

RECORD MANAGEMENT POLICY



PURPOSE

Newmark Primary (the school) is committed to ensuring procedures are in place to govern what records are created, managed and retained and for how long. This policy sets out the principles and framework governing the basis for the creation, capture, control, storage, access and disposal of records. The policy should be read and understood by school staff.

PRINCIPLES

- The school is committed to promoting a culture of good record management practice.
- The school believes efficient record management supports organisational effectiveness, and the school's processes and practices.
- In its record management the school is committed to accuracy and transparency wherever possible and appropriate.
- Where individual personal information is recorded, the school's Privacy Policy will apply.
- The school's management of its records complies with its commonwealth and state legal and regulatory requirements.

AIMS

- To ensure information can be accessed and when required, reproduced quickly and easily
- To ensure records are appropriately secure and that personal information is protected
- To ensure records are only kept for as long as is necessary
- To ensure record retention and disposal comply with commonwealth and state legal and regulatory requirements

LEGAL AND REGULATORY BASIS FOR COMPLIANCE

- The Crimes (Document Destruction) Act 2005 (Vic.)
- Public Record Office Vic. Retention and Disposal Authority for School Records (PRO 01/01 VAR 11)
- Public Record Office Vic. Retention and Disposal Authorities of Organisational Response to Child Sexual Abuse Incidents and Allegations (PROS 19/08)
- Victorian Registration and Qualifications Authority (VRQA) Minimum Standards
- Ministerial Order 1359

KEY DEFINITIONS

A **record register** is a comprehensive list of all the school's key records and the time period when the record should be retained, archived and/or destroyed. Specific record requirements apply to financial records, employment records and OHS records.

Permanent records are those records that the school retains forever. Although there is no legislation regarding permanent records covering non-government schools, the school is under a general obligation not to dispose of documents that might be relevant to future legal proceedings. In deciding which records are permanent, the school is guided by the requirements placed on Victorian schools. Inactive permanent records are archived.

Temporary records are those that are destroyed after a stated time period. In deciding which records are temporary, the school is guided by the requirements placed on Victorian schools.

In its day-to-day operation, the school will also create and use **transient materials**, such as working papers, drafts, duplicate copies of records stored elsewhere, unsolicited 'junk mail'. The school will aim to develop an organisational culture in which such transient materials are destroyed on a regular basis.

The following are the key record management elements: creation, capture, control, storage, access and disposal:

- a. **Creation:** School records are maintained to enable the school to function efficiently, for legal and compliance reasons, to provide a basis for future decision-making and for the school's historic record (e.g. board meeting minutes). Particular attention will be paid to the creation of records that have heightened importance due to their requirements for business continuity, legal and financial accountability, confidentiality and sensitivity.
The school will make intentional decisions as to the records it creates. Each type of record will be clearly named and the data held within it clearly identified.
- b. **Capture:** Data, information, actions and decisions are captured in the records created. Particular attention will be paid to the school's Privacy Policy when the data to be captured is personal information.
- c. **Control:** Records within the school's record management system are appropriately controlled to protect their integrity as evidence of the school's activities and decisions.
- d. **Storage:** The school will ensure that the storage and protection of records is planned. Regardless of format or location, the school will ensure that all records are locatable, secure from unauthorised access and preserved. This includes the storage of physical records, electronic records, and physical devices and hardware used to store electronic records.
Records no longer in current use (inactive records) are generally stored as archived material wherever possible in electronic form. Archives will be catalogued so records can be easily retrieved when required.
- e. **Access:** Records can only be used if they are appropriately accessible. The school will define access for each type of record, bearing in mind the commitments to both transparency and security.

- f. **Disposal:** School records must be disposed of when they become inactive and when the retention period has expired. Proper disposal of public records aids the efficient management of the school. Any destruction of school records will be lawful.¹

The school aims to properly manage its records, by staying up to date with the destruction of transient material and temporary records.

SCOPE

This policy covers:

- all areas of record management including: student records, employee records, financial records, OHS records, governance records; and
- records in all media and formats, including hardcopy, digital documents, email and websites.

The policy is applicable to all employees, contractors and volunteers.

ROLES AND RESPONSIBILITIES

The **school board** is responsible for ensuring that the school has an up-to-date Record Management policy and Record Retention Schedule.

The **principal** is responsible for:

- promoting a culture of good record management practice;
- ensuring this policy is implemented in accordance with privacy legislation;
- ensuring procedures are in place to manage records efficiently in line with this policy; and
- ensuring the record register is reviewed regularly and frequently.

The **Business Manager** is responsible for:

- creating an overview of what records are created and for what purpose;
- creating record management procedures;
- maintaining the Record Retention Schedule; and
- the school's financial records and management procedures.

Front Office Manager is responsible for:

- ensuring enrolment, attendance, community correspondence (emails) and First Aid records management procedures are followed.

All **staff** are responsible for:

- applying good record management practices, including good housekeeping (to clear transient or temporary records); and
- ensuring they are compliant with the school's Privacy Policy.

¹ The Crimes (Document Destruction) Act 2005

RECORD RETENTION AND DISPOSAL

The school will comply with the guidelines set out by the Public Office Records Victoria - Retention and Disposal Authority for School Records (PRO 01/01 VAR 11). The school is committed to the use of the Record Retention Schedule for Non-Government Schools to ensure requirements are met.

The school understands that records pertaining to Child Sexual Abuse have specific retention and disposal guidelines set out by Public Office Records Victoria - Retention and Disposal Authorities of Organisational Response to Child Sexual Abuse Incidents and Allegations (PROS 19/08). The school will comply with these standards.

Retention

The school will securely store records so that privacy is protected by ensuring:

- permission access is granted in alignment with staff roles only;
- guidelines for use of files is included in staff induction / training;
- super administration access is restricted to principal and principal's delegate; and
- keys to filing cabinets are locked away with minimal access provided.

Hard Copy Records: Stored in locked filing cabinets.

Electronic Records: Stored in electronic shared folders that are permission and password protected.

Disposal

When disposing of records with sensitive information, the school will take reasonable steps to destroy and de-identify records to protect privacy. The school will ensure that:

- there is no risk of these records being retrieved;
- the records are disposed of as soon as possible after authority has been given;
- it documented in a destruction register so that the school is able to determine whether destruction has occurred; and
- disposal is performed, and/or overseen by a staff member with appropriate authority.

Hard Copy Records: When disposing of hard copy records with sensitive information, the school will keep the records in a security bin and then shred them.

Electronic Records: When disposing of electronic records with sensitive information, the school will overwrite or purge the records.

ELECTRONIC RECORD KEEPING SYSTEMS

PC Schools

PC School is the school's administrative system provider. System maintenance and user training is provided by PC Schools, and data securely backed up offsite. The school records the following information in PC Schools:

- student and Family Personal Information
- attendance Records

- staff Information

The principal, business manager, leadership team, front office manager and teachers have access to PC Schools.

G Suite for Education

The school uses G Suite for Education for recording information including, but not limited to:

- education frameworks
- curriculum and teaching plans
- student assessment records
- email management
- school policies and procedures
- risk management plans
- board preparation and reporting
- financial modelling and budget preparation

Permissions are controlled by the principal (or delegate), as a super administrator. Staff and board members are provided permission access to specific shared folders in line with their role.

Files are created in shared folders with agreed naming conventions. Permissions are locked within shared folders to ensure files are not incorrectly deleted, moved or shared.

G Suite for Education is used to house: permanent, temporary and transient records. Unused permanent records are archived for later retrieval.

XERO

The school uses XERO for core financial management including:

- accounts payable and receivable
- financial reconciliations
- school fee invoices
- staff wages, payments, payslips

The Business Manager manages XERO. The principal and business manager have access to XERO, and at times members of the school's Finance, Risk and Audit Committee have access (view only) to the school's XERO system.

RELATED POLICIES

- Privacy Policy
- Technology Policy
- Child Safety Policy
- Reporting Obligations Policy

SUPPORTING DOCUMENTS

- Record Retention Schedule for Non-Government Schools 2nd Edition (RRDS)

POLICY REVIEW

The school board and principal will review the Record Management Policy every two years.

ENDORSEMENT

Updated date	April 2023
Endorsed by	School Board
Endorsed on	April 2023