

Earlscliffe (Sussex Summer Schools Ltd)

RECORD KEEPING POLICY

This policy has been created in accordance with the Data Protection Act 2018 (General Data Protection Regulation) and good practice advice from the National Independent Bursars Association. This policy provides minimum retention periods for all data held or managed by the college, some of which may be personal data.

Pupil Records

For each current pupil, a file is kept on each pupil in the Deputy Head's office. The file holds the registration/ acceptance form (the 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 any academic issues, school reports, references from previous schools and references prepared for universities and other institutions. There is also a confidential pastoral file held for each student that holds information on conversations and correspondence regarding a student's welfare. It will also record any disciplinary sanctions imposed on a pupil. Earlscliffe holds student data electronically through a secure database, iSAMS. Access to the database is restricted to Earlscliffe staff and within the database areas are restricted to those staff members who require the information only.

Pupils with Special Educational or Medical Needs

The names of pupils with special educational or medical needs are recorded on the school's database.

Medical Records

A confidential medical record on each pupil is kept by the School Nurse on the school database. The medical record contains: the Medical Questionnaire (Health Form) completed by parents when the pupil joins the school, and records of all treatments and immunisations that the pupil receives during the pupil's time at the school, including records of any accident and/or injury.

Staff are provided with access to the relevant areas of the database or given a list of the names and details of current pupils with medical conditions, or social information of a sensitive nature that might be of relevance in their dealings with pupils, for example, in relation to a pupil's boarding status or in relation to visits and activities.

Financial Records

The Bursar holds financial records on all pupils throughout their time at the school, in particular, a record of the deposit, a copy of the acceptance form and copies of bills for tuition fees and extras. If a pupil receives a bursary or scholarship, this will form part of the record, along with records of annual assessments and awards.

Access by Staff

Staff may consult the pupil records held. Access to medical records is restricted to the School Nurse, House Manager(s) and SLT. Access to financial records is restricted to the Head Teacher and Bursar.

Data Protection Policy

Parents and students accept a place for their child 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.

Parents and students who accept a place for their child are invited to consent to the school using anonymous photographs of their child and information relating to the child's achievements for promotional purposes, including publication in the prospectus or on the website.

The school's *Pupil Data Protection Policy* describes the school's 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. The policy also covers the circumstances under which data would be disclosed to a third party.

Fair Processing Policy

The 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.

Staff Induction

All new teaching and administrative staff are given training in accessing and managing school records, as part of their induction into school procedures for marking work, report-writing and making written and electronic communications with pupils and parents.

Records of Past Pupils

The school keeps records of past pupils until they reach the age of 25. At that point, all disciplinary, medical and financial records are destroyed. Records of results in public examinations, school prizes and other significant achievements are retained, together with information relating to former pupils' subsequent academic achievements. Records relating to alumni are stored in an archive.

Data Retention Periods:

Data Area	Record	Retention Period
COLLEGE-SPECIFIC RECORDS	Registration documents of College	Permanent
	Attendance Register	6 years from last date of entry, then archive.
	Minutes of Governors' meetings	6 years from date of meeting
	Annual curriculum	From end of year: 3 years (or 1 year for other class records: e.g. marks / timetables / assignments)
INDIVIDUAL STUDENT RECORDS	Admissions: application forms, assessments, records of decisions	25 years from date of birth (or, if student not admitted, no longer than 1 year from that decision).
	Examination results (external or internal)	7 years from student leaving college
	Student file including: <ul style="list-style-type: none"> • Student reports • Student performance records • Student medical records 	ALL: 25 years from date of birth (<u>subject to where relevant to safeguarding considerations: any material which may be relevant to potential claims should be kept for the lifetime of the student</u>).
	Special educational needs records (to be risk assessed individually)	35 years from Date of birth (allowing for special extensions to statutory limitation period)
	SAFEGUARDING	Policies and procedures (including audits)
	DBS disclosure certificates (if held)	12 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.
	Accident / Incident reporting	Indefinitely (as recommend by the Goddard inquiry)
	Child Protection files	Indefinitely (as recommend by the Goddard inquiry)
EMPLOYEE / PERSONNEL RECORDS	Single Central Record of employees	Keep a permanent record of all mandatory checks that have been undertaken (but not DBS certificate itself: 6 months as above)

	Contracts of employment/contract for services/consultancy agreements (self-employed or contracted personal) (offer letters and variation letters)	7 years from effective date of end of contract
	Employee appraisals or reviews	Duration of employment plus 7 years
	Staff personnel file (includes grievances, capability and disciplinary documentation, qualifications, termination documentation, references, training records, parental leave records)	As above, <u>but do not delete any information which may be relevant to historic safeguarding claims.</u>
	Payroll, salary, maternity pay records	6 years
	Pension or other benefit schedule records	Permanent, depending on nature of scheme
	Job application and interview/rejection records (unsuccessful applicants)	Minimum 3 months but no more than 1 year
	Immigration records	4 years
	Health records relating to employees	7 years from end of contract of employment
INSURANCE RECORDS	Insurance policies (will vary – private, public, professional indemnity)	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.
ENVIRONMENTAL, HEALTH & DATA	Accidents to children	25 years from birth (longer for safeguarding – see safeguarding)
	Accident at work records (staff)	4 years from date of accident, but review case-by-case where possible
	Staff use of hazardous substances	7 years from end of date of use
	Risk assessments (carried out in respect of above)	7 years from completion of relevant project, incident, event or activity.
	Data protection records documenting processing activity, data breaches	No limit: as long as up-to-date and relevant (as long as no personal data held)