



Barnham Primary School

Document Retention and Management – Whole School Process

This Whole School Process is based on guidance from the IRMS Information Management Toolkit for Schools – which provides direction for all schools in managing information in line with current legislative frameworks. This is a whole school process for operational use. Full guidance on document retention and management should be sought from the IRMS guide - Retention Guidelines for Schools below.

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 organisation. 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

Scope of the policy

This policy applies to all records created, received or maintained by permanent and temporary 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.

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.

A small percentage of the school's records will be selected for permanent preservation as part of the organization's archives and for historical research.

Responsibilities

The Trustee Body 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 Headteacher of the school.

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 The school will manage and document its records disposal process in line with the Records Retention Schedule. 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").

- Individual staff and employees must ensure, with respect to records for which they are responsible, that they: Manage the school's records consistently in accordance with the school's policies and procedures;
- Properly document their actions and decisions;
- Hold personal information securely;
- Only share personal information appropriately and do not disclose it to any unauthorised third party;
- Dispose of records securely in accordance with the school's Records Retention Schedule.

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.

Pupil Records

All schools, with the exception of independent schools are under a duty to main a pupil record for each pupil. The pupil file should be seen as the core record charting an individual pupil's progress through the Education System. The pupil file 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 file 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).

Barnham Primary School Pupil records

Files will be stored centrally in the Inclusion Coordinator's Office.

A pupil record will be started for each child when they join the school, either at the start of Year R or for in-year joiners as and when they start.

The file will include:





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)
Consents
Annual Written Report to Parents

Child protection files are stored separately in the School Business Manager's office. Pupil files will indicate if they have a child protection file.

SEND/ECHP files are stored in the Inclusion Coordinator's Office

Complaints – information relating to complaints will be stored in the SBMs office in a separate folder.

In addition to the paper pupil record, during their time at the school, each pupil will have an electronic running log where information relating to on-going issues, concerns or any other relevant information will be recorded. This could include, behavioural matters, correspondence from parents/carers and any other information which helps to ensure that the school is effectively looking after the safety, wellbeing and educational needs of the child.

Absence notes, trip consent forms (in the event of a major incident) correspondence with parents about minor issues and accidents forms should not be stored on the pupil record as they have different retention periods.

Transferring the Pupil Record to the Secondary School

The pupil record should not be weeded before transfer to the secondary school unless any records with a short retention period have been placed in the file. It is important to remember that the information which may seem unnecessary to the person weeding the file may be a vital piece of information required at a later stage.

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 be sent in-line with the Policy for the Transfer of Pupil Folders Between Schools – WSCC guidance. See Appendix A

Electronic documents that relate to the pupil file also need to be transferred, or, if duplicated in a master paper file, destroyed.

BPS running Log and data collection sheet should be added to the pupil file and follow the pupil as set out above





Responsibility for the Pupil Record Once the Pupil Leaves the School

The school which the pupil attended until statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25 years. [See the retention schedule for further information].

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 authorized to see it.

Running Logs

Running logs are stored on the school's server on the Teacher Drive. Access to the School's IT systems is limited by password.

The running logs are also password protected.

Emails

Emails make up a large majority of the communication that takes place between school, parents, Trustees and agency partners. Email is not always a secure medium to send confidential information. When sending personal or sensitive data, the information will be sent as a password protected document. The password will be sent in a separate email. A delivery and read receipt will be requested via the email system. Never put personal information, such as the pupils name in the subject line of an email. All electronic communications, whilst they are held, are disclosable under Freedom of Information and Data Protection legislation. Be aware that anything you write in an e-mail, an Instant Message (IM), a text, or on a message board, could potentially be made public. Electronic communications are very easy to copy and transmit and although you may have deleted your copy the recipients may not. Because of this they can form part of your records, commit you to contracts and expose the school to risk if used badly.

Consideration should be given to the number of recipients of an email, ensuring that everybody really needs the information before sending. When emailing groups of external recipients, the BCC option should be used so that recipients do not receive everyone else's email address.





How long do we keep e-mails?

E-mail is a communications tool, and e-mail applications are not designed for keeping e-mail as a record. E-mail that needs to be kept should be identified by content, for example:

- Does it form part of a pupil record?
- Is it part of a contract?
- Does it relate to an employee?

The retention for keeping these e-mails will then correspond with the types of records found in the Retention Schedule for schools below.

Retention Guidelines

This retention schedule sets out the length of time which records and documents needs to be retained and the action that should be taken when it is of no further administrative use. Staff are expected to manage their record keeping systems using this schedule and to take account of the different kinds of retention periods when they are creating new record keeping systems. Those with specific responsibility are listed on the schedule. Records must be reviewed annually and the appropriate retention or disposal actions taken.

Secure disposal means confidential waste bins or shredding

The School follows the guidance in The Information and Records Management Society – Retention Guidelines for Schools. [Click here for the full guidance.](#)





Appendix A

Policy for the Transfer of Pupil Folders Between Schools - WSCC**Where should files be transferred when a child leaves the school?**

Whenever a child transfers to a new school, all files and information pertaining to that child should be transferred to their new school. In the event of a child moving to an independent school, leaving the country, becoming missing from education or becoming home-schooled, the Local Authority will be informed.

The last school attended when a child leaves education should hold the complete records in accordance with the data retention schedule.

Checks to be undertaken prior to the issue of pupil data

Where the new school is a maintained school outside of West Sussex, or is an Academy, checks should be undertaken to ensure that the school has the following:

Registration with the ICO as a Data Controller (<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>)

A Privacy Notice and any other Data Protection information published on their website

Process for the transfer of data

Pupil Educational Files which need to be transferred from one school to another should be physically transported in one of the following ways:

- West Sussex CC Courier Service
- Delivery in person by a member of staff
- Royal Mail Special Delivery

The most appropriate method should be selected by the sending school based on the circumstances: numbers of files involved, transport distances, sensitivity of data etc. It is anticipated that Royal Mail Special Delivery will be used when files need to be transferred out of the area.

It is not recommended that schools use private courier firms for the transport of Educational Files as it is not possible to guarantee the security of their handling of the package.

In all cases, the package containing the file(s) should be sent with a receipt enclosed, listing the files provided, to be signed by the recipient and then returned to the sending school, by a stated deadline. In the event of the signed receipt not being received at the sending school by the deadline, it will be





their responsibility to contact the recipient to confirm receipt. *If the receiving school fail to respond to a reminder, the sending school will assume that the package has been received.*

In addition to this, the following specific procedures should be followed for each method of transport:

West Sussex CC Courier Service:

- A receipt should be signed by the courier on collection of the package confirming that it has been accepted, and that it will be stored securely during transit and not left unattended unless stored out of sight, locked in the rear of the van.

Delivery in Person:

- Delivery of files in person must only be undertaken by a member of staff with authorization from the school to use their vehicle on School business, and with appropriate Business Use insurance cover.
- The member of staff must drive directly to the destination school(s), without making any additional stops. The file(s) must be kept securely locked in the boot of the vehicle. The vehicle must not be left unattended with file(s) on board for any longer than necessary to make the deliveries.
- The member of staff delivering the files should obtain a signed receipt of delivery from the receiving school.

Royal Mail Special Delivery:

- Package must be securely wrapped in suitable, durable packaging for the journey so that it cannot be damaged in transit.
- Addresses should be checked for completeness and accuracy, including the post code, and clearly marked on the package in indelible, waterproof ink. The sending school's address should be marked on the reverse of the package as a return address.
- The package should be sent from a Post Office branch and a full receipt with the item's tracking number should be obtained from the clerk at time of posting. This should be retained by the sending school.

In the event of a file not arriving at the intended destination, the sending school will be responsible for reporting and investigating the data breach and should use any means available to them (e.g. package tracking) to attempt to identify the whereabouts of any missing packages.

