



Records Management Policy - Pupil Data

Policy Title	Records Management Policy
Statutory	No
Policy Version	2
Policy Author	Mrs A Majcher
Ratified By	Resources Committee
Date Ratified	December 2019
Review Period	3 years
Next Review Period	Autumn 2022
Distributed To	All
To be published on website	Yes
Changes to this policy	Updated in line with the revised IRMS Toolkit for Schools 2019
<p>This policy has been impact assessed against race, gender and disability and no adverse impact has been identified.</p>	

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:

- Scope
- Responsibilities
- Relationships with existing policies

1 Scope of the policy

1.1 This policy applies to all pupil records created, received or maintained by staff of the school in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the school.

1.2 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 electronic format e.g. paper documents, scanned documents, e-mails which document business activities and decisions, audio and video recordings, text messages, notes of telephone and Skype conversations, spreadsheets, Word documents, presentations etc.

2 Responsibilities

2.1 The governing body of a school has a statutory responsibility to maintain the school records and record keeping systems in accordance with the regulatory environment specific to the school. The responsibility is usually delegated to the Head Teacher of the school.

2.2 The person responsible for day-to-day operational management in the school will give guidance on 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.

2.3 The school will manage and document its records disposal process in line with the Records Retention Schedule (see Appendix A). This will help to ensure that it can meet Freedom of Information requests and respond to requests to access personal data under data protection legislation (subject access requests "SARS"). For more information on records management, please view the IRMS Toolkit for Schools at <https://irms.org.uk/page/SchoolsToolkit>

2.4 Individual staff and employees must ensure, with respect to records for which they are responsible, that they:

- 2.4.1 Manage the school's records consistently in accordance with the school's policies and procedures;
- 2.4.2 Properly document their actions and decisions;
- 2.4.3 Hold personal information securely;
- 2.4.4 Only share personal information appropriately and do not disclose it to any unauthorised third party;
- 2.4.5 Dispose of records securely in accordance with the school's Records Retention Schedule.

3. Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information policy
- Data Protection policy
- Information Governance Policy and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

Signed: _____ Head Teacher





CARRINGTON JUNIOR SCHOOL
PUPIL MANAGEMENT RETENTION SCHEDULE - PRIMARY

Pupil's Educational Record				
Basic file description	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	Personal Information
<p>Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.</p>				
Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 as amended by SI 2018 No 688			Yes
Primary		Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school. This will include: <ul style="list-style-type: none"> • to another primary school • to a secondary school • to a pupil referral unit 	
Child Protection information held on pupil file	"Keeping children safe in education Statutory guidance for schools and colleges September 2018"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children September 2018"	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file. Note: These records will be subject to any instruction given by IICSA	SECURE DISPOSAL – these records MUST be shredded	Yes

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Child Protection information held in separate files	“Keeping children safe in education Statutory guidance for schools and colleges September 2018”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children September 2018”	DOB of the child + 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record Note: These records will be subject to any instruction given by IICSA	SECURE DISPOSAL – these records MUST be shredded	Yes
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Attendance

Basic file description	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	Personal Information
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Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.

Attendance Registers	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made.	SECURE DISPOSAL	Yes
Correspondence relating to authorised any absence (authorised or unauthorised)	Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL	Potential

Special Educational Needs				
Basic file description	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record	Personal Information
<p>Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.</p>				
Special Educational Needs files, reviews and Education Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Children and Family's Act 2014; Special Educational Needs and Disability Act 2001 Section 14	Date of Birth of the pupil + 31 years [Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan in line with the Limitation Act]	SECURE DISPOSAL	Yes