



Records Management Policy

Review Programme:	Annually
Ratified by Governors at:	Full Governor Meeting on 14.06.2021
Date for next review:	April 2022
Signed - Chair of Governors:	
Signed - Headteacher:	

Contents:

Statement of intent	3
Legal framework	4
Responsibilities	5
Management of pupil records	6
Retention of Records	6
Identifying information	6
Storing and protecting information	7
Accessing information	8
Mapping Process	9
Disposal of data	10
Monitoring and review	11
Annex A	12
<i>'Guidance on the Retention and Transfer of Child Protection Records and Transfers of Pupil Files to Secondary Schools.'</i>	
Annex B	16
<i>'Transfer Form for Child Protection Records between Educational Establishments'</i>	

Statement of intent and Application

[Moseley Primary School](#) is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible by the appropriate individuals. In line with the requirements of the UK General Data Protection Regulation (UK GDPR), the school also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

The school has created this policy to outline how records are stored, accessed, monitored, and retained in order to meet the school's statutory requirements.

This policy applies to all employees, volunteers and visitors who are privy to personal data within [Moseley Primary School](#).

The Policy applies to all records created by staff and contractors in the course of their work and includes all types such as: files, papers, maps, plans, non-standard paper documents, as well as electronic records in all formats including: computer files, email and databases, video, audio and CCTV recordings. It also applies to all records held on MIS systems and processor systems.

This Policy must be read in conjunction with the School's existing policies and procedures. Those who are not held to the Staff Code of Conduct will be asked to return any personal data /records used in the course of their time at the school and will be prevented from further accessing records.

1. Legal framework

- 1.1. This policy has due regard to legislation including, but not limited to, the following:
 - UK General Data Protection Regulation
 - Data Protection Act 2018
 - Freedom of Information Act 2000
 - Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- 1.2. This policy also has due regard to the following guidance:
 - Information Records Management Society (2016) 'Information Management Toolkit for Schools'
 - DfE (2018) 'Data protection: a toolkit for schools'
- 1.3. This policy will be implemented in accordance with the following school policies and procedures:
 - [Data Protection Policy](#)
 - [Record Retention Schedule](#)
 - [CCTV Policy](#)
 - [Acceptable Use Policy](#)

2. Responsibilities

- 2.1. The school as a whole has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.
- 2.2. The [Governing Body and the Data Protection Officer \(DPO\)](#) holds overall responsibility for the wording of this policy.
- 2.3. The Senior Leadership team holds overall responsibility for the implementation of this policy.
- 2.4. All staff are responsible for the management of records and compliance with this policy at [Moseley Primary School](#).
- 2.5. The [Data Protection Officer](#) is responsible for promoting compliance with this policy and reviewing the policy on an [annual](#) basis, in conjunction with the [Governing Body and Senior Leadership Team](#).
- 2.6. All staff members are responsible for ensuring that any records for which they are responsible for are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

- 2.7. Wherever possible, the school should promote the electronic storage of personal data.

3. Management of pupil records

- 3.1. Pupil records are specific documents that are used throughout a pupil's time in the education system. They are passed to each school that a pupil attends and includes all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.

- 3.2. Electronic and paper records include the following information stored in the pupil record (this is not exhaustive):

- Forename, surname, gender and date of birth
- Unique pupil number
- Note of the date when the file was opened
- Note of the date when the file was closed, if appropriate
- Ethnic origin, religion and first language (if not English)
- Any preferred names
- Emergency contact details and the name of the pupil's doctor
- Any allergies or other medical conditions that are important to be aware of
- Names of parents, including their home address(es) and telephone number(s)
- Name of the school, admission number, the date of admission and the date of leaving, where appropriate
- Any other agency involvement, e.g. speech and language therapist
- Admissions form
- Details of any SEND
- If the pupil has attended an early years setting, the record of transfer
- Fair processing notice - only the most recent notice will be included
- Annual written reports to parents
- National curriculum and agreed syllabus record sheets
- Notes relating to major incidents and accidents involving the pupil
- Any information about an education, health and care (EHC) plan and support offered in relation to the EHC plan
- Any notes indicating child protection disclosures and reports are held
- Any information relating to exclusions

- Any correspondence with parents or external agencies relating to major issues, e.g. mental health
 - Notes indicating that records of complaints made by parents or the pupil are held
- 3.3. Hard copies of disclosures and reports relating to child protection are stored in a secure location- a note indicating as such is marked on the pupil's file.
 - 3.4. Hard copies of complaints via the complaint procedure made by parents or pupils are stored securely.
 - 3.5. Actual copies of accident and incident information are stored securely and held in line with the school's retention periods. For serious and reportable accidents, a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.
 - 3.6. Electronic records relating to a pupil's record will also be transferred to the pupils' next school in accordance with the Guidance on the Retention and Transfer of Child Protection Records and Transfers of Pupil Files to Secondary Schools in Annex A.
 - 3.7. The school will not keep any copies of information stored within a pupil's record, unless there is a recorded justification for retention at the time during which the pupil leaves the school. This excludes the personal data the school is legally required to retain. The responsibility for these records will then transfer to the next school that the pupil attends. If a child attends a school abroad or is to be home educated, the pupil file will be retained until the pupil reaches the age of 25 years.
 - 3.8. The school will refer and adhere to the Guidance on the Retention and Transfer of Child Protection Records and Transfers of Pupil Files to Secondary Schools when a transfer of records occurs.

4. Retention of records

- 4.1 The School refers and adheres to its Record Retention Schedule available here: <https://www.moseleyprimaryschool.co.uk/data-protection/>

5. Identifying information

- 5.1. Under the UK GDPR, data controllers must apply data protection by design and default. As the data controller, the school ensures appropriate measures are in place in order for individuals to exercise their rights.
- 5.2. Wherever possible, the school uses pseudonymisation, also known as the 'blurring technique', to reduce the risk of identification.
- 5.3. Once an individual has left the school, if identifiers are no longer required, these are made less specific wherever possible and as far as is possible.

- 5.4. Where data is required to be retained over time, e.g. attendance data, the school removes any personal data not required and keeps only the data needed ; for example, the statistics of attendance rather than personal information.

6. Storing and protecting information

- 6.1. The School will conduct a back-up of information routinely to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.
- 6.2. Where possible, backed-up information will be stored off the school premises, using a central back-up service.
- 6.3. Confidential paper records are kept in a secure location with restricted access.
- 6.4. Confidential paper records are not left unattended or in clear view when held in a location with general access.
- 6.5. Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed-up.
- 6.6. Where data is saved on removable storage or a portable device, the device is kept securely, for example in a lockable drawer when not in use.
- 6.7. All electronic devices are password-protected to protect the information on the device in case of theft.
- 6.8. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 6.9. School devices are governed by the Acceptable Use Policy.
- 6.10. All members of staff are provided with their own secure login and password to devices and systems that access personal data under the school's control. The password must be a combination of both letters, numbers and symbols for maximum security.
- 6.11. External emails containing sensitive or confidential information are password-protected to ensure that only the recipient is able to access the information or sent via secure Office 365 link. The password will be shared with the recipient over the phone.
- 6.12. Circular emails to parents and those external to the school are sent blind carbon copy (bcc), including when sent from a processor's software, to ensure email addresses are not disclosed to other recipients.
- 6.13. Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with Data Protection Legislation, either in an electronic or paper format, staff take

extra care to follow the same procedures for security, e.g. keeping devices secure. The person taking the information from the school premises accepts full responsibility for the security of the data.

- 6.14. Before sharing data, staff always ensure that:
- There is a valid legal basis for sharing the data (for example, there is a safeguarding need, or consent has been obtained).
 - Adequate security is in place to protect it when it is shared.
 - The data recipient has been outlined in a privacy notice.
 - It is not shared outside the UK without appropriate safeguards in place.
 - A compliant contract is in place when sharing with a processor
- 6.15. All staff members will implement a 'clear desk policy' wherever possible, to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be stored securely.
- 6.16. Under no circumstances are visitors allowed access to confidential or personal information without confirmation from the [Headteacher](#). Visitors to areas of the school containing sensitive information are supervised at all times. [The confidentiality statement should be signed by volunteers.](#)
- 6.17. The physical security of the school's buildings and storage systems, and access to them, is reviewed by the [School's authorised personnel](#). If an increased risk in vandalism, burglary or theft is identified, this will be reported to the [Senior Leadership Team](#) and extra measures to secure data storage will be considered.
- 6.18. The school takes its duties under Data Protection Legislation seriously and any unauthorised disclosure/ may result in disciplinary action. This is inclusive of employees, contractors and agents who have no lawful bases for viewing/processing the personal data.
- 6.19. The [Senior Leadership Team](#) is responsible for continuity and recovery measures are in place to ensure the security of protected data.
- 6.20. Any damage to or theft of data will be managed in accordance with the school's Breach Procedure.
- 6.21. Personal data in relation to staff will be retained for the current academic year plus six years will be archived to dedicated files on the school's server, which are password-protected - this will be backed-up in accordance with section 6 of this policy.
- 6.22. Unencrypted memory sticks will never be used to store school personal data.
- 6.23. The School will review new and existing storage methods annually and, where appropriate, discuss with the Data Protection Officer.

7. Accessing information

- 7.1. [Moseley Primary School](#) is transparent with data subjects, the information we hold and how it can be accessed.
- 7.2. All members of staff, parents of registered pupils and other users of the school, e.g. visitors, are entitled to:
 - Know what information the school holds and processes about them or their child and why.
 - Understand their rights as individuals.
 - Understand how to provide and withdraw consent to information being held.
 - Understand what the school is doing to comply with its obligations under the UK GDPR.
- 7.3. All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the UK GDPR, to access certain personal data being held about them or their child.
- 7.4. The disclosure of records is limited to the specific information required to be disclosed to authorised parties and always in accordance and with strict adherence to the Data Protection Act 2018 and UK General Data Protection Regulation.
- 7.5. Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information may still be shared with parents.
- 7.6. Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.
- 7.7. The school will adhere to the provisions outlined in the school's [Data Protection Policy and Subject Access Request Guidance](#) when responding to requests seeking access to personal information.

8. Mapping and Information Asset and Risk process

- 8.1. The school conducts information reviews as and when against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the UK GDPR. This is called 'data mapping' or a 'record of processing activities' and the spreadsheet document includes a record of the following information:
 - Paper documents and records
 - Electronic documents and records
 - Databases

- Video and photographic records
- 8.2. The data mapping may be completed in a number of ways, including, but not limited to:
- Interviews with staff members with key responsibilities - to identify information and information flows, etc.
 - Questionnaires to key staff members to identify information and information flows, etc.
 - A mixture of the above
- 8.3. The School's authorised personnel is responsible for completing the data mapping. The information review will include the following:
- The school's data needs
 - The information needed to meet those needs
 - The format in which data is stored
 - How long data needs to be kept for
 - Who is responsible for maintaining the original document
- 8.4. The School's authorised personnel will consult with staff members involved in the mapping process and this will be reviewed regularly to ensure that the information is accurate and up to date.
- 8.5. Once it has been confirmed that the information is accurate and up to date, the School's authorised personnel will record all details on the data mapping spreadsheet.
- 8.6. The information displayed on the data mapping spreadsheet will be shared with the Headteacher and DPO for approval. This will be resent as and when a change is made to the document.
- 8.7. The school will also maintain an Information Asset and Risk Register containing records of the asset used, asset owner and the risks and mitigations when using the asset.

9. Disposal of data

- 9.1. The School have implemented a Record Retention Schedule to outline when data will be destroyed/retained.
- 9.2. Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.
- 9.3. Where disposal of information is outlined as secure disposal, this will be shredded or pulped and electronic information will be scrubbed clean and, where possible, cut.

- 9.4. Where information has been kept for administrative purposes, the School's authorised personnel and, where necessary, the DPO, will review the information again after the retention period. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in the Retention Schedule. If any information is kept, the information will be reviewed every subsequent three years.
- 9.5. Where information must be kept permanently, this information is exempt from the normal review procedures.

10. Monitoring and review

- 10.1. This policy will be reviewed on an annual basis by the DPO in conjunction with the school's Headteacher and Governing Body. The next scheduled review date for this policy is April 2022.
- 10.2. Any changes made to this policy will be communicated to all members of staff and the Governing Body.

APPENDIX A: TRANSFER FORM - NO SAFEGUARDING CONCERNS (To be printed on mint green paper & inserted in the child's yellow folder)



Moseley Primary School
Moseley Avenue,
Coventry, CV6 1AB

For the attention of the school's Designated Safeguarding Lead

Child's Name -----

As far as we are aware there are no safeguarding concerns regarding this child.

Signed: _____

DSL at _____ school

Date _____

TRANSFER FORM - SAFEGUARDING CONCERNS (To be printed on lilac paper, with the top half being retained by receiving school and lower half for original school)



FROM: MOSELEY PRIMARY SCHOOL, MOSELEY AVENUE, COVENTRY, CV6 1AB

To: NAME OF RECEIVING SCHOOL _____

For the attention of the school's Designated safeguarding Lead

Please find enclosed paper work in respect of:

CHILD'S NAME				
DOB				
UPN				
YEAR GROUP				
ATTENDANCE				
DATE OF ADMISSION				
PREVIOUS SCHOOLS ATTENDED				
NAME OF CURRENT CHILD PROTECTION LEAD				
CP	CIN	EARLY HELP	LAC	GENERAL CONCERNS

Case open/closed dates.....

DATE	FILE HAND DELIVERED BY:	YES/NO	POSTED BY SPECIAL DELIVERY	YES/NO	FILE SENT ELECTRONICALLY	YES/NO

Please sign and return slip below as acknowledgement of receipt and keep the above half with the child's CP records.

=====

NAME OF RECEIVING CHILD PROTECTION LEAD				
NAME OF RECEIVING SCHOOL				
SIGNATURE				
I confirm receipt of paperwork in respect of:				
CHILD'S NAME				
DOB				
UPN				
YEAR GROUP				
ATTENDANCE				
DATE OF ADMISSION				
PREVIOUS SCHOOLS ATTENDED				
NAME OF CURRENT CHILD PROTECTION LEAD				
CP	CIN	EARLY HELP	LAC	GENERAL CONCERNS

Case open/closed dates.....

DATE	FILE HAND DELIVERED BY:	YES/NO	POSTED BY SPECIAL DELIVERY	YES/NO	FILE SENT ELECTRONICALLY	YES/NO

TRANSFER FORM - SEN FILES

(top half being retained by receiving school and lower half for original school)



FROM: MOSELEY PRIMARY SCHOOL, MOSELEY AVENUE, COVENTRY, CV6 1AB

To: NAME OF RECEIVING SCHOOL _____

For the attention of the school's SENCO

Please find enclosed paper work in respect of:

CHILD'S NAME	
DOB	
UPN	
YEAR GROUP	
NAME OF CURRENT SENCO	

DATE	FILE HAND DELIVERED BY:	YES/NO	POSTED BY SPECIAL DELIVERY	YES/NO	FILE SENT ELECTRONICALLY	YES/NO

Please sign and return slip below as acknowledgement of receipt and keep the above half with the child's SEN records.

=====

NAME OF RECEIVING SENCO	
NAME OF RECEIVING SCHOOL	
SIGNATURE	
I confirm receipt of paperwork in respect of: CHILD'S NAME	
DOB	
UPN	
YEAR GROUP	

DATE	FILE HAND DELIVERED BY:	YES/NO	POSTED BY SPECIAL DELIVERY	YES/NO	FILE SENT ELECTRONICALLY	YES/NO



TRANSFER OF PUPIL FILES RECEIPT FORM

NAME OF RECEIVING SCHOOL	
NAME OF PERSON RECEIVING INFO	
CONTACT PHONE NO.	
SIGNATURE	

I confirm I have received the transfer information for the following pupils:

	SURNAME	FORENAME	PUPIL FOLDER	SAFEGUARDING INFO (TICK IF APPLICABLE)	SEN INFO
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					