



MANAGEMENT AND RETENTION OF RECORDS POLICY

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Date: October 2020

This guidance applies to the retention of all records within the school. Some of the guidance below relates to records within the school that will contain 'personal data'. Personal data is defined under the General Data Protection Regulation (GDPR) as:

Any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (GDPR article 4).

It is each organisation's responsibility to ensure compliance with the GDPR. Therefore, where records contain personal data, schools need to be aware of the additional obligation they need to meet.

In brief, the GDPR introduces several legal obligations in relation to records containing personal data. This includes obligations such as advising data subjects of the information you hold on them, the purpose for which you hold or process such information, how long you hold it for (the retention period), the legal basis for which you process the personal data and what the data subject's rights are in relation to the data.

Overall, personal data should be kept for no longer than necessary. This means that schools need to be aware of how long each type of record needs to be retained in law, where it might be judicious to retain records for a longer period, and how to destroy records that are no longer required.

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 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.

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 Headteacher.

The person responsible for records management in the school 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 way.

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.

Relationship with existing policies

This policy has been drawn up within the context of:

- Freedom of Information policy
- Data Protection policy
- The guidelines follow those set out in the Records Management Toolkit for schools
- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

Record Keeping

Pupil Assessment information is stored electronically on SIMS which is a password protected system which includes:

These may include:

- Reading/Phonics word assessments
- Reading, Maths and Writing assessments
- Foundation subject assessments

Class files are retained as hard copies in the classrooms.

Children have their own personal file. These are stored electronically on CPOMs which is a password protected system which includes:

In this file are:

- Confidential reports, correspondence
- Details concerning the child, address, contact numbers, authorised collection, etc.
- Pupil reports
- Statutory Assessment information
- Medical information

Any other pupil information is stored in a lockable cabinet in the main office area.

Medical Records

Children with identified medical needs have documentation completed by parents and carers. These are kept in the main office and a copy is in each child's confidential file. Notes to inform all parties about individual symptoms, treatments and medication are kept by the class teacher.

A list of children with medical needs is kept centrally so they can be treated effectively as necessary. Please refer to the School policy on the administration of medicines and medical care of children at school.

Records of SEND or Child Protection

These records are kept electronically on CPOMs which is a password protected system.

Transfer of Records between schools

When a child leaves Joydens Wood Infant School before the end of their schooling, the appropriate records for the next school are sent to them as soon as possible using Royal Mail 'signed for' service.

These documents include the following:

- CPOMs reports
- Student files
- Any submitted EYPS, Phonics screening, KSI SATs

We require a receipt signature for any sensitive information (e.g. child protection records) passed on to the receiving school. A common transfer file, CTF, is sent electronically. This contains the child details and assessment data.

Junior Transfer

The transfer of records to Joydens Wood Junior School may consist of all or of some of the following:

1. CPOMs downloaded reports which are password protected
2. Hard copy school files
3. Hard copy SEN/Child Protection records

A CTF is sent electronically to the new school. Where possible we will ensure that hard copy records are delivered by hand.

Where this is not possible, records will be sent by recorded delivery. All information sent will require the receiving school to sign a receipt.

The above will also apply to any other school in which a record transfer is required

Archives

Old accounting and personnel records, and some other records, will be archived until being disposed of. Archived records will:

- Be treated as being as confidential as current records
- Not necessarily be as accessible as current records, but will still be retrievable
- Have adequate storage made available