



Felsted

RECORD KEEPING POLICY

COVERING BOTH SCHOOLS INCLUDING EYFS AND BOARDING

Governors' Committee normally reviewing:	Governance Committee
Date formally approved by the Committee :	Spring Term 2018
Date policy became effective :	September 2006

Period of Review:	2 Years
Next Review Date :	Spring Term 2020

Person responsible for implementation and monitoring :	Heads / Compliance Manager
Other relevant policies :	Data Protection Policy Confidentiality Policies Pastoral Care Plan & Policy Admissions Procedure & Policy Child Protection & Staff Behaviour Policies E-Safety Policies

The following Policy encompasses the Aims and Ethos of the Preparatory School and the Senior School

**Mr Simon James
Head, Preparatory School**

**Mr Chris Townsend
Head, Senior School**

[Aims and Ethos](#)

SAFEGUARDING STATEMENT

Felsted is committed to maintaining a safe and secure environment for all pupils and a 'culture of vigilance' to safeguard and protect all in its care, and to all aspects of its 'Safeguarding (Child Protection and Staff Behaviour) Policy'.

EQUAL OPPORTUNITIES STATEMENT

The aims of the School and the principles of excellent pastoral care will be applied to all children irrespective of differences in ethnic background, culture, language, religion, sexual orientation, gender and disabilities, so long as in the last matter the student is able to involve himself or herself in the activity concerned; equally these differences will be recognised and respected, and the School will aim to provide a positive culture of tolerance, equality and mutual respect.

RECORD-KEEPING POLICY

Felsted School 'the School' needs to create and maintain accurate records in order for it to function. The policy for managing records at Felsted School has been drawn up in conformity with legislation and regulations affecting schools.

In this policy, "record" means any document or item of data which contains evidence or information relating to the School, its staff or pupils. Some of this material, but not all, will contain personal and sensitive data concerning individuals.

All records will be kept within the recommended retention period (see Appendix 1) unless there is a legal obligation to retain beyond that time period.

1. PUPILS' RECORDS

A file is kept on each pupil in the School Office. The file holds the registration, admission and acceptance form, (the parent contract) and the academic record of a pupil as he or she progresses through the School. It will also include reports of conversations between parents and members of staff about academic or pastoral issues, school reports, references from previous schools and references prepared for universities and other institutions. It will record any disciplinary sanctions imposed on a pupil. The record identifies those with parental responsibility for the pupil and any court orders affecting parental responsibility or the care of the boarder.

The information held on the School's electronic management information system (MIS) covers: the pupil's name, address, House, and emergency contact details, academic performance, subjects studied and daily attendance. Confidentiality of personal information is protected. Access to records of conversations between parents and members of staff about any academic or pastoral issues is protected and stored as a separated electronic file for each child (Prep School) or on the pupil file (Senior School).

2. 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 who need to know that information.

3. MEDICAL RECORDS

A confidential medical record on each pupil is kept securely in the Medical Centre by the Medical Staff (Senior School pupils and Prep School full and weekly boarders) or with the School Nurse (Prep School day pupils and flexi boarders). The medical record contains: the NHS records of pupils who are registered with Blandford Medical Centre, the medical questionnaire that the parents completed when their child joined the School, and records of all treatment and immunisations that a pupil receives during his or her time at the School, including records of all accidents and injuries to the child. They include any significant known drug reactions, major allergies and notable medical

conditions. This information is available to staff who are likely to administer medication or treatment. The Catering Manager holds details of pupils with food allergies.

The School Management Information System identifies any pupils with a medical or chronic condition, via a flagging system, so that staff are aware and can obtain further information if/when required, for example if the pupil is attending a school trip.

4. SAFEGUARDING FILES

The School's records on child protection are password protected and saved in a designated area on the School system accessible to Designated Safeguarding Leads (DSLs) only. Paper files are kept locked in the DSL's office, and are separated from routine pupil records. Access is restricted to the DSLs, and the Heads.

Where a pupil leaves the School, the DSL will ensure that their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt. The DSL will retain a record of the child protection file in case of any historic safeguarding concern.

5. FINANCIAL RECORDS

The Bursar and the Accounts department holds financial records on all pupils throughout their time at the School. These cover: a record of the deposit, the acceptance form, bills for tuition fees and extras throughout a pupil's time at the School. If a pupil receives a bursary or scholarship, this will form part of the pupil record, along with records of annual assessments and awards.

6. ACCESS BY STAFF

All teaching and School office staff are able to access the School's password protected MIS where it is necessary for their role. Teaching staff may consult the pupil records held in the School Office. They also have access to relevant electronic records. Access to full medical records is restricted to the Medical staff. Access to financial records is restricted to the Headmaster and the relevant Bursary staff.

7. DATA PROTECTION/PRIVACY POLICY

Parents accept a place for their child at Felsted 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 in line with the Data Protection Act (as amended or superseded).

8. ACCESS BY PARENTS AND PUPILS

Felsted School's Data Protection/Privacy Policy describes its duties and obligations under the Data Protection Act (as amended or superseded), 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.

9. FAIR PROCESSING NOTICE

Felsted School will comply with a Fair Processing Notice legally issued by a public body or other authority that is a data controller and is subject to the same legal constraints regarding the manner in which it handles data.

10. STAFF TRAINING

New staff are given training regarding data protection and accessing and managing school records (including the MIS), as part of their induction to Felsted School. Staff are provided with training updates regarding data protection and in particular the security of personal and sensitive data.

11. RECORDS OF PAST PUPILS AND FELSTED SCHOOL ARCHIVE

We keep all records of past pupils until a pupil is 25 years old. At that point, we retain records of the following within the School Archive:

- Registration Form
- Final Confirmation of Entry Form
- Leavers Form
- All public examination results
- UCAS form or other similar final reports on leaving
- Information on other achievements, prizes or events of importance.
- A brief description of any examination considerations

All other information on the pupil file is securely destroyed unless there has been a safeguarding concern (see section 4).

School alumni records are stored by the Development Office.

12. STAFF RECORDS

The School maintains records of personnel relating to employees qualifications, experience, length of service, salary levels, medical questionnaire, disciplinary notes, grievance notes, right to work in the UK and all other required statutory documentation. All documentation is kept in secured filing cabinets and on the HR database system. All material is kept securely after employment has finished so that references can be written.

Access to staff records is available only to those where it is necessary for their role, including the HR team, Payroll Officer and Line Managers where applicable (eg training records, PDRs etc).

This policy has been written to be compliant with The Data Protection Act 1998 (as amended or superseded), Information Commissioner's Office [guidance for schools](#), and The Education (Pupil Information) (England) Regulations 2005.

APPENDIX 1 - TABLE OF RETENTION PERIODS

Type of Record/Document	Retention Period ¹ Records will be kept beyond the suggested retention period where there is a legal obligation to retain the records for a longer period.
<p>SCHOOL-SPECIFIC RECORDS</p> <ul style="list-style-type: none"> • Registration documents of the School • Attendance Register • Minutes of Governors' meetings • Annual curriculum 	<p>Permanent (or until closure of the School)</p> <p>6 years from last date of entry, then archive.</p> <p>Permanent</p> <p>From end of year: 3 years (or 1 year for other class records: eg marks / timetables / assignments)</p>
<p>INDIVIDUAL PUPIL RECORDS</p> <ul style="list-style-type: none"> • Admissions: application forms, assessments, records of decisions • Pupil file including pupil reports, examination results (external or internal) and pupil performance records • Pupil medical records • Special educational needs records (to be risk assessed individually) 	<p><i>These records contain personal data</i></p> <p>25 years from date of birth, or if pupil not admitted up to 7 years from decision. 7 years from pupil leaving school and then passed to Archive..</p> <p>25 years from date of birth and then archived (see section 11), subject where relevant to safeguarding considerations. Any material that may be relevant to potential claims will be kept for the lifetime of the pupil.</p> <p>25 years from date of birth, subject where relevant to safeguarding considerations. Any material that may be relevant to potential claims should be kept for the lifetime of the pupil.</p> <p>25 years from date of birth, subject where relevant to safeguarding considerations. Any material that may be relevant to potential claims should be kept for the lifetime of the pupil.</p>

¹ Some of these will be mandatory legal requirements (eg under the Companies Act 2006 or the Charities Act 2011), but in the majority of cases these decisions are up to the institution concerned. The suggestions will therefore be based on practical considerations for retention such as limitation periods for legal claims, weighed against whether there is a reasonable argument in respect of data protection.

<ul style="list-style-type: none"> • Copies of school bills 	7 years after issue
<u>SAFEGUARDING</u>	
<ul style="list-style-type: none"> • Policies and procedures 	Keep a permanent record of historic policies
<ul style="list-style-type: none"> • DBS disclosure certificates (potentially sensitive personal data & must be secure) 	No longer than 6 months from decision on recruitment, unless DBS specifically consulted but maintain a record of the fact that checks were undertaken, if not the certificate itself. <i>These records contain personal and sensitive data.</i>
<ul style="list-style-type: none"> • Incident reporting 	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
<ul style="list-style-type: none"> • Safeguarding/Child Protection Files (including where a pupil has transferred to another school) 	If a referral has been made / social care have been involved or child has been made subject of a multi-agency plan – indefinitely. If low level concerns, with no multi-agency action, assess at 25 years from date of birth or keep indefinitely, dependent on the concern.
<u>CORPORATE RECORDS (where applicable)</u>	
<ul style="list-style-type: none"> • Certificates of Incorporation 	Permanent (or until dissolution of the company).
<ul style="list-style-type: none"> • Minutes, Notes and Resolutions of Boards or Management Meetings 	Permanent
<ul style="list-style-type: none"> • Shareholder resolutions 	Permanent
<ul style="list-style-type: none"> • Register of Members/Shareholders 	Permanent (minimum 10 years for ex-members/shareholders).
<ul style="list-style-type: none"> • Annual reports 	Permanent

² The High Court has found that a retention period of 35 years was within the bracket of legitimate approaches. It also found that it would be disproportionate for most organisations to conduct regular reviews, but at the time of writing the ICO (Information Commissioner's Office) still expects to see a responsible assessment policy (eg every 6 years) in place.

<u>ACCOUNTING RECORDS³</u>	
<ul style="list-style-type: none"> 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) 	7 years from the end of the financial year in which the transaction took place.
<ul style="list-style-type: none"> Tax returns 	7 years
<ul style="list-style-type: none"> VAT returns 	7 years
<ul style="list-style-type: none"> Budget and internal financial reports 	3 years
<u>CONTRACTS AND AGREEMENTS</u>	
<ul style="list-style-type: none"> Signed or final/concluded agreements (plus any signed or final/concluded variations or amendments) 	7 years from completion of contractual obligations or term of agreement, whichever is the later.
<ul style="list-style-type: none"> Deeds (or contracts under seal) 	13 years from completion of contractual obligation or term of agreement.
<u>INTELLECTUAL PROPERTY RECORDS</u>	
<ul style="list-style-type: none"> Formal documents of title (trademark or registered design certificates; patent or utility model certificates) 	Permanent (in the case of any right which can be permanently extended, eg trade marks); otherwise expiry of right plus minimum of 7 years.
<ul style="list-style-type: none"> Assignments of intellectual property to or from the school 	As above in relation to contracts (7 years) or, where applicable, deeds (13 years).
<ul style="list-style-type: none"> IP / IT agreements (including software licences and ancillary agreements eg maintenance; storage; development; co-existence agreements; consents) 	7 years from completion of contractual obligation concerned or term of agreement.
<u>EMPLOYEE / PERSONNEL RECORDS</u>	
<ul style="list-style-type: none"> Single Central Record of employees 	<i>These records contain personal data</i> Keep a permanent record (not DBS certificates) of all mandatory checks that have been undertaken.
<ul style="list-style-type: none"> Contracts of employment 	7 years from effective date of end of contract.
<ul style="list-style-type: none"> Employee appraisals or reviews 	All staff HR files to be kept for the duration

³ Retention period for tax purposes should always be made by reference to specific legal or accountancy advice.

and staff personnel file	of the IICSA after which the School will follow guidance from the relevant authorities. The School will retain indefinitely any information that may be relevant to historic safeguarding concerns.
<ul style="list-style-type: none"> • Payroll, salary, maternity pay records 	6 years
<ul style="list-style-type: none"> • Pension or other benefit schedule records 	Teachers Pension returns - permanent Pension schemes via payroll - 7 years
<ul style="list-style-type: none"> • Job application and interview/rejection records (unsuccessful applicants) 	1 year (see note of DBS disclosure certificates).
<ul style="list-style-type: none"> • Immigration records 	4 years
<ul style="list-style-type: none"> • Health records relating to employees 	7 years from end of contract of employment.
<u>INSURANCE RECORDS</u>	
<ul style="list-style-type: none"> • Insurance policies (will vary - private, public, professional indemnity) 	Permanent
<ul style="list-style-type: none"> • Correspondence related to claims/ renewals/ notification re: insurance 	7 years
<u>ENVIRONMENTAL & HEALTH RECORDS⁴</u>	
<ul style="list-style-type: none"> • Maintenance logs 	10 years from date of last entry
<ul style="list-style-type: none"> • Accidents to children 	25 years from birth (unless a safeguarding incident - see safeguarding section)
<ul style="list-style-type: none"> • Accident at work records (staff) 	4 years from date of accident but review case by case if possible
<ul style="list-style-type: none"> • Staff use of hazardous substances 	7 years from end of date of use.
<ul style="list-style-type: none"> • Risk assessments(carried out in respect of above) 	7 years from completion of relevant project, incident, event or activity.

⁴ The School is aware that latent injuries can take years to manifest, and the limitation period for claims reflects this. The School will keep a note of all procedures as they were at the time, a record that they were followed and the relevant insurance documents.