## 6. Managing Pupil Records

The pupil record should be seen as the core record charting an individual pupil’s progress through the Education System. The pupil record should accompany the pupil wherever they find themselves in the Education system and should contain information that is accurate, objective and easy to access. These guidelines are based on the assumption that the pupil record is a principal record and that all information relating to the pupil will be found in the file (although it may spread across more than one file cover).

It has become clear over a series of information audits that there is no real consistency of practice in the way in which pupil records are managed. These are intended to be guidelines to assist schools about how pupil records should be managed and what kind of information should be included in the file. It is hoped that the guidelines will develop further following suggestions and comments from those members of staff in schools who have to deal with these records.

These are only guidelines and have no legal status, if you are in doubt about whether a piece of information should be included on the file please contact Michelle Hunt (Information Governance Specialist) on [michelle.hunt@kent.gov.uk](mailto:michelle.hunt@kent.gov.uk) for advice.

## 6.1 File covers for pupil records

It is strongly recommended that schools use a consistent file cover for the pupil record. This assists the Secondary School to ensure consistency of practice when receiving records from a number of different Primary Schools and also ensures that the same level of information is held for all pupils. For example, in one Secondary School there were at least three different kinds of file cover transferred for that year’s intake. This led to the Secondary School holding different levels of information for pupils which had come from different Primary Schools.

The pre-printed file covers issued by Kent County Supplies are a good example of best practice and should be used where possible. The use of standard document wallets should be avoided as it is very difficult to ensure that all the information required by the school is recorded consistently.

By using pre-printed file covers all the necessary information is collated and the record looks tidy and reflects the fact that it is the principal record containing all the information about an individual child.

## 6.2 Recording information

A pupil or their nominated representative can ask to see their file at any point during their education (and indeed until they reach the age of 25 years when the record is destroyed). It is important to remember that all information should be accurate and objective and expressed in the appropriate language.

## 6.2.1 Primary School records

## 6.2.1a Opening a file

The pupil record starts its life when a file is opened for each new pupil as they begin school. This is the file which will follow the pupil for the rest of his/her school career. If the pre-printed file covers are not being used then the following information should appear on the front of the file:

* + Surname
  + Forename
  + DOB
  + Gender
  + Position in family
  + Ethnic origin [although this is “sensitive” data under the Data Protection Act 2018/General Data Protection Regulations 2016, the DfE require statistics about ethnicity]
  + Language of home (if other than English)
  + Religion [although this is “sensitive” data under the Data Protection Act 2018/General Data Protection Regulations 2016, the school has good reasons for collecting the information]
  + Names of parents and/or guardians with home address and telephone number
  + Name of the school, admission number and the date of admission and the date of leaving.

Inside the front cover the following information should be easily accessible:

* The name of the pupil’s doctor
* Emergency contact details

There has been some discussion about whether or not the pupil’s UPN should be recorded on the front of the file with the other information. It is perfectly acceptable to include the UPN on the front of the file as the computer system is password protected.

It is essential that as these files contain all this personal information that they will be managed against the [information security guidelines](http://www.kelsi.org.uk/__data/assets/word_doc/0007/31201/RecordsManagementToolkit05.doc) also contained in the toolkit.

## 6.2.1b Items which should be included on the pupil record

* If the pupil has attended an early years setting, then the record of transfer should be included on the pupil file
* Admission form (application form)
* Fair processing notice [if these are issued annually only the most recent need be on the file]
* Parental permission for photographs to be taken (or not)
* Kent Years Record
* Annual Written Report to Parents
* National Curriculum and R.E. Agreed Syllabus Record Sheets
* Any information relating to a major incident involving the child (either an accident or other incident)
* Any reports written about the child
* Any information about a statement and support offered in relation to the statement
* Any relevant medical information (should be stored in the file in an envelope)
* Child protection reports/disclosures (should be stored in the file in an envelope clearly marked as such)
* Any information relating to exclusions (fixed or permanent)
* Any correspondence with parents or outside agencies relating to major issues
* Details of any complaints made by the parents or the pupil

The following records should be stored separately to the pupil record as they are subject to shorter retention periods and if they are placed on the file then it will involve a lot of unnecessary weeding of the files before they are transferred on to another school.

* Absence notes
* Parental consent forms for trips/outings [in the event of a major incident all the parental consent forms should be retained with the incident report not in the pupil record]
* Correspondence with parents about minor issues
* Accident forms (these should be stored separately and retained on the school premises until their statutory retention period is reached. A copy could be placed on the pupil file in the event of a major incident)

## 6.2.1c Transferring the pupil record to the Secondary School

The pupil record should not be weeded before transfer to the Secondary School unless any of the items mentioned above have been placed on the file. It is important to remember that the information which may seem unnecessary to the person weeding the file may be a vital piece of information required at a later stage.

Primary Schools do not need to keep copies of any records in the pupil record except if there is an ongoing legal action when the pupil leaves the school. Custody of, and therefore responsibility for, the records passes to the school the pupil transfers to.

If files are sent by post, they should be sent by registered post with an accompanying list of the files. Where possible, the Secondary School should sign a copy of the list to say that they have received the files and return that to the Primary School. Where appropriate records can be delivered by hand.

**Please note that if the pupil leaves the primary school and either joins an independent school, is home educated, moves abroad or moves to a school unknown to the primary school then the pupil file should be sent to the Information Resilience and Transparency Team, Room 2.89 Sessions House, Maidstone, for archiving. The records should be marked for the attention of Elizabeth Barber.**

## 6.2.2 Secondary School records

## 6.2.2a Items which should be included on the pupil record

* Admission form (application form)
* Privacy notice [if these are issued annually only the most recent need be on the file]
* Parental permission for photographs to be taken (or not)
* Kent Years Record
* Annual Written Report to Parents
* National Curriculum and R.E. Agreed Syllabus Record Sheets
* Any information relating to a major incident involving the child (either an accident or other incident)
* Any reports written about the child
* Any information about a statement and support offered in relation to the statement
* Any relevant medical information (should be stored in the file in an envelope)
* Child protection reports/disclosures (should be stored in the file in an envelope clearly marked as such)
* Any information relating to exclusions (fixed or permanent)
* Any correspondence with parents or outside agencies relating to major issues
* Details of any complaints made by the parents or the pupil

The following records should be stored separately to the pupil record as they are subject to shorter retention periods and if they are placed on the file then it will involve a lot of unnecessary weeding of the files once the pupil Leaves the school.

* Absence notes
* Parental consent forms for trips/outings [in the event of a major incident all the parental consent forms should be retained with the incident report not in the pupil record]
* Correspondence with parents about minor issues
* Accident forms (these should be stored separately and retained on the school premises until their statutory retention period is reached. A copy could be placed on the pupil file in the event of a major incident)

## 6.3 Responsibility for the pupil record once the pupil leaves the school

The school which the pupil attended until statutory school Leaving age (or the school where the pupil completed sixth form studies) is responsible for retaining the pupil record until the pupil reaches the age of 25 years. This retention is set in line with the Limitation Act 1980 which allows that a claim can be made against an organisation by minor for up to 7 years from their 18th birthday.

## 6.4 Transfer of a pupil record outside the EU area

If you are requested to transfer a pupil file outside the EU area because a pupil has moved into that area, please contact Michelle Hunt (Information Governance Specialist); [michelle.hunt@kent.gov.uk](mailto:michelle.hunt@kent.gov.uk) for further advice.

If you have any comments about these guidelines or suggestions about how they can be further developed please contact Elizabeth Barber (Records Manager); [elizabeth.barber@kent.gov.uk](mailto:elizabeth.barber@kent.gov.uk).

## 7. School Closures and Record Keeping

When a school closes there will be records which will need to be stored until they work out their statutory retention periods. A full list of records can be found in the [retention guidelines](#_Appendix_D_Recommended) but some examples might include:

* Pupil records (DOB of pupil + 25 years)
* Accident reporting records (DOB of pupil + 25 years or date of incident + 7 years)
* Financial records (Current year + 6 years)
* Records relating to the employment of staff (Termination + 7 years)

It is the responsibility of the Local Authority to manage these records until they have reached the end of their administrative life and to arrange for their disposal when appropriate.

There may be a number of different reasons why a school has closed and this may affect where the records need to be stored.

* If the school has been closed and the site is being sold or reallocated to other use then the LA should take responsibility for the records from the date the school closes.
* If two schools have merged onto one site and then function as one school, it is sensible to retain all the records relating to the two schools on the one site.
* If a secondary school closes and subsequently becomes an Academy, the records relating to the current pupil intake will be transferred to the Academy, but all other records become the responsibility of the LA.

Sorting out records, when a building has to be vacated, is time consuming especially if records management has not been a priority in the past. Sufficient time to ensure that the records have been properly sorted, listed and boxed before transfer to the LA must be allowed as part of the project timescales for the school closure. Proper resources must be allocated to this to ensure that the job can be completed before the school closes. It is much more difficult to sort records which have been boxed haphazardly in a hurry in the few days before the school closes.

It is important to bear in mind that when a school closes the staff teams may well feel a real sense of bereavement and this will affect the way in which they view the work which has to be done before the school closes. Sorting out records is usually low on the priority list, but nonetheless needs to be tackled. Managers will need to consider this when allocating the different elements of the task.

It is suggested that a project to sort out records could be managed in the following steps:

1. As soon as notification is received that the school is to be closed, a thorough review of all the records on the premises needs to take place. Agreement needs to be reached with the LA about where the records which need to be stored until they can be disposed of will be sent and who in the LA will be taking responsibility for them.
2. At this stage, if it has been decided to transfer records to the Records Management Service, it is useful to make initial contact with the Records Management Service team on 03000 411802. This is a good opportunity to find out how the system works, order boxes and look at the allocation of RMS code numbers.
3. The next step is to identify all the records which can be safely disposed of using the retention guidelines. If you are unsure about what records can be safely disposed of contact Elizabeth Barber (Records Manager); [elizabeth.barber@kent.gov.uk](mailto:elizabeth.barber@kent.gov.uk).
4. This should leave you with a list of the records which need to be transferred to the LA. If it has been decided to send records to the RMS then e-mail a list of the record series (e.g. pupil files, accident reports etc) to the RMS team and they will allocate RMS reference numbers for you to use.
5. The records need to be boxed up and listed in accordance with RMS procedures and sent to the RMS at Kings Hill.

If records need to be recalled to answer enquiries, this will be done by the LA.

If you need further advice or assistance about how to manage records for a closed school please contact Elizabeth Barber (Records Manager); [elizabeth.barber@kent.gov.uk](mailto:elizabeth.barber@kent.gov.uk) or Michelle Hunt (Information Governance Specialist); [michelle.hunt@kent.gov.uk](mailto:michelle.hunt@kent.gov.uk) .

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