

COURTWOOD PRIMARY SCHOOL

Document Retention Policy

Approved by the full Governing Board

On

19 November 2019

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DOCUMENT CONTROL

Authorisation

Authorised by: Local Governing Body

Date: 19th November 2019

Change History

Editor	Comment	Date	Version
T Farrelly		May 2016	1.0
FGB	Agreed by the Full Governing Board	17 May 2016	2.0
N Grant	Reviewed and amended	Nov 2019	3.0
LGB	Approved by the LGB	19.11.19	4.0

Document References

#	Title	Date	Version
1	White Paper: Retention Guidelines for Schools		
2	IRMS Schools Toolkit	Sept 2018	

Distribution List

Name	Date	Method
Admin staff	May 2016	Fronter
Governors	May 2016	Fronter

INTRODUCTION

Purpose

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. It covers:

Background

Scope of the Policy Responsibilities Recording Systems Safe Disposal of Information Using Retention Schedule Monitoring and Review Relationship with existing policies

Abbreviations

Abbreviation	Meaning
MCP	Medical Care Plan
CPOMs	Safeguarding Programme used to record concerns
SENDCO	Special Educational Needs and Disabilities Co-ordinator
CLA	Children Looked After
CAF	Common Assessment Framework
TAF	Team Around the Family

POLICY

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, received or maintained in hard copy or electronically.

The school needs to create and maintain accurate records in order for it to function. The policy for managing records at Courtwood Primary School has been drawn up in conformity with legislation, regulations affecting schools and best practice as publicised by the Records Management Society of Great Britain.

This policy sets out guidelines for recording, managing, storing and disposing of data, whether they are held on paper or electronically in order to assist staff, and the School, to comply with the General Data Protection Regulation (2018) and the Freedom of Information Act 2000 (FIA). It should be read and used in conjunction with the following school policies and documents:

- GDPR Policy
- Privacy Notices
- Information Asset Register

Members of staff are expected to manage their current record keeping systems using the Retention Policy and to take account of the different kinds of retention periods when they are creating new record keeping systems.

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. This should be done in liaison with the local authority archives centre.

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 Teacher.

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 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.

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).

Current Pupil Records

A file is kept on each pupil in a locked filing cupboard within their classroom. The file holds hard copies of information about that pupil e.g. school reports, reports from external agencies, and copies of letters. The information held on the school's electronic database SIMS is provided by parents on admission. Information includes: the pupil's name, address, house, emergency contact details, free school meals status, statutory test results and daily attendance. Confidentiality of personal information is protected in accordance with the Data Protection Policy.

Pupils with Special Educational Needs

The names of pupils with special educational needs are recorded in SIMS and information regarding these individual pupils are made available to those staff with a need to know that information. Electronic copies of documents are stored, securely, on the staff server managed by our SENDCO.

Pupils receiving Pupil Premium (PP) funding / Children Looked After (CLA) / Military funding

The names of pupils in receipt of additional funding due to their PP, CLA, post-CLA or military family status are recorded in SIMS. Information regarding these individual pupils are made available to staff with a need to know that information. Electronic copies of PP review / CLA review documents are stored on CPOMs managed by The Senior Leadership Team. Paper copies of review documents are stored within pupils' folders.

Medical Records

Information regarding medical needs is provided by parents / carers on admission. Information provided includes any significant known drug reactions, major allergies and notable medical conditions. This information is available to staff likely to administer medication or treatment. This information is shared with external providers (trips) or external bodies (caterers) only with parental permission.

All students who have a more serious level of medical need (e.g. diabetes, anaphylaxis) have an individual Medical Care Plan (MCP) which is put together by the parents/guardian with the GP's/consultant's instructions for care within school should the event arise. The MCPs are then checked by our SENDCO and stored securely on the staff server and/or CPOMs.

Record Keeping and Retention Policy 2018 Page 3 of 14 These records will be shared with school staff to ensure pupil safety. The photographs of children (for whom parents have given permission) will be displayed in the staff room to help identification. The SENDCo holds the original copies in a locked cabinet in their office. These records are shared with the medical services in case of emergency.

Financial Records

The office staff have access to information regarding school dinner payments and school trip payments. All other financial records are stored at The Collegiate Trust.

Access by Staff

All teaching and office staff are able to access the school's password protected database (SIMS). Teaching staff may consult the pupil records held in the School Office including emergency contact phone numbers. Other data e.g. discretionary absence request letters / attendance letters etc. are stored securely and only available to the necessary staff on request.

Data Protection Policy

Parents accept a place for their child at Courtwood Primary School in the knowledge that data about pupils and their parents will be collected on admission to allow for the efficient operation of the school. This data will be updated regularly and stored/ processed in order with the GDPR (2018) rules for good information handling.

Retention Periods

The table at the end of this policy provides guidance on retention periods for different records held by Courtwood Primary School. Unless there is a specific statutory obligation to hold or destroy records, the retention periods are established by the school for guidance purposes.

Disposal of Data

When information is no longer required, it can be disposed of. Files should be disposed of in line with the attached retention schedule (Records Management Toolkit for Schools-Retention Guidelines). This is a

process which should be undertaken on an annual basis during the month of August. For confidential, sensitive or personal information to be considered securely disposed of, it must be in a condition where it cannot either be read or reconstructed. Skips and 'regular' waste disposal are not considered to be secure.

Paper records should be shredded using a cross-cutting shredder; CDs / DVDs / diskettes should be cut into pieces. Hard-copy images, AV recordings and hard disks should be dismantled and destroyed. Where third party disposal experts are used they should ideally be supervised but, in any event, under adequate contractual obligations to the school to process and dispose of the information securely.

Table of Data/Document Retention Periods

1. 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 Protection Issues	Retention Period	Action at the end of the administrative life of the record	Child Protection
Child Protection Files	Yes	Until child leaves Courtwood Primary then transfer to the new education provider	DO NOT DESTROY ANY RECORDS	Information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (i.e. the information does not need to be sent to a university, for example). Where a child is removed from roll to be educated at home – or is registered as missing in education - the file should be copied to the Local Education Authority.
Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Until the person's normal retirement age, or 10 years from the date of the allegation if that's longer	SHRED	<p>ICO Employment Practices Code: Supplementary Guidance 2.13.1 (Discipline, grievance and dismissal)</p> <p>"Records of allegations about workers who have been investigated and found to be without substance should not normally be retained once an investigation has been completed. There are some exceptions to this where for its own protection the employer has to keep a limited record that an allegation was received and investigated, for example, where the allegation relates to abuse and the worker is employed to work with children or other vulnerable individuals".</p> <p>Summary record to be retained on confidential personnel file, and a copy given to the person concerned.</p>

2. Governors & Academy Committee Meetings				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Instrument of Government including articles of association	No	Permanent	ARCHIVE	Stored at The Collegiate Trust Office
Governors minutes – principle set signed with appropriate agenda & any reports referred to	Confidential minutes	Permanent	ARCHIVE	Stored at Courtwood Primary School / SharePoint
Governors eligibility forms, training logs and pecuniary interests forms	Yes	Retain during governor's term of office	SHRED	Stored at The Collegiate Trust Office
Governor documentation - agendas, action plans and policy documents	No	Date of meeting +3 years	SHRED	Stored at Courtwood Primary School / SharePoint
Governor reports	No	Date of meeting + 6 years	SHRED	Stored at Courtwood Primary School / SharePoint

3. Staff Records				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	
Staff personnel files	Yes	7 years from when staff member leaves (oral or written 1 warning 6 months, warning 2 12 months, final warning 18 months, maternity 3 years	SHRED	Within 6 months of staff member leaving all documentation should be printed and in staff personnel file. Everything else deleted from individual files / folders / server.
Staff historic allegation files	Yes	10 year from allegation or normal retirement age (whichever is longer)	SHRED	Within 6 months of staff member leaving all documentation should be printed and in staff personnel file. Everything else deleted from individual files / folders / server
Staff appraisal files	Yes	5 years	SHRED	By October, following academic year - all documentation should be printed and in staff personnel file. Everything else deleted from individual files / folders / server
Emergency contacts folder - staff	Yes	Updated termly and previous records removed.	SHRED	Only latest copy to be retained
Appointment documents, unsuccessful candidates	Yes	6 months	SHRED	Ensure all emails / files stored electronically are deleted after interview / selection date
Trainee Teacher records	Yes	All copies to be deleted at end of placement and submission of final report; except final report to be kept by mentor / HT for 3 years (may be required for references) and then deleted.	SHRED/ DELETE	Ensure all electronic documents removed by mentor / class teachers etc. Teacher training college to provide BCPS / student with user agreement re. data
Teacher mark book / folder	Yes	Current year + 1	SHRED	
Assessment files	Yes	Destroy 6 months after end of school year once data stored electronically	SHRED	

4. Pupil Information				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	Basic file description
Early Help Assessment records / CAF / TAF	Yes	Retain for 6 years after plan created. Staff to delete from own PC / memory stick annually	SHRED / DELETE	Ensure each updated copy is signed and copy stored in pupil's folder and in central file on office shared server.
Books, folders & test papers	Yes	Send books / papers home and shred test papers after 1 year	SHRED / SEND HOME	Shred front page of test papers – remainder can be recycled
Pupil Premium tracking documents / passports. CLA tracking.	Yes	Sent with child to next school	SHRED / DELETE	Ensure each updated copy is signed and copy stored in pupil's folder and in central file on office shared server.
Pupil folders	Yes	Sent with child to next school	SEND TO NEXT SCHOOL	
Behaviour slip book / record	Yes	2 years after incident	SHRED	Copies of letters re. behaviour slips to be stored in manilla folders.
Emergency pupil contacts register & medical list	Yes	12 months	SHRED / DELETE	
SEN folders / plans / TAF / Behaviour plans.	Yes	Retain for 6 years after plan created. Staff to delete from own PC/ memory stick annually.	SHRED / DELETE	Within 3 months of child leaving all documentation should be printed and in SEND folder. Everything else deleted from files / server / folders.
Intimate care plans / Manual handling risk assessments	Yes	Retain for 6 years after plan created	SHRED / DELETE	Within 3 months of child leaving all documentation should be printed and in SEND folder. Everything else deleted from files / server / folders.
Medical Health Assessments including dietary assessments	Yes	Updated termly unless changes warrant this sooner. Latest copy retained until child has left the school.	SHRED / DELETE	

5. Curriculum				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	Basic file description
Data Tracker FFT Aspire	Yes	1 year beyond pupil leaving primary school	DELETED BY FFT ASPIRE	Ensure FFT Aspire GDPR compliant
Data Tracker NCA Tools	Yes	1 year beyond pupil leaving primary school	DELETED BY NCA TOOLS	Ensure NCA Tools GDPR compliant
Data Tracker Perspective Lite	Yes	1 year beyond pupil leaving primary school	DELETED BY PERSPECTIVE LITE	Ensure Perspective Lite GDPR compliant

6. SLT / Office records				
Basic file description	Data Protection Issues	Retention Period	Action at the end of the administrative life of the record	Basic file description
Behaviour / anti-bullying logs	Yes	Retained whilst pupil at primary school	SHRED	Escalating concerns to be recorded as risk reduction
Accident / incident report	Yes	7 years after incident for adults; 25 years after birth for children	SHRED	
First Aid books	Yes	Date of incidents plus 12 year adults, 25 years from DOB for child. More serious incidents longer	SHRED	
Emergency contacts folder - pupils	Yes	Update annually at least	SHRED	
Medicine administration records	Yes	1 year. Emergency non-routine medicine - records to be kept for 21 years and 6 months from date of birth.	SHRED	
Signing in / out book / late book	Yes	1 year	SHRED	
Admissions documentation, parent correspondence	Yes	Delete when processed via SIMS or matter resolved	SHRED	Ensure SIMS GDPR compliant