



Bishop Cornish CEVA Primary School
Record Keeping and Retention Policy
Esteem and Educate Every Child

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Purpose of this Policy

The Code of Practice on the Management of Records under the Freedom of Information Act 2000, states:

"A school should have in place an overall policy statement, endorsed by top management and made readily available to staff at all levels of the organisation, on how it manages its records, including electronic records."

Every school needs to create and maintain accurate records in order for it to function. The policy for managing records at Bishop Cornish CEVA Primary School has been drawn up in conformity with legislation, regulations affecting schools and best practice.

This policy sets out guidelines for recording, managing, storing and disposing of data, whether they are held on paper or electronically, in order to assist staff, and the School, to comply with the General Data Protection Regulations 2018 (GDPR), the Data Protection Act 1998 (DPA) and the Freedom of Information Act 2000 (FIA). It should be read and used in conjunction with the following policies:

- Data Protection Policy
- Admissions Policy and Procedure

Members of staff are expected to manage their current record keeping systems using this Record Keeping and Retention Policy and to take account of the different kinds of retention periods when they are creating new record keeping systems.

Benefits of the Record Retention Policy

There are a number of benefits which arise from the use of a complete Retention Policy:

- Managing records against the Retention Policy is deemed to be "normal processing" under the GDPR 2018, Data Protection Act 1998 and the

Freedom of Information Act 2000. Provided members of staff are managing record series using the Retention Policy they are protected against allegations of misuse.

- Members of staff can be confident about destroying information at the appropriate time.
- Information which is subject to Freedom of Information and Data Protection legislation will be available when required.
- All personal data is stored securely in line with school policy.
- The school is not maintaining and storing data/information unnecessarily.

It is important that all staff bear in mind, when creating documents and records of any sort (and particularly email), that at some point in the future those documents and records could be disclosed - whether as a result of litigation or investigation, or because of a subject access request under the DPA. The watchwords of record-keeping are therefore **accuracy, clarity, professionalism** and **objectivity**.

Current Pupil Records

A file is kept on each pupil in the School Management Information System (Integris). This electronic file holds key information about every pupil. The safeguarding system used is CPOMs (Child Protection Online Management System) which electronically stores child protection information and concerns. Reports of all **serious / significant** conversations between parents and members of staff about any academic or pastoral issues are also stored on CPOMs.

The information held on the school's electronic database covers: the pupil's name, address, form, house, emergency contact details, academic performance, school reports and daily attendance. Confidentiality of personal information is protected in accordance with the Data Protection Policy.

Pupils with Special Educational, Welfare or Medical Needs

The names of pupils with special educational, welfare or medical needs are recorded and any special provision to be made for individual pupils are made available to those staff with a need to know that information via Integris and CPOMs.

Medical Records

A confidential medical record on each pupil is kept securely on Integris, Medical Tracker and CPOMs. The medical record contains information on allergies, and medication taking including records of all significant accidents and injuries to pupils. They include any significant known drug reactions, major allergies and notable medical conditions. This information is available to staff likely to administer medication or treatment. The Catering Manager holds details of pupils with food allergies. All students who have a more serious level of medical need (e.g. diabetes, anaphylaxis) have an individual Health Care Plan (HCP) which is put together by the parents/guardian with the GP's/consultant's instructions for care within school should the event arise. Teachers who have contact with these students can view pupils with serious health issues. These students have a medical alert flag along with other pupils with less serious health matters. The School Secretary will disclose the names of current pupils with medical conditions, or social information of a sensitive nature that may be of relevance to staff in their dealings with pupils, for example, when arranging trips and visits.

Financial Records

The School Business Manager and School Secretary holds electronic and paper financial records for pupils using Parentpay.

Access by Staff

All office staff are able to access Integris, Medical Tracker and CPOMs to view records and to input information.

Data Protection Policy

Parents accept a place for their child Bishop Cornish CEVA Primary School in the knowledge that data about pupils and their parents will be collected periodically and stored and processed in order to allow for the efficient operation of the school.

Access by Parents and Pupils

The Privacy Notice, GDPR and Data Protection Policy describes its duties and obligations under legislation, including parents' rights and the rights of pupils aged 12 or over to have access to their personal data. It also covers the circumstances under which data would be disclosed to a third party.

Staff Induction

All new teaching and office staff will be given training on accessing and managing school records (including the database), as part of their induction into the school's local procedures for marking work, report-writing and written and electronic communications with pupils and parents.

Security

As a guiding principle, the GDPR and DPA requires that personal data is only retained for as long as necessary - that is, necessary for the specific lawful purpose (or purposes) it was acquired. Any information which is held is to be kept in securely.

Retention Periods

One consideration in whether it is necessary or desirable to keep records is possible future litigation. Ideally, therefore, records would not be disposed of

until the limitation period for bringing a claim has passed. For most contracts that will mean 6 years from any breach but the date to start counting from is the last day of the period under contract. The period of 6 years also applies to many claims outside contract (such as fraud, mistake or negligence), while in the case of personal injury it is only 3 years. However, if the harm is only discovered later - e.g. 'latent' damage, or some unseen injury - then the timer only starts from the point of discovery: subject, in the case of latent property damage, to a 15-year backstop.

In some cases, the prompt may be the end of a calendar year, so for the purpose of this policy a contingency has generally been built in (e.g. 7 years where the statutory limitation is 6 years). For this reason, we keep all records of past pupils securely on Integris until a pupil is 18 years old.

In many cases these records will comprise personal or sensitive personal data (e.g. health or criminal allegations): in which case, even justifiable reasons to keep records for many years will need to be weighed against personal rights. Unless there is a specific statutory obligation to hold or destroy records, the retention periods are not prescriptive limits. Retention periods may be shorter or longer than the suggested document retention period, according to context.

Disposal of Documents

When information is no longer required, it can be disposed of. For confidential, sensitive or personal information to be considered securely disposed of, it must be in a condition where it cannot either be read or reconstructed. Skips and 'regular' waste disposal are not considered to be secure.

All paper records are disposed of securely through Devon Waste using secure methods. Some items will be shredded immediately using a cross-cutting shredder; CDs / DVDs / diskettes should be cut into pieces. Where third party disposal experts are used they should ideally be supervised but, in any event,

under adequate contractual obligations to the school to process and dispose of the information securely. Whenever records are destroyed, staff should record at least:

- File reference (or another unique identifier)
- File title (or brief description)
- No of files
- The name of the authorising officer
- Date of destruction