

Managing School Records Before and After Adoption

Key Guidance for Schools to Protect Children's Identity, Privacy and Safety

When a child is placed for adoption, schools play a vital role in safeguarding their identity and ensuring that legal requirements are followed. Errors in recording names, UPNs or historical records can compromise confidentiality, create data protection risks and inadvertently link a child's pre- and post-adoption identity.

Before an Adoption Order is Granted

The child remains legally looked after and must continue to be recorded using their current legal name (usually their birth name). Schools must not change a child's legal name in any statutory, administrative or electronic record before the Adoption Order is made.

This includes:

- MIS records
- Attendance records
- Assessment records
- School census returns
- Safeguarding systems
- Permanent pupil records
- Any statutory submissions to the DfE

Where families wish a child to be known informally by a different surname before adoption, schools must discuss this with the social worker and family and consider informal approaches (for example, using first names only on trays, displays and exercise books for all pupils).

Any arrangements relating to the use of a preferred name should be agreed collaboratively through a multi-agency meeting (for example, a PEP meeting) to ensure consistency, safeguard confidentiality and provide clarity for all professionals involved.

When an Adoption Order is Granted

Once an Adoption Order is made, the child ceases to be a looked-after child, and the local authority's corporate parenting responsibilities come to an end. The Adoption Order transfers full parental responsibility to the adoptive parent(s), who become the child's legal parent(s) in every respect. The original birth certificate is replaced by an Adoption Certificate.

Following the court order:

- ✓ Create a **new pupil record** using the child's new legal name.
- ✓ Issue a **new UPN**.
- ✓ Record the child as a new admission from the date of the Adoption Order.
- ✓ End the previous pupil record appropriately.
- ✓ Ensure there is **no electronic or administrative link** between the pre-adoption and post-adoption records. Archive the pre-adoption records.

The Department for Education (DfE) guidance is clear that the standard practice following adoption is to maintain **two separate, unlinked records** with different identifiers and different UPNs. In addition, the DfE advises that:

- adoptive parents should be asked whether they would like relevant records transferred and, if not, whether they would like a copy; and
- the local authority should review original reports to consider whether identifying information, such as names and school names, can be anonymised to reduce the risk of identification.

Assessment Data and Historic Attainment

Schools sometimes discover that historic EYFS, Phonics, KS1 or KS2 outcomes were submitted under a child's pre-adoption identity.

DfE guidance recognises that historic assessment information may be held within pre-adoption records and that care must be taken to avoid creating inappropriate links between pre- and post-adoption identities.

Any action taken must ensure that the child's identity, privacy and safety are protected and that legal requirements are followed. Information leaks from historic records can compromise confidentiality, create data protection risks and inadvertently reveal or link a child's pre- and post-adoption identity.

Where concerns are identified, schools should preserve the existing records, document the issue and seek guidance before taking action. This approach helps ensure that the child's legal identity remains protected while allowing any historical data issues to be considered safely and appropriately.

Schools should therefore not amend, merge or link records without first seeking advice.

If you are uncertain, contact:

[Contact the Department for Education - Contact type - GOV.UK](#)

Please provide:

- Child's details
- UPN (where known)
- Summary of the issue identified
- Details of any historic statutory submission concerns

This will create an individual case for review by the Department for Education.

The primary consideration in all cases must be the protection of the child's legal identity and the maintenance of appropriate separation between pre-adoption and post-adoption records.

Recording Information on CPOMS or Other Safeguarding Systems

Schools must take particular care not to create unnecessary links between a child's pre-adoption and post-adoption identity.

When recording safeguarding information:

- Follow your safeguarding and data protection policies.
- Ensure access is restricted to staff who need the information (e.g. DSL to DSL).
- Avoid unnecessary references that could reveal a child's previous identity.
- Seek advice where there is uncertainty regarding record retention or transfer.

Transfer from Primary to Secondary School

Where an adopted child transfers from primary to secondary school, schools must ensure that any information shared is necessary, proportionate and compliant with safeguarding, data protection and adoption requirements.

Records that reveal or link a child's pre-adoption identity should not be transferred automatically. Adoptive parents should be asked whether they wish relevant records to be transferred and, if not, whether they would like a copy. Consideration should also be given to whether identifying information can be anonymised before records are shared.

Prior to transfer:

- The Designated Safeguarding Lead (DSL) should review safeguarding records and determine what information is required to safeguard and support the child in their next setting.
- Any transfer of safeguarding information should take place securely between DSLs and on a strictly need-to-know basis.
- Records containing a child's pre-adoption identity should not be routinely shared unless there is a clear safeguarding, legal or statutory basis for doing so.
- Where records contain information that may identify a child prior to adoption, the local authority should consider whether names, school names or other identifying details can be anonymised before sharing.

Need Advice?

For advice on educational, safeguarding or confidentiality issues relating to adopted children and other permanently placed children, contact virtualschool@oxfordshire.gov.uk

For technical issues relating to DfE records, census returns, UPNs or historic statutory submissions, contact: [Contact the Department for Education - Contact type - GOV.UK](#)

Remember...

Before adoption: use the child's legal (birth) identity in all statutory systems.

After adoption: create a new record, issue a new UPN and keep records separate.

When in doubt: seek advice before making changes. Protecting confidentiality is a safeguarding responsibility as well as a data protection requirement.

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