



**Thistly Meadow Primary School**

**RECORDS MANAGEMENT POLICY**

# THISTLY MEADOW PRIMARY SCHOOL

## RECORDS MANAGEMENT POLICY

Thistly Meadow Primary 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.

### **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.

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.

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.

### **Responsibilities**

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, schools are responsible for ensuring that the collation, retention, storage and security of all personal information they produce and hold meets the provisions of this legislation.

The person with overall responsibility for this policy is the Head teacher. The School Business Manager will give guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely manner. 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.

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.

## **Managing Pupil Records**

The pupil record should be seen as 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. These guidelines are based on the assumption that the pupil record is a principal record and that all information relating to the pupil will be found in the file (although it may spread across more than one file).

Paper records are kept in lockable storage areas with restricted access. Records held in electronic format, for example the SIMS pupil database, have restricted access to key personnel. Access arrangements for pupil records 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.

A pupil or their nominated representative have the legal right to see their file at any point during their education and even until the record is destroyed (when the pupil is 25 years of age or 35 years from date of closure for pupils with special educational needs). This is their right of subject access under the Data Protection Act 1998. It is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

### **Pupil File**

The main file containing the pupil record is held in the school office. 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. Items which should be included in the pupil record are:

- Admission form which will include:
  - Surname
  - Forename
  - DOB
  - Preferred name
  - Special Educational Needs
  - Parent/Carer and Emergency contact details
  - Gender
  - Position in family (siblings)
  - Ethnic origin
  - Language of home (if other than English)
  - Names of parents and/or guardians with home address and telephone number (and any additional relevant carers and their relationship to the child)
  - Name of the school, and the date of admission and the date of leaving.

This information is entered into the pupil's electronic record.

The following information is usually in paper format:

- Parental consents (internet, photos, media etc.)
- Assessnet report\* and any information relating to a major incident involving the child (either an accident or other incident)
- Any reports written about the child
- Any relevant medical information
- Any information relating to exclusions (fixed or permanent)
- Any correspondence with parents or outside agencies
- Details of any complaints made by the parents or the pupil

*\*Assessnet accident reports are also stored separately and retained on the school premises until their statutory retention period is reached.*

The following are subject to shorter retention periods and if they are placed on the file then it will involve reviewing once the pupil leaves the school.

- Absence notes (filed with daily registers)
- Parental consent forms for trips/outings (if not electronic consent). 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

### **Special Educational Needs and Disabilities (SEND)**

Records relating to a child's special educational needs and or disabilities will be held in a separate SEND file by the SENCO.

This will include:

- Any relevant medical information
- Any other medical involvement e.g. speech and language therapist, paediatrician
- Any information about a statement and support offered in relation to the statement

### **Safeguarding records**

Safeguarding records are stored separately on the schools secure online CPOMS systems to which only authorised staff have access.

### **Transferring records to a pupil's new school**

The pupil's common transfer file (CTF) should be sent to the new school either:

- through the School to School (s2s) secure file transfer system
- over the agreed secure network for Leicestershire

If the new school is unknown, the Department for Education recommends that the school should still complete the CTF and load it onto s2s. Where a CTF has not been received for a new pupil a request can be made to the LA to search for the files on s2s.

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.

Files should not be sent by post unless absolutely necessary. Documents should be listed on a schedule and signed for by the receiving school/SENCO. If files are sent by post, they should be sent by registered post with an accompanying list of the files. The receiving school should sign and return a copy of the list to say that they have received the files.

Safeguarding records are transferred to the child's new school by secure online transfer using the CPOMS system if the recipient school uses the same system, or hand delivered (or by registered post) by the designated safeguarding lead (DSL) to the receiving DSL and signed for.

### **Responsibility for the pupil record once the pupil leaves the school**

The school which the pupil attends until statutory school leaving age (or the school where the pupil completed sixth form studies) is responsible for retaining the pupil record until the pupil reaches the age of 25 years. This retention is set in line with the Limitation Act 1980 which allows that a claim can be made against an organisation by a minor for up to 7 years from their 18th birthday.

### **Electronic Records**

The legal obligation to properly manage records, including compliance with Data Protection legislation, applies equally to electronic records. The main considerations for the management of electronic records are therefore the same as those for manual records. They include:

- Staff must be able to use and access electronic information effectively.
- Adequate measures must be in place to ensure all information is stored securely and only available to authorised persons.
- A school must be able to demonstrate a record's authenticity by ensuring information cannot be altered when declared a record.
- A system must be in place for disposing of electronic records in line with policy once they are no longer needed.

In addition to the above, sufficient backup/recovery processes must be in place. There must also be a process through which links are created from electronic records to any associated manual records. This is to ensure a full record can be considered when necessary, i.e. when decision making, providing access or considering a record for disposal.

### **Safe destruction of the pupil record**

Files should be disposed of in line with current guidance, for example, the IRMS Information Management Toolkit for Schools <http://irms.org.uk/page/SchoolsToolkit> . All personal information will be shredded before disposal. Electronic data will be archived on electronic media and 'deleted' appropriately at the end of the retention period.

### **Transfer of a pupil record outside the EU area**

If the school receives a request to transfer a pupil file outside the EU area because a pupil has moved into that area, the school will refer to the Local Authority for further guidance.

### **Relationship with existing policies**

This policy has been drawn up within the context of:

- Freedom of Information Act policy
- Data Protection policy

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