



# Whitehouse Primary School

## Records Management Policy

Version	Created	Review	Amendments	Governor Ratification
1.0	March 2018	March 2020		

Whitehouse Primary School

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Whitehouse Primary School

## Statement of intent

Whitehouse Primary School is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible by the appropriate individuals. In line with the requirements of the General Data Protection Regulations (GDPR) 2018, the school also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

The school has created this policy to outline how records are stored, accessed, monitored and disposed of, and how long data is retained for, in order to meet the school's statutory requirements.

Signed by:

\_\_\_\_\_ Headteacher

Date: \_\_\_\_\_

\_\_\_\_\_ Chair of governors

Date: \_\_\_\_\_

## **1. Legal framework**

- 1.1. This policy has due regard to statutory legislation including, but not limited to, the following:
  - General Data Protection Regulations 2018
  - Freedom of Information Act 2000
  - Limitation Act 1980 (as amended)
- 1.2. This policy also has due regard to the following guidance:
  - Information Records Management Society 'Information Management Toolkit for Schools' 2016
- 1.3. This policy will be implemented in accordance with the following school policies and procedures:
  - Data Protection Policy
  - Freedom of Information Policy
  - E-security Policy
  - Security Breach Management Plan

## **2. Responsibilities**

- 2.1. The whole school has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.
- 2.2. The Headteacher holds overall responsibility for this policy and for ensuring it is implemented correctly.
- 2.3. The School Business Manager is responsible for the management of records at Whitehouse Primary School.
- 2.4. The School Business Manager is responsible for promoting compliance with this policy, and reviewing the policy every two years, in conjunction with the Headteacher.
- 2.5. The School Business Manager is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of correctly.
- 2.6. All staff members are responsible for ensuring that any records for which they are responsible for are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

### 3. Management of pupil records

3.1. Pupil records are specific documents that are used throughout a pupil's time in the education system – they are documents that are passed to each school that a pupil attends and include all personal information relating to them, as well as their progress.

3.2. The following information is stored in the school office:

- Forename, surname, gender and date of birth,
- Unique pupil number
- Note of the date when the file was opened
- Note of the date when the file was closed, if appropriate
- Ethnic origin, religion and first language (if not English)
- Any preferred names
- Position in their family, e.g. eldest sibling
- Emergency contact details and the name of the pupil's doctor
- Any allergies or other medical conditions that are important to be aware of
- Names of parents and/or carers, including home addresses and telephone numbers
- Name of the school, admission number, the date of admission and the date of leaving
- Any other agency involvement, e.g. speech and language therapist

3.3. The following information is stored by the school, and will be easily accessible:

- Admissions form
- Details of any special educational needs and disabilities (SEND)
- If the pupil has attended an early years setting, the record of transfer
- The most recent GDPR Privacy Notice signed by the parent / carer
- Annual written reports to parents
- Notes relating to major incidents and accidents involving the pupil
- Any information about an SEN statement, and support offered in relation to the statement
- Any notes indicating child protection disclosures and reports are held
- Any information relating to exclusions
- Any correspondence with parents or external agencies relating to major issues, e.g. mental health
- Notes indicating that records of complaints made by parents or the pupil are held

3.4. The following information is subject to shorter retention periods and, therefore, will be stored separately in the school office.

- Absence notes where received.

- Parental consent forms for educational visits and trips, photographs and videos, etc.
  - Correspondence with parents about minor issues, e.g. behaviour
- 3.5. Actual copies of disclosures and reports relating to child protection are stored in a securely locked filing cabinet in the Headteacher's office a sticker is attached to the accessible file indicating this. A note is also attached to the pupil's electronic record to indicate there are safeguarding papers.
- 3.6. Complaints made by parents or the pupil are stored in a file in the Headteacher's office a note indicating this is marked on the pupil's file.
- 3.7. Copies of minor accident slips are stored separately in the school office and held in line with the statutory retention periods outlined in this policy. An additional copy may be placed on the pupil's file in the event of a major accident or incident.
- 3.8. The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.
- 3.9. The only exception to the above is any records placed on the pupil's file that have a shorter retention period and may need to be removed. In such cases, the School Business Manager will be responsible for disposing of these records.
- 3.10. Electronic records relating to the pupil's record will also be transferred. [Section 10](#) of this policy outlines how electronic records will be transferred.
- 3.11. The school will not keep any copies of information stored within a pupil's record, unless there is ongoing legal action at the time during which the pupil leaves the school. The responsibility for these records will then transfer to the next school that the pupil attends.
- 3.12. The school will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent to will be required to sign a copy of the list to indicate that they have received the files, and return this to the school.

#### **4. Retention of pupil records and other pupil-related information**

- 4.1. The table below outlines the school's retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements.
- 4.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Admissions</b>		
Register of admissions	Three years after the date on which the entry was made	Information is reviewed, and the register may be kept permanently
Proof of address (supplied as part of the admissions process)	When changed	Securely disposed of
Supplementary information submitted, including religious, medical information, etc. (where the admission was successful)	Added to the pupil's record	Securely disposed of
Supplementary information submitted, including religious, medical information, etc. (where the admission was not successful)	Until the appeals process has been completed	Securely disposed of
<b>Pupils' educational records</b>		
Pupils' educational records	Whilst the pupil remains at the school	Transferred to the destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period
Public examination results (SATs)	Added to the pupil's electronic record	Returned to the examination board
Child protection records	25 years after the pupil's date of birth	Securely disposed of – shredded
<b>Attendance</b>		
Attendance registers	Last date of entry on to the register, plus three years	Securely disposed of
Letters authorising absence	Current academic year, plus two years	Securely disposed of
<b>SEND</b>		
SEND files, reviews and individual education plans	25 years after the pupil's date of birth (as stated on the pupil's record)	Information is reviewed, and the file may be kept for longer than necessary if it is required for the school to defend themselves in a 'failure to provide sufficient education' case



Statement of SEN maintained under section 324 of the Education Act 1996 (and any amendments to the statement)	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of, unless it is subject to a legal hold
Information and advice provided to parents regarding SEND	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of, unless it is subject to a legal hold
Accessibility strategy	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of, unless it is subject to a legal hold
<b>Curriculum management</b>		
SATs results	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of
Published Admission Number (PAN) Reports	Current academic year, plus six years	Securely disposed of
Valued added and contextual data	Current academic year, plus six years	Securely disposed of
Self-evaluation forms	Current academic year, plus six years	Securely disposed of
Pupils' work	Returned to pupils at the end of the academic year, or transferred to next school	Securely disposed of by shredding
<b>Extra-curricular activities</b>		
Parental consent forms for school trips where no major incident occurred	Three months after the date of the trip	Securely disposed of by shredding
Parental consent forms for school trips where a major incident occurred	25 years after the pupil's date of birth, on the pupil's record (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils)	Securely disposed of by shredding
<b>Other Records</b>		
Reports for outside agencies	Duration of the pupil's time at school	Securely disposed of

Referral forms	Whilst the referral is current	Securely disposed of
Contact data sheets	Current academic year	Reviewed, and destroyed if no longer active
Contact database entries	Current academic year	Reviewed, and destroyed if no longer required
Group registers	Current academic year	Reviewed and destroyed if no longer required

## 5. Retention of staff records

- 5.1. The table below outlines the school's retention periods for staff records and the action that will be taken after the retention period, in line with any requirements.
- 5.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Operational</b>		
Staff personal file	Termination of employment, plus six years unless any concerns	Securely disposed of
Timesheets	Current academic year, plus six years	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus five years unless any concerns	Securely disposed of
<b>Recruitment</b>		
Records relating to the appointment of a new Headteacher	Date of appointment, plus six years	Securely disposed of
Records relating to the appointment of new members of staff (unsuccessful candidates)	Date of appointment of successful candidate, plus three months	Securely disposed of
Records relating to the appointment of new members of staff (successful candidates)	Relevant information added to the member of staff's personal file, and other information retained for six months	Securely disposed of
DBS certificates	Details added to Single Central Record, snapshot report used and stored for duration of DBS.	Securely disposed of

Proof of identify as part of the enhanced DBS disclosure	Retained for members of staff as part of the Single Central Record, termination of employment plus two years.	Securely disposed of by shredding
Evidence of right to work in the UK	Retained as part of Single Central Record, termination of employment, plus no longer than two years	Securely disposed of.

### Disciplinary and grievance procedures

Child protection allegations, including where the allegation is unproven	Added to staff personal file, and until the individual's normal retirement age + 10 years, or 10 years from the date of the allegation – whichever is longer  If allegations are malicious, they are removed from personal files	Reviewed and securely disposed of – shredded
Oral warnings	Date of warning, plus six months	Securely disposed of – if placed on staff personal file, removed from file
Written warning – level 1	Date of warning, plus six months	Securely disposed of – if placed on staff personal file, removed from file
Written warning – level 2	Date of warning, plus 12 months	Securely disposed of – if placed on staff personal file, removed from file
Final warning	Date of warning, plus 18 months	Securely disposed of – if placed on staff personal file, removed from file
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related and is disposed of as <a href="#">above</a>	Securely disposed of

## 6. Retention of senior leadership and management records

- 6.1. The table below outlines the school's retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements.
- 6.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Governing board</b>		
Agendas for governing board meetings	One copy alongside the original set of minutes – all others disposed of	Securely disposed of
Original, signed copies of the minutes of governing board meetings	Permanent	Stored by NTC Governor & Legal Services
Inspection copies of the minutes of governing board meetings	Date of meeting, plus three years	Shredded if they contain any sensitive, personal information
Reports presented to the governing board	Minimum of six years, unless they refer to individual reports – these are kept permanently	Securely disposed of or, if they refer to individual reports, retained with the signed, original copy of minutes
Meeting papers relating to the annual parents' meeting	Date of meeting, plus a minimum of six years	Securely disposed of
Instruments of government, including articles of association	Permanent	Stored by NTC
Trusts and endowments managed by the governing board	Permanent	Stored in school and transferred to NTC for storage if necessary
Action plans created and administered by the governing board	Duration of the action plan, plus three years	Securely disposed of
Policy documents created and administered by the governing board	Duration of the policy, plus three years	Securely disposed of
Records relating to complaints dealt with by the governing board	Date of the resolution of the complaint, plus a minimum of six years	Reviewed for further retention in case of contentious disputes, then securely disposed of

Annual reports created under the requirements of the Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002	Date of report, plus 10 years	Securely disposed of
Proposals concerning changing the status of the school	Date proposal accepted or declined, plus three years	Securely disposed of
<b>Headteacher and senior leadership team (SLT)</b>		
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus three years	Reviewed, and securely disposed of
Reports created by the Headteacher or SLT	Date of the report, plus a minimum of three years	Reviewed, and securely disposed of
Records created by the Headteacher, deputy Headteacher, heads of year and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed, and securely disposed of
Correspondence created by the Headteacher, deputy Headteacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Reviewed, and securely disposed of
Professional development plan	Duration of the plan, plus six years	Securely disposed of
School development plan	Duration of the plan, plus three years	Securely disposed of

## 7. Retention of health and safety records

7.1. The table below outlines the school's retention periods for health and safety records, and the action that will be taken after the retention period, in line with any requirements.

7.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Health and safety</b>		
Health and safety policy statements	Duration of policy, plus three years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment, plus three years	Securely disposed of

Records relating to accidents and injuries at work	Date of incident, plus 12 years  In the case of serious accidents, a retention period of 15 years is applied	Securely disposed of
Accident reporting – adults	Date of the incident, plus six years	Securely disposed of
Accident reporting – pupils	25 years after the pupil's date of birth, on the pupil's record	Securely disposed of
COSHH	Current academic year, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of last action, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation	Date of last action, plus 50 years	Securely disposed of
Fire precautions log books	Current academic year, plus six years	Securely disposed of

## 8. Retention of financial records

- 8.1. The table below outlines the school's retention periods for financial records and the action that will be taken after the retention period, in line with any requirements.
- 8.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Risk management and insurance</b>		
Employer's liability insurance certificate	Closure of the school, plus 40 years	Securely disposed of
<b>Asset management</b>		
Inventories of furniture and equipment	Current academic year, plus six years	Securely disposed of
Burglary, theft and vandalism report forms	Current academic year, plus six years	Securely disposed of

<b>Accounts and statements including budget management</b>		
Annual accounts	Current academic year, plus six years	Disposed of against common standards
Loans and grants managed by the school	Date of last payment, plus 12 years	Information is reviewed, then securely disposed of
All records relating to the creation and management of budgets	Duration of the budget, plus three years	Securely disposed of
Invoices, receipts, order books and requisitions, delivery notices	Current financial year, plus six years	Securely disposed of
Records relating to the collection and banking of monies	Current financial year, plus six years	Securely disposed of
Records relating to the identification and collection of debt	Current financial year, plus six years	Securely disposed of
<b>Contract management</b>		
All records relating to the management of contracts under seal	Last payment on the contract, plus 12 years	Securely disposed of
All records relating to the management of contracts under signature	Last payment on the contract, plus six years	Securely disposed of
All records relating to the monitoring of contracts	Current academic year, plus two years	Securely disposed of
<b>School fund</b>		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of
<b>School meals</b>		
Free school meals registers	Current academic year, plus six years	Securely disposed of

## **9. Retention of other school records**

- 9.1. The table below outlines the school's retention periods for any other records held by the school, and the action that will be taken after the retention period, in line with any requirements.
- 9.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Property management</b>		
Title deeds of properties belonging to the school	Permanent	Retained by NTC
Plans of property belonging to the school	For as long as the building belongs to the school	Retained by NTC
Leases of property leased by or to the school	Expiry of lease, plus six years	retained by NTC
Records relating to the letting of school premises	Current financial year, plus six years	Securely disposed of
<b>Maintenance</b>		
All records relating to the maintenance of the school carried out by contractors	Current academic year, plus six years	Securely disposed of
All records relating to the maintenance of the school	Current academic year, plus six years	Securely disposed of
<b>Operational administration</b>		
General file series	Current academic year, plus five years	Reviewed, and securely disposed of
Records relating to the creation and publication of the school brochure and/or prospectus	Current academic year, plus three years	Disposed of against common standards
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year, plus one year	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year plus one year	Disposed of against common standards
Visitors' books and signing-in sheets	Current academic year, plus six years	Reviewed, then securely disposed of
Records relating to the creation and management of parent teacher associations and/or old pupil associations	Current academic year, plus six years	Reviewed, then securely disposed of

## 10. Storing and protecting information

- 10.1. The School business Manager will undertake a risk analysis to identify which records are vital to school management, and these records will be stored in the most secure manner.



- 10.2. The School Business Manager will conduct a backup of information on a termly basis of any information system that is stored on a local drive to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.
- 10.3. Where possible, backed-up information will be stored off the school premises, using a central back-up service, operated by the LA.
- 10.4. Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.
- 10.5. Confidential paper records are not left unattended or in clear view when held in a location with general access.
- 10.6. Where data is saved on removable storage or a portable device, the device is kept in a locked and fireproof filing cabinet, drawer or safe when not in use.
- 10.7. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.
- 10.8. All electronic devices are password-protected to protect the information on the device in case of theft.
- 10.9. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 10.10. Staff and governors do not use their personal laptops or computers for school purposes.
- 10.11. Staff and governors will not use school laptops, ipad or computers for their own purposes.
- 10.12. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- 10.13. Emails containing sensitive or confidential information are password-protected to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email.
- 10.14. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- 10.15. Where personal information that could be considered private or confidential is taken off the premises, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.
- 10.16. Before sharing data, all staff always ensure that:
  - They are allowed to share it.
  - Adequate security is in place to protect it.

- Who will receive the data has been outlined in a privacy notice.
- 10.17. All staff members will implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be stored in a securely locked filing cabinet, drawer or safe with restricted access.
- 10.18. Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.
- 10.19. The physical security of the school's buildings and storage systems, and access to them, is reviewed on a termly basis by the site manager and any increased risk in vandalism, burglary or theft is identified, and reported to the school business manager and extra measures to secure data storage will be put in place as necessary.
- 10.20. The school takes its duties under the GDPR 2018 extremely seriously and any unauthorised disclosure may result in disciplinary action.
- 10.21. The School Business Manager is responsible for continuity, and recovery measures are in place to ensure the security of protected data.
- 10.22. Any damage to or theft of data will be managed in accordance with the school's Data Protection Policy and legal requirements under GDPR.

## **11. Accessing information**

- 11.1. All members of staff, parents of registered pupils and other users are entitled to:
- Know what information the school holds and processes about them or their child, and why.
  - Understand how to gain access to it.
  - Understand how to keep it up-to-date.
  - Understand what the school is doing to comply with its obligations under the GDPR 2018.
- 11.2. All members of staff, parents of registered pupils and other users have the right, under the GDPR 2018, to access certain personal data being held about them or their child.
- 11.3. The school will adhere to the provisions outlined in the school's Data Protection Policy when responding to requests seeking access to personal information.

## **12. Digital Mapping & Asset Register**

- 12.1. All data that is used and shared by the school is part of the school's data mapping process and is recorded on the data asset register.
- 12.2. The School Business Manager will identify any digital data that will need be named as part of the data asset register.

12.3. Memory sticks will never be used to store digital data.

12.4. The following information will be included within the data asset register:

- A statement of purpose and requirements for keeping the records
- A description of how access to the information asset is to be managed in accordance with the GDPR 2018

### **13. Information audit**

13.1. The school conducts information audits on an annual basis against all information held by the school: to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with GDPR 2018. This includes the following information:

- Paper documents and records
- Electronic documents and records
- Databases
- Video and photographic records
- Hybrid files, containing both paper and electronic information

13.2. The information audit may be completed in a number of ways:

- Interviews with staff members with key responsibilities – to identify information and information flows, etc.
- Questionnaires to key staff members to identify information and information flows, etc.
- A mixture of the above

13.3. The school business manager is responsible for completing the information audit. The information audit will include:

- The school's needs
- The information needed to meet those needs
- The format in which it is stored
- How long it needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document

13.4. The school business manager will consult with staff members involved in the information audit process to ensure that the information is accurate.

13.5. Once it has been confirmed that the information is accurate, name of individual will record all details on the school's data asset register.

13.6. The information displayed on the data asset register will be shared with the Headteacher and GDPR governor to gain their approval.

## **14. Disposal of data**

- 14.1. Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.
- 14.2. Where disposal of information is outlined as secure disposal, this will be shredded or pulped and electronic information will be scrubbed clean and, where possible, cut. The school business manager will keep a record of all files that have been destroyed.
- 14.3. Where the disposal action is indicated as reviewed before it is disposed, the School Business Manager will review the information against its administrative value – if the information should be kept for administrative value, the School Business Manager will keep a record of this.
- 14.4. If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.
- 14.5. Where information has been kept for administrative purposes, the School Business Manager will review the information again after three years, and conduct the same process. If it should be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every subsequent three years.
- 14.6. Where information must be kept permanently, this information is exempt from the normal review procedures.

## **15. Monitoring and review**

- 15.1. This policy will be reviewed on a two yearly basis by the School Business Manager in conjunction with the Headteacher – the next scheduled review date for this policy is March 2020.
- 15.2. Any changes made to this policy will be communicated to all members of staff.