

Catholic College Sale CHILD SAFETY RECORD KEEPING POLICY

1.0 POLICY AUTHORITY

The Board of Catholic College Sale Limited (the Board) governs the College. Based on the principle of subsidiarity and in keeping with the Board's Delegations Schedule, the Board delegates a broad range of duties, functions, powers, and authority to the Principal of Catholic College Sale Ltd (the College). This includes the effective implementation of this *Child Safety Record Keeping Policy* and the compliance obligations outlined herein.

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**

Record/records:

In this Policy, a record is all information that the College creates, sends, or receives 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., meeting minutes and student files) or informal (e.g., chat history and instant messages via telephone or social media).

4.0 PRINCIPLES

The College 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 by using the Child Safety Reporting Register;
- 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 College's *Records Management Policy* and as per the Public Record Office Victoria Retention and Disposal Authority for School Records:
- staff seek authorisation from the College Principal or Principal delegate 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:

August 2025 V3 Page 1 of 3

• 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 of 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 College's record-keeping systems and processes in accordance with the College's 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 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 College's *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:

- complete the Child Safety Reporting Register Google form on SIMON;
- 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 <u>must not:</u>

- destroy, delete or alter records without written authorisation from the Principal or delegate, or the Chair of the College Board;
- destroy records relating to child safety, health, and well-being 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 or delegate, or the Chair of the College Board.

August 2025 V3 Page 2 of 3

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.

Catholic College Sale Ltd is a prescribed Information Sharing Entities (ISEs), 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 LEGISLATION AND RESOURCES

- 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

- Child Safety and Wellbeing Policy
- Child and Family Violence Information Sharing Schemes Policy
- Complaints Management Policy
- Privacy Policy
- Privacy Standard Collection Notice
- Records Management Policy
- Information Sharing for the Child Information Sharing Scheme and the Family Violence Information Sharing Scheme

8.0 APPROVAL

Approved by	CC Sale Ltd Board
Person(s) Responsible	Principal
Date(s) Reviewed or Updated	August 2025
Next Review Date	August 2027

August 2025 V3 Page 3 of 3