



Record Management Policy

Schools are responsible for creating, managing and appropriately disposing of public records in accordance with the Public Records Act 1973 (Vic), standards issued by the Public Record Office Victoria (PROV) and policy and guidance issued by the Department of Education.

Schools must 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.

Harkaway Hills College Policy

Harkaway Hills College is responsible for creating, managing and disposing of school administration and student records.

Records Harkaway Hills College must only be disposed of with the written approval of the school's principal, after the minimum retention period has been met (see Part 2 for retention periods).

Harkaway Hills College recognises that records are vital:

- For the welfare protection of Harkaway Hills College students, staff and families.
- To facilitate information accessibility and enhance the College business by supporting management and administration.
- To provide evidence of College activities, actions, consultations and decisions to reporting bodies.
- To provide evidence of actions and decisions and precedents for future decision making.
- To deliver relevant information to members in an efficient, fair and equitable manner.

All staff, Board members, contractors and volunteers must comply with this policy in their conduct of official business for Harkaway Hills College. This policy applies to records in all formats.

Part 1: Records Management System

A records management system is a planned, co-ordinated set of policies, procedures, people, systems and activities that are required to manage records.

The Harkaway Hills College Records Management System seeks to ensure that:

- The College has the physical and electronic records it needs to support and enhance ongoing school operations, meet accountability requirements and community expectations.
- College records are managed efficiently and can be easily accessed

- The College complies with all requirements concerning records and records management practices to ensure compliance

The College is committed, through its Records Management System, to maintaining records in authentic and accessible form for as long as they are required.

The Harkaway Hills College Records Management System includes:

- *Dropbox* for Board, Management Team and Administration Team documentation
- *Google Drive* for staff access to policies, procedures, registers, forms and curriculum documentation
- *Sentral* for student enrolment, medical, reporting and attendance documentation
- *Hard copy* documentation of all College Policies for easy access in the Principal's Office.

Part 2: Minimum Retention Periods

The following record retention periods are obtained from the document Victorian Government *Retention and Disposal Authority for Records of School Records (Authority number: PROS 01/01 VAR 9)*.

The list below must not be used for records about child sexual abuse incidents, allegations nor the College's prevention, identification and response to such incidents and allegations.

Refer to Part 3 for Child Safety Record Keeping.

Activity/Documentation	Status	Stored	Disposal Action
Board and Committee Meetings	Permanent	Dropbox	Retain in archives.
Draft minute taking notes and recordings	Temporary	Dropbox	May be destroyed 1 month after date of confirmation of the minutes.
School Planning and Reporting: Board level	Permanent	Dropbox	Retain in archives.
Appointment of Board members	Temporary	Dropbox	May be destroyed 1 year after transaction completed.
Conflict of Interest Register	Temporary	Dropbox	May be destroyed 7 years after a person ceases to be a Board member.
School operation reporting: Management level	Permanent	Dropbox	Retain in archives.
School policy reporting (i.e. evidence of outcomes of policies)	Temporary	Dropbox	May be destroyed after administrative use is concluded.
School policy, procedures and strategies	Permanent	Dropbox	Retain in archives.
Summary Enrolment Records	Permanent	Dropbox, Sentral	Retain in archives.
Individual Enrolment Records	Temporary	Sentral	May be destroyed 2 years after administrative use is concluded.

Individual Enrolment and Withdrawal Records for Senior Secondary Qualifications	Temporary	Not yet determined	May be destroyed 2 years after student's departure from College.
Student Attendance	Temporary	Sentral	May be destroyed 6 years after end of school year in which the entry was made.
Parents Approval for student Attendance (e.g. excursions, extra-curricular)	Temporary	Google Drive	May be destroyed 1 year after action complete.
Suspension and Welfare Records	Temporary	Google Drive	May be destroyed 1 year after student's departure from College.
Expulsion Records	Temporary	Google Drive	May be destroyed within 1 year of student's expulsion or ceasing to be of school age, whichever is the later.
Records of camps and excursions management where no accident(s) occurred	Temporary	Dropbox	May be destroyed 7 years after excursion/ camp.
Records of camps and excursions management where accident(s) did occur	Temporary	Dropbox	May be destroyed 20 years after excursion/ camp.
Accident reporting at school or school related activities (e.g. Sports days)	Temporary	Dropbox	May be destroyed 20 years after last entry.
Incident reporting	Temporary	Dropbox	May be destroyed 7 years after administrative use is concluded.
Work Experience	Temporary	Not yet determined	May be destroyed 7 years after completion of Work Experience.
Student School Reports	Permanent	Dropbox, Sentral	Retain in archives.
Individual student examination papers and assessment tasks	Temporary	Google Drive	May be destroyed 4 months after notification of final result
Records of Special Provision	Temporary	Google Drive	May be destroyed 1 year after student's departure from College.
The process of managing State-based and internal testing and reporting	Temporary	Google Drive	May be destroyed after administrative use is concluded.
Student References	Temporary	Google Drive	May be destroyed 1 year after student's departure from College.
Student services, support and disability and impairment programs	Permanent	Dropbox	Retain in archives.

Student support data collection records utilised for allocation of funds	Temporary	Google Drive	May be destroyed 2 years after administrative use is concluded.
Student Services Support Program Case Management - Single transaction cases	Temporary	Sentral	May be destroyed 7 years after transaction.
Student Services Support Program Case Management - Multiple transaction cases	Temporary	Sentral	May be destroyed 30 years after client date of birth.
Student Services Support Program Case Management - Permanent sample	Permanent	Dropbox	Retain in archives.
Curriculum Development and Revisions	Temporary	Google Drive	May be destroyed when superseded
Official and Operational Correspondence	Permanent	Dropbox	Retain in archives.
Building maintenance	Temporary	Dropbox	May be destroyed 7 years after administrative use is concluded.
Building and grounds new projects, renovations and/or upgrades	Permanent	Dropbox	Retain in archives.
Security camera footage	Temporary	External provider	May be destroyed after administrative use is concluded.
The formal recording and preservation of a school's history	Permanent	Dropbox	Retain in archives.
Routine correspondence that does not fall under the categories on this list	Temporary	Various	May be destroyed after administrative use is concluded.
Operational files that does not fall under the categories on this list	Temporary	Dropbox	May be destroyed 7 years after operational requirements have concluded.

Part 3: Child Safety Record Keeping

Effective child safety record keeping is one of the College's key strategies in the management of its child safety obligations, including the fulfillment of our duty of care.

It is through such record keeping that the College can ensure that, should there ever be a need for evidence of the College's child safe culture or precautions and preventative measures taken in response to the risk of child abuse, the College has well-documented and easily-accessible records.

Documenting a Suspicion or Belief of Abuse

Where a staff member, Board member, Direct Contact Volunteer or other member of the College community forms the belief on reasonable grounds that a student is in need of protection, written and dated notes of their observations and concerns should be recorded to assist in a referral/report of child abuse.

All verbal and written communications regarding child safety matters (including notes of observations, student disclosures, meetings and telephone calls) must be properly documented. The documented records should include dates and times and enough detail to record key conversations, especially those relating to the student's disclosure.

The records of child safety must be stored securely in *Dropbox*.

How to Record Observations, Disclosures or Allegations of Abuse, Grooming or Student Sexual Offending

The College requires all members of the College community, including the Board, staff, Volunteers, Third Party Contractors and External Education Providers to use the Responding to Suspected Child Abuse Template or the Student Sexual Offending Record Keeping Template to record all observations, beliefs, suspicions, disclosures or allegations of abuse, grooming or student sexual offending.

The Templates are provided by the DET and DHHS Child Protection for all Victorian schools and are made available on the College's public website, internal [*Google Drive*](#), and in hard copy at the College.

The "Process of Review" section in the Templates must be completed between 4-6 weeks after an incident, suspicion or disclosure of abuse in conjunction with the College's Principal, a Child Protection Officer or a senior member of staff.

All completed Template reporting forms are to be given to the College's Principal, a Child Protection Officer or a senior member of staff. The College maintains records of these forms indefinitely. Records relating to a child safety incident are only disposed of in accordance with this Records Management Policy.

Working with Children Check Documentation

It is the responsibility of the Administration Assistant to verify the status of all College staff and non-parent volunteers' Working with Children Checks (WWC Checks).

In line with the College's risk-based approach to child safety and protection, where parent volunteers are volunteering at large off-site activities, such as overnight excursions or camps, the College requires that these parent volunteers undergo a Working with Children Check as a matter of best practice. Harkaway Hills College maintains records (electronic or hard copy format) of child-related workers including:

- full name
- WWC Check Card Number (or WWC Check Application Receipt Number)
- date and outcome of WWC Check clearance
- notices sent by the Department of Justice
- expiry date.

Records of Teacher Registration and VIT Notifications

Under our Teachers' Requirements Policy, Harkaway Hills College maintains a register of the registration status of all teachers at the College. That register includes a record of the date and type of any notifications made to the Victorian Institute of Teaching (VIT) by the College about a registered teacher pursuant to Conduct that is Reportable to the Victorian Institute of Teaching.

It is the responsibility of the College Principal to ensure that the register of teachers is maintained up to date with relevant notifications.

Recording Child Safety Actions

Section 91 of the Wrongs Act imposes a duty of care on schools to take reasonable precautions to prevent the physical or sexual abuse of a child under its care, supervision or authority, by an individual associated with the school. If a school is involved in a proceeding under the Wrongs Act, the school is presumed to have breached its duty of care unless it can prove, on the balance of probabilities, that it took reasonable precautions to prevent the abuse.

Whether or not a school took reasonable precautions will be assessed by a court in accordance with considerations set out in the Wrongs Act and case law. The effective implementation of the College's risk management strategies in Child Safety Risk Management is an example of taking reasonable precautions to prevent the physical or sexual abuse of a child.

It is critical that the College maintains accurate and comprehensive records of these policies, procedures, work systems and strategies should the courts ever call on such evidence in relation to a claim against the College for damages in respect of child abuse.

It is the College policy that all records that relate to Child Sexual Abuse Incidents and Allegations are retained by the College permanently.

Activity/Documentation	Status	Stored	Disposal Action
All records that relate to Child Sexual Abuse Incidents and Allegations	Permanent	Dropbox	Retain in archives.

Part 4: Occupational, Health and Safety

The Harkaway Hills College Principal and Operations Manager are responsible to ensure records are kept with respect to all OHS issues, including, but not limited to:

- the current OHS Policy and Procedures
- training of workers
- minutes of OHS meetings
- reports on accidents, hazards and incidents
- reports on accident and incident analysis and investigation
- reports on workplace inspections
- accident statistics
- safety equipment records including from the time of purchase to ongoing maintenance
- method of hazard identification and risk assessments, including details of measures introduced and assessment of their effectiveness
- OHS audits and reviews
- details of qualifications held by individuals.

Many OHS records are confidential and should only be accessible to those who have a need to know. This is particularly important in the case of incident reports and workers compensation claims which would contain personal data relating to individuals.

OHS records are maintained in such a way that they are retrievable and protected against damage, deterioration or loss. This includes maintaining records in electronic format with appropriate backup procedures in place.

It is the College policy that all records that relate to Occupational Health and Safety are retained by the College for a minimum of seven years.

Activity/Documentation	Status	Stored	Disposal Action
All records that relate to Occupational Health and Safety	Temporary	Dropbox	May be destroyed 7 years after administrative use is concluded.

Part 5: Student Medical Records

Refer to the College **Student Medical Records and Medication Administration Policy**

Last reviewed: September 2020
To be reviewed: January 2021