



Rationale

To set out principles for the effective management of records and to fulfil recordkeeping obligations.

Scope

This policy applies to all DOBCEL employees.

Policy Statement

Good recordkeeping is an important part of making and supporting institutions to be child safe and to provide full and accurate records of school activities and decisions that have been created to meet legislative requirements and community needs.

[Ministerial Order No. 1359: Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and School Boarding Premises](#) imposes a new requirement on schools in Victoria to “develop a policy or statement that details the processes the school has in place to meet Public Record Office Victoria Recordkeeping Standards”.

Public Record Office Victoria (PROV) is the archive facility of the Victorian State Government as well as for Victoria’s 79 local government areas (LGAs). It sets mandatory recordkeeping standards and provides support and advice on recordkeeping to these sectors. Independent and Catholic schools are now required to maintain recordkeeping standards in accordance with MO No. 1359.

Schools will therefore need to review their internal recordkeeping, information handling and data security measures to ensure they meet the PROV standards. For example, in response to the Royal Commission into Institutional Responses to Child Sexual Abuse, PROV introduced a new standard, PROS 19/08. This standard, which applies to records relating to organisational responses to child sexual abuse, requires organisations to:

- indefinitely retain records relating to the development of policy, strategy and procedure
- retain reporting and investigation records for 99 years
- retain training and development records for 45 years.

Records relevant to this policy are those that relate to:

- Students
- Staff
- Curricula
- Administration
- Financial matters
- Complaints
- Policies and procedures
- Child safety

Recordkeeping Procedures

- Records are to be organised so that they can be readily accessed and used for authorised purposes
- Systems and processes are to be developed to ensure that records are kept secure so that unauthorised access, amendment, use, release and/or disposal is prevented
- Records are to be stored in secure physical locations and systems are to be used that will protect them from misuse, damage, deterioration or loss
- Records are to be preserved in a readable and accessible format for the respective minimum required retention period
- Staff will require authorisation prior to the disposal of school records
- Staff are not to dispose of any records that could be required for legal proceedings
- Records are only to be disposed of when the respective minimum required retention periods have expired.

Schools must not dispose of:

- any records that are reasonably likely to be required in a legal proceeding
- any record that may be required for a freedom-of-information request
- permanent records or records that are of historic value (for example, records created in the 1800s or school anniversary publications)

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

Schools may dispose of temporary records that have reached the required retention period (the minimum period that the records must be kept for before they can be legally destroyed). The principal must approve the disposal 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
- drafts
- duplicate copies of records stored elsewhere
- short-term facilitative records (such as phone messages)
- unsolicited 'junk mail'.

Schools must securely dispose of records and ensure that electronic and hardcopy records are destroyed in a way that ensures the records are unreadable and irretrievable.

The [School Records Retention Guide](#) outlines the required retention periods for different types of records, which will assist staff in assessing when records can be destroyed.

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

Public records that have an enduring value to the Victorian community must be transferred to PROV when no longer needed by the school.

Public records

Work-related records in any format or media made or received by staff or volunteers in Victorian Government schools.

Temporary records

Public records that are required to be kept for a specific period of time for legislative or other requirements before they can be destroyed.

For the purposes of this policy, a record is all information that a school creates, sends or receives that provides evidence of decisions, directions and school activities, particularly with regard to child safety.

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

Records can be formal (for example, meeting minutes and student files) or informal (for example, chat history and instant messages).

See Appendix A for Recordkeeping Compliance Checklist.

References

https://prov.vic.gov.au/sites/default/files/files/documents/0101var11_0.pdf - government school schedule

[Creating, Managing and Retaining Records for Current or Future Child Sexual Abuse Allegations](#)

APPENDIX A – Recordkeeping Compliance Checklist

This checklist is designed to assist schools to assess their compliance with recordkeeping requirements. The requirements have been drawn from the Public Record Office Victoria [Recordkeeping Standards framework](#).

Records governance

<input type="checkbox"/>	Does the school have a records management policy?
--------------------------	---

Records training

<input type="checkbox"/>	Have school staff and volunteers received training on their recordkeeping obligations and the school's recordkeeping systems and processes? For example: <ul style="list-style-type: none">• Staff understand when and why records must be created• Staff know how to create and where to store records (digital and hardcopy).
--------------------------	--

Recordkeeping

<input type="checkbox"/>	Have full and accurate records of school decisions and activities been systematically created and captured? For example: <ul style="list-style-type: none">• Recordkeeping processes for important activities, such as complaint handling and administering camps and excursions, have been defined.• Staff and volunteers understand recordkeeping processes and routinely follow them.
--------------------------	---

Record access and control

<input type="checkbox"/>	Have records been protected from unauthorised access? For example: <ul style="list-style-type: none">• 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.
<input type="checkbox"/>	Can records be readily accessed and used when required? For example, physical files have been catalogued and recordkeeping procedures have been documented.
<input type="checkbox"/>	Are there systems and processes in place to ensure the authenticity and reliability of records, so that they can be trusted as credible evidence? For example, systems have audit logs to show who created or modified a record and when.

Record storage and preservation

<input type="checkbox"/>	Have records been stored so that they are protected from misuse, loss, deterioration and damage? For example: <ul style="list-style-type: none">• The backup and restoring of digital records is practised routinely• Physical devices that contain digital records (for example, servers, hard drives) have been stored in appropriate environmental conditions to protect them from fire, water, pests and dust• Digital records have been preserved in formats that are expected to remain readable for the lifetime of the record, such as PDF/A• Hardcopy records have been stored securely in environmental conditions that protect them from fire, water, pests and dust.
<input type="checkbox"/>	Are record storage locations being well maintained? For example:

- | | |
|--|---|
| | <ul style="list-style-type: none">• Digital storage systems and devices are regularly tested and backed up, and updates and security patches are regularly applied and replaced when necessary• Hardcopy storage locations are regularly inspected for water, heat and pest damage, and repairs are being made when necessary. |
|--|---|

Records retention and disposal

<input type="checkbox"/>	Has the school principal authorised the routine disposal of time-expired records?
<input type="checkbox"/>	Are only records that have reached their minimum retention period being disposed of?
<input type="checkbox"/>	Are secure and permanent methods being used to dispose of records? For example, secure disposal bins for hardcopy records.