

## RECORDS MANAGEMENT POLICY

### 1.0 INTRODUCTION

This Records Management 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, specifically Marist-Sion College Warragul (**Marist-Sion College**).

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 assist Marist-Sion College understand and meet requirements for creating, storing and disposing of school records.

### 3.0 PRINCIPLES

Marist-Sion College is responsible for creating, managing and appropriately disposing of public records in accordance with the *Public Records Act 1973* (Vic.) and standards issued by the Public Record Office Victoria (**PROV**) as follows:

- 3.1 Marist-Sion College is responsible for creating, managing and disposing of school administration and student records.
- 3.2 Records must only be disposed of with written approval of the Principal, after the minimum retention period has been met (Note: short-term information created through normal administrative practice can be destroyed without needing the written approval of the principal).
- 3.3 From 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.
- 3.4 Schools should also review the PROV [Retention and Disposal Authority for School Records](#) which provides information on common school records and their minimum retention periods.

### 4.0 DEFINITIONS

**Normal Administrative Practice:** Working papers, drafts, duplicate copies of records stored elsewhere, short-term facilitative records (such as phone messages), and unimportant records such as unsolicited 'junk mail' which may be destroyed without approval once administrative use has ended.

**Permanent records:** A record that must be retained indefinitely because of their historical, social, legal or administrative value. Permanent records should only be transferred to an off-site secure storage facility when they are no longer needed by the school, such as when a student is no longer enrolled at the school.

**Public records:** Work-related records in any format or media made or received by staff or volunteers in DOSCEL Schools or DOSCEL Secretariat.

**Temporary records:** A public record that is required to be kept for a specific period of time for legislative or other requirements, and can only be destroyed once that period has expired.

## 5.0 RECORD CREATION

Marist-Sion College must create full and accurate records of College functions and activities, including records relating to:

- school governance
- operations
- the handling of incidents, complaints and investigations
- student management.

This includes both hardcopy (paper) and electronic records.

## 6.0 COMMON SCHOOL RECORDS AND MINIMUM RETENTION PERIODS

The PROV [Retention and Disposal Authority for School Records](#) outlines how long common types of school records need to be kept, to assist schools in assessing if records are ready for destruction.

This Retention and Disposal Authority **must not be used** for records about child sexual abuse incidents, allegations or Marist-Sion College and/or DOSCEL prevention, identification and response to such incidents and allegations. This includes records of this nature created through Marist-Sion College and/or DOSCEL's reporting, oversight or regulatory relationships with other agencies.

For policy and guidance on managing records that relate to Child Safety, refer to the Child Safe Standards – Recordkeeping Policy.

DOSCEL regularly reviews record retention requirements relating to Schools. If the PROV Retention and Disposal Authority for School Records does not contain a record you would like to know the required retention period of, or you require further advice, contact the DOSCEL Secretariat Industrial Relations / Human Resources Team in the first instance.

## 7.0 RECORDS STORAGE AND ACCESS

### Records Storage

Marist-Sion College must have systems and processes for managing electronic and hardcopy records to ensure the authenticity, security, reliability and accessibility of these records.

To support accessibility to records, it is recommended that Marist-Sion College retain electronic copies of physical or hardcopy records (this is usually carried out through scanning or photographing the source record). However, Marist-Sion College must ensure original physical or hardcopy records are not destroyed as they may have historical value, or may be required for litigation etc.

All records must be stored in safe and secure locations to ensure their integrity and accessibility. Permanent records must be stored in conditions that ensure their long-term preservation.

### Requests to access school records

Where Marist-Sion College receives a request for documentation (for example, a request for documents from the media, lawyers and non-legal advocates or requests from parents, guardians or carers for documents that is not considered ordinary school communication), including when to release documents directly, contact should be made with the DOSCEL Secretariat Industrial Relations / Human Resources Team in the first instance.

DOSCEL schools are prescribed Information Sharing Entities (**ISE**) under the Child Information Sharing Scheme (**CISS**) and Family Violence Information Sharing Scheme (**FVISS**) (together, **Information Sharing Schemes**) and must respond to all requests for information made by other Information Sharing Entities under the Information Sharing Schemes. All information that meets the requirements for sharing under either Scheme must be shared.

For policy and guidance on managing requests for information using the Information Sharing Schemes, refer to DOSCEL Child and Family Violence Information Sharing Schemes Policy.

## 8.0 RECORDS DESTRUCTION

Marist-Sion College must not dispose of:

- any records relating to child safety, health and wellbeing, including records that relate to child sexual abuse incidents and allegations
- any records that are reasonably likely to be required in a legal proceeding
- any record that may be related to, or required for, a current Freedom of Information request
- permanent records or records that are of historic value (for example, records created in the 1800s or school anniversary publications).

Marist-Sion College may dispose of temporary records that have reached the required retention period (the minimum period the records must be kept for before they can be legally destroyed). The principal must approve the disposal of records in writing to provide evidence of the disposal activity.

Some records created through normal administrative practice may be destroyed without approval once administrative use has ended. These records include:

- working papers
- draft documents
- duplicate copies of records stored elsewhere
- short-term facilitative records (such as phone messages)
- unsolicited 'junk mail'.

Marist-Sion College must securely dispose of records and ensure electronic and hardcopy records are destroyed in a way that ensures the records are unreadable and irretrievable. DOSCEL recommends the use of secure disposal bins for hardcopy records.

## **9.0 EXPECTED OUTCOMES**

Marist-Sion College will understand and meet requirements for creating, storing and disposing of school records in accordance with the *Public Records Act 1973* (Vic.) and standards issued by the Public Record Office Victoria.

## **10.0 RELATED POLICIES AND RESOURCES**

- Child and Family Violence Information Sharing Schemes Policy
- Child Safe Standards – Record Keeping Policy
- Child Safe Standards – Record Keeping Factsheet for School Staff, Contractors and Volunteers
- Child Safe Standards – Record Keeping School Compliance Checklist
- Complaints and Grievances Management Policy
- Information Sharing for the Child Information Sharing Scheme and the Family Violence Information Sharing Scheme
- Mandatory Reporting Policy
- Public Record Office Victoria [Retention and Disposal Authority for School Records](#)
- Privacy Policy
- Protection of Children – Reporting Obligations Procedure
- Whistleblower Policy

## 11.0 LEGISLATION AND REFERENCES

- [Accident Compensation \(OHS\) Act 1996](#) (Vic.)
- [Child Wellbeing and Safety Act 2005](#) (Vic.)
- [Child Wellbeing and Safety \(Information Sharing\) Regulations 2018](#) (Vic.)
- [Education and Training Reform Act 2006](#) (Vic.)
- [Equal Opportunity Act 2010](#) (Vic.)
- [Evidence Act 2008](#) (Vic.)
- [Family Violence Protection Act 2008](#) (Vic.)
- [Family Violence Protection \(Information Sharing\) Regulations 2018](#) (Vic.)
- [Financial Management Act 1994](#) (Vic.)
- [Freedom of Information Act 1982](#) (Vic.)
- [Health Records Act 2001](#) (Vic.)
- [Ministerial Order No. 1359: Child Safe Standards – Managing the Risk of Child Abuse in Schools and School Boarding Premises \(made under the Education and Training Reform Act 2006\)](#) (Vic.)
- [Privacy and Data Protection Act 2014](#) (Vic.)
- [Public Administration Act 2004](#) (Vic.)
- [Public Records Act 1973](#) (Vic.)

## 12.0 REVIEW

**Implementation Date:** December 2022

**Review Date:** December 2024