

THE ELTON HIGH SCHOOL



Records Management Policy

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1. 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, responsibilities and interests of the school, and provide evidence for demonstrating performance and accountability including the GDPR. This document provides the policy framework through which this effective management can be achieved and audited. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

2. Scope of the policy

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

2.2 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 detailed in the appendix) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

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

3. Responsibilities

3.1 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.

3.2 The Headteacher will give guidance for 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.

3.3 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.

4. Data Security

Staff and governors must keep personal data secure against loss or misuse. Where other organisations process personal data as a service on our behalf, the DPO will establish what, if any, additional specific data security arrangements need to be implemented in contracts with those third party organisations.

Storing data securely

- In cases when data is stored on printed paper, it should be kept in a secure place where unauthorised personnel cannot access it. It should not be left on desks, unsecured.

- Printed data should be shredded when it is no longer needed
- Data stored on a computer should be protected by strong passwords that are changed regularly. Computers must be locked when leaving the room or the desk.
- Data stored on memory sticks must be locked away securely when they are not being used.
- Data should not be sent to personal email accounts (to work with off-site). Always use work email accounts.
- Servers containing personal data must be kept in a secure location, away from general office space
- Data should be regularly backed up in line with the school's backup procedures
- All mobile devices such as laptops, tablets or smartphones with data should have alpha numeric password protection.
- All servers containing sensitive data must be approved and protected by security software and strong firewall.

5. Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information policy
- Data Protection policy
- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

6. Appendices

The following information is taken from the Information Management Toolkit for Schools, Version 5.

The Retention Schedule is divided into five sections:

1. Management of the School
2. Human Resources
3. Financial Management of the School
4. Property Management
5. Pupil Management
6. Curriculum Management
7. Extra-Curricular Activities
8. Central Government and Local Authority

Management of the School

1.1 Governing Body					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
1.1.1	Agendas for Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL
1.1.2	Minutes of Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff and pupils		One copy should be retained with the master set of minutes. All other copies can be disposed of	SECURE DISPOSAL
	Inspection Copies	There may be data protection issues if the meeting is dealing with confidential issues relating to staff and pupils		Date of meeting + 3 years	If these minutes contain any sensitive, personal information they must be shredded.
1.1.3	Reports presented to the Governing Body	There may be data protection issues if the report deals with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently.	SECURE DISPOSAL or retain with the signed set of the minutes
1.1.4	Action plans created and administered by the Governing Body	No		Life of the action plan + 3 years	SECURE DISPOSAL
1.1.5	Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years	SECURE DISPOSAL
1.1.6	Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL

1.1.7	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No		Date proposal accepted or declined + 3 years	SECURE DISPOSAL
1.2 Headteacher and Senior Management Team					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
1.2.1	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refer to individual pupils or members of staff		Date of the meeting + 3 years then review	SECURE DISPOSAL
1.2.2	Reports created by the Headteacher or the Management Team	There may be data protection issues if the record refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then review	SECURE DISPOSAL
1.2.3	Records created by head teachers, deputy headteachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff		Current academic year + 6 years then review	SECURE DISPOSAL
1.2.4	Correspondence created by the headteachers, deputy headteachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then review	SECURE DISPOSAL

1.3 Admissions Process

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
1.3.1	Register of Admissions	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made.	REVIEW - Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school.
1.3.2	Supplementary Information form including additional information such as religion, medical conditions etc.	Yes		This information should be added to the pupil file and remain until pupil leaves.	SECURE DISPOSAL
	For successful admissions			This information should be added to the pupil file and remain until pupil leaves.	SECURE DISPOSAL

1.4 Operational Administration					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
1.4.1	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
1.4.2	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	SECURE DISPOSAL
1.4.3	Newsletters and other items with a short operational use	No		Current year + 1 year	SECURE DISPOSAL
1.4.4	Visitors' Books and Signing in Sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL

2. Human Resources

2.1 Recruitment					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
2.1.1	All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff - unsuccessful candidates	Yes		Date of appointment + 6 years	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff - successful candidates	Yes		All the relevant information should be added to the staff personal file (see below) and all the other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information - DBS Checks	No	DBS Update Service Employer Guide June 2014: KCSIE	The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months	SECURE DISPOSAL
2.1.5	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	SECURE DISPOSAL
2.1.6	Pre-employment vetting information - Evidence proving the right to work in the United Kingdom	Yes	An employer's guide to right to work checks (Home Office May 2015)	Where possible these documents should be added to the Staff Personal File (see below), but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years	SECURE DISPOSAL

2.2 Operational Staff Management

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
2.2.1	Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal/assessment records	Yes		Current year + 5 years	SECURE DISPOSAL

2.3 Management of Disciplinary and Grievance Processes

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Yes	"KCSIE Statutory guidance for schools and colleges March 2015", "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	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	SECURE DISPOSAL - These records must be shredded
2.3.2	Disciplinary Proceedings	Yes			
	oral warning			Date of warning + 6 months	SECURE DISPOSAL - (If warnings are placed on personal files then they must be weeded from the file)
	written warning - level 1			Date of warning + 6 months	SECURE DISPOSAL - (If warnings are placed on personal files then they must be weeded from the file)
	written warning - level 2 final warning case not found			Date of warning + 12 months Date of warning + 18 months If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL

2.4 Health and Safety					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
2.4.1	Health and Safety Policy Statements	No		Life of Policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.3	Records relating to accident/injury at work	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
2.4.4	Accident Reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
	Adults			Date of incident + 6 years	SECURE DISPOSAL
	Children			DOB of the child + 25 years	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Control of substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)	Current year + 40 years	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire Precautions log books	No		Current year + 6 years	SECURE DISPOSAL

3. Financial Management of the School

3.1 Risk Management and Insurance				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
3.1.1 Employer's Liability Insurance Certificate	No		Closure of school + 40 years	SECURE DISPOSAL

3.2 Asset Management				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
3.2.1 Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
3.2.2 Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL

3.3 Accounts and Statements including Budget Management				
Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
3.3.1 Annual Accounts	No		Current year + 6 years	STANDARD DISPOSAL
3.3.2 Loans and grants managed by the school	No		Date of last payment on the loan + 12 years then REVIEW	SECURE DISPOSAL

3.3.3	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of the budget + 3 years	SECURE DISPOSAL
3.3.4	Invoices, receipts, order books and requisitions, delivery notes	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.5	Records relating to the collection and banking of monies	No		Current financial year + 6 years	SECURE DISPOSAL

3.4 School Meals Management					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
3.4.1	Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
3.4.2	School Meal Registers	Yes		Current year + 3 years	SECURE DISPOSAL
3.4.3	School Meals Summary Sheets	No		Current year + 3 years	SECURE DISPOSAL

4. Property Management

4.1 Maintenance					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
4.1.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
4.1.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	No		Current year + 6 years	SECURE DISPOSAL

5. Pupil Management

5.1 Pupil's Educational Record					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	Secondary		Limitation Act 1980 (Section 2)	Date of Birth of the pupil + 25 years	SECURE DISPOSAL
5.1.2	Examination Results - Pupil Copies	Yes			
	Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.
	Internal			This information should be added to the pupil file	
5.1.3	Child Protection Information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"		
5.1.4	Child Protection Information held in separate files	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	DOB of the child + 25 years then review - this retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record	SECURE DISPOSAL - these records MUST be shredded

5.2 Attendance					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
5.2.1	Attendance Registers	Yes	School attendance : Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL
5.2.2	Correspondence relating to authorized absence		Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL

5.3 Special Educational Needs					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
5.3.1	Special Educational Needs files, reviews and individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of Birth of the pupil + 25 years	- NOTE: This retention period is the minimum retention 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.
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs to Disability Act 2001 Section 1	Date of birth of the pupil + 25 years (This would normally be retained on the pupil file)	SECURE DISPOSAL unless the document is subject to a legal hold

5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth of the pupil + 25 years (This would normally be retained on the pupil file)	SECURE DISPOSAL unless the document is subject to a legal hold
5.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 25 years (This would normally be retained on the pupil file)	SECURE DISPOSAL unless the document is subject to a legal hold

6. Curriculum Management

6.1 Statistics and Management Information					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
6.1.1	Examination Results (Schools Copy)	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.2	Value Added and Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.3	Self Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL

6.2 Implementation of Curriculum					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
6.2.1	Schemes of Work	No		Current year + 1 year	
6.2.2	Timetable	No		Current year + 1 year	

6.2.3	Class Record Books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL
6.2.4	Mark Books	No		Current year + 1 year	
6.2.5	Record of homework set	No		Current year + 1 year	
6.2.6	Pupils' Work	No		Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the school's policy then current year + 1 year	SECURE DISPOSAL

7. Extra Curricular Activities

7.1 Educational Visits outside the Classroom					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Secondary Schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit + 10 years	SECURE DISPOSAL
7.1.2	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.
7.1.3	Parental permission slips for school trips - where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil involved in the incident + 25 years - the permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all the pupils	

8. Central Government and Local Authority

8.1 Central Government					
	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
8.1.1	OFSTED reports and papers	No		Life of the report then REVIEW	SECURE DISPOSAL
8.1.2	Returns made to central government	No		Current year + 6 years	SECURE DISPOSAL
8.1.3	Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL