



Felsted

RECORD KEEPING POLICY

COVERING BOTH SCHOOLS
INCLUDING EYFS AND BOARDING

Governors' Committee normally reviewing:	Governance Committee
Date formally approved by the Committee :	Summer Term 2022
Date policy became effective :	September 2006

Period of Review:	2 Years
Next Review Date :	Summer Term 2024

Person responsible for implementation and monitoring :	Heads / Compliance Manager
Other relevant policies :	Data Protection Policy Privacy Notices Admissions Policy Safeguarding (Child Protection & Staff Behaviour) Policy Online Safety and ICT Acceptable Use Policy

The following Policy encompasses the Aims and Ethos of the Preparatory School and the 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 identified documents, systems or items of data which contain evidence or information relating to the School, its staff or pupils. Some of this material, but not all, will contain personal and special category 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. The file holds the registration, admission and acceptance form, (the parent contract) and the academic record of a pupil as they progress 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 pupil.

The information held on the School's electronic management information system covers: the pupil's name, address, House, and emergency contact details, academic performance, subjects studied and daily attendance. Confidentiality of personal information is protected.

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 by the School's medical staff (Medical Centre and Prep School Medical Room).). The medical record contains: the NHS records of pupils who are registered with Blandford Medical Centre, the medical questionnaire that the parents complete when their child joins the School, and subsequent medical information provided by parents and/or pupils and records of all treatment and immunisations that a pupil receives during their time at the School. They include any significant known drug reactions, major allergies and notable medical conditions. Relevant information is available to staff who are likely to administer medication or treatment.

The health and safety staff hold records of accidents and injuries to a pupil.

The catering department holds details of pupils with food allergies.

The School's 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 system accessible to Designated and Deputy Designated Safeguarding Leads (DSLs).

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

5. COUNSELLING RECORDS

Counselling records are stored in accordance with guidance from the British Association for Counselling and Psychotherapy, of which the School's counsellors are members of, and are retained for three years.

6. FINANCIAL RECORDS

The Bursar and the Accounts department hold financial records on pupils and parents / fee payers throughout their time at the School. These include 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.

7. ACCESS BY STAFF

Teaching and operational staff are able to access the School's password protected electronic record systems where it is necessary for their role. Teaching staff may also consult paper pupil records held, as necessary. Access to full medical records is restricted to Medical staff. Access to financial records is restricted to the Heads, Bursar and the relevant Bursary / Accounts staff.

8. DATA PROTECTION/PRIVACY NOTICE

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).

9. ACCESS BY PARENTS AND PUPILS

Felsted School's Data Protection / Privacy Notices describe 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.

10. STAFF TRAINING

New staff are given training regarding data protection and accessing and managing school records as part of their induction to Felsted School. Staff are provided with ongoing guidance and training updates regarding data protection, in particular the security of personal and special category 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 and as per Appendix 1.

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).

13. DISPOSAL

The School ensures appropriate and secure disposal and / or deletion of special category, personal and / or confidential information.

Special category and / or personal data held in paper form must be shredded via the confidential shredding service when no longer required. Any individual member of staff who produces any hard copy documents (including photocopying) that contain personal data is responsible for ensuring secure storage and / or disposal.

Electronic files must be securely deleted by the appropriate method for the location of the electronic record.

Staff are required to manage their download files either by deleting the files once they have been viewed and are no longer needed or visiting their download folder once a month and deleting files no longer required.

APPENDIX 1 - TABLE OF RETENTION PERIODS

Type of Record/Document	Retention Period Records will be kept beyond the suggested retention period where there is a legal obligation to retain the records for a longer period.
<u>SCHOOL-SPECIFIC RECORDS</u>	
<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>
<u>INDIVIDUAL PUPIL RECORDS</u>	
<ul style="list-style-type: none"> • Admissions: application forms, assessments, records of decisions • Examination results (external or internal) • Pupil file including: pupil reports, pupil performance records, pupils' medical records • Special educational needs records (to be risk assessed individually) • Complaints 	<p>25 years from date of birth and then passed to Archive. If pupil is not admitted, up to 7 years from decision.</p> <p>7 years from pupils leaving school</p> <p>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 of statutory limitation period)</p> <p>Complaints which do not have safeguarding implications will be retained for a minimum of 7 years.</p>
<u>INDIVIDUAL PARENT RECORDS</u>	
<ul style="list-style-type: none"> • Contact details for parents and other next of kin, i.e. emergency contact details 	<p>Duration of pupil's time in school (potential to keep beyond if notified accordingly of change of lawful basis for processing personal data (please see below))</p>

<p><u>INDIVIDUAL ALUMNI/PAST PARENT RECORDS</u></p> <ul style="list-style-type: none"> • Contact details for alumni/past parents • Communication records • Prospect research on alumni/past parents 	<p>Lifetime of alumni/past parent (subject to review of consent/legitimate interest)</p>
<p><u>SAFEGUARDING</u></p> <ul style="list-style-type: none"> • Policies and procedures • DBS disclosure certificates (potentially sensitive personal data & must be secure) • <u>Accident / Incident</u> reporting • Safeguarding/Child Protection Files (including where a pupil has transferred to another school) • Counselling Records 	<p>Keep a permanent record of historic policies</p> <p>No longer than 6 months 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).Files to be reviewed from time to time if resources allow and a suitably qualified person is available.¹</p> <p>If a referral has been made / social care have been involved or child has been made subject of a multi-agency plan – indefinitely.</p> <p>If low level concerns, with no multi-agency act - apply applicable school level individual assessment. This may be 25 years from date or birth or indefinitely.</p> <p>Three years - based on advice from the British Association for Counselling and Psychotherapy.</p>
<p><u>CORPORATE RECORDS (where applicable)</u></p> <ul style="list-style-type: none"> • Certificates of Incorporation 	<p>Permanent (or until dissolution of the company)</p>

¹ 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.

<ul style="list-style-type: none"> • Minutes, Notes and Resolutions of Boards or Management Meetings 	Minimum 10 years
<ul style="list-style-type: none"> • Shareholder resolutions 	Minimum 10 years
<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 	Minimum 6 years
<u>ACCOUNTING RECORDS²</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) 	Minimum – 6 years for UK charities (and public companies) 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>

² Retention period for tax purposes should always be made by reference to specific legal or accountancy advice.

<ul style="list-style-type: none"> • Contracts of employment • Employee appraisals or reviews and staff personnel file • Payroll, salary, maternity pay records • Pension or other benefit schedule records • Job application and interview/rejection records (unsuccessful applicants) • Immigration records • Health records relating to employees 	<p>Keep a permanent record (not DBS certificate itself) of all mandatory checks that have been undertaken.</p> <p>7 years from effective date of end of contract.</p> <p>All staff HR files to be kept for the duration 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.</p> <p>6 years</p> <p>Teachers' Pension returns - permanent Pension schemes via payroll - 7 years</p> <p>1 year (see note of DBS disclosure certificates).</p> <p>4 years</p> <p>7 years from end of contract of employment.</p>
<p><u>INSURANCE RECORDS</u></p> <ul style="list-style-type: none"> • Insurance policies (will vary - private, public, professional indemnity) • Correspondence related to claims/ renewals/ notification re: insurance 	<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>7 years</p>
<p><u>ENVIRONMENTAL & HEALTH RECORDS³</u></p> <ul style="list-style-type: none"> • Maintenance logs • Accidents to children • Accident at work records (staff) • Staff use of hazardous substances • Risk assessments (carried out in respect of above) 	<p>10 years from date of last entry</p> <p>25 years from birth (unless a safeguarding incident - see safeguarding section)</p> <p>4 years from date of accident but review case by case if possible</p> <p>7 years from end of date of use.</p> <p>7 years from completion of relevant project, incident, event or activity.</p>
<p><u>DATA PROCESSING</u></p> <p>Data protection records documenting processing activity, data breaches</p>	<p>No limit: as long as up-to-date and relevant (as long as no personal data held)</p>

³ 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.