CHILD SAFETY RECORD KEEPING POLICY

1.0 INTRODUCTION

This Child Safe Standards – Record Keeping Policy (**Policy**) applies to all primary and secondary Catholic schools (**Schools**) managed and operated by the Diocese of Sale Catholic Education Limited (**DOSCEL**) in the Diocese of Sale, State of Victoria.

This Policy also applies to the DOSCEL Secretariat, contractors, volunteers and companies providing services to, or on behalf of, DOSCEL and Schools.

2.0 PURPOSE

The purpose of this Policy is to set out principles for the effective management of records and fulfil record keeping obligations under Child Safe Standard 2 of Ministerial Order No. 1359.

3.0 DEFINITION

3.1 **Record/records**:

In this Policy, a record is all information that DOSCEL and Schools create, send or receive that provides evidence of decisions, directions and activities, particularly with regard to child safety.

Records may be in digital or physical format, including documents, email correspondence, financial statements, photographs, website pages, social media posts and audio-visual recordings.

Records can be formal (e.g. meetings minutes and student files) or informal (e.g. chat history and instant messages via telephone or social media).

4.0 PRINCIPLES

DOSCEL and Schools will ensure that:

- full and accurate records of activities and decisions are created and kept to meet legislative requirements and community needs
- records are organised so they can be readily accessed and used for authorised purposes

- systems and processes are developed to ensure records are kept secure from unauthorised access, amendment, use, release and disposal
- records are stored in secure physical locations and systems that will protect them from misuse, damage, deterioration or loss
- records are preserved in a readable and accessible format for their minimum required retention period as set out in the DOSCEL Records Management Policy.
- staff seek authorisation from the school principal or relevant DOSCEL Manager prior to disposing of records
- staff do not dispose of any records that are likely to be required in a legal proceeding
- staff do not dispose of any records relating to child safety, health and wellbeing until further notice.
- records, excluding those that relate to child safety, health and wellbeing, are only disposed of when they have reached their minimum required retention period.

5.0 PROCEDURES

5.1 Record creation and retention

Staff, contractors and volunteers must keep clear and comprehensive notes relating to incidents, disclosures and allegations of abuse. These records may become helpful when a report is made to the relevant authorities. The records may also be sought at a later date if the matter is the subject of Court proceedings.

NOTE: As at July 2019, there is a 'freeze' on destroying records relating to child safety, health and wellbeing in schools and early childhood programs, until further notice.

5.2 Record keeping responsibilities

The Principal must ensure that:

- staff, contractors and volunteers understand their obligations on information sharing and the school's recordkeeping requirements
- staff receive training on their record keeping obligations and the school's record keeping systems and processes in accordance with DOSCEL requirements and Public Record Office Victoria Recordkeeping Standards
- contractors and volunteers receive training, guidance and information on record keeping obligations and the school's record keeping systems and processes relating to recordkeeping where relevant to their role
- storage locations are locked, systems are password protected and users are issued with individual passwords
- personal and sensitive records are only accessible to authorised staff
- records are stored so they are protected from misuse, loss, deterioration and damage
- records are retained or disposed of in accordance with the DOSCEL Records Management Policy, with the exception being records relating to child safety, health

and wellbeing, which are to be held in perpetuity until legislation prescribes otherwise.

School staff, contractors and volunteers must:

- document decisions made, actions taken and notes of meetings and important conversations
- ensure records include relevant contextual information – for example, the date and location of an incident, disclosure or allegation and who was involved
- make sure records are complete, accurate and can be understood in the future by those who were not directly involved
- keep records in authorised systems and designated storage areas
- protect records from unauthorised access and disclosure.

School staff, contractors and volunteers must not:

- destroy, delete or alter records without written authorisation from the principal, principal's delegate or the DOSCEL Secretariat
- destroy records relating to child safety, health and wellbeing until further notice
- damage or lose records in their care
- keep records on personal devices or personal cloud storage locations or in portable storage devices such as USBs
- remove records from school premises without written authorisation from the principal, the principal's delegate or the DOSCEL Secretariat.

5.3 Privacy and information sharing

Information and records relating to incidents, complaints, responses and decisions are treated as confidential, except where the sharing or distribution of information and records is mandated by statutory requirements or the principles of natural justice. In this regard, if an incident, disclosure or allegation involves conduct that is serious and/or potentially criminal, any legal obligations to report relevant information to external authorities will override confidentiality.

DOSCEL Schools are prescribed Information Sharing Entities (**ISE**s), meaning that, where legislated requirements are met, schools are able to share confidential information with other ISEs to promote child wellbeing or safety. This occurs via the Child Information Sharing Scheme (**CISS**) or the Family Violence Information Sharing Scheme (**FVISS**).

6.0 REFERENCES AND LEGISLATION

- *Australian Privacy Principles 2014 (Cth)*
- *Child Wellbeing and Safety Act 2005 (Vic.)*
- *Child Wellbeing and Safety (Information Sharing) Regulations 2018*
- *Family Violence Information Sharing Scheme*
- *Family Violence Information Sharing Guidelines (Vic.)*
- *Information Sharing and Family Violence Reforms Contextualised Guidance*
- *Ministerial Order No. 1359: Child Safe Standards – Managing the Risk of Child Abuse in Schools and School Boarding Premises*

7.0 RELATED POLICIES AND DOCUMENTS

- *DOSCEL Child Safety and Wellbeing Policy*
- *DOSCEL Child and Family Violence Information Sharing Schemes Policy*
- *DOSCEL Complaints and Grievances Management Policy*
- *DOSCEL Information Sharing for the Child Information Sharing Scheme and the Family Violence Information Sharing Scheme*
- *DOSCEL Privacy Policy*
- *DOSCEL Privacy Collection Notice*
- *DOSCEL Record keeping Compliance Checklist*
- *DOSCEL Record keeping Factsheet for School Staff, Contractors and Volunteers*
- *DOSCEL Records Management Policy*

8.0 REVIEW

Implementation Date: January 2023

Updated: July 2024

Review Date: April 2025