



# Catholic College Sale

## RECORDS MANAGEMENT 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 *Records Management Policy* and the compliance obligations outlined herein.

### 2.0 PURPOSE

The purpose of this Policy is to assist the College in understanding and meeting its requirements for creating, storing and disposing of school records.

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

### 3.0 PRINCIPLES

The 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** The College is responsible for creating, managing and disposing of school administration and student records.
- 3.2** Records must only be disposed of with the 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** The College 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 its 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 at Catholic College Sale Ltd.

**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

The College will create full and accurate records of school 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 the School and/prevention, identification and response to such incidents and allegations.

For policy and guidance on managing records that relate to Child Safety, refer to the *Child Safety Record Keeping Policy*.

The Board regularly reviews record retention requirements relating to the College. 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 College in the first instance.

## 7.0 RECORDS STORAGE AND ACCESS

### Records Storage

The 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 the College considers retaining electronic copies of physical or hardcopy records (this is usually carried out through scanning or photographing the source record). However, the College must ensure that original physical or hardcopy records are not destroyed, as they may have historical value or 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 the 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 are not considered ordinary school communication), including when to release documents directly, contact should be made with the College in the first instance.

Catholic College Sale is prescribed Information Sharing Entities (ISE) under the Child Information Sharing Scheme (CISS) and Family Violence Information Sharing Scheme (FVISS) (together, Information Sharing Schemes). They 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 the College's *Child and Family Violence Information Sharing Schemes Policy*.

## 8.0 RECORDS DESTRUCTION

The 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).

The 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'.

The 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.

## 9.0 EXPECTED OUTCOMES

The 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 LEGISLATION AND RESOURCES

- *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.)
- *Privacy and Data Protection Act 2014* (Vic.)
- *Public Administration Act 2004* (Vic.)
- *Public Records Act 1973* (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.))
- Public Record Office Victoria - Retention and Disposal Authority for School Records

## 11.0 RELATED POLICIES AND DOCUMENTS

- Child and Family Violence Information Sharing Schemes Policy
- Child Safety Record Keeping Policy
- Record Keeping Factsheet for School Staff and Volunteers
- Complaints Management Policy
- Privacy Policy
- Protection of Children – Reporting Obligations Procedure
- Responding to and Reporting Child Safety Incidents & Concerns Policy

## 12.0 APPROVAL

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