

Record Keeping Policy (including Transfer of Records to School)

Date reviewed:07.04.2025

**Policy statement**

Hanslope Pre-school maintains records, policies, and procedures required for the safe and efficient management of the setting and to meet the needs of the children.

# **Aim**

We have record-keeping systems in place for the safe and efficient management of the setting and to meet the needs of the children, which meet legal requirements for the storing and sharing of information within the framework of the GDPR and the Human Rights Act.

# **Objectives**

* Children’s records are kept in personal files, divided into appropriate sections, and stored separately from their developmental records.
* Children’s files contain registration information as specified in this policy.
* Children’s files contain other material described as confidential as required, such as Common Assessment Framework assessments, Early Support information or Education, Health, and Care Plan (EHCP, case notes including recording of concerns, discussions with parents, and action taken, copies of correspondence and reports from other agencies.
* Ethnicity data is only recorded where parents have identified the ethnicity of their child themselves.
* Confidentiality is maintained by secure storage of files in a locked cabinet with access restricted to those who need to know. Client access to records is provided within procedure 07.4 Client access to records.
* Staff know how and when to share information effectively if they believe a family may require a particular service to achieve positive outcomes
* Staff know how to share information if they believe a child is in need or at risk of suffering harm.
* Staff record when and to whom the information has been shared, why the information was shared, and whether consent was given. Where consent has not been given and staff have taken the decision, in line with guidelines, to override the refusal for consent, the decision to do so is recorded.
* Guidance and training for staff specifically covers the sharing of information between professions, organisations, and agencies as well as within them, and arrangements for training take into account the value of multi-agency as well as single-agency working.

# **Records**

The following information and documentation are also held:

* name, address, and contact details of the provider and all staff employed on the premises
* name, address, and contact details of any other person who will regularly be in unsupervised contact with children
* a daily record of all children looked after on the premises, their hours of attendance, and their named key person
* Certificate of registration displayed and shown to parents on request
* Records of risk assessments
* record of complaints

**Procedures**

If a child attends another setting, we establish a regular two-way flow of appropriate information with parents and other providers. Where appropriate, we will incorporate comments from other providers, as well as parents or carers, into the child’s records.

**Children’s Records (10.6)**

We keep two kinds of records on children attending our setting.

**Developmental records**

* These include observations of children in the setting, photographs, video clips, samples of their work, and summary developmental reports.
* These are kept in the children’s online learning journal (Tapestry) and can be freely accessed and contributed to by staff and the child’s parents.

**Personal Records**

These may include the following

* Personal details – including the child’s registration form and any consent forms.
* Contractual matters – signed day-care records, the child’s days, and times of attendance.
* A record of the child’s fees, any fee reminders, or records of disputes about fees.
* Child’s development, health, and well-being – including a summary of the child’s EYFS profile report, a record of discussions about everyday matters about the child’s development, health, and well-being with the parent.
* Early years support – including any additional intervention provided by our setting (e.g., support for behaviour, language, or development that needs a SEN action plan) and records of any meetings held.
* Welfare and child protection concerns - including records of all welfare and protection concerns, and our resulting action, meetings, and telephone conversations about the child, an Educational Health Care Plan, and any information regarding a Looked After Child.
* Correspondence and reports – including copies of the child’s 2-Year-Old Progress Check (as applicable), all letters and emails to and from other agencies, and any confidential reports from other agencies.
* Paper confidential records are stored in a lockable cabinet and are kept secure by the Practice Manager.
* Any computer-stored records are password protected, and access is only available to the staff who are required to make entries to them.
* Online learning journals are password protected, and access is only available to staff who need to make entries to them, the Practice Manager and Deputy Manager, and the individual child’s parents.
* We ensure access to children’s files is restricted to those authorised to see them and to make entries in them, this being our Practice Manager, Deputy Practice Manager, or designated person for child protection, the child’s keyworker, or other staff as authorised by our Practice Manager.
* Children’s files may be handed to Ofsted as part of an inspection or investigation; they may also be handed to local authority staff conducting an S11 audit if authorisation is seen.
* We ensure that children’s files are not handed over to anyone else to look at.
* Parents have access, in accordance with our Privacy Notice, and Confidentiality Policy (Client Access to Records), to the files and records of their own children but do not have access to information about any other child.
* Staff will not discuss personal information given by parents with other members of staff, except where it affects planning for the child’s needs. Our staff induction programme includes an awareness of the importance of confidentiality in the role of the key person.
* We retain children’s records for at least three years after they have left the setting; except records that relate to an accident or child protection matter, which are kept until a child reaches the age of 21 years or 24 years, respectively. These are kept in a secure place.
* Retention periods for all records are listed in the tables below.

**Archiving children’s files**

* When a child leaves our Pre-school, we remove all paper documents from the child’s personal file and place them in a robust envelope, with the year that they left.
* We seal the envelope, and it is archived and stored in a safe place (i.e., a locked filing cabinet) for three years. After three years it is destroyed.
* If data is kept electronically, it is encrypted and stored as above.
* Where there were s47 child protection investigations, we mark the envelope with a star and archive it for 25 years.
* We store financial information according to our finance procedures.

**Other Records**

* We keep a daily record of the names of the children we are caring for, their hours of attendance, and the name of the key person.
* Students on Early Years Alliance or other recognised qualifications and training, when they are observing in the setting, are advised of our Confidentiality Policy, and are required to respect it.

**Provider Records (10.7)**

We keep records and documentation for the purpose of maintaining our business. These include:

* Records pertaining to our registration.
* Landlord/lease documents and other contractual documentation pertaining to amenities, services, and goods.
* Financial records pertaining to income and expenditure.
* Risk assessments.
* Employment records of our staff including name, home address and telephone number.
* Names, addresses and telephone numbers of anyone who is regularly in unsupervised contact with the children.

We consider our records as confidential based on the sensitivity of the information, such as with employment records. These confidential records are maintained about the framework of the General Data Protection Regulations (2018), further details are given in our Privacy Notice and the Human Rights Act (1998).

This policy and procedure should run alongside our Privacy Notice, Confidentiality - Client Access to Records Policy and Information Sharing.

**Procedures**

* All records are the responsibility of the officers of the management committee who ensure they are kept securely.
* All records are kept in an orderly way in files and filing is kept up to date.
* Financial records are kept up to date for audit purposes.
* We maintain health and safety records; these include risk assessments, details of checks or inspections, and guidance, which are maintained by our Practice Manager.
* Our Ofsted registration certificate is displayed.
* Our Public Liability insurance certificate is displayed.
* All employment and staff records are kept securely and confidentially in a lockable cabinet.

**We notify Ofsted of any**

* Change to the name and address of our registered provider, or the provider’s contact information.
* Change to the person who is managing our provision.
* A significant event that is likely to affect our suitability to look after children.
* Other events as detailed in the Statutory Framework for the Early Years Foundation Stage (DfE 2021).

**Transfer of Records**

Records about a child’s development and learning in the EYFS are made by the setting; to enable smooth transitions, appropriate information is shared with the receiving setting or school at transfer. Confidential records are passed on securely where there have been concerns, as appropriate.

**Transfer of development records for a child moving to another Early Years setting or school**

* It is the designated person’s responsibility to ensure that records are transferred and closed under the archiving procedures set out below.
* If the Local Safeguarding Partners (LSP) retention requirements are different from the setting, the designated person will liaise with the management committee and seek legal advice if necessary.

**Development and learning records**

* The key person prepares a summary of achievements in the prime and specific areas of learning and development
* This record refers to any additional languages spoken by the child and their progress in all languages.
* The record also refers to any additional needs that have been identified or addressed by the setting and any action plans.
* The record also refers to any special needs or disability and whether early help referrals, or child in need referrals or child protection referrals, were raised in respect of special educational needs or disability, whether there is an Action Plan (or another relevant plan, such as CIN or CP, or early help) and gives the name of the lead professional.
* The summary shared with schools should also include whether the child receives or is eligible for EYPP or other additional funding.
* The record contains a summary by the key person and a summary of the parents’ view of the child.
* The document may be accompanied by other evidence, such as photos or drawings that the child has made.
* The setting will use the local authority’s assessment summary format or transition record, where these were provided.
* Whichever format of assessment summary is used, it should be completed and shared with the parent before transfer.

**Transfer of confidential safeguarding and child protection information**

* The receiving school/setting will need a record of child protection concerns raised in the setting and what was done about them. The responsibility for the transfer of records lies with the originating setting, not with the receiving setting or school, to make contact and request them.
* To safeguard children effectively, the receiving setting must be made aware of any current child protection concerns, preferably by telephone, before the transfer of written records.
* Parents should be reminded that sensitive information about their child is passed on to receiving settings where there have been safeguarding concerns, and should be asked to agree to this before the information is shared. Settings are obliged to share data linked to “child abuse,” which is defined as physical injury (non-accidental), physical and emotional neglect, ill-treatment, and abuse.
* Parents/carers should be asked to agree to this, however, where safeguarding concerns have reached the level of a referral being made to local children’s social work services (either due to concerns that a child may be at risk of significant harm or that a child may be in need under Section 17 of the Children Act,) if consent is withheld the information will most likely need to be shared anyway. Any decisions made to share or not share with or without consent must be fully recorded.
* For any safeguarding or welfare concerns that resulted in an early help referral being made, and if consent to share is withheld, legal advice is sought before sharing.
* If the level of a safeguarding concern has not been such that a referral was made for early help, or to children’s social work services or police, the likelihood is that any concerns were at a very low level and if they did not meet the threshold for early help, they are unlikely to need to be shared as child abuse data with a receiving setting, however, the designated person should make decisions on a case by case basis, seeking legal advice is necessary.
* The designated person should check the quality of information to be transferred before transfer, ensuring that any information to be shared is accurate, relevant, balanced, and proportionate. Parents can request that any factual inaccuracies be amended before transfer.
* If a parent wants to see the exact content of the safeguarding information to be transferred, they should go through the subject access request process. A child or other person mustn't be put at risk through information being shared.
* If no referrals have been made for early help or to children’s social work services and police, there should not normally be any significant information that is unknown to a parent being shared with the receiving school or setting.
* If a parent has objections or reservations about safeguarding information being transferred to the new setting, or if it is unclear what information should be included, the designated person will seek legal advice.
* If LSP requirements are different from the setting’s this must be explained to the parent, and recorded, and a record of the discussion should be signed by parents to indicate that they understand how the information will be shared, in what circumstances, and by whom.
* Prior to sharing the information with the receiving setting, the designated person should check LSP retention procedures, and if it becomes apparent that the LSP procedures are materially different from the setting’s procedures, this is brought to the attention of the designated person’s line manager, who will agree on how to proceed.
* If a child protection plan or child in need plan is in place, a child welfare and protection summary is also photocopied, and a copy is given to the receiving setting or school, along with the date of the last professional meeting or case conference.
* If a S47 investigation has been undertaken by the local authority, a copy of the child welfare and protection concern summary form is given to the receiving setting/school.
* Where a CAF/early help assessment has been raised in respect of welfare concerns, the name and contact details of the lead professional are passed on to the receiving setting or school**.**
* If the setting has a copy of a current plan in place due to early help services being accessed, a copy of this should be given to the receiving setting, with parental consent.
* Where there has been a S47 investigation regarding a child protection concern, the name and contact details of the child’s social worker will be passed on to the receiving setting/school, regardless of the outcome of the investigation.
* Where a child has been previously or is currently subject to a child protection plan, or a child in need plan, the name and contact details of the child’s social worker will be passed onto the receiving setting/school, along with the dates that the relevant plan was in place for.
* This information is posted (by ‘signed for’ delivery) or taken to the school/setting, addressed to the setting's or school’s designated person for child protection, and marked confidential. Electronic records must only be transferred by a secure electronic transfer mechanism or after the information has been encrypted.
* Parent/carers should be made aware of what information will be passed on to another setting via 07.1a Privacy notice.
* Copies of the last relevant initial child protection conference/review, as well as the last core group or child in need minutes, can be given to the setting or school.
* The setting manager must review and update 06.1a Child welfare and protection summary, checking for accuracy, proportionality, and relevance, before this is copied and sent to the setting/school.
* The setting manager ensures the remaining file is archived in line with the procedures set out below.

No other documentation from the child’s file is passed to the receiving setting or school.The setting keeps a copy of any safeguarding records in line with required retention periods.

**Archiving children’s files**

* Paper documents are removed from the child’s file, placed in a robust envelope with the child’s academic year.
* The designated person writes clearly on the front of the envelope the length of time the file should be kept before destruction.

This is sealed and placed in an archive box and stored in a safe place, i.e., a locked cabinet, for three years or until the next Ofsted inspection is conducted after the child has left the setting and can then be destroyed.

* For web-based or electronic children’s files, the designated person must also use the archiving procedure and record details of what needs to be retained/destroyed. The designated person must decide to ensure that electronic files are deleted/retained as required under the required retention periods in the same way as paper-based files.
* Health and safety records and some accident records pertaining to a child are stored in line with required retention periods.

**Legal references**

General Data Protection Regulation 2018

Freedom of Information Act 2000

Human Rights Act 1998

Statutory Framework for the Early Years Foundation Stage (DfE 2024)

Data Protection Act 2018

### **Further guidance**

Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents, and carers. (HMG 2024)

This policy was reviewed by Hanslope Pre-school on the 7th of April 2025

To be reviewed on the 1st of September 2025

Signed on behalf of the Hanslope Pre-school

By Emma Courtney



Chairperson

Date: 25.06.2025

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| **Children’s Records** | **Retention Period** | **Status** | **Authority** |
| Children’s records, including registers, medication records, and accident records on children\*If a concern is identified that legal action may be instigated, all relevant information will be retained until the child reaches the age of 25 | Records should be retained for a reasonable period afterChildren have left the provision (e.g., three years) or until the next Ofsted Inspection after the child had left the setting (whichever is soonest) | Requirement | EYFE (given legal force by the Childcare Act 2006) |
| Until the child reaches 21, or until the child reaches the age of 25 for child protection records, SEND records, and health care plansRecords concerning Safeguarding concerns will also need to be kept under the Local Safeguarding Children Board’s requirements | Recommendation | Limitation Act 1980Normal limitation rules (which mean that an individual can claim for negligibility caused personal injury up to three years after, or deliberately caused personal injury up to six years after the event) are postponed until the child reaches 18 years old |
| Records of any reportable death, injury, disease, or dangerous occurrences | Three years from the date of the last entry, or if the accident involves a child, then until the person reaches the age of 21The setting will also need to consider whether it is necessary to keep the records for a longer period, considering the circumstances | Requirement | The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI1995/3163) (as amended) |
| Safeguarding and welfare records (including a written summary of information transferred to schools), which resulted in a Child Protection referral or Child in Need referral being made to the local authority | Until the child reaches the age of 25 years, or for Looked After Children, 75 years | Requirement | Limitation Act 1980 |
| Safeguarding and welfare records (including a written summary of information transferred to schools), which resulted in a referral being made to CAF or other early years support services | Until the child reaches the age 25 years, or for Looked After Children 75 years | Requirement | Limitation Act 1980 |
| **Personnel Records** | **Retention Period** | **Status** | **Authority** |
| Personnel files and training records (including disciplinary records and working time records) | Six years after employment ceases | Recommendation | Chartered Institute of Personnel and Development |
| Application forms and interview notes for unsuccessful candidates | Six months to one year | Recommendation | Chartered Institute of Personnel and Development |
| DBS information | Once a recruitment (or other relevant) decision has been made, we do not keep Disclosure information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaintsWe will maintain in employee files the reference number, the date a check was obtained, and who obtained it | RequirementRequirement | Disclosure and Barring ServiceEYFS (given legal force by the Childcare Act 2006) |
| **Pay** | **Retention** | **Status** | **Authority** |
| Wages/Salary records (including overtime, bonuses, and expenses) | Six years | Requirement | Taxes Management Act 1970 |
| Statutory Maternity Pay (SMP) records | Three years after the end of the tax year in which the maternity period ends | Requirement | The Statutory Maternity Pay (General) Regulations 1986 (SI 1993/744) as amended |
| Statutory Sick Pay (SSP) records | Six years after employment ceases | Recommendation | Chartered Institute of Personnel and Development |
| Income Tax and National Insurance returns/records | At least three years after the end of the tax year to which they relate | Requirement | The Income Tax (Employment) Regulations 1993 (SI 1993/744) as amended |
| Redundancy details, calculations of payments, refunds, and notification to the Secretary of State | Six years from the date of redundancy | Recommendation | Chartered Institute of Personnel and Development |
| National Minimum Wage records | Three years after the end of the pay reference period following the one that the records cover | Requirement | National Minimum Wage Act 1998 |
| Pension Scheme and members' records | Six years (except for records of opt-out, which must be kept for four years) | Requirement | The Pension regulator |
| 12 years from the ending of any benefit payable under the policy | Recommendation | Chartered Institute of Personnel and Development |
| **Health and Safety** | **Retention** | **Status** | **Authority** |
| Records of reportable death, injury, disease, or dangerous occurrence | Three years from the date of the last entry | Requirement | The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI1995/3163) (as amended) |
| Accident/medical records specified by the Control of Substances Hazardous to Health regulations (COSHH) 1999 | 40 years from the date of the last entry | Requirement | The Control of Substances Hazardous to Health regulations 1999 (COSHH) (SI 1999/437 and 2002/2677) |
| Assessments under Health and Safety Regulations and records of consultations with safety representatives and committees | Permanently | Recommendation | Chartered Institute of Personnel and Development |
| **Financial Records** | **Retention** | **Status** | **Authority** |
| Accounting Records | Three years for Private CompaniesSix years for Public Limited CompaniesSix years for Charities | Requirement | Sections 386 and 388 of the Companies ActCharities Act 2011 section 131 |
| **Administration Records** | **Retention** | **Retention** | **Authority** |
| Complaints records | At least three years from the date of the last record | Requirement | Early Years Foundation Stage Welfare Requirements (given legal force by the Childcare Act 2006) |
| Insurance policies | Permanently | Recommendation | Information and Records Management Society |
| Minutes/minutes book | Permanently | Recommendation | Chartered Institute of Personnel and Development |

**The following information is taken from the Early Years Alliance publication ‘Financial Management’:**

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| **Purchase Invoices and Supplier Documentation** |
| ***Document type*** | **Required retention period** |
| Payments cash book or record of cheque payments | 6 years |
| Purchase ledger | 6 years |
| Invoice – revenue | 6 years |
| Invoice – capital item | 10 years |
| Successful quotations for capital expenditure | Indefinitely |
| Petty cash records | 7 years |
| **Income/monies received** |
| ***Document type*** | **Required retention period** |
| Bank paying-in counterfoils | 6 years |
| Bank statements | 6 years |
| Receipts cash book | 10 years |
| Sales ledger | 10 years |
| Remittance advices | 6 years |
| Bank reconciliations | 6 years |
| Deeds of covenant | 6 years (12 years if dispute over payment) |
| Correspondence re donations | 3 years |
| **Other documents** |
| ***Document type*** | **Required retention period** |
| Fixed asset register, investment ledger, investment certificates | Indefinitely |
| Agreements with suppliers and licensing agreements | Under seal – 12 years after expiry |
| Leases, rental agreements, and hire purchaseIndemnities and guaranteesLoan agreementsOther contracts and agreements | Other – 6 years after expiry |
| **Payroll Documentation** |  |

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| Income Tax re employee leaving (P45), notice to employer of tax code changes(P6), certificate of pay tax deducted (P60), notice of tax code change and annual return of taxable pay and tax deducted (P14) | 6 years |
| Retirements and benefits scheme | 7 years |
| Copy pay slips | 2 years |
| Payroll and payroll control account | 7 years |
| **Employee/Personnel Records** |  |
| Medical reports | 40 yearsafter the date of the last entry or end of investigation |
| Accident reports | 3 years after the date of the last entry or end of investigation |
| Expenses records | 6 years plus current year |