



Records Management Policy - Pupil Data

Policy Title	Records Management Policy
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Policy Author	Mrs A Majcher
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Changes to this policy	N/A
This policy has been impact assessed against race, gender and disability and no adverse impact has been identified.	

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.
- 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 or received, and then stored, in hard copy or electronically.

2 Responsibilities

- 2.1 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.
- 2.2 The person responsible for records management in the school (Head Teacher) 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.
- 2.3 Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with this document.

3 Relationship with existing policies

This policy has been drawn up within the context of:

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

Signed:  Head Teacher

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 cover).

1. File covers for pupil records

It is strongly recommended that schools use a consistent file cover for the pupil record. This assists the school to ensure consistency of practice when receiving records from a number of different schools.

Using pre-printed files ensures all the necessary information is collated and the record looks tidy and reflects the fact that it is the principal record containing all the information about an individual child.

2. Recording information

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/GDPR 2018. It is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

Pupils have a right of access to their educational record and so do their parents under the Education (Pupil Information) (England) Regulations 2005. A pupil or their nominated representative has a right to see information held about them. This right exists until the point that the file is destroyed. Therefore, it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

Primary School Records

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. If pre-printed file covers are not being used then the following information should appear on the front of the paper file:

- Surname
- Forename
- DOB
- Unique Pupil Number

On the Data Collection form the following information is accessible:

- Basic pupil data
- Names of parents and/or guardians with home address and telephone number (and any additional relevant carers and their relationship to the child)
- Medical and dietary information
- Mode of transport to school
- Ethnic origin [although this is “sensitive” data under the Data Protection Act 1998/GDPR 2018, the Department for Education require statistics about ethnicity]
- Home Language
- Country of birth
- Religion
- First Language
- Nationality

3. Items which should be included in the pupil record

- If the pupil has attended an early years setting, then the record of transfer should be included on the pupil file
- Admission form (application form)
- Privacy Notice [if these are issued annually only the most recent needs to be on the file]
- Photograph Consents
- Annual written report to parent
- Any reports written about the child
- Any information relating to a major incident involving the child (either an accident or other incident)
- Any reports written about the child
- Any information relating to exclusions (fixed or permanent)
- Any correspondence with parents or outside agencies relating to major issues
- Details of any complaints made by the parents or the pupil
- Any SEN correspondence/reports/plans securely stored in the SENDCo’s office.
- Child protection reports/disclosures securely stored with the DSL

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

- Absence notes
- Parental consent forms for trips/outings [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
- Accident forms (these should be stored separately and retained on the school premises until their statutory retention period is reached. A copy could be placed on the pupil file in the event of a major incident)

4. Responsibility for the pupil record once the pupil leaves the school

The pupil record will be retained whilst the child remains at the school. Please see Appendix A, Pupil Management retention Schedule for Primary schools.

The school which the pupil attended 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.

5. Safe destruction of the pupil record

The pupil record should be disposed of in accordance with the safe disposal of records guidelines.

6. Transfer of a pupil record outside the EU area

If the school is requested to transfer a pupil file outside the EU area because a pupil has moved into that area, the school should contact the Local Education Authority for further advice.

7. Storage of pupil records

All pupil records should be kept securely at all times. Paper records, for example, should be kept in lockable storage areas with restricted access, and the contents should be secure within the file. Equally, electronic records should have appropriate security.

Access arrangements for pupil records should 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.

Retention Schedule for Primary Schools

The retention schedule (Appendix A) contains recommended retention periods for pupil management in maintained schools. If records are to be kept for longer or shorter periods than laid out in this document the reasons for this need to be documented.

This schedule should be reviewed on a regular basis.