



St Mary's Church of England Primary School
Established 1845

Records Management Policy

The School recognises that by efficiently managing its records, it will comply with its legal and regulatory obligations and contribute to its overall effective management. The school is committed to create, keep and manage records which document its principal activities. Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability. This document covers the scope, responsibilities and relationships with existing policies such as the data protection policy.

1. Scope of the policy

This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions, and also by any contractors or third parties acting on behalf of the school such as payroll or accountant). Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received, or maintained in hard copy or electronically. For example, e-mails, text messages, audio and video recordings, presentation. 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. This should be done in liaison with the County Archives Service.

2. Responsibilities

The governing body has statutory responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. This is delegated to the Principal.

- The Principal will give guidance for good records management practice and promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. The Principal will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- School will manage and document its records disposal process in line with the records retention schedule. This will help to ensure it can meet Freedom of Information requests and respond to access requests for personal data Subject Access Requests).
- Individual staff and employees must ensure that records for which they are responsible are accurate, maintained and disposed of in accordance with the school's records management guidelines and data protection policy.

3. Relationship with existing policies: This policy has been drawn up within the context of:

Freedom of Information and Data Protection policies and the GDPR.

Pupil record guidance

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

1. Managing Pupil Records

The pupil record is the core record charting an individual pupil's progress through the Education System. The pupil record should accompany the pupil to every school they attend and should contain information that is accurate, objective and easy to access. This record will serve as the formal record of academic achievements, other skills and abilities and progress in school.

2. Recording and disclosure

Pupils have a right of access to their educational record and so do their parents under the Education (Pupil Information) (England) Regulations 2005. Under the Data Protection Act 1998 a pupil or their nominated representative has a right to see information held about them. This right exists until the point that the file is destroyed. Therefore, it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

3. What should be recorded and where

The same file cover should be used for all pupil records so the relevant information is held and easily transferred when the pupil enters secondary school. The pupil record starts its life when a file is opened for each new pupil as they begin school. This is the file which will follow the pupil for the rest of his/her school career. The following information should be recorded at the front of the paper file or start of the electronic file:

- Surname
- Forename
- Date Of Birth
- Unique Pupil Number¹
- Date that file was opened and date when file is closed if appropriate.

The following information should also be easily accessible:

¹ The Unique Pupil Number is a number that identifies each pupil in England uniquely. It is intended to remain with them throughout their school career regardless of any change in school or Local Authority. Not to be confused with the the Unique Learner Number allocated to pupils over 14 <https://nationalpupildatabase.wikispaces.com/IDs>

- Preferred name
- Emergency contact details
- Names of adults who hold parental responsibility with home address and telephone number (and any additional relevant carers and their relationship to the child)
- Allergies/medical conditions
- Gender
- Siblings
- Ethnic origin ²
- Language of home (if other than English)
- Religion ²
- Any allergies or other medical conditions that it is important to be aware of ²
- Any other agency involvement e.g. speech and language therapist, paediatrician

It is essential that these files, which contain personal information, are managed against information security guidelines.

Other items which should be included on the pupil record:

- If the pupil has attended an early years setting, then the record of transfer should be included on the pupil file
- Admission form
- Annual Written Report to Parents
- Any information relating to a major incident involving the child (either an accident or other incident)
- Any reports written about the child
- Any information about a statement and support offered in relation to the statement
- Any relevant medical information (should be stored in the file in a sealed envelope^[L]_[SEP] clearly marked as such)^[L]_[SEP]
- Child protection reports/disclosures (should be stored in the file in a sealed envelope^[L]_[SEP] clearly marked as such)
- Specific correspondence with parents or outside agencies relating to major issues such as exclusions
- Details of any complaints made by the parents or the pupil^[L]_[SEP]
- Examination reports

² this is sensitive data under the Data Protection Act 1998, but the Dept for Education require statistics about ethnicity

Other items which should be included on the pupil record:

The following records should be stored separately to the pupil record as they are subject to shorter retention periods, and may not all be transferred on to another school.

- Absence notes
- Administering medicine records and consents.
- Attendance registers
- Copies of birth certificates or passports.
- Parental consent forms for trips/outings [in the event of a major incident all the parental consent forms should be retained with the incident report not in the pupil record]
- Correspondence with parents about minor issues
- Accident forms (these should be stored separately and retained on the school premises until their statutory retention period is reached. A copy could be placed on the pupil file in the event of a major incident)
- Photography consents
- Pupil work

4. Transferring the pupil record to the secondary school

The pupil record should not be weeded before transfer to the secondary school unless any records with a short retention period have been placed in the file. It is important to remember that the information which may seem unnecessary to the person weeding the file may be a vital piece of information required at a later stage. ^[LSEP]Primary schools do not need to keep copies of any records in the pupil record except if there is an ongoing legal action when the pupil leaves the school. Custody of and responsibility for the records passes to the school the pupil transfers to. ^[LSEP]Files should not be sent by post unless absolutely necessary and if so, they should be sent special delivery with signature. ^[LSEP]Electronic files should be transferred using the Common Transfer file from the MIS including child protection information.

5. Responsibility for the pupil record once the pupil leaves the school

The school which the pupil attended until statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25 years. *[See the retention schedule for further information].*

6. Safe destruction of the pupil record The pupil record should be disposed of in accordance with the safe disposal of records guidelines.

7. Transfer of a pupil record outside the EU area

If you are requested to transfer a pupil file outside the EU area because a pupil has moved into that area, please contact the Local Authority for further advice.

8. Storage of pupil records

All pupil records should be kept securely at all times. Paper records, for example, should be kept in lockable storage areas with restricted access, and the contents should be secure within the file. Equally, electronic records should have appropriate security.

Access arrangements for pupil records should ensure that confidentiality is maintained whilst equally enabling information to be shared lawfully and appropriately, and to be accessible for those authorised to see it.

9. E-mails and text messages

All staff should bear in mind that e-mails and text messages are subject to the Freedom of Information Act. E-mails are not a filing system so should be regularly deleted if they are not part of the pupil record, a contract or employee record. Staff are advised to take care in the language they use which can be taken out of context and may tend to be more informal. Choose recipients carefully so as not to send personal data to the wrong address which would constitute a data protection breach. Secure your data and your devices.

Date last reviewed: June 2021

Approved by: Madeleine Spinks (Chair of Governors)

Person Responsible: Peter Kyles (Principal)

Review Date: September 2023

Acknowledgements: Information Management Toolkit for Schools, 2019