Bearnes Primary School **– Cheriton Bishop Primary School - Diptford** C of E Primary School
Harbertonford C of E Primary School – **Hennock** Primary School - **Landscove** C of E Primary School
Stoke Gabriel Primary School – Tedburn St Mary Primary School – Yeoford Primary School

Records Management

The Link Academy Trust (the 'Trust') recognises that, by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and to contribute effective overall management of the institution. Records provide evidence for protecting the legal rights and interests of the Trust, 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

1.1 This policy applies to all records created, received or maintained by staff of the Trust 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 Trust 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.

1.3 A percentage of the Trust's records will be selected for permanent preservation as part of the institution's archives for historical research.

Responsibilities

1.4 The Trust 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 Chief Executive Officer (CEO).

1.5 The person responsible for records management in the Trust 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. 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.

1.6 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 Trust's record management guidelines.

Relationship with existing policies

1.7 This policy has been drawn up within the context of:

- Freedom of Information Policy
- Data Protection Policy
- Other legislation or regulations (including audit, equal opportunities and ethos affecting the Trust

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.

Recording Information

Pupils have a right of access to their educational record and so do their parents under the Education (Pupil Information) (England) Regulations 2005. Under the Data Protection Act 1998 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.

Creating a file

This section relates to both paper and electronic pupil files.

The pupil record starts when a file is created (opened) for each new pupil as they begin school. This is the file that will follow the pupil for the rest of his/her school life. At the Trust we include the following information on the front of the hard copy pupil file:-

- Surname
- Forename
- Date of Birth
- Unique Pupil Number

The inside cover of each pupil file contains:-

- Pupil Name
- Address
- Telephone Number
- Mother's contact number and time
- Father's contact number and time
- Name and address of any other person who has agreed to take charge of the child until a parent reaches home
- Date of birth
- Admission number
- Date of entry
- Date of Leaving

File Contents

The pupil record includes the following contents:-

- Record of transfer from early years provision
- Application Form
- Photography Consents
- Any information relating to a major incident concerning the child
- Annual reports
- Any information about Educational Health Care Plans in place
- Any relevant medical information
- Any child protection reports/disclosures (kept in a sealed envelope)
- Information relating to any exclusions (fixed or permanent)
- Individual specific correspondence with parents or external agencies relating to major incidents
- Details of complaints made by the pupil and/or parents

The following pupil information should be kept separate from the pupil file as they are subject to shorter retention periods:-

- Absence notes
- Parental consent forms
- Correspondence with parents about minor issues
- Accident forms (unless a major accident)

Transferring the file to secondary school (or alternative primary if in- year transfer)

The Trust does not retain any pupil files when pupils leave the school unless there is any ongoing legal action. Custody of and responsibility for the records passes to the school that the pupil transfers to.

Files will not be sent by post wherever possible. In the event that they are sent by post they should be sent by registered post with an accompanying list of the files. The school receiving the files should sign the list to say that they have been received and return it to the school. Where possible, the Trust will arrange for pupil files to be delivered by hand or through the local authority internal courier system.

Electronic documents held by the Trust are destroyed once the pupil leaves.

Storage of pupil files

All pupil records at the Trust are held securely. Paper files are stored in a locked cupboard in the admin office where access is managed by the admin team. All electronic records are held securely on the Trust's management information system with appropriate access levels as determined by the local authority.

Access arrangements are made ensuring that confidentiality is maintained whilst equally enabling information to be shared lawfully and appropriately, and to be accessible for those who need to see it.

Disposal of records which have reached the end of their administrative life

This section outlines how records, whether electronic or paper, are disposed of once they have reached the end of their administrative life [detailed in the records retention schedule].

The Trust is committed to complying with data protection requirements by ensuring that files no longer required are reviewed as soon as possible so that only the appropriate records are destroyed.

Safe destruction of records

All records containing personal or sensitive information are shredded to ensure reconstruction is not possible. In the event that records are identified as to be destroyed but have not yet been done so, and a request for the records is received, they must still be provided.

Prior to records being destroyed by the school administrator, authorisation is sought by a senior member of staff.

Retention periods

Retention of records differ according to type. The schedule on the following pages outlines the retention period required for different records. The schedule has been divided into five sections:-

1. Management of the Trust
2. Human resources
3. Financial management of the Trust
4. Property management
5. Pupil management

This Policy is reviewed by the Audit Committee every 2 years and must be approved by the Board of Directors and signed by the Chair of Directors and Chief Executive Officer.

Policy Reviewed:	July 2018
Next Review:	Summer Term 2020
Signature of Chair of Directors:	Signature of CEO:

The Link Academy Trust – Records Retention Schedule

1.1 Governance					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
1.1.1	Agendas of meetings	There may be data protection issues if the meetings are dealing with confidential issues relating to staff		One copy retained with the master set of minutes. All other copies can be destroyed	Secure disposal
1.1.2	Minutes of meetings – Principal set signed by the Chair	There may be data protection issues if the meetings are dealing with confidential issues relating to staff		To be kept permanently	N/A
1.1.3	Reports presented at meetings	There may be data protection issues if the meetings are dealing with confidential issues relating to staff		To be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports, the reports should be kept permanently	Secure disposal or retained with signed minutes
1.1.4	Articles of Association	No		Permanent	N/A

1.1.5	Action plans created and administered by the Board of Directors	No		Life of the action plan + 3 years	Secure disposal
1.1.6	Policy documents created and administered by the Board of Directors	No		Life of the action plan + 3 years	Secure disposal
1.1.7	Records relating to complaints dealt with by the governing bodies	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	Secure disposal
1.1.8	Proposals concerning the change of status of the school including specialist status and academies	No		Date of proposal accepted or declined + 3 years	Secure disposal

1.2 Senior Leadership Team					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
1.2.1	Log books of activity in the school maintained by the headteacher/head of school	There may be data protection issues if the log book refers to		Date of last entry of book + a minimum of 6 years then review	These could be of permanent historical value and should be

		individual pupils or members of staff			offered to the local archives
1.2.2	Minutes of senior leadership team meetings and other internal administrative bodies	There may be data protection issues if the minutes refer to individual pupils or members of staff		Date of the meeting + 3 years then review	Secure disposal
1.2.3	Reports created by the headteacher/head of school or senior leadership team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of report + a minimum of 3 years then review	Secure disposal
1.2.4	Records created by the headteacher/head of school and others with administrative responsibilities	There may be data protection issues if the records refers to individual pupils or members of staff		Current academic year + 6 years then review	Secure disposal
1.2.5	Correspondence created by the headteacher/head of school and others with administrative responsibilities	There may be data protection issues if the correspondence refer to individual		Date of correspondence + 3 years then review	Secure disposal

		pupils or members of staff			
1.2.6	Trust or School Improvement Plans	No		Life of the plan + 3 years	Secure disposal

1.3 Admissions Process					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
1.3.1	All records relating to the creation and implementation of the Schools' Admission Policies	No	School Admission Code statutory guidance	Life of the policy + 3 years then review	Secure disposal
1.3.2	Admissions if the admission is successful	Yes	School Admission Code statutory guidance	Date of admission + 1 year	Secure disposal
1.3.3	Admissions if the appeal is unsuccessful	Yes	School Admission Code statutory guidance	Resolution of case + 1 year	Secure disposal
1.3.4	Register of admissions	Yes	School attendance: Departmental advice	Every entry in the admissions register must be retained for a period of 3 years after the admission	Secure disposal
1.3.5	Proof of address supplied by parent on admission	Yes	School Admission Code statutory guidance	Current year + 1 year	Secure disposal
1.3.6	Supplementary information such as religion, medical etc	Yes		Added to pupil file and retained in accordance with pupil file	Secure disposal

1.4 Operational Administration

	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
1.4.1	General Files	No		Current year + 5 years then review	Secure disposal
1.4.2	Records relating to the creation and publication of the school prospectus	No		Current year + 3 years	Standard disposal
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils	No		Current year + 1 year	Standard disposal
1.4.4	Newsletters and other items with a short operational issue	No		Current year + 1 year	Standard disposal
1.4.5	Visitors' Books and signing in sheets	Yes		Current year + 6 years then review	Secure disposal
1.4.6	Records relating to creation and management of Parent Teacher Associations and/or Pupil Associations	Yes		Current year + 6 years then review	Secure disposal

2. Human Resources

2.1 Recruitment					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
2.1.1	All records leading up to the appointment of a new CEO/Executive Principal, headteacher/head of school	Yes		Date of appointment + 6 years	Secure disposal
2.1.2	All records leading to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months	Secure disposal

2.1.3	All records leading up to the appointment of a new member of staff - successful candidates	Yes		All relevant information added to staff file (see below)	Secure disposal
2.1.4	Pre-employment vetting information – DBS checks	Yes	DBS Update Service Guidance; Keeping Children Safe in Education	School should not keep DBS certificates. If it does it must only be kept for six months	
2.1.5	Proofs of identity collected as part of the process of checking "portable2 enhanced DBS"	Yes		Where possible these should be checked and a note kept of what was seen and has been checked (on the SCR). Paper copies should be kept on the personnel file	
2.1.6	Pre-employment vetting information –evidence providing the right to work in the UK	Yes	An employer's guide to the right to work checks (Home Office 2015)	Kept on the personnel file. If kept separately should be retained for termination of employment plus no less than 2 years	

2.2 Operational Staff Management					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life

2.2.1	Staff Personnel File	Yes	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years	Secure disposal
2.2.2	Timesheets/Supply Claimsheets	Yes		Current year + 6 years	Secure disposal
2.2.3	Annual Appraisal Records	Yes		Current Year + 5 years	Secure disposal

2.3 Management of Disciplinary and Grievance Processes					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
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 March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then review. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned.	Secure disposal
2.3.2	Disciplinary proceedings	Yes			Secure disposal

	Oral warning			Date of warning + 6 months	Secure disposal
	Written warning level 1			Date of warning + 6 months	
	Written warning level 2			Date of warning + 12 months	
	Final warning			Date of warning + 18 months	
	Case not found			If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	Secure disposal

2.4 Health and Safety					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
2.4.1	Health and Safety Policy Statements	No		Life of policy + 3 years	Secure disposal
2.4.2	Health and Safety Risk Assessments	No		Life of risk assessment + 3 years	Secure disposal
2.4.3	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

2.4.4	Accident reporting	Yes	Social Security (Claims and Payments) Regulations 1979 regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		Secure disposal
	Adults			Date of incident + 6 years	
	Children			DOB of the child + 25 years	
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	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 19 (2)	Current year + 40 years	Secure disposal
2.4.6	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	No		Last action + 40 years	Secure disposal
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation	No		Current year + 50 years	Secure disposal
2.4.8	Fire precaution log books	No		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 the administrative life
2.5.1	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	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 of the School

3.1 Risk Management and Insurance					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
3.1.1	Employer's Liability Insurance Certificate	No		Current year + 6 years	Secure disposal

3.2 Asset Management					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years	Secure disposal
3.2.2	Burglary, theft and vandalism report forms	No		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 the administrative life
3.3.1	Annual accounts	No		Current year + 6 years	Standard disposal
3.3.2	All records relating to the creation and management of budgets including	No		Life of the budget + 3 years	Secure disposal

	the annual budget statement and background papers				
3.3.3	Invoices, receipts, order books, requisitions and delivery notes	No		Current financial year + 6 years	Secure disposal
3.3.4	Records relating to the collection and banking of monies	No		Current financial year + 6 years	Secure disposal
3.3.5	Records relating to the identification and collection of debt	No		Current financial year + 6 years	Secure disposal

3.4 Contract Management					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
3.4.1	Records relating to the management of contracts	No		Current year + 2 years	Secure disposal

3.5 School Meals Management					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
3.5.1	Free School Meals registers	Yes		Current year + 6 years	Secure disposal
3.5.2	School meals registers	Yes		Current year + 3 years	Secure disposal
3.5.3	School meals summary sheets	Yes		Current year + 3 years	Secure disposal

4. Property Management

4.1 Property Management					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life

4.1.1	Records relating to the letting of the school's premises	No		Current financial year + 6 years	Secure disposal

5. Pupil Management

5.1 Pupil's Education Record					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
5.1.1	Pupil's Education Record	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No.1437	Retain for as long as the child remains at a school within the Link Academy Trust	The file should follow the pupil when he/she leaves the primary school. This will include: • to another primary school • to a secondary school • to a pupil referral unit • If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to

					be retained for the statutory retention period. Primary Schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the record from the Local Authority
5.1.2	Child protection information held on pupil file	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	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.	SECURE DISPOSAL – these records MUST be shredded
5.1.3	Child protection information held in separate files	Yes	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to	DOB of the child + 25 years then review. This retention period was agreed in	SECURE DISPOSAL – these records MUST be shredded

			safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015"	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	

5.2 Attendance					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
5.2.1	Attendance Registers	Yes	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
5.2.2	Correspondence relating to authorised absences	Yes	Education Act 1996 Section 7	Current academic year + 2 years	Secure disposal

5.3 Special Educational Needs (SEND)					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
5.3.1	SEND files, reviews and educational plans	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil + 25 years	REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEND files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.
5.3.2	Statement 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	DOB of the pupil + 25 years (This would normally be retained on the pupil file)	Secure disposal unless the document is subject to a legal hold
5.3.3	Advice and information provided to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	DOB of the pupil + 25 years (This would normally be retained on the pupil file)	Secure disposal unless the document is subject to a legal hold

5.3.4	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 2	DOB of the pupil + 25 years (This would normally be retained on the pupil file)	Secure disposal unless the document is subject to a legal hold

6. Curriculum Management

6.1 Statistics and Management Information					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
6.1.1	Curriculum returns	No		Current year + 3 years	Secure disposal
6.1.2	Examination results (school's copy) SATS results	Yes		Current year + 6 years	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 the administrative life
6.2.1	Schemes of Work	No		Current year + 1 year	Secure disposal
6.2.2	Timetable	No		Current year + 1 year	

6.2.3	Class Record books	No		Current year + 1 year	
6.2.4	Mark books	No		Current year + 1 year	
6.2.5	Record of homework set	No		Current year + 1 year	
6.2.6	Pupils' Work	No		Where possible pupils' work should be returned to the pupil at the end of the academic year. Where it is kept at school it shall be retained for current year + 1 year	

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 the administrative life
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the classroom	No	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 + 14 years	Secure disposal

7.1.2	Parental consent forms for school trips where there has been no major incident	Yes		Conclusion of trip	Secure disposal
7.1.3	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil involved in the incident + 25 years. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	

8. Central Government and Local Authority

8.1 Local Authority					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
8.1.1	Secondary transfer sheets	Yes		Current year + 2 years	Secure disposal
8.1.2	Attendance returns	Yes		Current year + 1 year	Secure disposal
8.1.3	School Census returns	No		Current year + 5 years	Secure disposal

8.1.4	Circulars and other information sent from the LA	No		Operational Use	Secure disposal

8.2 Central Government					
	Basic file description	Data protection issues	Statutory provisions	Retention period	Action at the end of the administrative life
8.2.1	Ofsted reports and papers	No		Life of the report then review	Secure disposal
8.2.2	Returns made to central government	No		Current year + 6 years	Secure disposal
8.2.3	Circulars and other information sent from central government	No		Operational Use	Secure disposal