

Date: <u>February 2020</u> Review Date: <u>November 2023</u> **Responsibility: <u>Bursar</u>** 



# **Information and Record Management Policy**

#### 1. General

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 or received, and then stored, in hard copy or electronically. A small percentage of the school's records may be selected for permanent preservation as part of the institution's archive.

Some of the data will contain personal data of individuals as defined by data protection legislation.

Epsom College (subsequently referred to as the "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 organisation. 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.

Like all organisations, schools need to have records which document the full range of their activities. The law and DfE standards require that a large number of records are maintained and kept by schools covering a range of issues relating to staff and pupils, including:

- a. An Admissions Register (the School Roll) containing the prescribed information about each pupil;
- b. An Attendance Register that is maintained in accordance with the regulations;
- c. A record of sanctions for serious disciplinary offences, and exclusions;
- d. All incidents of bullying;
- e. Pupil progress and attainment records;
- f. Single Central Register maintained in accordance with the regulations;
- g. Pupils' health records;
- h. Records of complaints and their outcomes.

### 2. Current Pupils

Paper files are kept on each pupil by the Headmaster's PA. This file contains all registration details, the acceptance form, signed consent forms and substantive correspondence to and from the school about the individual pupil.

Digital records are also kept within the School's management information system (iSAMS) or on the College pastoral management software (Badger). These include reports of all conversations between parents and members of staff about any academic or pastoral issues, references prepared for universities and other institutions. It contains records of any disciplinary sanctions imposed on a pupil. The Accounts Department maintains paper copy files of all based correspondence pertaining to the pupil and any discussions/communications affecting the financial transactions.

The information held on the School's management information system is as follows: the pupil's name, address, school details (House, year group etc.), parent contact details, including details of those with parental responsibility and any court orders affecting parental responsibility, emergency contact details, record of academic

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performance, list of subjects studied and daily attendance record. Confidentiality of personal information is protected.

## 3. 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 is made available to those staff with a need to know that information. This provision is overseen by the Academic Support Department.

### 4. Pupil Safeguarding

Individual safeguarding files are held in paper form within the secure safeguarding filing system in the office of the Designated Safeguarding Lead. A file is opened only when it is considered appropriate. Access to the files is restricted to the Safeguarding team (Governors with special responsibility for safeguarding, Headmaster, Designated Safeguarding Lead and Deputy Safeguarding Leads).

#### 5. Medical Records

A confidential medical record on each pupil is kept securely in the Medical Centre or on iSAMS by the nursing staff. The medical record contains the medical questionnaire that the parents completed when their child joined the school, and records of any significant events/episodes. This would also include any significant known drug reactions, major allergies and notable medical conditions. This information is only available to staff with a recognised medical/nursing qualification and who are likely to administer medication or treatment, or to other staff with the Headmaster's authority. These records also contain any correspondence with GPs, Consultants, and hospitals within the NHS and within the private sector.

The Medical staff also input electronically a daily record of all visits to the Medical Centre by students, which can be accessed by members of the IT Department; however, no confidential data is entered onto this.

It is essential that all staff organising trips consult with medical staff for up to date information, as per the trips policy.

Records of all accidents and injuries to a pupil are retained by the Medical Centre.

The Head of Catering holds details of pupils with food allergies.

Housemasters and Housemistresses flag any relevant medical information and management plans to the appropriate staff once parental permission to do so has been secured.

## 6. Staff Files

A file is kept on each member of staff in HR Department. The file contains the following:

- a. Recruitment documentation, including:
  - i. Application form and/or CV;
  - Proof of identity;
  - iii. Proof of address;
  - iv. References;
  - v. Relevant safeguarding checks that have been carried out;
  - vi. Proof of qualifications (where appropriate);
  - vii. Payroll details and details of next of kin.
- b. Copy of letter of appointment;
- c. Contract of employment;

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- d. Any alterations to contract or terms and conditions;
- e. Record of appraisals and reviews;
- f. Relevant details of any investigations, disciplinary action and formal notifications;
- g. Details of any other HR or payroll matters.

Payroll details are retained digitally on the payroll system, access to which is limited to the Payroll Administrator, Senior Accounts Assistant and Director of Finance.

#### 7. Financial Records

The Accounts Department holds financial records for all pupils throughout their time at the school. These include: a record of the deposit, the acceptance form, payment schedules, 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 record, along with records of annual assessments and awards.

Access to the digital files is maintained for at least seven years.

# 8. Access to records by Staff

All teaching and the appropriate office staff are able to access iSAMS which is password protected. Teaching staff may consult the pupil records held in the Headmaster's PA's Office. Access to medical records is restricted to the Medical staff. Access to financial records is restricted to the Bursar and Accounts Department staff.

### 9. Data Protection Policy

Parents accept a place for their child at the School in the knowledge that sensitive and personal data about them and their child will be collected periodically and stored and processed in order to allow for the efficient operation of the School.

Parents who accept a place agree to the terms and conditions of the School, the Privacy Notice for Pupils and the Privacy Notice for Parents.

# 10. Access to records by parents and pupils

The School's Privacy policy sets out its duties and obligations under the Data Protection Act, 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.

#### 11. Privacy Notice

The School will comply with a Privacy 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.

#### 12. Staff Induction

All new teaching and office staff, where applicable, will be given training in accessing and managing school records (including iSAMS). Induction will also cover the School's "house style" for marking work, report-writing and in written and electronic communications with pupils and parents.

## 13. Records of Past Pupils

Historically we have kept all records of past pupils until a pupil is 25 years old. Currently we retain pupil records indefinitely.

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We retain records of results in public examination, lists of school prizes and other significant achievements, together with information relating to former pupils' subsequent academic achievements.

Records relating to alumni are stored in the Education Trust office.

#### 14. Record Retention

### a. Document disposal

All hard copy documents, when no longer required, are shredded with due regard to secure disposal.

# b. Pupil files

Hard copy Pupil files are currently retained indefinitely after a pupil leaves the School. They are stored in a locked area on site, and access is only granted to the relevant members of staff.

# Learning Support files

Hard copy files are currently retained indefinitely after a pupil leaves the School. They are stored in a locked area on site, and access is only granted to the relevant members of staff.

## Safeguarding files

These files are kept in the secure safeguarding cabinet for a period determined by the Safeguarding Lead. Pupil files are currently being retained indefinitely.

### Complaints files

These files are kept in the secure cabinet for a period determined by the Second Master. Files are currently being retained indefinitely.

## **Medical Information**

Medical information is stored in iSAMS, to which access is restricted. All hard copy paperwork from the Medical Centre is stored securely in a locked area & kept for seven years, or until pupil reaches 23 yrs.

All NHS paperwork is transferred to the Doctor's surgery when the pupil leaves the School.

#### c. Admissions Files

Documentation is kept in digital or hard copy format until a pupil reaches the age of 18, after which all hard copy paperwork is shredded. Files are stored in a locked area on site, and access is only granted to the relevant members of staff.

### d. Staff files

Staff hard copy files are retained for as long as is considered appropriate after they have left the School. The School does not have a policy of deleting files after a period of time. Files are stored in a locked area on site, and access is only granted to the relevant members of staff.

Digital records on the payroll system are retained for a minimum of seven years.

# e. Unsuccessful staff application documentation

Documentation is kept in digital or hard copy format for four months, after which all hard copy paperwork is shredded. Files are stored by the HR Manager.

#### f. Other School Documentation

#### i. Registration Documentation of the School

These documents are retained permanently in the School Archives or the Bursary.

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# ii. Attendance Registers

These are retained in hard copy or in digital format for a minimum of six years after the last date of an entry.

### iii. Minutes of Governors Meetings and other papers

Signed hard copies of the Governors' Minutes, bound in the Governors' Minutes Book, are kept by the Bursar or in the School Archives. Agendas and other supporting papers are kept for a period of seven years before being disposed of securely.

#### iv. Examination Results

The details of a pupil's examination results are retained for a minimum of seven years after the pupil leaves the School.

The results stored on iSAMS from January 2011 can be used as a true record of a pupil's formal qualifications. Results pre-dating January 2011 are stored in a locked area on site, access granted to relevant members of staff.

#### v. Policies

Digital versions of published policies are retained by the Bursary.

### vi. Disclosure and Barring Service (DBS) Disclosures

Disclosures are personal documents, belonging to the individual they concern. The School notes the DBS number and date. The School does not keep copies of DBS certificates in staff files.

## vii. Accident / Incident Reports

All hard copy paperwork from the Medical Centre is stored securely in a locked area & kept for seven years.

### viii. Insurance documentation

This is retained indefinitely by the Bursar in hard copy.

# ix. Annual Reports / Accounts / Financial returns

These are retained for a minimum of seven years by the Bursar and Director of Finance, in hard copy or PDF.

#### x. Intellectual Property

Documentation is retained indefinitely, in hard copy or PDF. It is stored in the Bursar's Office or School Archives.

#### 15. Summary

Records are essential to the running of the School and in reviewing past practice. Accurate and full records are important to protecting pupils, staff and the School.

The 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 Bursar who will give guidance about good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way.

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 Record Management Policy.