

# Record Management policy

## Northlands Primary School and Nursery



Approved by: Ian Randle

Date: May 2024

Next review due by: May 2025

## **Introduction**

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 document provides the policy framework through which this effective management can be achieved and audited.

### **1. 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 or received, and then stored, in hard copy or electronically.

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

### **2. Responsibilities**

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 of the School.

The person responsible for records management in the school (Headteacher and DPC) will give guidance about 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.

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.

### **3. Recording Systems**

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

#### **Maintenance of Record Keeping Systems**

- 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).
- Applying retention periods is straightforward provided files are closed on a regular basis.
- Once a file has been closed, it should be moved out of the current filing system and stored in the archive area within the school or in another appropriate place until it has reached the end of the retention period.
- 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 a screen if the computer is unattended;
  - ✓ Files containing personal or sensitive information should not be left out on desks over night;
  - ✓ Where possible sensitive personal information should not be sent by e-mail;
  - ✓ 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 data 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 encryption software, e.g. TrueCrypt.or purchased encrypted memory sticks.
  - ✓ All computer information should be backed up regularly and the back-up should be stored off the site.
- Information contained in email or fax should be filed into the appropriate electronic or manual filing system once it has been dealt with.

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

Files should be disposed of in line with the attached retention schedule (see appendix). This is a process which should be undertaken on an annual basis. For staff personnel files the Essex Record Retention schedule has been used.

Paper records containing personal information should be shredded using a cross-cutting shredder. 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. CD's/DVD's should be cut into pieces. Audio/Video tapes and fax rolls should be dismantled and shredded.

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

#### **5. Transfer of files**

When a pupil leaves the school, efforts will be made to identify which school the pupil has transferred to. Once this has been established, the pupil's records will be transferred to this school. Records may be transferred in person or by recorded delivery post. If records are posted, a copy of the records will be retained until we receive receipt showing the new school has received the records, then the copy will be shredded. We will retain a copy of the Records transfer form, showing who has received the records and when. (See appendix for form) Where a new school cannot be identified, the pupil's records will be stored securely until the child would reach the age of 25 years old. A copy of any SEN records will always been retained by the school and stored securely for DOB + 25 years.

#### **6. Monitoring and Review**

This policy has been reviewed and approved by the head teacher and governors. The Records Management Policy will be reviewed and updated as necessary every 2 years.

## Appendix 1: Retention Schedule

<b>Child Protection</b>				
The retention and use of records relating to child protection matters concerning pupils, and child protection allegations against staff requires specific guidance in this schedule.				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
<b>Child Protection files</b>	Yes	Education Act 2002, s175, related guidance 'Keeping Children Safe in Education' (DfE, 2016), Annex B	Until transfer paperwork has been completed by a school the child has transferred to (senior school or new school) then all files should be destroyed. Senior schools DOB + 25 years	SECURE DISPOSAL
<b>Allegation of a child protection nature against a member of staff, including where the allegation is unfounded</b>	Yes	Section 175 of the Education Act 2002 <ul style="list-style-type: none"> <li>• Section 157 of the Education Act 2002 and the Education (Independent School Standards) (England) Regulations 2010</li> <li>• The Children Act 2004</li> <li>• Section 11 of the Children Act 2004 (other agencies)</li> <li>• Sections 141F, 141G and 141H3 of the Education Act 2002.</li> </ul>	Until the person's normal retirement age, or 10 years from the date of the allegation if that is longer. Restricted access.	SECURE DISPOSAL
<b>Governors</b>				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
<b>Minutes</b>				
▪ Principal set (signed)	No		Permanent	Retain in school for 6 years from date of meeting
▪ Inspection Copies	No		Date of meeting + 3 years	SECURE DISPOSAL [If these minutes contain any sensitive personal information they must be shredded]
<b>Agendas</b>	No		Date of meeting	SECURE DISPOSAL
<b>Reports</b>	No		Date of report + 6 years	Retain in school for 6 years from date of meeting
<b>Instruments of Government</b>	No		Permanent	Retain in school whilst school is open
<b>Trusts and Endowments</b>	No		Permanent	Retain in school whilst operationally required
<b>Action Plans</b>	No		Date of action plan + 3 years	SECURE DISPOSAL
<b>Policy documents</b>	No		Expiry of policy	Retain in school whilst policy is operational (this includes if the expired policy is part of a past decision making process)
<b>Complaints files</b>	Yes		Date of resolution of complaint + 6 years	Retain in school for the first six years. Review for further retention in the case of contentious disputes. SECURE DISPOSAL routine complaints.
<b>Management</b>				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
<b>Minutes of the Senior Management Team and other internal administrative bodies</b>	Yes		Date of meeting + 5 years	Retain in the school for 5 years from meeting
<b>Reports made by the headteacher or the management team</b>	Yes		Date of report + 3 years	Retain in the school for 3 years from meeting

Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities.	Yes		Closure of file + 6 years	SECURE DISPOSAL
Correspondence created by headteachers, deputy headteachers, heads of year and other members of staff with administrative responsibilities	No		Date of correspondence + 3 years	SECURE DISPOSAL
Professional development plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
School Development Plans	Yes		Life of the plan + 3 years	Review
<b>Pupils</b>				
Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Admission Registers	Yes		Date of last entry in the book (or file) + 6 years	Retain in the school for 6 years from the date of the last entry then consider transfer to the archives.
Attendance registers	Yes		Date of register + 3 years	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]
Pupil record sheets	Yes			
▪ Primary			Retain for the time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school.
Pupil files	Yes			
▪ Primary			Retain for the time which the pupil remains at the primary school	Transfer to the Secondary school (or other primary school) when the child leaves the school.
Special Educational Needs files, reviews and Personal Learning Plans	Yes		DOB of the pupil + 25 years then review. NOTE: This retention period is the minimum period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case.	SECURE DISPOSAL
Correspondence Relating to Authorised Absence and Issues	No		Date of absence + 2 years	SECURE DISPOSAL
Examination results	Yes			
▪ Public	No		Year of examinations + 6 years	SECURE DISPOSAL
▪ Internal examination results	Yes		Current year + 5 years	SECURE DISPOSAL
Any other records created in the course of contact with pupils	Yes/No		Current year + 3 years	Review at the end of 3 years and either allocated a further retention period or SECURE DISPOSAL
Statement maintained under The Education Act 1006 – Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	SECURE DISPOSAL unless legal action is pending
Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	SECURE DISPOSAL unless legal action is pending

<b>Advice and information to parents regarding educational needs</b>	Yes	Special Educational Needs and Disability Act 2001 Section 2	Closure + 12 years	SECURE DISPOSAL unless legal action is pending
<b>Accessibility Strategy</b>	Yes	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12 years	SECURE DISPOSAL unless legal action is pending
<b>Parental permission slips for school trips – where there has been no major incident</b>	Yes		Conclusion of the trip	SECURE DISPOSAL
<b>Parental permission slips for school trips – where there has been a major incident</b>	Yes	Limitation Act 1980	DOB of the pupil involved in the incident + 25 years. The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils.	SECURE DISPOSAL

### Curriculum

Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
<b>School Development Plan</b>	No		Current year + 6 years	SECURE DISPOSAL
<b>Schemes of work</b>	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SECURE DISPOSAL
<b>Mark Books</b>	No		Current year + 1 year	SECURE DISPOSAL
<b>Samples of Pupils work</b>	No		Current year + 1 term	SECURE DISPOSAL
<b>Examination results</b>	Yes		Current year + 6 years	SECURE DISPOSAL
<b>SATS records – Examination Papers and Results</b>	Yes		Current year + 6 years	SECURE DISPOSAL
<b>Value Added &amp; Contextual Data</b>	Yes		Current year + 6 years	SECURE DISPOSAL
<b>Self-Evaluation forms</b>	Yes		Current year + 6 years	SECURE DISPOSAL

### Personnel

Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
<b>Staff Personnel files</b>	Yes	Based on Essex Personal files and record retention guidance	Termination + 6 years	SECURE DISPOSAL
<b>Recruitment</b>				
<b>Interview notes and recruitment records including application forms and letters</b>	Yes	Legal Timeframe	Date of interview + 6 months	SECURE DISPOSAL
<b>Successful candidate Papers transfer to Personal File.</b>		<b>Operation of the employment contract</b>	End of Employment + 6 years	SECURE DISPOSAL

<b>Recruitment Monitoring Form</b>	No	<b>N/A Forms are anonymous and not held on personal files</b>	<b>Forms must not be held on personal files Destroy once monitoring complete.</b>	SECURE DISPOSAL
<b>Pre- employment checks and SCR Evidence</b>				
<b>References</b>	No	Recommended	Transfer to Personnel File End of employment + 6 years	SECURE DISPOSAL
<b>Prohibition from teaching check</b>		Recommended	Held on Personnel File End of Employment	SECURE DISPOSAL
<b>Evidence of medical Clearance</b>		Recommended	Copy of signed health declaration form placed on Personnel file End of employment + 6 years	SECURE DISPOSAL
<b>Identity</b>		Statutory guidance	3 documents - Held on Personnel File End of Employment	SECURE DISPOSAL
<b>Qualifications</b>		Statutory guidance	Held on Personnel File End of Employment	SECURE DISPOSAL
<b>Pre-employment vetting information (including unsuccessful DBS checks, SD2 form)</b>	No	DBS guidelines	Destroy once DBS processed and appointment decision made SD2 to be retained in a sealed envelope	SECURE DISPOSAL [by the designated member of staff]
<b>Enhanced DBS check/DBS Children's barred list</b>		Recommended	Destroy once DBS processed and appointment decision made Disclosure certificates must not be retained on file for more than 6 months. No record may be held detailing any convictions etc Where a positive DBS check is received a risk assessment should be completed and this should be retained on the file in a sealed envelope End of employment	SECURE DISPOSAL
<b>Right to work in the UK</b>		Statutory guidance	Held on Personnel File End of Employment + 2 years A clear copy of the document must be retained and the person who checks the document must write on it "The right to work document was checked on [insert date] and name recorded of who checked.	SECURE DISPOSAL
<b>S128 Directions check</b>	No	No requirement to hold evidence – record on SCR	N/A	SECURE DISPOSAL
<b>Childcare Disqualification</b>		Recommended	Retain original form if no positive declaration End of employment + 6 years The form must not be retained if there is a positive declaration – a copy of the Risk Assessment and any Waiver documentation should be retained. End of Employment +6 years	SECURE DISPOSAL
<b>Checks on individuals who have lived or worked in the UK</b>		Recommended	Held on Personnel file. End of Employment	SECURE DISPOSAL
<b>Induction, Probation, Performance Management and Disciplinary &amp; Capability (All papers should have restricted access)</b>				
<b>Job descriptions, person specifications</b>		Recommended	Held on Personnel File End of employment+6 years	SECURE DISPOSAL
<b>Induction checklist/Statutory Induction</b>		Recommended	Held on Personnel File End of employment+6 years	SECURE DISPOSAL

<b>Probationary records</b>		Recommended	Held on Personnel File End of employment+6 years	SECURE DISPOSAL
<b>Annual Performance management records</b>	No		Held on Personnel File End of employment+ 5 years	SECURE DISPOSAL
<b>Training Records</b>		Recommended	Held on Personnel File End of employment+6 years	
<b>Oral warning</b>		Recommended	Held on Personnel File Conclusion of case + 5 years	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
<b>Written warning – level 1</b>		Recommended	Held on Personnel File Conclusion of case + 5 years	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
<b>Written warning – level 2</b>		Recommended	Held on Personnel File Conclusion of case + 5 years	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
<b>Final warning</b>		Recommended	Held on Personnel File Conclusion of case + 5 years	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
<b>Case not found</b>		Recommended	If child protection related please see 1.2, otherwise SECURE DISPOSAL immediately at the conclusion of the case	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
<b>Dismissal</b>		Recommended	Held on Personnel File Conclusion of case + 6 years	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
<b>Capability records</b>		Recommended	Held on Personnel File Conclusion of case + 6 years	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
<b>Grievance records</b>		Recommended	Held on Personnel File Conclusion of case + 6 years	SECURE DISPOSAL If this is placed on a personal file, it must be weeded from the file
<b>Contractual Documents</b>				
<b>Offer letters</b>		Recommended	Held on Personnel File End of employment+6 years	SECURE DISPOSAL
<b>Contract of employment</b>		Recommended	Held on Personnel File End of employment+6 years	SECURE DISPOSAL
<b>Resignation documents</b>		Recommended	Held on Personnel File End of employment+6 years	SECURE DISPOSAL
<b>Redundancy documents</b>		Recommended	Held on Personnel File End of employment+6 years	SECURE DISPOSAL
<b>Pay and Pensions</b>				
<b>Payroll information</b>		Recommended	Held on Personnel File End of employment+6 years	SECURE DISPOSAL
<b>Salary statement letters</b>		Required by TPCD	Held on Personnel File End of employment+6 years	SECURE DISPOSAL
<b>Timesheets, sick pay</b>	Yes	Financial Regulations	Current year + 6 years	SECURE DISPOSAL
<b>Pension documentation</b>			Held on personnel file Normal pension Age	SECURE DISPOSAL
<b>Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995</b>	Yes		Current year + 6 years	SECURE DISPOSAL
<b>Leave Records</b>				
<b>Leave of absence records</b>		Recommended	Held on Personnel File End of employment+6 years	SECURE DISPOSAL

Records of child related leave e.g. Maternity records	Yes	Statutory Maternity Pay (General Regulations 1986 (SI 1986/1990), revised 1999 (SI 1999/567))	Current year + 3 years	SECURE DISPOSAL
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
<b>Sickness Records</b>				
Sickness records	Yes	Statutory	Held on Personnel File End of employment + 6 years	SECURE DISPOSAL
<b>Health and Safety</b>				
<b>Basic File Description</b>	<b>Data Prot Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
Accessibility Plans		Disability Discrimination Act	Current year + 6 years	SECURE DISPOSAL
Accident Reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980. Health & safety regulations		
▪ Adults	Yes		Date of incident + 12 years	SECURE DISPOSAL
▪ Children	Yes		DOB of child + 25 years <sup>(1)</sup>	SECURE DISPOSAL
COSHH			Current year + 40 years [Where appropriate an additional retention period may be allocated]	
Incident reports	Yes		Current year + 20 years	SECURE DISPOSAL
Policy Statements			Date of expiry + 3 years	SECURE DISPOSAL
Risk Assessments	Yes		Current year + 3 years	SECURE DISPOSAL
Process of monitoring of areas where employees and persons are likely to have come in contact with asbestos			Last action + 40 years	SECURE DISPOSAL
Process of monitoring of areas where employees and persons are likely to have come in contact with radiation			Last action + 50 years	SECURE DISPOSAL
Fire Precautions log books			Current year + 6 years	SECURE DISPOSAL
<b>Administrative</b>				
<b>Basic File Description</b>	<b>Data Prot Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
Employer's Liability Certificate			Closure of the school + 40 years	SECURE DISPOSAL
Inventories of equipment and furniture			Current year + 6 years	SECURE DISPOSAL
General file series			Current year + 5 years	Review to see whether a further retention period is required

School brochure/prospectus			Current year + 3 years	Transfer to Archives [The appropriate archivist will then take a sample for permanent preservation]
Newsletters, ephemera			Current year + 1 year	Review to see whether a further retention period is required
Visitors' book			Current year + 6 years	Review to see whether a further retention period is required
PTA/Old Pupils' Associations			Current year + 6 years	Review to see whether a further retention period is required

### Finance

Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Annual Accounts		Financial Regulations	Current year + 6 years	Archive
Loans and grants		Financial regulations	Date of last payment on loan + 12 years	Review to see whether a further retention period is required
<b>Contracts</b>				
▪ Under seal			Contract completion date + 12 years	SECURE DISPOSAL
▪ Under signature			Contract completion date + 6 years	SECURE DISPOSAL
▪ Monitoring records			Current year + 2 years	SECURE DISPOSAL
<b>Copy orders</b>			Current year + 2 years	SECURE DISPOSAL
<b>Budget reports, budget monitoring etc.</b>			Current year + 3 years	SECURE DISPOSAL
<b>Invoice, receipts and other records covered by the Financial Regulations</b>		Financial Regulations	Current year + 6 years	SECURE DISPOSAL
<b>Annual Budget and background papers</b>			Current year + 6 years	SECURE DISPOSAL
<b>Order books and requisitions</b>			Current year + 6 years	SECURE DISPOSAL
<b>Delivery Documentation</b>			Current year + 6 years	SECURE DISPOSAL
<b>Debtors' Records</b>		Limitation Act 1980	Current year + 6 years	SECURE DISPOSAL
<b>School Fund – Cheque books</b>			Current year + 3 years	SECURE DISPOSAL
<b>School Fund – Paying in books</b>			Current year + 6 years then review	SECURE DISPOSAL
<b>School Fund – Ledger</b>			Current year + 6 years then review	SECURE DISPOSAL
<b>School Fund – Invoices</b>			Current year + 6 years then review	SECURE DISPOSAL
<b>School Fund – Receipts</b>			Current year + 6 years	SECURE DISPOSAL
<b>School Fund – Bank statements</b>			Current year + 6 years then review	SECURE DISPOSAL
<b>School Fund – School Journey books</b>			Current year + 6 years then review	SECURE DISPOSAL
<b>Student grant applications</b>			Current year + 3 years	SECURE DISPOSAL
<b>Petty cash books</b>		Financial Regulations	Current year + 6 years	SECURE DISPOSAL

### Property

Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
Title Deeds			Permanent	These should follow the property unless the property has been registered at the Land Registry

<b>Plans</b>			Permanent	Retain in school whilst operational
<b>Maintenance and contractors</b>		Financial Regulations	Current year + 6 years	SECURE DISPOSAL
<b>Leases</b>			Expiry of lease + 6 years	SECURE DISPOSAL
<b>Lettings</b>			Current year + 3 years	SECURE DISPOSAL
<b>Burglary, theft and vandalism report forms</b>			Current year + 6 years	SECURE DISPOSAL
<b>Maintenance log books</b>			Current year + 6 years	SECURE DISPOSAL
<b>Contractors' Reports</b>			Current year + 6 years	SECURE DISPOSAL

### Department for Education

Basic File Description	Data Prot Issues	Statutory Provisions	Retention period [operational]	Action at the end of the administrative life of the record
<b>HMI reports</b>			These do not need to be kept any longer	
<b>OFSTED reports and papers</b>			Replace former report with any new inspection report	Review to see whether a further retention period is required
<b>ISI reports and paper</b>			Replace former report with any new inspection report	Review to see whether a further retention period is required
<b>Returns</b>			Current year + 6 years	SECURE DISPOSAL

### School Meals

Basic File Description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record
<b>Dinner Register</b>			Current year + 3 years	SHRED
<b>School Meals Summary Sheets</b>			Current year + 3 years	SHRED
<b>Free school meals register</b>			Current year + 6 years	SHRED

## **Appendix 2: Pupil Records Guidance**

These guidelines are intended to help provide consistency of practice in the way in which pupil records are managed. These will assist schools about how pupil records should be managed and what kind of information should be included in the file. It is hoped that the guidelines will develop further following suggestions and comments from those members of staff in schools who have the most contact with pupil records.

These guidelines apply to information created and stored in both physical and electronic format. These are only guidelines and have no legal status.

### **Managing Pupil Records**

The pupil record should be seen as the core record charting an individual pupil's progress through the Education System<sup>1</sup>. The pupil record 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 record is a principal record and that all information relating to the pupil will be found in the file. The exception to this will be sensitive Child Protection or SEN information which will be held in a different place and transferred separately.

### **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.

### **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 not be sent by post unless absolutely necessary. If files are sent by post, they should be sent by registered post with an accompanying list of the files. The secondary school should sign a copy of the list to say that they have received the files and return that to the primary school. Where appropriate, records can be delivered by hand with signed confirmation for tracking and auditing purposes.

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

## **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].

## **Safe destruction of the pupil record**

The pupil record should be disposed of in accordance with the safe disposal of records guidelines.

## **Transfer of a pupil record outside the EU area**

If you are requested to transfer a pupil file outside the EU area because a pupil has moved into that area, please contact the Local Authority for further advice.

## **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 authorised to see it.