



RECORD KEEPING POLICY

COVERING BOTH SCHOOLS
INCLUDING EYFS AND BOARDING

Governors' Committee normally reviewing:	Governance Committee
Date formally approved by the Committee :	Summer Term 2024
Date policy became effective :	September 2006

Period of Review:	2 Years
Next Review Date :	Summer Term 2026

Person responsible for implementation and monitoring :	Heads / Compliance Manager
Other relevant policies :	<ul style="list-style-type: none">• 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

Pupil records are stored on the School's management information system and a pupil file. A pupil's record includes:

- pupil name, address, parent details, emergency contact details and any court orders affecting parental responsibility or the care of the pupil;
- academic performance and pupil progress, including school reports;
- attendance records;
- registration, admission and acceptance form, (the parent contract);
- records of academic and / or pastoral issues;
- references from previous schools and references prepared for universities and other institutions; and
- rewards and disciplinary sanctions imposed on a pupil.

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) within the School's management information system. 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 protected and saved in a designated system accessible to the Designated Safeguarding Lead (DSL), the Deputy Designated Safeguarding Leads (DDSLs) and the Heads.

When 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, and within 5 working days for an in-year transfer or within the first 5 working days of the start of a new term to allow the new school or college to have support in place for when the child arrives. 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 concerns.

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

Staff are able to access the School's protected electronic record systems where it is necessary for their role. 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). Privacy Notices and the School's Data Protection Policy are published on the school website and accessible to data subjects at any time.

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. The Notices also cover 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. Staff with a school IT account are required to undertake data protection and cybersecurity training at least every two years.

11. RECORDS OF PAST PUPILS AND FELSTED SCHOOL ARCHIVES

The School retains records of past pupils until a pupil is 25 years old. At that point, the following records are retained 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 record is securely destroyed unless there has been a safeguarding concern (see section 4).

School alumni records are stored by the Development Office on a secure, cloud-based CRM system, which is accessed only via 2-step authentication by a limited number of users.

12. STAFF RECORDS

The School maintains records of staff (including governors, agency staff and volunteers) 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 stored securely in electronic and hard copy format and within the HR software a 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 staff and line managers where applicable.

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.

APPENDIX 1 - TABLE OF RETENTION PERIODS

Type of Record/Document	Retention Period
EMAIL AND IT ACCOUNTS	
<p>Pupil account</p> <p>Staff account</p> <p>Google Retention periods</p>	<p>Deactivated:</p> <ul style="list-style-type: none"> • Year 13, middle of the Autumn half term break (end of October) after leaving the School • Year 11, at the end of August of the year in which they are leaving • Pupils leaving the School at any other time, as soon as they leave <p>Deleted: 2 years after the pupil left</p> <p>Deactivated: Immediately when staff member leaves</p> <p>Deleted: 2 years after leaving date</p> <p>Gmail - Purge permanently deleted messages 6 months after the email has been deleted by the user</p> <p>Drive - Purge permanently deleted items 6 months after the item has been deleted by the user</p> <p>Chat</p> <ol style="list-style-type: none"> 1.1. Purge all messages after 730 days 1.2. Delete unused chats not used since 31st December 2019. <p>Meet - Purge only permanently deleted data after 6 months based upon last modified date</p> <p>Sites - Purge only permanently deleted items 6 months after the item has been deleted by the user</p>
SCHOOL-SPECIFIC RECORDS	
<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 the 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><u>INDIVIDUAL PUPIL RECORDS</u></p> <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 dealt with under the School's complaints procedure • Pupil immigration record 	<p>25 years from date of birth and then passed to Archives. If a 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 (<i>subject to where relevant to safeguarding considerations; any material which may be relevant to potential claims to be kept for the lifetime of the pupil</i>).</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> <p>Duration of sponsorship and 25 years from date of birth</p>
<p><u>INDIVIDUAL PARENT RECORDS</u></p> <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>

<u>SAFEGUARDING</u>	
<ul style="list-style-type: none"> • Policies, procedures and insurance 	Permanent record of historic policies
<ul style="list-style-type: none"> • DBS disclosure certificates 	No longer than 6 months from decision on recruitment. A record of the DBS and all other employment checks is kept on the Single Central Record (see staff records below).
<ul style="list-style-type: none"> • <u>Accident / Incident reporting</u> 	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
<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 has been involved or the child has been made subject of a multi-agency plan – 75 years. If low level concerns, with no multi-agency act - apply applicable school level individual assessment, 25 years from date of birth.
<ul style="list-style-type: none"> • Counselling Records 	Three years - based on advice from the British Association for Counselling and Psychotherapy.
<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 	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>	

¹ .The High Court has found that a retention period of 35 years was within the bracket of legitimate approaches for retaining safeguarding records. IICSA has recommended that, for child sexual abuse records, the period should be 75 years, and subject to regular review. The ICO (Information Commissioner's Office) also expects to see a regular review policy in place (e.g. every 6 years), although the High Court also held that could be a disproportionate use of resource for many organisations' safeguarding teams. The position is likely to be different for records of low-level concerns about adults, which should only be kept in line with employment records unless likely to be relevant for historic abuse claims or a specific safeguarding need.

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

<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) Tax returns VAT returns Budget and internal financial reports 	<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>7 years</p> <p>7 years</p> <p>3 years</p>
<p><u>CONTRACTS AND AGREEMENTS</u></p>	
<ul style="list-style-type: none"> Signed or final/concluded agreements (plus any signed or final/concluded variations or amendments) Deeds (or contracts under seal) 	<p>7 years from completion of contractual obligations or term of agreement, whichever is the later.</p> <p>13 years from completion of contractual obligation or term of agreement.</p>
<p><u>INTELLECTUAL PROPERTY RECORDS</u></p>	
<ul style="list-style-type: none"> Formal documents of title (trademark or registered design certificates; patent or utility model certificates) Assignments of intellectual property to or from the school IP / IT agreements (including software licences and ancillary agreements eg maintenance; storage; development; co-existence agreements; consents) 	<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>7 years from completion of contractual obligation concerned or term of agreement.</p>
<p><u>EMPLOYEE / HR RECORDS</u></p>	
<ul style="list-style-type: none"> Single Central Record of employees Contracts of employment Employee appraisals or reviews and staff personnel file Payroll, salary, maternity pay records 	<p><i>These records contain personal data</i></p> <p>Permanent record (not DBS certificate itself) of all mandatory checks that have been undertaken.</p> <p>7 years from the effective date of end of contract.</p> <p>Duration of employment plus minimum of 7 years. 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>

<ul style="list-style-type: none"> • Pension or other benefit schedule records • Job application and interview/rejection records (unsuccessful applicants) • Immigration records • Sponsored skilled worker records • Health records relating to employees • Records of low-level concerns about adults 	<p>1 year (see note of DBS disclosure certificates).</p> <p>4 years from the end of employment.</p> <p>Duration of sponsorship plus 1 year.</p> <p>7 years from the end of contract of employment.</p> <p>At least 7 years from the end of employment and then review.</p>
<u>INSURANCE RECORDS</u>	
<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>
<u>ENVIRONMENTAL & HEALTH RECORDS³</u>	
<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>
<u>DATA PROCESSING</u>	
<p>Data protection records documenting processing activity, data breach records, data protection impact assessments</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.