



Germander Park School Records Management and Data Protection Policy

We recognise that by efficiently managing our records, we are able to comply with our legal and regulatory obligations and to contribute to the effective overall management of the school. 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 is achieved and can be audited.

It covers:

- Scope
- Responsibilities
- Relationships with existing policies

1 Scope of the policy

- 1.1. This policy applies to all records created, received or maintained by staff of the school 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 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.
- 1.3. A small percentage of the school records may be selected for permanent preservation as part of the institute's archives and for historical research.

2. Responsibilities

- 2.1 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 Verity Stobart.
- 2.2 The Headteacher Verity Stobart 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. She will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- 2.3. Individual staff and employees must ensure that records for which they are responsible are accurate, and maintained and disposed of in accordance with the school's records management guidelines.

3. Relationships with existing policies

This policy is drawn up within the context of:

- Freedom of information policy
- Data protection policy



- Other legislation or regulations (including audit, equal opportunities, safeguarding) and ethics affecting the school

Managing pupil records

The pupil record is seen as the core record charting an individual pupil's progress throughout the education system. The pupil record accompanies 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 (although it may be spread across more than one file).

1. File covers for Germander Park School

At Germander Park school we use a pale green card cover for the pupil record. This assists the junior school to ensure consistency of practice when receiving records from a number of different infant schools.

By using pre-printed file covers we help ensure that all necessary information is collated and the record looks tidy and reflects the fact that it is the principal record containing all information about an individual child.

2. Recording information

A pupil or their nominated representative have the legal right to see their file at any point during their education and even until the file is destroyed (when the pupil is 25 years of age or 35 years of age from the date of closure for pupils with special educational needs). This is their right of subject access under the Data Protection Act of 1998. It is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

3. Primary School Records

3a. Opening a file

The pupil record starts its life when a file is opened for each new pupil as they begin school. This is the file which will follow the pupil for the rest of their school career.

The file cover contains the child's name, gender and date of Birth as well as a note of the date when the file was opened and the date when the file is closed if it is felt appropriate.

Inside the front cover the following information is easily accessible:

- Name of the pupil's doctor
- Emergency contact details
- Gender
- Preferred name
- Position in Family
- Ethnic origin(although this is 'sensitive' data under the Data Protection Act of 1998, the Department for Education requires statistics about ethnicity)



- Language of home (if other than English)
- Religion(although this is 'sensitive' data under the Data Protection Act of 1998, the school has good reasons for collecting the information)
- Any allergies or other medical conditions that it is important to be aware of (although this is 'sensitive' data under the Data Protection Act of 1998, the school has good reasons for collecting the information)
- Names of parents and/or guardians with home address and telephone number (and any additional relevant carers and their relationship to the child)
- Name of the school, admission number, the date of admission and the date of leaving
- Any other agency involvement (e.g. speech and language therapist, paediatrician)

It is essential that these files which contain personal information are managed against the information security guidelines

3b. Items which are included on the pupil record

- If a pupil has attended an early years setting, then the record of transfer is included on the pupil's file
- Admission form (application form)
- Fair processing notice (if these are issued annually only the most recent need be on the file)
- Parental permission for photographs to be taken(or not)
- Years Record
- Annual written report to parent
- National curriculum and RE agreed syllabus record sheets
- Any information relating to a major incident involving the child (either accident or other incident)
- Any relevant medical information (stored in the file in an envelope clearly marked as such)
- Any reports written about the child
- Any information about a statement or EHC plan and support offered in relation to the statement or EHC plan
- Any information relating to exclusions (fixed or permanent)
- Any correspondence with parents or outside agencies relating to major issues
- Details of any complaints made by the parents or pupil

The following records are stored in a divided and separate part of the pupil record as they are subject to shorter retention periods and if placed in the main file then it will involve a lot of unnecessary weeding of the files before they are transferred on to another school.

- Absence notes



- Parental consent forms for trips/outings (in the event of a major incident all the parental consent forms are retained with the incident report, not in the pupil record)
- Correspondence with parents about minor issues
- Accident forms (these are stored separately and retained on the school premises until their statutory retention period is reached. A copy may be placed on the pupil file in the event of a major incident)

The following records are stored separately in a secure cabinet in the Headteacher's office:

- Child protection reports/disclosures (these are clearly marked as such and are kept in purple files)

3c. Transferring the pupil record to a new school or the pupil's junior school

The pupil record is not weeded before transfer to a new school or the pupil's junior 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.

Germander Park School does not 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.

If files are sent by post they are sent by registered post with an accompanying list of the files.

The new school or junior school are requested to sign a copy of the list to say that they have received the files, and return that to Germander Park School. Where appropriate, records can be delivered by hand with signed confirmation for tracking and auditing purposes.

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

4. Responsibility for the pupil record once the pupil leaves the school

The school which the pupil attended until statutory school leaving age (or the school where the pupil completed sixth form studies) is responsible for retaining the pupil record until the pupil reaches the age of 25 years. This retention is set in line with the Limitation Act 1980 which allows that a claim can be made against an organisation by a minor for up to 7 years from their 18th birthday.

5. Safe destruction of the pupil record

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

6. Transfer of a pupil record outside the EU area

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



7. Storage of pupil records

All pupil records are kept securely at all times. Paper records, for example are kept in a lockable storage area with restricted access, and the contents are secure within the file. Electronic records have appropriate security.

Access arrangements for pupil records are set up to 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.