

WHOLE SCHOOL POLICY & PROCEDURES

RECORDS MANAGEMENT POLICY



Mission Statement

'The Lord God requires of us that we should help others whenever we can, always make the right choices and be the best that we can be in everything that we do'.

Policy: Records Management Policy					
Type: School Policy	Website: Yes		Author: M Keeffe		
Approved: March 2023		Next Review: November 2024			
Frequency: 2 Yearly			Delegated: Governors - Full		
Notes:					

Document Control

Publication Date	
Related Legislation / Applicable Section of Legislation	Data Protection Act 2018 General Data Protection Regulation (GDPR) now UK GDPR Freedom of Information Act 2000 Limitations Act 1980
Related Policies, Strategies, Guideline Documents	Information Records Management Society 'Information Management Toolkit for Schools' 2019
Replaces	
Policy Owner (Name/Position)	Mr M Keeffe - DPO
Policy Author (Name/Position)	Mr M Keeffe - DPO

Review of Policy

Last Review Date	10 November 2021		
Review undertaken by	Mr M Keeffe		
Next Review Date	This policy will be review following any fundamental changes to data protection Law as a result of Brexit		

Document Approvals

This document requires the following approvals.

Name	Title	Date of Approval	Version Number
Mr M Keeffe	DPO		V1

St Cuthbert's Roman Catholic High School recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute towards its effective overallmanagement. Records provide evidence for protecting the legal rights and interests of the school and provide evidence for demonstrating performance and accountability.

Scope

This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its day to day activities. Records are defined as all those documents which facilitate the business carried out by the school and which are 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.

Responsibilities

The UK General Data Protection regulation states that all records containing personal data must only be retained whilst they are relevant unless they are being retained for public interest, archiving, scientific or historical research or statistical purposes.

The school has a responsibility to maintain its records and record keeping systems in accordance with the regulations. The person with overall responsibility for this policy is the Headteacher.

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.

Student Records

All Student records are held on our Management Information System. Paper documents are scanned and uploaded to the system and then paper records are confidentially destroyed.

The Student information held in our records include name, address, form group, record of schooltransfer, emergency contact details, academic performance, subjects studied, daily attendance, and consent information.

The electronic documents file contains the registration and acceptance form, (the parent contract) and the academic record of a Student as he or she progresses through the school. It willalso include correspondence and reports of conversations between parents and members of staff about any academic or pastoral issues, school reports, references from previous schools and references prepared for universities and other institutions. It will record any rewards and disciplinary sanctions imposed on a child.

Students with Special Educational or Medical Needs

Relevant information concerning Students with special educational or medical needs are recorded on the school's management system. A confidential paper record for each Student is kept securely in the SENCO's office.

Medical Records

Confidential medical records are kept securely in the Medical Room. The medical record contains: the medical questionnaire that the parents completed when their child joined the school, plus any updated information, and records of all treatment that a Student received during his or her time at the school, including records of all accidents and injuries to the child. School will provide information regarding current Students with medical conditions, or social information of a sensitive nature that may be of relevance to staff in their dealings with Students, for example, when arranging trips and visits.

Student Financial Records

Financial records for Students are stored electronically and recorded on the relevant software. These cover a record of payments for trips, bills for music tuition fees and extras throughout a Student's time at the school. This information stays on the relevant software and is not deleted. If a Student receives a bursary, this will form part of the record, along with records of awards. Biometric data to facilitate the cashless system is also stored electronically and accessed only by Finance and Kitchen staff.

Access by Staff

All teaching and administrative staff are able to access the school's password protected management system. Access to medical records is restricted to relevant staff only. Access to financial records is restricted to the Headteacher, the Business Manager and members of the Finance team.

Data Protection Policy and Disclosure of Information

St Cuthbert's Roman Catholic High School 's Data Protection Policy and Privacy Notice describe its duties and obligations under the General Data Protection Regulation, including parents' rights and the rights of Students to have access to their personal data. It also covers the circumstances under which data would be disclosed to a third party.

Privacy Notice

St Cuthbert's Roman Catholic High School will comply with a Privacy Notice legally issued by a public body or other authority that is a data controller and is subject to the same legal constraints regarding the manner in which it handles data.

Staff Induction

All new teaching and office staff will be given training accessing and managing school records as part of their induction into St Cuthbert's Roman Catholic High School.

Records of Past Students

Records are retained, archived and destroyed in line with the policy of our third party software provider. We keep all records of past Students until a Student is 25 years old. We retain and archiverecords of results in public examinations, lists of school prizes and other significant achievements, together with information relating to former Students' subsequent academic achievements.

Disposal of Records

Due to the ongoing Independent Inquiry into Child Sexual Abuse (IICSA) no Student and staff record will be destroyed until further notice. This has been noted in the 'Disposal Action' column of the attached retention and disposal schedule.

Files will be disposed of securely in line with school policy (currently, confidential information is collected by a reputable contractor and destroyed on-site.

Electronically held records are archived within our school management information system. Other information not forming part of a Student's Education Record (such as information held by teachers for their own use) will be destroyed at the end of the academic year (or when a teacher leaves the school).

Personnel Records

The school maintains records of personnel relating to their qualifications, experience, length of service and salary levels. Appraisal statements are stored with the personnel records and also stored within the staff record on the school's Management Information System.

Application forms of applicants (and references) for vacant posts are kept securely in the school office until an appointment has been made. Following a successful interview the successful candidate's application and references shall be placed on the individual's personnel file and the others kept for no less than six months securely within the school with access by the Headteacher and Personnel Officer only. Any copies of these applications shall be destroyed following a successful appointment.

References for staff within the school for posts outside it are kept securely by the Headteacher.

Financial Records

Records of the school's financial controls and budget are kept in accordance with current

Department of Education regulations and shall be made available for inspection by the proper authorities under those statutes and regulations.

Curriculum Policy Documents

Documents which describe the school's policies on the curriculum, topics and schemes of work are maintained within each area of the school and are available for inspection by authorised persons such as the Headteacher and Senior Leadership Team, parents, advisors, inspectors and governors.

Non-Curricular Policy Documents

Documents which describe the school's policies on non-curricular matters as required by the Governing Body, Ofsted, LA or Department of Education are available to authorised persons as required. A list of existing policies including the Terms of Reference for each committee of the Governing Body is also available.

Data Retention Schedule

The following schedule is in operation. This lays down the length of time a record needs to be retained, after which time it will be destroyed. Time scales are based on Government guidelines.

Data Retention Schedule

1. Management of the School

This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Headteacher and the Senior Leadership Team, the admissions process and operational administration.

1.1 Governing Body

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
1.1.1	Agendas for meetings	If include confidential issues relating to staff		One copy should be retained with the master set of minutes.	Secure disposal
1.1.2	Minutes	If include confidential issues relating to staff			
	 Principle set (signed) 			Permanent	Archived
	Inspection copies			Date of meeting + 3 years	Secure disposal
1.1.3	Reports	If include confidential issues relating to staff		Date of report + 6 years	Retain in school for 6 years from date of meeting
1.1.4	Instruments of Government including Articles of Association			Permanent	Retain in school whilst school is open.
1.1.5	Trust and Endowments			Permanent	Retain in school whilst operationally required.
1.1.6	Action Plans			Date of Action Plan + 3 years	Secure disposal
1.1.7	Policy documents			Life of the policy + 3 years	Secure disposal

1.1.8	Complaints files	Yes		Date of resolution of complaint + 6 years then review for further retention in the case of contentious disputes.	Secure disposal
1.1.9	Annual reports required by the Department for Education		Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI 2002 No 1171	Date of report + 10 years	Secure disposal
1.1.10	Proposals concerning a change of status including Specialist Status			Date proposal accepted or declined + 3 years	Secure disposal

1.2 Headteacher and Senior Leadership Team

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
1.2.1	Log books of activity in the school maintained by Headteacher			Date of last entry + 6 years	Archive due to historical value
1.2.2	Minutes of the Senior Leadership Team and other internal administrative bodies	Yes		Date of meeting + 3 years	Secure disposal
1.2.3	Reports made by the Headteacher or the Leadership Team	Yes		Date of report + 3 years	Secure disposal
1.2.4	Records created by Headteacher, Deputy Headteacher, Heads of Year and other members of staff with administrative responsibilities	Yes		Current year + 6 years	Secure disposal

1.2.5	Professional Development Plans	Yes	Life of the plan + 6 years	Secure disposal
1.2.6	School Development Plans		Life of the plan + 6 years	Secure disposal

1.3 Admissions Process

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
1.3.1	All records relating		School Admissions Code	Life of the policy + 3 years then review	Secure disposal
	to the creation and				
	implementation of the				
	School Admissions' Policy				
1.3.2	Admissions – successful	Yes	School Admissions Code	Admission + 1 year	Secure disposal
1.3.3	Admissions – unsuccessful	Yes	School Admissions Code	Resolution of case + 1 year	Secure disposal
	including appeals				
1.3.4	Register of Admissions	Yes		Admission + 6 years	Secure disposal/Archive
1.3.5	Admissions – proof of	Yes		Current year + 1 year	Secure disposal
	address				
1.3.6	Supplementary Information	Yes			
	Successful admissions			Add to Student file	Secure disposal
	Unsuccessful			Until appeals process	Secure disposal
	admissions			completed	

1.4 Operational Administration

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
1.4.1	General file series			Current year + 5 years	Secure disposal
1.4.3	Records relating to the creation of the school prospectus			Current year + 3 years	Disposal

1.4.4	Newsletters and circulars to parents/staff/Students		Current year + 1 year	Disposal
1.4.5	Visitors Book and signing in sheets	Yes	Current year + 6 years	Secure disposal

2. Human Resources

This section deals with all matters of Human Resources management within the school.

2.1 Recruitment

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
2.1.1	All records leading up to the appointment of a new Headteacher	Yes		Date of appointment + 6 years	Do not destroy (refer to disposal of records section above)
2.1.2	Interview notes and recruitment records	Yes		Date of interview + 6 months	Secure disposal – add relevant information for successful candidates to staff personal file
2.1.3	Pre-employment vetting information (including DBS checks)	Yes	DBS Update Service Employer Guide June 2014: Keeping children safe in education. September 2021 (Statutory Guidance from Dept. of Education) Sections 73, 74	Date of check + 6 months	Secure disposal
2.1.4	Proofs of identity collected as part of the DBS application process	Yes		Retain for the life of the personnel file	Secure disposal

2.2 Operational Staff Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
2.2.1	Staff Personnel files	Yes	Limitation Act 1980	Termination of employment + 6 years	Do not destroy (refer to disposal of records section above)
2.2.2	Timesheets, sickness records	Yes		Current year + 6 years	Secure disposal
2.2.3	Annual appraisal/assessment records	Yes		Current year + 5 years	Do not destroy (refer to disposal of records section above)

2.3 Management of Disciplinary and Grievance Processes

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
2.3.1	Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	"Keeping children safe in education Statutory guidance for schools and colleges September 2021"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children July 2018"	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer	Do not destroy (refer to disposal of records section above)
2.3.2	Disciplinary proceedings	Yes			Do not destroy (refer to disposal of records section above)
•	Oral warning & written warning - level 1			Date of warning + 6 months	Do not destroy (refer to disposal of records section above)
•	Written warning – level 2			Date of warning + 12 months	Do not destroy (refer to disposal of records section above)

•	Final warning	Date of warning + 18 months	Do not destroy (refer to disposal of records section above)
•	Case not found	Conclusion of the case unless related to a Child Protection issue	Do not destroy (refer to disposal of records section above)
•	Warnings based on an unfounded case (excluding child protection related cases)	No retention required	Do not destroy (refer to disposal of records section above)

2.4 Health and Safety

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
2.4.1	Health & Safety Policy Statements and Risk Assessments			Life of policy/assessment + 3 years	Secure disposal
2.4.2	Records relating to accident/ injury at work	Yes		Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	Secure disposal
2.4.3	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
•	Adults			Date of incident + 6 years	Secure disposal
•	Children			Date of birth + 25 years	Secure disposal
2.4.4	Incident reports	Yes		Current year + 20 years	Secure disposal

2.4.5	Control of Substances Hazardous to Health (COSHH)	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2)	Current year + 40 years	Secure disposal
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	Secure disposal
2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation		Last action + 50 years	Secure disposal
2.4.8	Fire precaution log books		Current year + 6 years	Secure disposal

2.5 Payroll and Pensions

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
2.5.1	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year + 3 years	Secure disposal
2.5.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	Secure disposal

3 Financial Management

This section deals with all aspects of the financial management of the school including the administration of school meals.

3.1 Risk Management and Insurance

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
3.1.1	Employer's Liability Certificate			Closure of the school + 40 years	Secure disposal

3.2 Asset Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
3.2.1	Inventories of equipment/furniture			Current year + 6 years	Secure disposal/Archive
3.2.2	Burglary, theft and vandalism report forms	Yes – if contains PII		Current year + 6 years	Secure disposal

3.3 Accounts and Statements including Budget Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
3.3.1	Annual Accounts			Current year + 6 years	Archive
3.3.2	Loans and grants managed by school			Date of last payment + 12 years then review	Secure disposal
3.3.3	Student Grant applications	Yes		Current year + 3 years	Secure disposal
3.3.4	All records relating to the creation and management of			Life of the budget + 3 years	Secure disposal/Archive

	budgets including the Annual Budget statement and background papers		
3.3.5	Invoices, receipts, orders, requisitions, delivery notes	Current year + 6 years	Secure disposal/Archive
3.3.6	Records relating to the collection and banking of monies	Current year + 6 years	Secure disposal/Archive
3.3.7	Records relating to the identification and collection of debt	Current year + 6 years	Secure disposal

3.4 Contract Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
3.4.1	Contracts - under seal		The Limitations Act 1980	Contract completion date + 12 years	Secure disposal
3.4.2	Contracts – under signature		The Limitations Act 1980	Contract completion date + 6 years	Secure disposal
3.4.3	Records relating to the monitoring of contracts			Current year + 2 years	Secure disposal

3.5 School Fund

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
3.5.1	School Fund documents:			Current year + 6 years	Secure disposal
	Cheque books				
	 Paying in books 				
	Ledger				

Invoices		
Receipts		
Bank Statements		
 Journey Books 		

3.6 School Meals Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
3.6.1	Free School Meals Register	Yes		Current year + 6 years	Secure disposal/Archive
3.6.2	School Meal Register	Yes		Current year + 3 years	Secure disposal/Archive
3.6.3	School Meal Summary Sheets			Current year + 3 years	Secure disposal

4 Property Management

This section covers the management of buildings and property.

4.1 Property Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
4.1.1	Title Deeds of the property			Permanent	Retain whilst school is operational
4.1.2	Plans of property belonging to school			Permanent	Retain whilst school is operational
4.1.3	Leases			Expiry of lease + 6 years	Secure disposal
4.1.4	Lettings			Current year + 6 years	Secure disposal

4.2 Maintenance

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
4.2.1	Maintenance and Contractors records and reports			Current year + 6 years	Secure disposal
4.2.2	Maintenance log books/records of school maintenance carried out by school employees			Current year + 6 years	Secure disposal

5 Student Management

This section includes all records which are created during the time a Student spends at the school. For information about accident reporting see under Health and Safety above.

5.1 Student's Educational Record

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
5.1.1	Student's Educational Record required by The Education (Student Information) (England) Regulations 2005	Yes	Limitation Act 1980 (Section 2)	Date of birth + 25 years	Do not destroy (refer to disposal of records section above)
5.1.2	Public Examination results – Student copies	Yes		Added to Student file	Archived
5.1.3	Internal Examination results	Yes		Added to Student file	Archived
5.1.4	Safeguarding information held on CPOMS and held in separate files	Yes	"Keeping children safe in education Statutory guidance for schools and colleges September 2021"	Date of birth + 25 years	Do not destroy (refer to disposal of records section above)

5.1.5	Records created in the course	Yes	Recorded on School	Do not destroy (refer to
	of contact with Students and		Management system if	disposal of records section
	parents/carers		relevant	above)

5.2 Attendance

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
5.2.1	Attendance Registers	Yes	School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Date of register +3 years	Secure disposal
5.2.2	Correspondence relating to authorised absence and issues	Yes	Education Act 1996 Section 7	Date of absence + 2 years	Secure disposal

5.3 Special Educational Needs

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
5.3.1	Special Educational Needs files and all supporting documentation including EHCP and reviews	Yes	Limitation Act 1980 (Section 2)	Date of birth + 25 years	Do not destroy (refer to disposal of records section above)
5.3.2	EHCP maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	Date of birth + 25 years	Do not destroy (refer to disposal of records section above)
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Date of birth + 25 years	Do not destroy (refer to disposal of records section above)
5.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Date of birth + 25 years	Do not destroy (refer to disposal of records section above)

5.4 Medical Information

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
5.4.1	Records for the administration of routine medication e.g. antibiotics, asthma or diabetes medication	Yes		Recorded in Student record onschool management system	Secure disposal/Archive
5.4.2	Records for the administration of non-routine medication e.g. epi-pen, antidepressants and any reported difficulties or issues with administering medication	Yes		Date of birth + 21 years & 6 months	Secure disposal/Archive

6 Curriculum Management

6.1 Statistics and Management Information

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
6.1.1	Examination Results (school copy)	Yes		Current year + 6 years	Archive
6.1.2	Examination papers and non- exam assessment work			Retain until end of the Autumn term following results day	Secure disposal
6.1.3	Published Admission Number (PAN) Reports	Yes		Current year + 6 years	Secure disposal

6.1.4	Value Added and Contextual Data	Yes	Current year + 6 years	Secure disposal
6.1.5	Self Evaluation forms	Yes	Current year + 6 years	Secure disposal

6.2 Implementation of Curriculum

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
6.2.1	Records of marks awarded			Current year + 1 year	Review with a view to secure disposal
6.2.2	Records of homework set			Current year + 1 year	Review with a view to secure disposal
6.2.3	Student's work			Current year + 1 year	Review with a view to secure disposal

7 Extra-Curricular Activities

7.1 Educational Visits outside the classroom

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
7.1.1	Records created by school to obtain approval to run an Educational Visit outside the classroom		Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice".	Date of visit + 10 years	Secure disposal
7.1.2	Parental consent forms for school trips – where no major incident has occurred	Yes		Conclusion of trip	Secure disposal

7.1.3	Parental consent form for	Yes	The Limitations Act 1980 (Section 2)	Date of birth + 25 years	Secure disposal
	school trips – where there				
	has been a major incident				

8 Central Government and Local Authority

8.1 Local Authority

Basic File Description		Data Protection	Statutory Provisions	Retention period	Action at the end of Administrative life of record
		Issues			
8.1.1	Attendance returns	Yes		Current year + 1 year	Secure disposal
8.1.2	School Census returns			Current year + 5 years	Secure disposal
11.2	Circulars and other information sent from the LA			Operational use	Secure disposal

8.2 Central Government

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
8.2.1	Ofsted reports and papers			Retain whilst current	Archive and replace with new report
8.2.2	Returns made to central government			Current year + 6 years	Secure disposal
8.2.3	Circulars and other information sent from the LA			Operational use	Secure disposal

8.3 Positive Steps

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention period	Action at the end of Administrative life of record
13.1	Service level agreements			Until superseded	Secure disposal
13.2	Work experience agreement			Date of birth of student + 18	Secure disposal
				years	