



THE ROBERT DRAKE PRIMARY SCHOOL

Records Management Policy

Member of staff Responsible	<i>Hannah Towns</i>
Policy produced	<i>April 2018</i>
Policy agreed/last reviewed	<i>April 2018</i>
To be reviewed	<i>April 2020</i>
Other Policies Related	<i>Freedom of Information policy, Data Protection policy and other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.</i>
Other Paperwork Attached (appendix)	<i>Records Retention Schedule</i>

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 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.

1. Scope of the Policy

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

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.

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

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 Head of the School.

The person responsible 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. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.

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. Recording Systems

Information created by the school must be managed against the same standards regardless of the media in which it is stored.

Maintenance of Record Keeping Systems

- It is important that filing information is properly resourced and is carried out on a regular basis. It is equally important that the files are weeded of extraneous information where appropriate on a regular basis. Removing information from a file once a freedom of information request has been made will be a criminal offence (unless it is part of normal processing).
- Applying retention periods is straightforward provided files are closed on a regular basis.
- Once a file has been closed, it should be moved out of the current filing system and stored either in a record room in the school or in another appropriate place until it has reached the end of the retention period.
- Information security is very important especially when dealing with personal information or sensitive policy information. There are a number of basic rules:

- ✓ All personal information should be kept in lockable filing cabinets which are kept locked when the room is unattended;
 - ✓ Personal information held on computer systems should be adequately password protected. Information should never be left up on a screen if the computer is unattended;
 - ✓ Files containing personal or sensitive information should not be left out on desks over night;
 - ✓ Where possible sensitive personal information should not be sent by e-mail;
 - ✓ If files need to be taken off the premises they should be secured in the boot of a car or in lockable containers;
 - ✓ Teachers may carry data on memory sticks or other removable data carriers in order to access their files both at home and at school. Any data carried in this way must be encrypted using appropriate encryption software.
 - ✓ All computer information should be backed up regularly and the back-up should be stored off the site.
- Information contained in email, fax should be filed into the appropriate electronic or manual filing system once it has been dealt with.

4. The Safe Disposal of Information Using the Retention Schedule

Files should be disposed of in line with the attached retention schedule (see appendix). This is a process which should be undertaken on an annual basis.

Paper records containing personal information should be shredded using a cross-cutting shredder. Other files can be bundled up and put in a skip or disposed of to the waste paper merchant. Loose papers should not be put in skips unless the skip has a lid. CD's/DVD's/Floppy disks should be cut into pieces. Audio/Video tapes and fax rolls should be dismantled and shredded.

Electronic data should be archived on electronic media and 'deleted' appropriately at the end of the retention period.

5. Monitoring and Review

This policy has been reviewed and approved by the head teacher and governors. The Records Management Policy will be reviewed and updated as necessary every 2 years.

Retention Schedule

Child Protection				
The retention and use of records relating to child protection matters concerning pupils, and child protection allegations against staff requires specific guidance in this schedule.				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Child Protection files	Yes	Education Act 2002, s175, related guidance 'Keeping Children Safe in Education' (DfE, 2016), Annex B	Until transfer paperwork has been completed by a school the child has transferred to (senior school or new school) then all files should be destroyed. Senior schools DOB + 25 years	SECURE DISPOSAL
Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Section 175 of the Education Act 2002 <ul style="list-style-type: none"> • Section 157 of the Education Act 2002 and the Education (Independent School Standards) (England) Regulations 2010 • The Children Act 2004 • Section 11 of the Children Act 2004 (other agencies) • Sections 141F, 141G and 141H3 of the Education Act 2002. 	Until the person's normal retirement age, or 10 years from the date of the allegation if that is longer	SECURE DISPOSAL
Governors				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Minutes				
▪ Principal set (signed)	No		Permanent	Retain in school for 6 years from date of meeting
▪ Inspection Copies	No		Date of meeting + 3 years	SECURE DISPOSAL [If these minutes contain any sensitive personal information they must be shredded]
Agendas	No		Date of meeting	SECURE DISPOSAL
Reports	No		Date of report + 6 years	Retain in school for 6 years from date of meeting
Annual Parents' meeting papers	No		Date of report + 6 years	Retain in school for 6 years from date of meeting

Instruments of Government	No		Permanent	Retain in school whilst school is open
Trusts and Endowments	No		Permanent	Retain in school whilst operationally required
Action Plans	No		Date of action plan + 3 years	SECURE DISPOSAL
Policy documents	No		Expiry of policy	Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)
Complaints files	Yes		Date of resolution of complaint + 6 years	Retain in school for the first six years. Review for further retention in the case of contentious disputes. SECURE DISPOSAL routine complaints.
Annual Reports required by the Department for Education	No	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.S1 2002 No 1171	Date of report + 10 years	SECURE DISPOSAL
Management				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Minutes of the Senior Management Team and other internal administrative bodies	Yes		Date of meeting + 5 years	Retain in the school for 5 years from meeting
Reports made by the headteacher or the management team	Yes		Date of report + 3 years	Retain in the school for 3 years from meeting
Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities.	Yes		Closure of file + 6 years	SECURE DISPOSAL
Correspondence created by headteachers, deputy headteachers, heads of year and other members of staff with administrative responsibilities	No		Date of correspondence + 3 years	SECURE DISPOSAL
Professional development plans	Yes		Closure + 6 years	SECURE DISPOSAL
School Development Plans	Yes		Closure + 6 years	Review

Pupils				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Admission Registers	Yes		Date of last entry in the book (or file) + 6 years	Retain in the school for 6 years from the date of the last entry then consider transfer to the archives.
Attendance registers	Yes		Date of register + 3 years	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]
Pupil Record File	Yes			
▪ 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.
Special Educational Needs files, reviews and Individual Education Plans	Yes		DOB of the pupil + 25 years then review. NOTE: This retention period is the minimum 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. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period.	SECURE DISPOSAL
Correspondence Relating to Authorised Absence and Issues	No		Date of absence + 2 years	SECURE DISPOSAL
Examination results	Yes			
▪ Public	No		Year of examinations + 6 years	SECURE DISPOSAL
▪ Internal examination results	Yes		Current year + 5 years	SECURE DISPOSAL
Any other records created in the course of contact with pupils	Yes/No		Current year + 3 years	Review at the end of 3 years and either allocated a further retention period or SECURE DISPOSAL
Statement maintained under The Education Act 1006 – Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	SECURE DISPOSAL unless legal action is pending
Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	SECURE DISPOSAL unless legal action is pending

Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Closure + 12 years	SECURE DISPOSAL unless legal action is pending
Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12 years	SECURE DISPOSAL unless legal action is pending
Parental permission slips for school trips – where there has been no major incident	Yes		Conclusion of the trip	SECURE DISPOSAL
Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980	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.	SECURE DISPOSAL

Curriculum

Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
School Development Plan	No		Current year + 6 years	SECURE DISPOSAL
Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
Mark Books	No		Current year + 1 year	SECURE DISPOSAL
Samples of Pupils work	No		Current year + 1 term	SECURE DISPOSAL
Examination results	Yes		Current year + 6 years	SECURE DISPOSAL
SATS records – Examination Papers and Results	Yes		Current year + 6 years	SECURE DISPOSAL
Value Added & Contextual Data	Yes		Current year + 6 years	SECURE DISPOSAL
Self-Evaluation forms	Yes		Current year + 6 years	SECURE DISPOSAL

Staff Records				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Recruitment				
Recruitment papers – unsuccessful candidate	Yes	Legal Claim Timeframe	6 months from date of appointment	Application form, letters, interview notes etc.
Successful candidate	Yes	Operation of the employment contract	Papers transfer to Personal File. End of Employment + 6 years	Application form, letters, interview notes etc.
Recruitment Monitoring Form	Yes	N/A Forms are anonymous and not held on personal files	Forms must not be held on personal files.	Anonymised forms/data retained for equality monitoring purposes. Destroy once monitoring complete.
Pre-employment checks and SCR evidence				
References	Yes	Recommended	Transfer to personal file: End of Employment + 6 years	Where requests for references have been made but references have not been received – keep copies of such requests. We recommend that when appointing without a full reference history, a risk assessment is completed and retained outlining the factors taken into account when deciding to appoint.
Evidence of medical clearance	Yes	Recommended	Copy of signed health declaration form placed on personal file. End of Employment + 6 years.	Pre-employment health questionnaires, where completed by applicants, must not be looked at or retained by the school. Only the OH clearance confirmation should be retained. Where the confirmation contains information regarding the employee's health this should have restricted access*
Identity	Yes	Statutory guidance “Keeping children safe in education”	Held on personal file. End of Employment	From March 2015 – 3 documents
Qualifications	Yes	Statutory guidance “Keeping children safe in education” Those qualifications required for the job e.g. QTS	Held on personal file. End of Employment	Copy of original certificate/original letter from awarding body AND/OR A print out from Teacher Services System (teachers)
DBS consent form(s)	Yes	Recommended	Destroy once DBS processed and appointment decision made.	A new form is required for every DBS status check.
SD2 form	Yes	Recommended	Destroy once DBS check completed and appointment decision made.	Until destroyed, this form should be held in a sealed envelope if it contains a positive disclosure
Enhanced DBS check	Yes		Destroy once employment decision confirmed. Disclosure certificates MUST NOT be retained on file for more than 6 months. No record may be held detailing any convictions etc Where a positive DBS check is received	Until destroyed, this form should be held in a sealed envelope if it contains a positive disclosure. Retain print out from e-DBS system or top part of Certificate only. Risk Assessments should have restricted access*

			a risk assessment should be completed and this should be retained on the file. End of Employment	
DBS Children's Barred List	Yes	Recommended	As above	As above
Right to work in the UK	Yes	Required by statutory guidance "Keeping children safe in education" Home Office requirement	End of Employment + at least 2 years	A clear copy of the document must be retained and the person who checks the document must write on the copy "This Right to Work document was checked on [insert date]". It is also recommended that the name of the person who carried out the check is recorded on the copy.
Prohibition from teaching check	Yes	Recommended	Held on personal file. End of Employment	A print out from Teacher Services System.
S128 Directions check Relevant posts in Academies only	Yes	No requirement to hold evidence – simply record on SCR	N/A	
Childcare Disqualification	Yes	Recommended	Original form can be retained if no positive declaration. End of Employment + 6 years The form must not be retained if there is a positive declaration – a copy of the Risk Assessment and any Waiver documentation should be retained. End of Employment +6 years	Risk Assessments and Waiver should have restricted access*
Checks on individuals who have lived or worked outside the UK	Yes	Recommended	Held on personal file. End of Employment	Appropriate certificate of good conduct/character or police certificate from the relevant embassy/authority. EEA Prohibition Check. Any sensitive information should have restricted access*
Induction, Probation and Performance Management				
Job description & Person specification	Yes	Recommended	Held on personal file. End of Employment + 6 years	Any updates during employment should also be kept on the file
Induction checklist	Yes	Recommended	Held on personal file. End of Employment + 6 years	
Statutory Induction (teachers)	Yes	Recommended	Held on personal file. End of Employment + 6 years	Papers related to Induction process and certificate or print out from Teacher Services System confirming Induction status.
Probationary records (if applicable)	Yes	Recommended	Held on personal file. End of Employment + 6 years	Records/forms for probation review meetings. Any letters, including confirmation of successful completion
Performance Management	Yes	Recommended	Held on personal file. End of Employment + 6 years	All forms and correspondence
Contractual Documents				
Offer letters	Yes	Recommended	Held on personal file. End of employment + 6 years	Copy of offer letters and written particulars

Contract of employment & written particulars	Yes	Recommended	Held on personal file. End of employment + 6 years	including any amendments. A signed copy should be on the file if available.
Pay and pensions				
Payroll information	Yes	Recommended	Held on personal file. End of employment + 6 years	Paper not required if electronic records held
Salary statement letters	Yes	Required by TPCD	Held on personal file. End of employment + 6 years	Teachers only
Pension documentation	Yes	Required under Pension legislation	Held on personal file. Normal pension Age	Copies of all Opt-in and Opt-out forms and any correspondence in relation to pension
Leave Records				
Annual leave records	Yes	Recommended	Held on personal file. End of employment + 6 years	Full time Support staff only
Leave of absence records	Yes	Recommended	Held on personal file. End of employment + 6 years	Leave of absence request forms and decisions/appeals
Records of child related leave (maternity/paternity/adoption/parental leave)	Yes	Statutory Maternity Pay Regulations 1986 (as amended)	Held on personal file. Current year + 3 years	Copies of all correspondence and forms
Sickness records				
Sickness records	Yes	Statutory minimum 3 years	Held on personal file. End of employment + 6 years	Self-certificates, Fit Notes (copies, return original to employee), return to work meetings notes/form. OH referrals and reports, all correspondence Any papers referring to an individual's health should have restricted access*
Disciplinary (including capability) and grievance				
Allegations of a child protection nature against a member of staff. All incidents except malicious allegations.	Yes	Statutory Guidance "Keeping Children Safe in Education" Working Together to Safeguard Children	Held on personal file. Normal Pension Age or 10 years from incident – whichever is longer.	Papers relating to malicious allegation should be destroyed once the case is concluded. Papers should have restricted access*
Disciplinary records – other – no case to answer	Yes	Recommended	Held on personal file. Conclusion of case	Including notes/minutes of all meetings/hearings, all correspondence, reports etc. 1 records retained for 5 years in case of repeated pattern of behaviour. Warnings will be disregarded after expiry. Papers should have restricted access*
Disciplinary records – other - warning	Yes	Recommended	Held on personal file. Conclusion of case +5 years ¹	
Disciplinary records – other - dismissal	Yes	Recommended	Held on personal file.	
Capability records	Yes	Recommended	End of employment + 6 years	
Grievance records	Yes	Recommended	Held on personal file.	
Other				
Training/CPD records		Recommended	Held on personal file. End of employment + 6 years	Correspondence. Individual learning agreements

Accidents/Injuries at work		Health & Safety Regulations	Date of incident +12 years H&S Executive notification must be kept indefinitely	Copies of accident/ incident reports Notifications to the Health and Safety Executive
Secondment documents		Recommended	Held on personal file. End of employment + 6 years	Agreement and details of arrangements
Redundancy documents		Recommended	Held on personal file. End of employment + 6 years	Including letters, minutes of meetings, figures etc
Resignation documents		Recommended	Held on personal file. End of employment + 6 years	Resignation letter. Other relevant paperwork
Timesheets		Recommended	Held on personal file. End of employment + 6 years	
Health and Safety				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Accessibility Plans		Disability Discrimination Act	Current year + 6 years	SECURE DISPOSAL
Accident Reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980.		
▪ Adults	Yes		Date of incident + 7 years	SECURE DISPOSAL
▪ Children	Yes		DOB of child + 25 years ⁽¹⁾	SECURE DISPOSAL
COSHH			Current year + 10 years [Where appropriate an additional retention period may be allocated]	
Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL
Policy Statements			Date of expiry + 1 year	SECURE DISPOSAL
Risk Assessments	Yes		Current year + 3 years	SECURE DISPOSAL
Process of monitoring of areas where employees and persons are likely to have come in contact with asbestos			Last action + 40 years	SECURE DISPOSAL
Process of monitoring of areas where employees and persons are likely to have come in contact with radiation			Last action + 50 years	SECURE DISPOSAL
Fire Precautions log books			Current year + 6 years	SECURE DISPOSAL

Administrative				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Employer's Liability Certificate			Closure of the school + 40 years	SECURE DISPOSAL
Inventories of equipment and furniture			Current year + 6 years	SECURE DISPOSAL
General file series			Current year + 5 years	Review to see whether a further retention period is required
School brochure/prospectus			Current year + 3 years	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
Newsletters, ephemera			Current year + 1 year	Review to see whether a further retention period is required
Visitors' book			Current year + 2 years	Review to see whether a further retention period is required
Fundraising Group			Current year + 6 years	Review to see whether a further retention period is required
Finance				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Annual Accounts		Financial Regulations	Current year + 6 years	Archive
Loans and grants		Financial regulations	Date of last payment on loan + 12 years	Review to see whether a further retention period is required
Contracts				
▪ Under seal			Contract completion date + 12 years	SECURE DISPOSAL
▪ Under signature			Contract completion date + 6 years	SECURE DISPOSAL
▪ Monitoring records			Current year + 2 years	SECURE DISPOSAL
Copy orders			Current year + 2 years	SECURE DISPOSAL
Budget reports, budget monitoring etc.			Current year + 3 years	SECURE DISPOSAL
Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year + 6 years	SECURE DISPOSAL
Annual Budget and background papers			Current year + 6 years	SECURE DISPOSAL
Order books and requisitions			Current year + 6 years	SECURE DISPOSAL

Delivery Documentation			Current year + 6 years	SECURE DISPOSAL
Debtors' Records		Limitation Act 1980	Current year + 6 years	SECURE DISPOSAL
School Fund – Cheque books			Current year + 3 years	SECURE DISPOSAL
School Fund – Paying in books			Current year + 6 years then review	SECURE DISPOSAL
School Fund – Ledger			Current year + 6 years then review	SECURE DISPOSAL
School Fund – Invoices			Current year + 6 years then review	SECURE DISPOSAL
School Fund – Receipts			Current year + 6 years	SECURE DISPOSAL
School Fund – Bank statements			Current year + 6 years then review	SECURE DISPOSAL
School Fund – School Journey books			Current year + 6 years then review	SECURE DISPOSAL
Student grant applications			Current year + 3 years	SECURE DISPOSAL
Petty cash books		Financial Regulations	Current year + 6 years	SECURE DISPOSAL

Property

Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Title Deeds			Permanent	These should follow the property unless the property has been registered at the Land Registry
Plans			Permanent	Retain in school whilst operational
Maintenance and contractors		Financial Regulations	Current year + 6 years	SECURE DISPOSAL
Leases			Expiry of lease + 6 years	SECURE DISPOSAL
Lettings			Current year + 3 years	SECURE DISPOSAL
Burglary, theft and vandalism report forms			Current year + 6 years	SECURE DISPOSAL
Maintenance log books			Current year + 6 years	SECURE DISPOSAL
Contractors' Reports			Current year + 6 years	SECURE DISPOSAL

Department for Education

Basic File Description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
HMI reports			These do not need to be kept any longer	
OFSTED reports and papers			Replace former report with any new inspection report	Review to see whether a further retention period is required
ISI reports and paper			Replace former report with any new inspection report	Review to see whether a further retention period is required

Returns			Current year + 6 years	SECURE DISPOSAL
Circulars from DFE			Whilst operationally required	Review to see whether a further retention period is required

School Meals

Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Dinner Register			Current year + 3 years	SHRED
School Meals Summary Sheets			Current year + 3 years	SHRED

***Restricted access.** Access to sensitive and highly confidential information (health, safeguarding allegations, disciplinary papers) should be particularly restricted to those who need to access the information (usually a senior manager only). The process of restricting access will depend on who has access to the file. Where administrative staff (e.g. those just processing payroll information or employment contracts) have access to personal files, it may require the papers to be held in sealed envelopes within the file with "Confidential [type eg health, discipline] Documents: Access restricted to [post title(s)]"/password protected electronic files.

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