



PILGRIM  
PATHWAYS  
SCHOOL

# RECORDS MANAGEMENT POLICY

## [046]

<b>Approved by:</b>	Management Committee	<b>Date approved:</b>	1 <sup>st</sup> June 2018
<b>Date reviewed:</b>	June 2018 February 2022	<b>Next review due by:</b>	February 2025
<b>Policy Lead:</b>	Leah Miller, Headteacher	<b>Ownership:</b>	Management Committee

## Table of Contents

1. Introduction	1
2. Scope of the Policy	1
3. Responsibilities	1
4. Transferring records to a pupil's new school	2
5. Recording Systems	2
6. The Safe Disposal of Information Using the Retention Schedule	3
7. Monitoring and Review	3
Appendix 1	4

---

## 1. Introduction

Pilgrim Pathways School recognises the necessity for the efficient management of its records to comply with its legal and regulatory obligations and to contribute to the effective overall management of the school.

The school must ensure that educational records are maintained and disclosed to parents on request, as noted in the [Education \(Pupil Information\) \(England\) Regulations 2005 \(SI 2005/1437\)](#) . Educational records include information for pupils and former pupils:

- processed by, or on behalf of, the management committee or a teacher
- originating from or supplied by local authority employees (for certain schools)
- Originating from or supplied by teachers or other employees of the school.

## 2. Scope of the Policy

This policy applies to all records that are 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.

## 3. Responsibilities

Under the Data Protection Act 2017 (DPA) and the General Data Protection Regulation schools are responsible for ensuring that the collation, retention, storage and security of all personal information they produce and hold meets the provision of both of these regulations:

- personal information appearing in a pupil's educational record
- any other information they hold which identifies individuals, including pupils, staff and parents.

Pilgrim Pathways School is registered as a data controller with the Information Commissioner's Officer (ICO).

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 of the school. The school administration officer 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 manner.

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 record management guidelines (Appendix 1)

#### **4. Transferring records to a pupil's new school**

We do have the ability to use the common transfer file system but as students do not transfer to the Pilgrim Pathways School on a permanent basis this is not commonly used.

Headteachers at maintained schools must ensure the statutory requirements for the transfer of records between schools are fulfilled, including the completion of the common transfer file (CTF). This is noted in the Education (Pupil Information) (England) Regulations 2005, SI 2005/1437.

If a pupil moves to another school in England, Wales, Scotland or Northern Ireland, the pupil's CTF and educational record must be passed to the new school. Academies are not subject to these regulations, however they are expected to adhere to the following protocols, as a matter of good practice.

The means of transfer to a school outside England must be in line with the arrangements for transfer between schools in England. Information must be transferred within 15 school days of any request from the pupil's new school. The pupil's CTF should be sent to the new school either:

- through the school to school (s2s) secure file transfer system
- over a secure network that can only be accessed by the LA, the governing body or a teacher at any school within that LA.

If the new school is unknown, the Department for Education recommends that the school should still complete the CTF and load it onto s2s. Where a CTF has not been received for a new pupil a request can be made to the LA to search for the files on s2s.

Requests to transfer a pupil file outside the EU area because a pupil has moved into that area, must be referred to the Local Authority for further advice.

#### **5. Maintenance of Record Keeping Systems**

Information created by the school must be managed against the same standards regardless of the media in which it is stored.

5.1 It is important that filing information is properly resourced and is carried out on a regular basis. It is equally important that the files are weeded of extraneous information where appropriate on a regular basis. Removing information from a file once a freedom of information request has been made will be a criminal offence (unless it is part of normal processing).

5.2 Applying retention records is straightforward provided files are closed on a regular basis.

5.3 Once a file has been closed it should be moved out of the current filing system and stored in an appropriate place until it has reached the end of the retention period.

5.4 Information security is very important especially when dealing with personal information or sensitive policy information. There are a number of basic rules:

- All personal information should be kept in lockable filing cabinets which are kept locked when the room is unattended.
- Personal information held on computer systems should be adequately password protected. Information should never be left up on the screen if the computer is unattended.
- Files containing personal or sensitive information should not be left out on desks overnight.
- Where possible sensitive personal information should not be sent by email.
- If files need to be taken off the premises they should be secured in the boot of a car or in lockable containers.

- Teachers may carry information on memory sticks or other removable data carriers in order to access their files both at home and at school. Any data carried in this way must be encrypted using appropriate software/sticks.
- All computer based information should be backed up regularly and the backup should be stored off site.
- Information contained in emails should be filed in the appropriate electronic or manual filing system once it has been dealt with.

## **6. The Safe Disposal of Information Using the Retention Schedule**

Files should be disposed of in line with the attached retention schedule (see Appendix 1). This process should be undertaken on an annual basis at the end of July. All personal information should be shredded before disposal. Other files can be bundled up and put in a skip or disposed of to the waste paper merchant. Loose papers should not be put in skips unless the skip has a lid.

Electronic data should be archived on electronic media and 'deleted' appropriately at the end of the retention period.

## **7. Monitoring and Review**

This policy is to be reviewed and approved by the Management Committee every 3 years or when new legislation comes into force (whichever is soonest).



## Appendix 1

Management of the School			
1.1 Governing Body			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
1.1.1	Agendas for Governing Body meetings	One copy to be retained as a master, all other copies to be disposed of.	SECURE DISPOSAL
1.1.2	Minutes of Governing Body meetings	Permanent	
1.1.3	Reports presented to the Governing Body	Reports should be kept for a minimum of 6 years.	SECURE DISPOSAL
1.1.4	Action/Development plans created by the Governing body	Life of the plan + 3 years	SECURE DISPOSAL
1.1.5	Policy documents created and administered by the Governing body	Life of the policy + 3 years	SECURE DISPOSAL
1.1.6	Records relating to complaints dealt with by the Governing body	Date of the resolution of the complaint + a minimum of 6 years	SECURE DISPOSAL
1.1.7	Annual Reports created under the requirements of the Education Regulations 2002	Date of report + 10 years	SECURE DISPOSAL
1.1.8	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	Date proposal accepted or declined + 3 years	SECURE DISPOSAL
1.1.9	All records leading up to the appointment of a new member of Management Committee	All relevant information to be saved electronically and in paper format into Management Committee member files. Term of office	SECURE DISPOSAL
1.2 Head Teacher and Senior Management Team			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
1.2.1	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	Date of the meeting + 3 years then review	SECURE DISPOSAL

1.2.2	Reports created by the Head Teacher or the Management Team	Date of the report + a minimum of 3 years then review	SECURE DISPOSAL
1.2.3	Records created by the Head Teacher, Senior staff or staff with administrative responsibilities	Current academic year + 6 years then review	SECURE DISPOSAL
1.2.4	Correspondence created by the Head Teacher, Senior staff or staff with administrative responsibilities	Date of correspondence + 3 years then review	SECURE DISPOSAL
1.2.5	Professional Development Plans	Life of the plan + 6 years	SECURE DISPOSAL
1.2.6	School Development Plans	Life of the plan + 3 years	SECURE DISPOSAL
<b>1.3 Admissions Process</b>			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
1.3.1	Register of Admissions	Every entry in the admission register must be preserved for a period of 3 years after the date on which the entry was made.	Electronic copy to be kept permanently
1.3.2	Supplementary Information form including additional information such as religion, medical conditions etc.	Information should be added to pupil file	SECURE DISPOSAL
<b>Human Resources</b>			
<b>2.1 Recruitment</b>			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
2.1.1	All records leading up to the appointment of a new Head Teacher	Date of appointment + 6 years	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	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	All relevant information should be added to the staff personal file and all other information retained for 6 months	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks	The school does not have to keep copies of DBS certificates. If the school does so	

		the copy must NOT be retained for more than 6 months	
2.1.5	Proof of identify	Should be stored on staff's personal file	
2.1.6	Pre-employment vetting information	Should be stored on personal file	
<b>2.2 Operational Staff Management</b>			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
2.2.1	Staff Personal File	Termination of Employment + 6 years	SECURE DISPOSAL
2.2.2	Annual appraisal records	Current year + 5 years	SECURE DISPOSAL
<b>2.3 Management of Disciplinary and Grievances Processes</b>			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Until the persons normal retirement age or 10 years from the date of the allegation, whichever is longer.	SECURE DISPOSAL
2.3.2	Disciplinary Proceedings		
	Oral warning	Date of warning + 12 months	Retained on file as a record only. Information cannot be referred to in relation to further warnings after 12 months.
	Written warning – level 1	Date of warning + 12 months	
	Written warning – level 3	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 conclusion of case	SECURE DISPOSAL
<b>2.4 Health and Safety</b>			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
2.4.1	Health & Safety risk assessments	Life of risk assessment + 3 years	SECURE DISPOSAL
2.4.2	Records relating to accident/injury at work	Date of incident + 12 years	SECURE DISPOSAL
2.4.3	Fire Precaution log books	Current year + 6 years	SECURE DISPOSAL
<b>Financial Management</b>			
<b>3.1 Accounts and Statements including Budget Management</b>			



Basic File Description		Retention Period	Action at the end of the administrative life of the record
3.1.1	Annual Accounts	Current year + 6 years	SECURE DISPOSAL
3.1.2	All records relating to the creation and management of budgets	Life of the budget + 3 years	SECURE DISPOSAL
3.1.3	Invoices. Receipts, requisitions, delivery notes	Current financial year + 6 years	SECURE DISPOSAL
3.1.4	Records relating to the collection and banking of monies	Current financial year + 6 years	SECURE DISPOSAL
<b>Pupil Management</b>			
<b>4.1 Pupil's Educational Record</b>			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
4.1.1	Pupil's Educational Record required by the Education Regulations 2005		
	Primary	Retain whilst the child remains at the primary school	<p>The file should follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> <li>● To another primary school</li> <li>● To a secondary school</li> <li>● To a pupil referral unit</li> <li>● 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.</li> </ul> <p>If the pupil transfers to an independent school, home schooling or leaves the country the file should be returned to the Local Authority.</p>
	Secondary	Date of birth of the pupil + 25 years	SECURE DISPOSAL
4.1.2	Examination Results – Pupil Copies	This information should be added to the pupil file	

4.1.3	Child Protection information held on pupil file	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
4.1.4	Child Protection information held in separate files	DOB of the child + 25 years then review	SECURE DISPOSAL
<b>4.2 Attendance</b>			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
4.2.1	Attendance Register	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made.	SECURE DISPOSAL
4.2.2	Correspondence relating to authorised absence	Current academic year + 2 years	SECURE DISPOSAL
<b>4.3 Special Educational Needs</b>			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
4.3.1	Special Educational Needs files, reviews, and individual educational plans	Date of birth of the pupil + 25 years	SECURE DISPOSAL
4.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	DOB of the pupil + 25 years	SECURE DISPOSAL
4.3.3	Advice and information provided to parents regarding educational needs	DOB of the pupil + 25 years	SECURE DISPOSAL
4.3.4	Accessibility Strategy	DOB of the pupil + 25 years	SECURE DISPOSAL
<b>Curriculum Management</b>			
<b>5.1 Statistics and Management Information</b>			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
5.1.1	Curriculum Returns	Current year + 3 years	SECURE DISPOSAL
5.1.2	Examination Results (School Copy)	Current year + 6 years	SECURE DISPOSAL
5.1.3	Published Admission Number Reports	Current year + 6 years	SECURE DISPOSAL

5.1.4	Self-Evaluation Forms	Current year + 6 years	SECURE DISPOSAL
<b>5.2 Implementation of Curriculum</b>			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
5.2.1	Schemes of Work	Current year + 1 year	SECURE DISPOSAL
5.2.2	Timetable	Current Year + 1 year	SECURE DISPOSAL
5.2.3	Class Record Books	Current year + 1 year	SECURE DISPOSAL
5.2.4	Mark Books	Current year + 1 year	SECURE DISPOSAL
5.2.5	Record of homework set	Current year + 1 year	SECURE DISPOSAL
5.2.6	Pupil's Work	Where possible work should be returned to the pupil. If kept, current year + 1 year	SECURE DISPOSAL
<b>Extra-Curricular Activities</b>			
<b>6.1 Educational Visits</b>			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
6.1.1	Records created by school to run educational activity outside of the classroom	Date of visit + 10 years	SECURE DISPOSAL
6.1.2	Parental consent forms	Conclusion of the trip	SECURE DISPOSAL
<b>Central Government &amp; Local Authority</b>			
<b>7.1 Central Government &amp; Local Authority</b>			
Basic File Description		Retention Period	Action at the end of the administrative life of the record
7.1.1	Attendance Returns	Current Year + 1 year	SECURE DISPOSAL
7.1.2	School Census Returns	Current Year + 5 years	SECURE DISPOSAL
7.1.3	OFSTED reports & papers	Life of the report then review	SECURE DISPOSAL
7.1.4	Returns made to central government	Current year + 6 years	SECURE DISPOSAL