------|--|
| Minutes of team<br>meetings (with<br>reference to individual<br>pupils or staff<br>members) | Date of the meeting +<br>3 years then review       | Secure disposal   | Headteacher                         | Google Drive   |
| Reports (with<br>reference to individual<br>pupils or staff<br>members)                     | Date of the meeting +<br>3 years then review       | Secure disposal<br>Pupil files follow<br>pupil to the next<br>educational<br>establishment. | Admin<br>Office/Business<br>Manager | Pupil File and/or<br>CPOMS<br>Staff Files in<br>admin office |
| Records (with<br>reference to individual<br>pupils or staff<br>members)                     | Current academic year<br>+ 6 years then review     | Secure disposal<br>Pupil files follow<br>pupil to the next<br>educational<br>establishment. | Admin<br>Office/Business<br>Manager | Pupil File and/or<br>CPOMS<br>Staff Files in<br>admin office |
| Correspondence (with<br>reference to individual<br>pupils or staff<br>members)              | Date of<br>correspondence + 3<br>years then review | Secure disposal<br>Pupil files follow<br>pupil to the next<br>educational<br>establishment. | Admin<br>Office/Business<br>Manager | Pupil File and/or<br>CPOMS<br>Staff Files in<br>admin office |

## Admissions Process

| Description                                 | Retention period                            | Action at end   | Role responsible                                    | Location of records  |
|---|---|---|---|--|
| School Admissions<br>Policy                 | Life of the policy + 3<br>years then review | Secure disposal   | Gaynor Pearce                                       | Historic - Admin<br>archive filing   |
|   |   |   |   | Current - school<br>website/Google<br>Drive  |
| Admissions – if the admission is successful | Date of admission + 1<br>year               | Secure disposal   | Local Authority<br>Admissions Team<br>Gaynor Pearce | Admin archive filing   |
| Admissions – if the appeal is unsuccessful  | Resolution of case + 1<br>year              | Secure disposal   | Local Authority<br>Admissions Team                  | Admin archive filing   |
| Register of admissions                      | Permanent                                   | Records<br>permanently kept to<br>enable the school to<br>confirm dates pupils<br>attended the school | Gaynor Pearce                                       | MIS System<br>Paper copies<br>from Swindon<br>Borough Council<br>- admin archive<br>filing |

# **Operational Administration**

| Description                              | Retention period                      | Action at end   | Role responsible | Location of records  |
|--|---------------------------------------|-----------------|------------------|--|
| Visitors' Books and<br>Signing in Sheets | Current year + 6 years<br>then review | Secure disposal | Karen Luker      | Historic - paper<br>copies filed with<br>archive admin<br>filing |
|  |                                       |                 |                  | Current -<br>Inventry signing<br>in system                       |

#### **Human Resources**

#### Recruitment

| Description  | Retention period   | Action at end   | Role responsible             | Location of<br>records                   |
|--|--|-----------------|------------------------------|--|
| Records relating to<br>appointment of a new<br>Headteacher                                     | Date of appointment +<br>6 years                             | Secure disposal | Karen Luker                  | Staff File -<br>successful<br>candidate. |
| Records relating to<br>appointment of a new<br>member of staff –<br>unsuccessful<br>candidates | Date of appointment<br>of successful<br>candidate + 6 months | Secure disposal | Karen Luker<br>Gaynor Pearce | Archive admin<br>filing                  |

| Records relating to<br>appointment of a new<br>member of staff –<br>successful candidate  | Add relevant<br>information to the<br>staff personal file;<br>Otherwise<br>Date of appointment<br>+ 6 months          | Secure disposal | Karen Luker<br>Gaynor Pearce | Information held<br>on staff file  |
|---|---|-----------------|------------------------------|--|
| Copies of DBS<br>certificates<br>Copies of DBS<br>certificates are not<br>retained - may be<br>copied to capture<br>information but then<br>securely destroyed. | DBS information held<br>on staff file/SCR for<br>period of<br>employment/voluntee<br>ring position/contract<br>worker | Secure Disposal | Gaynor Pearce<br>Gill Young  | Information held<br>on SCR & staff<br>files  |
| Proofs of identity  | Termination of employment + 6 years.  | Secure Disposal | Gaynor Pearce<br>Karen Luker | Information held<br>on staff file  |
| Evidence of right to<br>work in the UK  | Home Office requires<br>Date of termination of<br>employment + at least<br>2 years                                    | Secure Disposal | Gaynor Pearce<br>Karen Luker | Historic copies<br>added to the<br>staff personal<br>file. New<br>evidence held in<br>separate file in<br>admin office |

# Operational Staff Management

| Description                                   | Retention period                    | Action at end   | Role responsible             | Location of records  |
|---|-------------------------------------|-----------------|------------------------------|--|
| Staff personal file                           | Termination of employment + 6 years | Secure disposal | Karen Luker<br>Gaynor Pearce |  |
| Timesheets<br>(Signing in/out<br>information) | Current year + 6 years              | Secure disposal | Karen Luker<br>Gaynor Pearce | Historic - paper<br>copies filed with<br>archive admin<br>filing<br>Current -<br>Inventry signing<br>in system |
| Annual appraisal record                       | Current year + 5 years              | Secure disposal | Karen Luker<br>Gaynor Pearce | Staff file   |

# Management of Disciplinary and Grievance Processes

| Description   | Retention period   | Action at end  | Role responsible | Location of records                                 |
|---|--|--|------------------|---|
| Allegation of a child<br>protection nature<br>against a member of<br>staff,<br>including where the<br>allegation is | Whichever is the<br>longer of:<br>Person's normal<br>retirement age<br>OR<br>Date of allegation + 10 | Secure disposal<br>These records must<br>be shredded | Headteacher      | Head Teacher's<br>office - locked<br>filing cabinet |
| unfounded   | years<br>Then review   |  |                  |   |

|                         | Note allegations that<br>are found to be<br>malicious should be<br>removed from files |                 |                  |             |
|-------------------------|---|-----------------|------------------|-------------|
| Disciplinary            |   | Secure disposal | Headteacher      | Staff Files |
| proceedings:            |   |                 | Business Manager |             |
| Oral warning            | Date of warning + 6   |                 |                  |             |
|                         | months  |                 |                  |             |
| Written warning – level | Date of warning + 6   |                 |                  |             |
| 1                       | months  |                 |                  |             |
| Written warning – level | Date of warning + 12  |                 |                  |             |
| 2                       | months  |                 |                  |             |
| Final warning           | Date of warning + 18  |                 |                  |             |
|                         | months  |                 |                  |             |
|                         |   |                 |                  |             |
|                         | Conclusion of case  |                 |                  |             |
| Case not found          | (unless CP related)   |                 |                  |             |

# Health and safety

| Description   | Retention period   | Action at end   | Role responsible | Location of records  |
|---|--|-----------------|------------------|--|
| Records relating to accident/injury at work             | Date of incident + 12<br>years<br>In case of serious<br>accidents a further<br>retention period will<br>need to be applied | Secure disposal | Karen Luker      | Historic paper<br>records - admin<br>archive filing<br>Current -<br>Smartlog   |
| Accident reporting –<br>adults                          | Date of incident + 6<br>years  | Secure disposal | Karen Luker      | Historic paper<br>records - admin<br>archive filing<br>Current -<br>Smartlog   |
| Accident reporting –<br>children                        | DOB of the pupil<br>involved in the<br>incident + 25 years   | Secure disposal | Karen Luker      | Historic paper<br>records - admin<br>archive filing<br>Current -<br>Smartlog   |
| Control of Substances<br>Hazardous to Health<br>(COSHH) | Current year + 40<br>years   | Secure disposal | Karen Luker      | Historic paper<br>records - admin<br>archive filing<br>Current -<br>cleaning<br>cupboard,<br>kitchen & SBM<br>office |

Payroll and Pensions

| Description   | Retention period       | Action at end   | Role responsible             | Location of records     |
|---|------------------------|-----------------|------------------------------|-------------------------|
| Maternity pay records   | Current year + 3 years | Secure disposal | Gaynor Pearce                | Admin archive filing    |
| Records held under<br>Retirements Benefits<br>Schemes (Information<br>Powers) Regulations<br>1995 | Current year + 6 years | Secure disposal | Karen Luker<br>Gaynor Pearce | Admin archive<br>filing |

# Financial Management of the School

Contract management

| Description  | Retention period                    | Action at end   | Role responsible | Location of<br>records              |
|--|-------------------------------------|-----------------|------------------|-------------------------------------|
| Records relating to<br>management of<br>contracts under seal         | Last payment on contract + 12 years | Secure disposal | Karen Luker      | School Business<br>Manager's office |
| Records relating to<br>management of<br>contracts under<br>signature | Last payment on contract + 6 years  | Secure disposal | Karen Luker      | School Business<br>Manager's office |

# **Pupil Management**

Pupil's Educational Record

| Description  | Retention period           | Action at end   | Role responsible                | Location of records  |
|--|----------------------------|---|---------------------------------|--|
| Pupil's Educational<br>Record                                  | DOB of pupil + 25<br>years | Secure disposal<br>The file will follow<br>the pupil if s/he<br>transfers to another<br>school/secondary<br>school  | Admin Office                    | Admin Office   |
| Examination results –<br>pupil copies (public<br>and internal) | Add to pupil file          | Secure disposal<br>The file will follow<br>the pupil if s/he<br>transfers to another<br>school/secondary<br>school  | Admin Office                    | Pupil File (School<br>Report)  |
| Child protection<br>information (held in<br>separate files)    | DOB of pupil + 25<br>years | Secure disposal<br>These records must<br>be shredded<br>The file should<br>follow the pupil<br>when s/he transfers<br>to another<br>education institution | Designated<br>Safeguarding Lead | All information<br>for current<br>pupils kept<br>electronically<br>(CPOMS).<br>Historic<br>paperwork kept<br>in locked filing<br>cabinet.<br>All CP files for<br>pupils where we<br>have no<br>forwarding<br>information (i.e.<br>gone<br>abroad/home<br>schooling) kept<br>in admin archive<br>filing until next<br>school in UK<br>identified. |

## Attendance

| Description   | Retention period                   | Action at end   | Role responsible | Location of records                                      |
|---|------------------------------------|-----------------|------------------|--|
| Attendance registers                                | Date entry made + 3<br>years       | Secure disposal | Gaynor Pearce    | MIS System<br>(SIMS -<br>Historic/Integris<br>- Current) |
| Correspondence<br>relating to authorized<br>absence | Current academic year<br>+ 2 years | Secure disposal | Gaynor Pearce    | MIS System<br>(SIMS -<br>Historic/Integris<br>- Current) |

Special Educational Needs

| Description   | Retention period  | Action at end   | Role responsible                      | Location of<br>records  |
|---|---|-----------------|---------------------------------------|---|
| Special educational<br>needs files, reviews<br>and Individual<br>Education Plan | DOB of pupil + 25<br>years<br>Note this retention<br>period is the minimum<br>retention period that<br>any pupil file should<br>be kept | Secure disposal | SENCo - Sarah Muir<br>Kirsten Dunning | Copies of all<br>correspondence<br>retained on pupil<br>file.<br>Copy of<br>correspondence<br>also kept on<br>SM/KD personal<br>drive<br>IEP's kept on<br>Google Drive<br>Copies of all<br>correspondence<br>uploaded to<br>CPOMS |
| Statement of SEN/<br>EHCP and any<br>amendments                                 | DOB of pupil + 25<br>years<br>Note this retention<br>period is the minimum<br>retention period that<br>any pupil file should<br>be kept | Secure disposal | SENCo - Sarah Muir<br>Kirsten Dunning | Copies of all<br>correspondence<br>retained on pupil<br>file.<br>Copy of<br>correspondence<br>also kept on<br>SM/KD personal<br>drive   |
| Advice and information<br>provided to parents<br>regarding educational<br>needs | DOB of pupil + 25<br>years<br>Note this retention<br>period is the minimum<br>retention period that<br>any pupil file should<br>be kept | Secure disposal | SENCo - Sarah Muir<br>Kirsten Dunning | Copies of all<br>correspondence<br>retained on pupil<br>file.<br>Copy of<br>correspondence<br>also kept on<br>SM/KD personal<br>drive   |

# **Curriculum Management**

Statistics and Management Information

| Description                            | Retention period       | Action at end   | Role responsible | Location of<br>records |
|--|------------------------|-----------------|------------------|------------------------|
| Examination results<br>(Schools' copy) | Current year + 6 years | Secure disposal | Headteacher      | MIS - Integris         |

## Extra Curricular Activities

Educational Visits Outside the Classroom

| Description  | Retention period   | Action at end   | Role responsible             | Location of records   |
|--|--|-----------------|------------------------------|---|
| Records created to<br>obtain approval to run<br>educational visit<br>outside the classroom | Date of visit + 10 years                                   | Secure disposal | Gaynor Pearce<br>Karen Luker | Most recent -<br>admin office<br>Historic - admin<br>archive filing |
| Parental consent forms<br>for school trips where<br>there has been no<br>major incident    | Conclusions of the trip                                    | Secure disposal | Gaynor Pearce<br>Karen Luker | Admin office  |
| Parental consent forms<br>for school trips where<br>there has been a major<br>incident     | DOB of the pupil<br>involved in the<br>incident + 25 years | Secure disposal | Gaynor Pearce<br>Karen Luker | Most recent -<br>admin office<br>Historic - admin<br>archive filing |