



Records Management Policy

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Statement of intent

Stonebow 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 Regulation (GDPR), 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, retained and disposed of, in order to meet the school's statutory requirements.

This document complies with the requirements set out in the Data Protection Act 2018.

1 Legal framework

- 1.1. This policy has due regard to legislation including, but not limited to, the following:
 - General Data Protection Regulation
 - Data Protection Act 2018
 - Freedom of Information Act 2000
 - Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- 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 (DPP)
 - ICT Policies

2. Responsibilities

- 2.1. The governing body has a statutory responsibility to maintain the Academy records and recordkeeping systems in accordance with this policy. The responsibility has been delegated to the Head Teacher.
- 2.2. All members of staff have a responsibility for maintaining the records and record-keeping systems they use in line with statutory requirements, and for ensuring that they are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.
- 2.3. The data protection staff are responsible for the management of records at Stonebow Primary School. The data protection staff are the Business Manager/Office Staff and the Computer Manager.
- 2.4. The DPO is responsible for promoting and auditing compliance with this policy, in conjunction with the headteacher.
- 2.5. All staff are 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. Governors are responsible for any personal data shared with them in pursuance of their duties. They must store it securely while in use and return to the school for shredding when no longer needed

3. Management of pupil records

- 3.1. Pupil records are specific documents, either paper or electronic, that are used throughout a pupil's time in the education system – they are passed to each school that a pupil attends and include all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.
- 3.2. The following information is stored in **the classroom** or on the Google Drive in the **teacher access** section:
 - Copies of pupils reports
 - Current information of any Special Educational Needs or Disabilities (SEND)
 - If the pupil has attended an early years setting, the record of transfer
 - Marking and assessment records in pupil workbooks
 - Medical and allergy information for current pupils
- 3.3. The following information is on the schools electronic **Pupil Management System (SIMS)**:
 - Forename, surname, gender and date of birth
 - Unique pupil number
 - Ethnic origin, religion and first language (if not English)
 - Any preferred names
 - 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, including their home address(es) and telephone number(s)
 - Name of the school, admission number, the date of admission and the date of leaving, successor school, where appropriate
 - SEND category and basic need
 - Assessment, attendance, and exclusion data
 - Eligibility for free school meals and Pupil Premium
- 3.4. The following information is stored in the **Headteacher's office**, in a lockable cabinet (most current records are on My Concern Safeguarding Software)
 - Historical relating to major incidents and accidents involving the pupil

- Historical notes indicating child protection disclosures and reports
 - Historical information relating to exclusions
 - Notes indicating that records of complaints made by parents or the pupil are held
 - Correspondence with parents about minor issues, e.g. behaviour
- 3.5. The following information is stored in the **SEND** locked cabinet, :
- Any information about an education and healthcare (EHC) plan and support offered in relation to the EHC plan
 - Any correspondence with parents or external agencies relating to major issues.
- 3.6. The following information is stored in **the school offices** in a locked cabinets:
- Admissions form
 - Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
 - Absence notes
 - Index of pupil's name, address, parental and GP contact details
- 3.7. Electronic copies of accident and incident information are stored separately on Assessnet and held in line with the retention periods outlined in this policy. An additional copy may be placed in 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 if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, the member of staff responsible for disposing records, will remove these records.
- 3.10. Electronic records relating to a pupil's record will also be transferred to the pupils' next school.
- 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 is 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 records

Different classes of records have different retention periods. The following is a broad summary. Details can be found in the Appendices.

Types of record	Length of retention period
The majority of admin records	Current academic year plus 3 years
All financial records	Current financial year plus 6 years
Most personnel records (but see Appendix for details)	Six years after a member of staff has left. Before archiving, files will be checked for any data subject to a different retention period.
Classroom records eg timetables, mark books, class lists	Current academic year plus 1 year
Pupil record – electronic and class files SEN records Child Protection records	Passed on to next school
Recruitment information about unsuccessful candidates	Six months
Trip permission slips when no major incident has occurred.	Do not need to be kept
Trip permissions where there has been a major incident	Long term – see Appendix for more information
Records of accidents and injuries	Long term – see Appendix for more information
Signed minutes of governors meetings and any papers referred to in them Documents relating to occupation or ownership of school site (eg lease)	Permanent

5. Storing and protecting information

- 5.1. Data protection staff 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.

- 5.2. Where possible, backed-up information will be stored off the school premises, using a central back-up service operated by the LA.
- 5.3. Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.
- 5.4. Confidential paper records are not left unattended or in clear view when held in a location, or at a time, with general public access.
- 5.5. All class-based personal data is stored securely on the cloud (Google drive) and only shared with staff members who need to see it.
- 5.6. No data is saved on removable storage or a portable device.
- 5.7. Memory sticks are not used to hold personal information in any circumstances.
- 5.8. All teacher laptops are password-protected to protect the information on the device in case of theft.
- 5.9. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 5.10. If staff and governors use their personal laptops or computers for school purposes, no personal data should be stored on these devices.
- 5.11. All members of staff are provided with their own secure login and password for laptops and the domain. Staff may choose their email password but it must be a safe password.
- 5.12. Emails must not contain sensitive or confidential information but may share a link to a document containing sensitive or confidential information on the Google drive.
- 5.13. Circular emails to parents are sent through Weduc, so email addresses are not disclosed to other recipients. If emails are sent in any other way, they are sent blind carbon copy(bcc)
- 5.14. When sending confidential information by fax, members of staff always check that the recipient is correct before sending.
- 5.15. Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the GDPR, 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.

- 5.16. Before sharing data, staff always ensure that:
- They know the legal basis for sharing the data
 - They have consent from data subjects to share it if this is necessary.
 - Adequate security is in place to protect it.
 - The data recipient has been outlined in a privacy notice.
- 5.17. 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.
- 5.18. 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.
- 5.19. The physical security of the school's buildings and storage systems, and access to them, is reviewed termly by the premises officer in conjunction with the business manager/data protection staff. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the headteacher and extra measures to secure data storage will be put in place.
- 5.20. The school takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.
- 5.21. The data protection staff are responsible for continuity and must have recovery measures in place to ensure the security of protected data.

6. Accessing information

- 6.1. Stonebow Primary School is transparent with data subjects, the information we hold and how it can be accessed.
- 6.2. All members of staff, parents of registered pupils and other users of the school, e.g. visitors and third-party clubs, 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 provide and withdraw consent to information being held.
 - Understand what the school is doing to comply with its obligations under the GDPR.
- 6.3. All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the GDPR, to access certain personal data being held about them or their child.

- 6.4. Personal information may at the discretion of the headteacher, be shared with pupils before they are considered to be at an appropriate age to make decisions for them selves (usually 12) although, this information can still be shared with parents.
- 6.5. Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights. This is generally felt to be over the age of 12, but may still apply to pupils at this school in certain circumstances.
- 6.6. The school will adhere to the provisions outlined in the school's Data Protection Policy when responding to requests seeking access to personal information.
- 6.7. The data will be archived to dedicated files on the school's server, which are password-protected.
- 6.8. Memory sticks will never be used for the storage of digital data.
- 6.9. The Computer Manager will review new and existing storage methods annually.
- 6.10. When records have been identified as needing to be retained for a long period, a digital continuity statement will be written to ensure the records remain accessible. The following information will be included within the digital continuity statement:
 - A statement of purpose and requirements for keeping the records
 - The names of the individuals responsible for long term data preservation
 - A description of the information assets to be covered by the digital preservation statement
 - A description of when the record needs to be captured into the approved file formats
 - A description of the appropriate supported file formats for long-term preservation
 - A description of the retention of all software specification information and licence information
 - A description of how access to the information asset register is to be managed in accordance with the GDPR

7. Information audit

- 7.1. 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 the GDPR. This includes the following information:
 - Paper documents and records
 - Electronic documents and records

- Databases
 - Sound recordings
 - Video and photographic records
 - Hybrid files, containing both paper and electronic information
- 7.2. The information audit may be completed in a number of ways, including, but not limited to:
- 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.
 - Review of suppliers and third party data processors using GDPRiS software.
 - A mixture of the above
- 7.3. The DPO is responsible for completing the information audit. The information audit will include the following:
- The school's data needs
 - The information needed to meet those needs
 - The format in which data is stored
 - How long data needs to be kept for
 - Vital records status and any protective marking
 - Who is responsible for maintaining the original document
- 7.4. The DPO will consult with staff members involved in the information audit process to ensure that the information is accurate.
- 7.5. Once it has been confirmed that the information is accurate, the DPO will record all details on the school's Information Asset Register.
- 7.6. The information displayed on the Information Asset Register will be shared with the headteacher to gain their approval.

8. Disposal of data

- 8.1. 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.
- 8.2. 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.
- 8.3. Where the disposal action is indicated as reviewed before it is disposed, the data protection staff will review the information against its administrative value

– if the information should be kept for administrative value, the data protection staff will keep a record of this.

- 8.4. 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.
- 8.5. Where information has been kept for administrative purposes, the DPO will review the information again after three years and conduct the same process. If it needs to 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 three subsequent years.
- 8.6. Where information must be kept permanently, this information is exempt from the normal review procedures
- 8.7. All paper records will be disposed of by secure shredding by LEA contractor.

9. Monitoring and review

- 9.1. This policy will be reviewed by governors every three years.
- 9.2. Any changes made to this policy will be communicated to all members of staff and the governing board.

Appendix 1: Retention of pupil records and other pupil-related information

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.

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

Type of file	Retention period	Action taken after retention period ends
Pupils' records		
Pupil's admission form	While the pupil attends the school	If information is all on SIMS, paper copy may be securely disposed of. Check nothing has been stapled on.
Proof of address (supplied as part of the admissions process)	Attached to pupil admission form	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	Added to the pupil's admission form	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was not successful)	Until the appeals process has been completed	Securely disposed of
Pupils' educational records	Whilst the pupil remains at the school	Transferred to the next 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
Assessment information	Added to the pupil's record	Securely disposed of - shredded
Child protection records held in a separate file	25 years after the pupil's date of birth, so passed to next school when pupil leaves	Securely disposed of – shredded
Attendance registers	Last date of entry on to the register, plus three years	Securely disposed of

Letters authorising absence	Current academic year, plus three years	Securely disposed of
SEND		
SEND files, reviews and individual education plans	All SEN records should be forwarded to the next school the pupil attends	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 or an EHC plan maintained under section 37 of the Children and Families Act 2014 (and any amendments to the statement or plan)	All SEN records should be forwarded to the next school the pupil attends	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	All SEN records should be forwarded to the next school the pupil attends	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	All SEN records should be forwarded to the next school the pupil attends	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
Curriculum management		
SATs results	Results should be entered on the pupil's record and transferred to the next school. Composite lists may be retained for the current year plus 6 years.	Securely disposed of
Examination papers	Until the appeals/validation process has been completed	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 retained for the current academic year, plus one year	Securely disposed of
Schemes of work, timetables, class records, mark books, records of homework set	Current plus 1 year	It may be appropriate to review the records at the end of each year and allocate a further retention period – or securely disposed of.
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip	Securely disposed of.
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

Appendix 2: Retention of staff records

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

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
Staff members' personal file	Termination of employment, plus six years	Securely disposed of
Timesheets and absence records	Current academic year, plus six years	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus six years.	Securely disposed of
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 eight 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.	Securely disposed of
DBS certificates	This should be retained by the certificate holder. If a copy is taken it should not be retained for more than six months	A note of the certificate number held in school and the certificate retained by the person
Proof of identify as part of the enhanced DBS check	After identity has been proven	Reviewed and a note kept of what was seen and what has been checked – if it is necessary to keep a copy this will be placed on the staff member's personal file, if not, securely disposed of
Evidence of right to work in the UK	Added to staff personal file	Securely disposed of

Child protection allegations, including where the allegation is unproven	Added to staff personal file, and until the individual's normal retirement age, 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 above	Securely disposed of

Appendix 3: Retention of management records

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.

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
Governing board		
Agendas for governing board meetings	One copy alongside the original set of minutes – all others disposed of without retention	Securely disposed of
Original, signed copies of the minutes of governing board meetings	Permanent	Stored permanently
Inspection copies of the minutes of governing board meetings	Date of meeting, plus three years	Shredded if they contain any sensitive and personal information
Reports presented to the governing board	Minimum of six years, unless referred to directly in the minutes – these are kept permanently	Securely disposed of or, if they refer to individual reports, retained with the signed, original copy of minutes
Instruments of government, including articles of association	Permanent	Stored permanently
Trusts and endowments managed by the governing board	Permanent	Retained in the school whilst it remains open, then provided to the County Archives service when the school closes
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
Proposals concerning changing the status of the school	Date proposal accepted or declined, plus three years	Securely disposed of

Headteacher and senior leadership team (SLT)		
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
Health and safety		
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
Control of substances hazardous to health	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
Fire safety management documents	Current academic year, plus six years	Securely disposed of
Property management		
Title deeds of properties belonging to the school	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the school	For as long as the building belongs to the school	Transferred to new owners if the building is leased or sold
Leases of property leased by or to the school	Expiry of lease, plus six years	Securely disposed of
Maintenance		
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 carried out by school employees	Current academic year, plus six years	Securely disposed of

Appendix 4: Retention of financial records

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.

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
Payroll pensions		
Maternity pay records	Current academic year, plus three years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current academic year, plus six years	Securely disposed of
Risk management and insurance		
Employer's liability insurance certificate	Closure of the school, plus 40 years	Securely disposed of
Asset management		
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
Accounts and statements including budget management		
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, requisitions and 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

Records relating to the letting of school premises	Current financial year, plus six years	Securely disposed of
Contract management		
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
School meals		
Free school meals registers	Current academic year, plus six years	Securely disposed of
School meals registers	Current academic year, plus three years	Securely disposed of
School meals summary sheets	Current academic year, plus three years	Securely disposed of

Appendix 5: Retention of other school records

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.

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
Operational administration		
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