

## KENT COUNTY COUNCIL

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| <b>Title of document:</b> | Records Management Toolkit for Children's Centres |
| <b>Document owned by:</b> | Records Manager                                   |
| <b>Status:</b>            | Version 1   |
| <b>Classification:</b>    | Open  |
| <b>Date:</b>              | 28 <sup>th</sup> April 2010                       |

### Records Management Toolkit for Children's Centres

The Records Management Toolkit for Children's Centres has been created to assist Children's Centre staff to manage the records the Children's Centres create. The information below outlines what can be found in the toolkit. If members of staff cannot find any information which they require please contact Elizabeth Barber on [elizabeth.barber@kent.gov.uk](mailto:elizabeth.barber@kent.gov.uk)

#### Records Management

The Records Management Toolkit aims to assist Children's Centres to manage the records which they create and maintain in the course of their work. This includes the storage of physical and electronic records, information security including the safe disposal of records.

#### Retention Schedule

The core part of the toolkit is the retention schedule which lists all the possible records any Children's Centre, might produce and the recommended retention periods. Some of these have a statutory basis, others have been created in consultation with the relevant officers.

#### Training

If you are interested in training about records management or about Data Protection and Freedom of Information please contact Michelle Hunt on [michelle.hunt@kent.gov.uk](mailto:michelle.hunt@kent.gov.uk).

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### 1. Storage of physical records

#### Physical records

*all records which are not held in an electronic format. This will include paper records and microform as well as photographs and analogue audio and visual material. In some circumstances it will also include items such as CDs/DVDs or external hard drives which contain electronic data but which need to be stored as "physical records".*

Records must be managed to ensure that they cannot be lost, damaged or destroyed. This will usually involve the purchase of high quality storage equipment. It may not always be necessary to store non-core records in the same high quality storage.

Records must be stored in the workplace in a way that does not cause a health and safety hazard. Records must not be stored in corridors or gangways and must not impede or block fire exits. There should be, where appropriate heat/smoke detection connected to fire alarms, a sprinkler system and the required number of fire extinguishers. The area should be secured against intruders and have controlled access as far as possible to the working space.

#### Environmental Damage - Fire

Records can be damaged beyond repair by fire. Smoke and water damage will also occur to records which have been in a fire, although generally records damaged by smoke or water can be repaired.

Core records should be kept in fire-proof cabinets. Records which are stored on desks or in cupboards which do not have doors will suffer more damage than those which are stored in cupboards/cabinets which have close fitting doors.

#### Environmental Damage - Water

Records damaged by water can usually be repaired by a specialist document salvage company. The salvage process is expensive, therefore, records need to be protected against water damage where possible. Where flooding is involved the water may not always be clean and records could become contaminated as well as damaged.

Records should not be stored directly under water pipes or in places which are liable to flooding (either from excess rainfall or from the overflow of toilet cisterns). Records should be stored in cabinets/cupboards with tight fitting doors which provide protection from water ingress. Records stored on desks or in cabinets/cupboards without close fitting doors will suffer serious water damage.

Records should be stored at least 2 inches off the ground. Most office furniture stands 2 inches off the ground. Portable storage containers (i.e. boxes or individual filing drawers) should be raised off the ground by at least 2 inches. This is to ensure that in the case of a flood that records are protected against immediate flood damage.

#### Environmental Damage – Sunlight

Records should not be stored in direct sunlight (e.g. in front of a window). Direct sunlight will cause records to fade and the direct heat causes paper to dry out and become brittle.

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### **Environmental Damage - High Levels of Humidity**

Records should not be stored in areas which are subject to high levels of humidity. Excess moisture in the air can result in mould forming on the records. Mould can be a hazard to human health and will damage records often beyond repair.

The temperature in record storage areas should not exceed 18°C and the relative humidity should be between 45% and 65%.

### **Environmental Damage - Insect/Rodent Infestation**

Records should not be stored in areas which are subject to insect infestation or which have a rodent problem (rats or mice).

## **2. Storing Electronic Records**

There is a misconception that the information contained in electronic records can be managed differently to information held in physical files as the electronic information takes up less physical storage space. Retention periods relate to the information described not the media in which it is stored. Electronic records should not be stored for longer than they need to be simply because it is perceived that they are taking up less storage space.

Although electronic storage is relatively cost effective, it is not without cost. Electronic systems which become too large are proportionately more likely to become corrupted and the speed of the system slows to such a degree that retrieval can become a problem. Therefore, electronic systems should be cleared of unnecessary information on a systematic basis.

Where the servers are backed up by ISG then it is the responsibility of the individual divisions to ensure periodically that the back-ups are being done on a regular basis and that a test restore of back-up data is undertaken at least once a year.

It is vital that users do not discover that either the back-ups have not been done or that ISG are unable to restore the data at the time when there is a business need to restore the data. All problems relating to the back-up process need to be identified and resolved quickly.

## **3. Information Security**

There have been a number of high profile information security breaches which have been reported in recent times. It is essential that all members of staff are aware of their responsibilities to ensure that information is retained securely and the procedures to follow if there is an information security breach. Information security is an integral part of the Data Protection Act 1998. You must take all reasonable steps to ensure that any personal or sensitive information which you are collecting and storing is securely stored.

You will find below some guidelines to bear in mind when considering information security:

1. All personal information should be kept in lockable filing cabinets which are kept locked when the room is unattended. Personal information should not be left on your desk where anyone could see it. You might need to consider restricting access to offices in which personal information is being worked on or stored.

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2. If you are "archiving" information somewhere else in your own building (or in an outbuilding) make sure that the door can be locked and that the key is kept locked away. Anyone accessing the room should sign for the key. Where possible, there should be a file tracking system where anyone borrowing items from the "archive" room must make a note of what they have taken.
3. Personal information held on computer systems should be adequately password protected. Information should never be left up on a screen if the computer is unattended. Make sure that you don't have shared passwords to systems (or share personal passwords with other members of staff) and that all members of staff log off the computer when it is left unattended.
4. Where possible personal information should not be sent by e-mail, as its security cannot be guaranteed. Using a "safe haven" fax is preferable to e-mail (a fax machine in a secure or constantly manned area). Never send personal information in the text of an e-mail, if necessary make sure that the information is in an MSOffice document attached to the e-mail. When sending land-mail through either the internal or external postal system make sure that the information is in a sealed envelope.
5. If files need to be taken off the premises they should be secured in a lockable box or briefcase and put in the boot of the car. Any items containing personal information (e.g. laptops, PDAs, briefcases etc) should not be left in a car on open view. Records should not be left in the boot of a car overnight or for any extended period of time. Once you have taken the records from the car please make sure that they are not left on general access in your home. Put them out of sight in a secure environment.
6. If using a home computer (or laptop) to process personal information ensure you have up-to-date virus protection software installed. No other members of your household should have access to the computer or the information contained on it. Any documents produced should be stored onto disk and not to the hard drive. Do not use datasticks, even if they have been encrypted, for the transportation of personal data.
7. Be careful of giving out personal information over the telephone; invite the caller to put the request in writing. If the request is urgent take the caller's name and switchboard telephone number and verify their details before responding.
8. Do not discuss other people's personal business in public areas where conversations can be overheard by people with no right to know the details of the information.

One of the best rules of thumb for dealing with sensitive, personal information, is to ask the question "if this was my information would I be happy with the way in which it is being treated?"

If you lose a file or electronic storage media which contains personal information or if personal information which has been sent to you by a third party has not arrived then you must report it to Michelle Hunt as soon as possible after it has happened. The authority maintains a log of all such losses to track whether processes and/or procedures need to be amended or additional levels of security introduced. The authority recognises that these breaches happen from time to time as all members of staff are human, and no one is immune from being the victim of crime and members of staff should not be embarrassed to report the loss of data.

For more advice please contact Michelle on [michelle.hunt@kent.gov.uk](mailto:michelle.hunt@kent.gov.uk)

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### 4. Safe Disposal of Records

Records which have been identified for disposal must be destroyed in a way which reflects the sensitivity or confidentiality of the information which the record contains.

The authority is required to keep a record of which records have been destroyed, when they were destroyed and on whose authority. This is to ensure that the authority can show that records have been destroyed on a systematic and routine basis when a freedom of information request covers records which have been destroyed.

Where records are disposed of to an outside agency (such as a confidential waste operator or a waste paper merchant) a certificate of destruction must be produced by the company concerned to indicate that the records have been pulped.

All records must be disposed of in a way which complies with KCC's information security policies and in line with KCC's environmental policy.

Manual records consist of records which are held in paper or microform format. These records should be disposed of using the methods outlined at Table 1

Electronic records consist of all records held in digital format. Examples include MS Office documents, e-mails, graphics, presentations, sound files, photographs and databases. There are many different methods of storing magnetic media.

The main issue with records held electronically is ensuring that they have actually been removed from the storage medium.

The methods outlined at Table 2 are appropriate for the disposal of records stored electronically.

Once hardware has been decommissioned and it has been decided that it is not suitable to be refurbished it must be recycled in accordance with the Waste Electrical Electronic Equipment (WEEE) Directive. Advice can be obtained from ISG about how to manage this process.

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**Table 1      Methods for the Disposal of Manual Records**

| Method              | Disposal to Waste Paper Merchant  | Red Security Waste Bins  | Shredding  |
|---------------------|---|--|--|
| <b>Description</b>  | This involves the bundling of records for destruction. They are then collected by a waste paper merchant for pulping. Alternatively, records can be placed in the "green" paper recycling bins which are sited around the building. | Facilities Services provide a number of "red" locked secure waste bins in the headquarters buildings. These bins are emptied periodically by a secure waste disposal company.  | Records are shredded using a diamond or cross cut shredder on the office premises or a shredding company is employed to shred records on site  |
| <b>Suitable For</b> | Records which do not contain sensitive information;<br>Runs of leaflets or brochures which are not required;<br>Non-sensitive waste paper from printers.  | Records which contain personal or financial information;<br>Records which may be politically sensitive   | Records containing sensitive personal information (e.g. medical details) or financial information<br>Records which may be politically sensitive<br>Records stored on microfilm or microfiche                   |
| <b>Notes</b>        | This method should only be used for very general office waste. There may be a time delay before the paper is sent for pulping which could lead to the possibility of an information security breach.                                | In order to be effective these bins <b>MUST</b> be locked. The bins should not be filled to the point where paper records are coming out of the slot at the top. These bins <b>MUST NOT</b> be used if they are unlocked or over full. Periodically, a member of staff must accompany the waste to ensure that the company concerned are carrying out the proper procedures. | This is the preferred method of disposal for confidential records. Once the records have been shredded they can be placed either in the "green" paper recycling bins or in the "red" locked secure waste bins. |

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Table 2 Methods for the Disposal of Electronic Records

| Storage Media              | Method of Disposal  | Notes   |
|----------------------------|---|---|
| <b>Floppy Disk</b>         | If files are deleted from the floppy disk and the disk is reused then the files will be overwritten on the disk. Where there are no plans to re-use the disk, the plastic cover should be removed and the magnetic disk inside should be shredded. The shreds can be disposed of in the same way as ordinary rubbish.   | <p><i>It is important to remember that as data recovery companies become more adept at recovering data, shredding the magnetic media may be the only way to ensure complete destruction of the information.</i></p> |
| <b>CD/R; CD/RW; DVD</b>    | CD/R; CD/RW and DVD should all be shredded before disposal in the ordinary rubbish. Most shredders have a CD/DVD shredding function which involves using a separate feed. In the absence of a shredder, writing on the "data" side of the disk with a permanent marker will render the disk useless in an ordinary computer.  |   |
| <b>Data/Memory Stick</b>   | Files can be deleted from a memory stick in the same way as a floppy disk above. It is important to check whether the data/memory stick has a recycling bin. If so the recycling bin must be emptied in addition. If there are no plans to reuse the data/memory stick then it should be destroyed by breaking open the casing and taking the magnetic media out so that it can be shredded.  |   |
| <b>External Hard Drive</b> | External hard drives can be re-formatted if there are plans to use the external hard drive to store other data. Individual records can be removed from the hard drive using the standard "delete" procedure. However, until the sector of the disk is over-written the records will still be recoverable by a data recovery company. If there are no plans to re-use the hard drive then the disk must be removed from the drive and destroyed. | <p><i>It is important to remember that as data recovery companies become more adept at recovering data, shredding the magnetic media may be the only way to ensure complete destruction of the information.</i></p> |

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| Storage Media              | Method of Disposal  | Notes   |
|----------------------------|---|---|
| <b>Internal Hard Drive</b> | Internal hard drives can be re-formatted if there are plans to use the external hard drive to store other data. Individual records can be removed from the hard drive using the standard "delete" procedure. However, until the sector of the disk is over-written the records will still be recoverable by a data recovery company. If there are no plans to re-use the hard drive then the disk must be removed from the drive and destroyed. |   |
| <b>Back up Tapes</b>       | Back up tapes will be overwritten each time a back up is made so the data will survive until the back up is completely overwritten. Data can be restored from back up tapes by data recovery companies even if it appears to have become corrupted. When back up tapes are decommissioned, the casing needs to be removed and the tape removed and shredded,  |   |
| <b>Lap Top computer</b>    | If lap top computers need to be decommissioned or refurbished, the internal hard drive needs to be reformatted. Where appropriate the internal hard drive should be removed and a new hard drive fitted. The original hard drive should then be destroyed.  | <i>Decommissioned lap top computers should only be made available for re-use within the authority.</i>  |
| <b>Desk Top computer</b>   | If desk top computers need to be decommissioned, the internal hard drive needs to be reformatted. Where appropriate the internal hard drive should be removed and a new hard drive fitted. The original hard drive should then be destroyed.  | <i>Decommissioned desk top computers should only be made available for re-use within the authority.</i> |

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### 5. Retention Schedule

There are a number of benefits which arise from the use of a retention schedule:

- Managing records against the retention schedule is deemed to be "normal processing" under the Data Protection Act 1998 and the Freedom of Information Act 2000. Provided members of staff are managing record series using the retention schedule they can not be found guilty of unauthorised tampering with files once a freedom of information request or a data subject access requests have been made.
- Members of staff can be confident about shredding information at the appropriate time.
- Information which is subject to Freedom of Information and Data Protection legislation will be available when required.

The retention periods are minimum periods for which the data needs to be retained. Some records will need to be reviewed at the end of the minimum retention period to see whether they need to be kept for a further period of time.

If you cannot find a particular record series in the Children's Centre retention schedule below, please contact Elizabeth Barber on [elizabeth.barber@kent.gov.uk](mailto:elizabeth.barber@kent.gov.uk).

The retention schedule contains the following headings:

Ref – This refers to the unique reference in the corporate retention schedule.

Basic File Description – A description of the record series.

DP – A Y in this column indicates that the record series contains personal information and is included in the Data Protection notification.

Statutory Provisions – Any legislation which applies to the retention of the record series.

Retention Period – The minimum length of time the document needs to be retained.

MRC Reference – Modern Records Centre code number – only applicable if records are to be transferred to the MRC.

Arch – This column indicates whether records should be offered to the Archives at the end of their administrative life.

Disposal – Method of disposal.,]

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### 5.1 Retention Schedule for Children's Centres

| Ref           |    |     | Basic file description  | DP | Statutory Provisions | Retention period  | MRC Ref | Arch | Disposal                        |
|---------------|----|-----|---|----|----------------------|---|---------|------|---------------------------------|
| <b>CS38.1</b> |    |     | <b>Children's Centres: Client Information</b>   |    |                      |   |         |      |                                 |
| CS            | 38 | 1.1 | Registration Forms  | Y  |                      | Date entered on the system + 3 months   |         | N    | SHRED                           |
| CS            | 38 | 1.2 | Client files containing contact sheet, detailed record sheet and referrals where there is no child protection information | Y  |                      | Where possible all this information should be attached to the electronic record on the system.<br>Where paper records are held the file should be reviewed once the child has reached 6 years of age  |         | N    | Delete securely from the system |
| CS            | 38 | 1.3 | Client files containing contact sheet, detailed record sheet and referrals where there is child protection information    | Y  |                      | Where possible all this information should be attached to the electronic record on the system.<br>Where paper records are held the file should be reviewed to ensure that all child protection information has been included in the principal social care file. |         | N    | SHRED                           |

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| Ref   | Basic file description |     | DP   | Statutory Provisions | Retention period   | MRC Ref | Arch | Disposal |
|---|------------------------|-----|--|----------------------|--|---------|------|----------|
| <b>CS38.2 Children's Centres: Health and Safety</b> |                        |     |  |                      |  |         |      |          |
| CS  | 38                     | 2.1 | Accident Reporting - Children  | Y                    | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 |         | N    | SHRED    |
| CS  | 38                     | 2.2 | Accident Reporting - Adults  | Y                    | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 |         | N    | SHRED    |
| CS  | 38                     | 2.3 | A record of any medicinal product administered to any child on the premises, including the date and circumstances of its administration, by whom it was administered, including medicinal products which the child is permitted to administer to himself | Y                    | Limitation Act 1980  |         | N    | SHRED    |
| CS  | 38                     | 2.4 | Risk Assessments   |                      |  |         | N    | SHRED    |
| CS  | 38                     | 2.5 | Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos  |                      |  |         | N    | SHRED    |
| CS  | 38                     | 2.6 | Process of monitoring of areas where employees and persons are likely to have come in contact with radiation   |                      |  |         | N    | SHRED    |
| CS  | 38                     | 2.7 | Fire Precautions log books   |                      |  |         | N    | SHRED    |

<sup>1</sup> This retention period has been set in consultation with the Risk and Insurance section and Legal Services.

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| Ref  | Basic file description |     |  | DP             | Statutory Provisions  | Retention period                    | MRC Ref | Arch | Disposal   |
|--|------------------------|-----|--|----------------|-----------------------|-------------------------------------|---------|------|------------|
| <b>CS38.3 Children's Centres: Financial Information</b>  |                        |     |  |                |                       |                                     |         |      |            |
| CS   | 38                     | 3.1 | Copies of financial records where the main copy of the record has been sent to Finance for payment | N              | Financial Regulations | Current year + 1 year               |         | N    | SHRED      |
| CS   | 38                     | 3.2 | Financial records - main copy (held either in Finance or in individual Units) - KCC                | N              | Financial Regulations | Close of audit + 3 years            |         | N    | SHRED      |
| CS   | 38                     | 3.3 | Budget spreadsheets and budget reconciliation spreadsheets (manager's copy)                        | N              |                       | Current year + 1 year               |         | N    | SHRED      |
| CS   | 38                     | 3.4 | Records relating to the creation of an annual budget (manager's copy)                              | N              |                       | Current year + 1 year               |         | N    | SHRED      |
| CS   | 38                     | 3.5 | External Funding including Surestart Funding and any other partner funding streams                 | N              |                       | Current year + 12 years then review |         | N    | SHRED      |
| <b>CS38.4 Children's Centres: Personnel Information</b>  |                        |     |  |                |                       |                                     |         |      |            |
| It is assumed that all the principal copies of documents relating to an individual's employment history are held by Employee Services. |                        |     |  |                |                       |                                     |         |      |            |
| CS   | 38                     | 4.1 | Personal files maintained by managers for the purpose of managing individual members of staff      | Y <sup>2</sup> |                       | Termination                         |         | N    | SHRED      |
| <b>CS38.5 Children's Centres: Project Documentation</b>  |                        |     |  |                |                       |                                     |         |      |            |
| CS   | 38                     | 5.1 | Project documentation relating to Children's Centre projects                                       | N              |                       | Last action on project + 12 years   |         | Y    | See Note 1 |

<sup>2</sup> Managers should note that these files are subject to KCC's open file policy in the same way as the main personnel file. Records relating to disciplinary procedures should be removed from the files at the correct intervals. See HR11.2.

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| <b>CS38.6 Children's Centres: Administrative Information</b> |                        |     |   |    |                      |  |         |      |          |
| CS   | 38                     | 6.1 | Sure Start Children's Centres – Sub Group and Advisory Board meetings | N  |                      | Principal Copies: Minimum of 4 years then review<br>Operational Copies: Destroy at the end of administrative use |         | N    | SHRED    |

### 5.2 Retention Schedule for Early Years Settings

Where a Children's Centre runs a crèche/nursery provision as part of the Centre's services, the records must be managed in accordance with the Early Years Settings retention schedule which is shown below.

| Ref  | Basic file description |     |   | DP | Statutory Provisions  | Retention period  | MRC Ref | Arch | Disposal |
|--|------------------------|-----|---|----|---|---|---------|------|----------|
| <b>CS33.1 Records to be kept by Registered Persons - All Cases</b> |                        |     |   |    |   |   |         |      |          |
| CS   | 33                     | 1.1 | The name, home address and date of birth of each child who is looked after on the premises                | Y  | <i>Statutory Framework for the Early Years Foundation Stage</i><br>May 2008 p38 | Closure of setting + 50 years <sup>3</sup>  |         | N    | SHRED    |
| CS   | 33                     | 1.2 | The name, home address and telephone number of a parent of each child who is looked after on the premises | Y  | <i>Statutory Framework for the Early Years Foundation Stage</i><br>May 2008 p38 | If this information is kept in the same book or on the same form as in CS331.1 then the same retention period should be used as in CS331.1. If the information is stored separately, then destroy once the child has left the setting (unless the information is collected for anything other than emergency contact) |         | N    | SHRED    |

<sup>3</sup> These could be required to show whether or not an individual child attended the setting in a child protection investigation

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| Ref |    |     | Basic file description   | DP | Statutory Provisions  | Retention period  | MRC Ref | Arch | Disposal |
|-----|----|-----|--|----|---|---|---------|------|----------|
| CS  | 33 | 1.3 | The name, address and telephone number of any person who will be looking after children on the premises  | Y  | <i>Statutory Framework for the Early Years Foundation Stage</i><br>May 2008 p40 | See CS33.4.5 below  |         | N    | SHRED    |
| CS  | 33 | 1.4 | A daily record of the names of children looked after on the premises, their hours of attendance and the names of the persons who looked after them   | Y  | <i>Statutory Framework for the Early Years Foundation Stage</i><br>May 2008 p40 | The regulations say that these records should be kept for 2 years (SI20031996 7(1b))<br>If these records are likely to be needed in a child protection setting (see CS33.1.1 above) then the records should be retained for closure of setting + 50 years |         | N    | SHRED    |
| CS  | 33 | 1.5 | A record of accidents occurring on the premises and incident books relating to other incidents   | Y  | <i>Statutory Framework for the Early Years Foundation Stage</i><br>May 2008 p26 | DOB of the child involved in the accident or the incident + 25 years<br>If an adult is injured then the accident book must be kept for 7 years from the date of the incident  |         | N    | SHRED    |
| CS  | 33 | 1.6 | A record of any medicinal product administered to any child on the premises, including the date and circumstances of its administration, by whom it was administered, including medicinal products which the child is permitted to administer to himself, together with a record of parent's consent | Y  | <i>Statutory Framework for the Early Years Foundation Stage</i><br>May 2008 p26 | DOB of the child being given/taking the medicine + 25 years   |         | N    | SHRED    |
| CS  | 33 | 1.7 | Records of transfer  | Y  |   | One copy is to be given to the parents, one copy transferred to the Primary School where the child is going   |         | N    | SHRED    |
| CS  | 33 | 1.8 | Portfolio of work, observations and so on  | Y  |   | To be sent home with the child  |         | N    | SHRED    |

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| <b>Document owned by:</b> | Records Manager                                   |
| <b>Status:</b>            | Version 1   |
| <b>Classification:</b>    | Open  |
| <b>Date:</b>              | 28 <sup>th</sup> April 2010                       |

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|---|----|-----|--|----|---|---|---------|------|----------|
| CS  | 33 | 1.9 | Birth certificates   | Y  |   | Once the setting has had sight of the birth certificate and recorded the necessary information the original can be returned to the parents<br>There is no requirement to keep a copy of the birth certificate |         |      |          |
| <b>CS33.2 Records to be kept by Registered Persons - Day Care</b> |    |     |  |    |   |   |         |      |          |
| CS  | 33 | 2.1 | The name and address and telephone number of the registered person and every other person living or employed on the premises         | Y  | <i>Statutory Framework for the Early Years Foundation Stage</i><br>May 2008 p26 | See CS334 below   |         | N    | SHRED    |
| CS  | 33 | 2.2 | A statement of the procedure to be followed in the event of a fire or accident   | N  | <i>Statutory Framework for the Early Years Foundation Stage</i><br>May 2008 p34 | Procedure superseded + 7 years  |         | N    | SHRED    |
| CS  | 33 | 2.3 | A statement of the procedure to be followed in the event of a child being lost or not collected                                      | N  | <i>Statutory Framework for the Early Years Foundation Stage</i><br>May 2008 p23 | Procedure superseded + 7 years  |         | N    | SHRED    |
| CS  | 33 | 2.4 | A statement of the procedure to be followed where a parent has a complaint about the service being provided by the registered person | N  | <i>Statutory Framework for the Early Years Foundation Stage</i><br>May 2008 p23 | Until superseded  |         | N    | SHRED    |

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|---------------|----|-----|---|----|---|--|---------|------|----------|
| CS            | 33 | 2.5 | A statement of the arrangements in place for the protection of children, including arrangements to safeguard the children from abuse or neglect and procedures to be followed in the event of allegations of abuse or neglect | N  | <i>Statutory Framework for the Early Years Foundation Stage</i><br>May 2008 p22 | Closure of setting + 50 years <sup>4</sup>   |         | N    | SHRED    |
| <b>CS33.3</b> |    |     | <b>Other Records – Administration</b>   |    |   |  |         |      |          |
| CS            | 33 | 3.1 | Financial records – accounts, statements, invoices, petty cash etc  | N  |   | Current year + 6 years   |         | N    | SHRED    |
| CS            | 33 | 3.2 | Insurance policies – Employers Liability  | N  | Employers Liability Financial Regulations                                       | The policies are kept for a minimum of 6 years and a maximum of 40 years depending on the type of policy |         | N    | SHRED    |
| CS            | 33 | 3.3 | Claims made against insurance policies – damage to property   | Y  |   | Case concluded + 3 years   |         | N    | SHRED    |
| CS            | 33 | 3.4 | Claims made against insurance policies – personal injury  | Y  |   | Case concluded + 6 years   |         | N    | SHRED    |
| CS            | 33 | 3.5 | Personal Files - records relating to an individual's employment history   | Y  |   | Termination + 6 years then review  |         | N    | SHRED    |

<sup>4</sup> These could be required to show whether or not an individual child attended the setting in a child protection investigation