



School Records Management Policy



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1. Introduction

Bredon 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. It covers:

- Scope
- Responsibilities
- Relationships with existing policies

2. Scope

This policy applies to all records 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.

A small percentage of the school's records will be selected for permanent preservation as part of the institution's archives and for historical research. This should be done in liaison with the County Archives Service.

3. Responsibilities

Bredon 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 of the School.

The Data Manager is responsible for records management in the school, 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. The Data Manager 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. The school follows the Guidelines for Independent Schools on the Storage and Retention of Records and Documents (2019) produced by the Independent Schools' Bursars Association

4. Relationship with Existing Policies

This policy has been drawn up within the context of the school's Freedom of Information Policy, Data Protection Policy and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school.

Signed: _____



[Head of the School]

Appendix A: Guidelines for Independent Schools on the Storage and Retention of Records and Documents (2019)

Type of Record/Document	<u>Suggested</u> ¹ Retention Period
<p><u>SCHOOL-SPECIFIC RECORDS</u></p> <p>Registration documents of School</p> <p>Attendance Register</p> <p>Minutes of Governors' meetings</p> <p>Annual curriculum</p>	<p>Permanent (or until closure of the school)</p> <p>6 years from last date of entry, then archive.</p> <p>6 years from date of meeting</p> <p>From end of year: 3 years (or 1 year for other class records: e.g. marks / timetables / assignments)</p>
<p><u>INDIVIDUAL PUPIL RECORDS</u></p> <p>Admissions: application forms, assessments, records of decisions</p> <p>Examination results (external or internal)</p> <p>Pupil file including: Pupil reports Pupil performance records Pupil medical records Special educational needs records (<i>to be risk assessed individually</i>)</p>	<p><i>NB – this will generally be personal data</i></p> <p>25 years from date of birth (or up to 7 years from the pupil leaving). If unsuccessful: up to 1 year.</p> <p>7 years from pupil leaving school</p> <p>ALL: 25 years from date of birth (subject to where relevant to safeguarding considerations: any material which may be relevant to potential claims should be kept for the lifetime of the pupil).</p> <p>Date of birth plus up to 35 years (allowing for special extensions to statutory limitation period)</p>
<p><u>SAFEGUARDING</u></p> <p>Policies and procedures</p> <p>DBS disclosure certificates (if held)</p> <p>Accident / Incident reporting</p> <p>Child Protection files</p>	<p><i>NB – please read notice at the top of this note</i></p> <p>Keep a permanent record of historic policies</p> <p><u>No longer than 6 months</u> from decision on recruitment, unless DBS specifically consulted – but a record of the checks being made must be kept, if not the certificate itself.</p> <p>Keep on record for as long as any living victim may bring a claim (NB civil claim limitation periods can be set aside in cases of abuse). Ideally, files to be reviewed from time to time if resources allow and a suitably qualified person is available.²</p> <p>If a referral has been made / social care have been involved; or child has been subject of a multi-agency plan; or there is a risk of future claims – indefinitely.</p> <p>[If the school operates a low level concerns policy, if there has been no multi-agency action, consider whether or not the child needs to be named in any record concerning an adult, or if a copy should be kept on the child protection file.]</p>

<p><u>CORPORATE RECORDS (where applicable)</u></p> <p>Certificates of Incorporation</p> <p>Minutes, Notes and Resolutions of Boards or Management Meetings</p> <p>Shareholder resolutions</p> <p>Register of Members/Shareholders</p> <p>Annual reports</p>	<p><i>eg where schools have trading arms</i></p> <p>Permanent (or until dissolution of the company)</p> <p>Minimum – 10 years</p> <p>Minimum – 10 years</p> <p>Permanent (minimum 10 years for ex members/shareholders)</p> <p>Minimum – 6 years</p>
<p><u>ACCOUNTING RECORDS</u> ³</p> <p><i>Accounting records (normally taken to mean records which enable a company's accurate financial position to be ascertained & which give a true and fair view of the company's financial state)</i></p> <p>[NB <u>specific ambit to be advised by an accountancy expert</u>]</p> <p>Tax returns</p> <p>VAT returns</p> <p>Budget and internal financial reports</p>	<p>Minimum – 3 years for private UK companies (except where still necessary for tax returns)</p> <p>Minimum – 6 years for UK charities (and public companies) from the end of the financial year in which the transaction took place</p> <p>Internationally: can be up to 20 years depending on local legal/accountancy requirements</p> <p>Minimum – 6 years</p> <p>Minimum – 6 years</p> <p>Minimum – 3 years</p>
<p><u>CONTRACTS AND AGREEMENTS</u></p> <p>Signed or final/concluded agreements (<i>plus any signed or final/concluded variations or amendments</i>)</p> <p>Deeds (or contracts under seal)</p>	<p>Minimum – 7 years from completion of contractual obligations or term of agreement, whichever is the later</p> <p>Minimum – 13 years from completion of contractual obligation or term of agreement</p>
<p><u>INTELLECTUAL PROPERTY RECORDS</u></p> <p>Formal documents of title (trade mark or registered design certificates; patent or utility model certificates)</p> <p>Assignments of intellectual property to or from the school</p>	<p>Permanent (in the case of any right which can be permanently extended, eg trade marks); otherwise expiry of right plus minimum of 7 years.</p> <p>As above in relation to contracts (7 years) or, where applicable, deeds (13 years).</p>

<p>IP / IT agreements (including software licences and ancillary agreements e.g. maintenance; storage; development; coexistence agreements; consents)</p>	<p>Minimum – 7 years from completion of contractual obligation concerned or term of agreement</p>
<p><u>EMPLOYEE / PERSONNEL RECORDS</u></p> <p>Single Central Record of employees</p> <p>Contracts of employment</p> <p>Employee appraisals or reviews</p> <p>Staff personnel file</p> <p>Payroll, salary, maternity pay records</p> <p>Pension or other benefit schedule records</p> <p>Job application and interview/rejection records (unsuccessful applicants)</p> <p>Immigration records</p> <p>Health records relating to employees [Low-level concerns about adults]</p>	<p><i>NB this will contain personal data</i></p> <p>Keep a permanent record that mandatory checks have been undertaken (but do <u>not</u> keep DBS certificate information itself: 6 months as above)</p> <p>7 years from effective date of end of contract</p> <p>Duration of employment plus minimum of 7 years <u>As above, but do not delete any information which may be relevant to historic safeguarding claims.</u></p> <p>Minimum – 6 years</p> <p>Possibly permanent, depending on nature of scheme</p> <p>Minimum 3 months but no more than 1 year</p> <p>Minimum – 4 years</p> <p>7 years from end of contract of employment [Regular review recommended to justify longer-term retention as part of safeguarding files.]</p>
<p><u>INSURANCE RECORDS</u></p> <p>Insurance policies (will vary – private, public, professional indemnity)</p> <p>Correspondence related to claims/ renewals/ notification re: insurance</p>	<p>Duration of policy (or as required by policy) plus a period for any run-off arrangement and coverage of insured risks: ideally, until it is possible to calculate that no living person could make a claim.</p> <p>Minimum – 7 years</p>
<p><u>ENVIRONMENTAL, HEALTH & DATA</u></p> <p>Maintenance logs</p> <p>Accidents to children ⁴</p> <p>Accident at work records (staff) ⁴</p>	<p>10 years from date of last entry</p> <p>25 years from birth (longer for safeguarding)</p> <p>Minimum – 4 years from date of accident, but review case-by-case where possible</p>

Staff use of hazardous substances ⁴	Minimum – 7 years from end of date of use
Risk assessments (carried out in respect of above) ⁴	7 years from completion of relevant project, incident, event or activity.
Data protection records documenting processing activity, data breaches	No limit: as long as up-to-date and relevant (as long as no personal data held)