

child safety record keeping policy

policy objectives

The purpose of this policy is to ensure that all school records relating to Child Safety are created, maintained, and disposed of in accordance with Public Record Office Victoria Recordkeeping Standards, required minimum retention periods.

This policy considers relevant requirements within the State of Victoria, including the specific requirements of the Child Safe Standards as set out in Ministerial Order No. 1359 and the Public Record Office of Victoria Recordkeeping Standards (to the extent that they apply to Clarendon).

rationale

At Clarendon, we hold the care, safety and wellbeing of children and young people as a central and fundamental responsibility of our school. We are committed to ensuring that we have good record keeping processes in place, particularly with respect to Child Safety Records.

definitions

Child - A child who is under the age of 14 years.

Young Person - A person from 14 – 17 years of age.

Child Abuse - Child abuse includes:

- any act committed against a child involving:
 - a sexual offence
 - an offence under section 49B (2) of the Crimes Act 1958 (grooming)
- the infliction, on a Child, of:
 - physical violence
 - serious emotional or psychological harm
- serious neglect of a Child

Child Connected Work - Work that involves direct contact with children that is regular and not incidental to the work.

Child Safety - Encompasses matters related to protecting all children from child abuse, managing the risk of child abuse, providing support to a child at risk of child abuse, and responding to suspicions, incidents, disclosures or allegations of child abuse (Ministerial Order No. 1359)

Child Safety Record - Any Record that involves or relates to matters concerning Child safety or which involves or relates to matters involving the safety or wellbeing of a Child, which may include Records relating to:

- concerns or complaints relating to child safety or the safety or wellbeing of a child
- safety incidents involving a child
- Mandatory reporting
- Reportable allegations
- Reportable conduct
- other matters relating to child safety or the safety or wellbeing of a child

Mandatory Reporting - Is the legal requirement under the Children, Youth and Families Act 2005 (Vic.) to protect children from harm relating to physical and sexual abuse. The Principal, registered teachers and early childhood teachers, school counsellors, religious clergy, medical practitioners and nurses at a school are mandatory reporters under this Act (PROTECT: Identifying and responding to all forms of abuse in Victorian schools).

NCCD - The Nationally Consistent Collection of Data on School Students with Disability (NCCD) takes place every year. The NCCD is a collection that counts the number of school students receiving an adjustment or 'help' due to disability.

Record - All information that the school creates, sends or receives, that provides evidence of decisions, directions and school activities. Records may be in any format (whether formal or informal), including digital or physical format, and may include documents, email correspondence, financial

statements, text messages, meeting notes, audio-visual recordings, photographs, website pages and social media posts.

Reportable Conduct - As defined in the Child Wellbeing and Safety Act 2005 (Vic) means:

- a sexual offence committed against, with or in the presence of a child, whether or not a criminal proceeding in relation to the offence has been commenced or concluded
- sexual misconduct committed against, with or in the presence of a child
- physical violence committed against, with or in the presence of a child
- any behaviour that causes significant emotional or psychological harm to a child
- significant neglect of a child

School Environment - Any of the following physical, online or virtual places used during or outside school hours:

- the school campus
- online or virtual school environments made available or authorised by Clarendon College for use by a student (including email, intranet systems, software, applications, collaboration tools and online services)
- other locations provided by the school or through a third-party provider for a student to use including, but not limited to, locations used for school camps, delivery of education and training, sporting events, excursions, competitions and other events (Ministerial Order No. 1359).

School Staff - An individual working in a school environment who is:

- directly engaged or employed by a school governing authority
- a contracted service provider (whether or not a body corporate and whether or not any other person is an intermediary) engaged to perform child-connected work for Siena College

Volunteer - A person who performs work without remuneration or reward for Clarendon College in the school environment.

principles/guiding principles

At Clarendon we are committed to ensuring that we have good record keeping processes in place, particularly with respect to Child Safety Records. We recognise that good record keeping helps to:

- protect the rights of students, school staff, volunteers and the school community
- support collaboration and informed decision-making
- ensure transparency and accountability by providing proof of school practices, communications, decisions and actions
- support continuity and consistency in management and administration
- provide an audit trail to meet operational and legal requirements
- reduce the risk of being unable to produce evidence of school activities

Clarendon will ensure that:

- Full and accurate records of school activities and decisions relating to Child Safety are created and kept to meet legislative requirements and community needs.
- Child Safety Records are organised so they can be readily accessed and used for authorised purposes.
- Systems and processes are developed to ensure Child Safety Records are kept secure from unauthorised access, amendment, use, release or disposal.
- Child Safety Records are stored in secure physical locations and systems that will protect them from misuse, damage, deterioration or loss.
- Child Safety Records are preserved in a readable and accessible format for their required retention period.
- School staff and volunteers seek written authorisation from the Principal and President of School Council prior to disposing of Child Safety Records.
- School staff and volunteers do not dispose of any Child Safety Records that are likely to be required in a legal proceeding.
- The method used to dispose of Child Safety Records is secure and permanent.
- A register of Child Safety Records disposal is kept.

procedures

Record Keeping

Clarendon ensures that full and accurate records of all decisions and activities relevant to Child Safety and child wellbeing are created and captured. Clarendon has the following processes in place to ensure

the above is achieved:

- All concerns and complaints associated with child safety and child wellbeing are reported and recorded in accordance with Clarendon Complaints Handling Policy.
- To ensure all School staff, contractors, and volunteers are aware of and can comply with recordkeeping obligations, support and training measures as outlined in the below "Records Training" section will be provided.

Record Access and Control

Clarendon ensures that Child Safety Records can only be accessed, modified or used by those with relevant authority. Clarendon has the following processes in place to ensure that this is achieved:

- Only authorised personnel have the authority to access Pastoral Notes as appropriate. Staff authorised to access pastoral notes are Principal, Deputy Principal, Head of Wellbeing, Head of ICT and Heads of School as deemed required to support NCCD documentation.
- Only certain authorised personnel have the authority to access, modify and use Pastoral Notes, as appropriate. Authorised staff for these purposes include: Principal, Deputy Principal, Head of Wellbeing, Head of ICT and Heads of School support NCCD documentation.
- All *physical* Child Safety Records are securely stored in locations that are locked, and which are only able to be accessed by authorised personnel.
- All *digital/electronic* Child Safety Records are securely stored, by password protection and encryption where possible.

Clarendon ensures that Child Safety Records can be readily accessed and used when and as required. Clarendon has the following processes in place to ensure that this is achieved:

- Systems have been put in place to catalogue records with sufficient descriptive information that enable Child Safety Records to be easily located and accessed when they are needed.

Clarendon has systems and processes in place to ensure the authenticity and reliability of Child Safety Records, so that they can be trusted as credible evidence.

Clarendon has the following processes in place to ensure that this is achieved:

- Clarendon has put in place audit logs that show who has created or modified an electronic Record (and when).
- Clarendon requires all staff to date hard copy Records confirming when the Record was created.

Record Storage and Preservation

Clarendon ensures that Child Safety Records are stored in a way that protects them from misuse, loss, deterioration and damage.

The school has the following processes in place to ensure the above is achieved:

- All physical Child Safety Records are stored in a format and made of materials that are likely to survive and be readable for their required retention period.
- All physical Child Safety Records are stored securely in environmental conditions that protect them from damage, including fire, water, pests and dust. Only authorised staff have access to the records in these locations.
- All digital / electronic Child Safety Records are preserved in formats that are expected to remain readable for the required retention period of the Record.
- All digital / electronic Child Safety Records are routinely backed up.

Clarendon ensures that all storage locations used for the storage of Child Safety Records are well maintained. Clarendon has the following processes in place to ensure that this is achieved:

- Digital storage systems and devices (on which Child Safety Records are stored) are regularly tested, backed-up and replaced (as necessary).
- Updates and security patches are regularly applied to digital storage systems on which Child Safety Records are stored.
- Physical storage locations (in which physical Child Safety Records are stored) are regularly inspected for water, heat and pest damage and are repaired where necessary.

Records Retention and Disposal

Clarendon ensures that Child Safety Records are only disposed of:

- once they have reached their required retention period, in accordance with the Public Record Office Victoria Recordkeeping Standards; and
- with the authority of the Principal and President of the School Council

Clarendon ensures that records are disposed of using secure and permanent methods.

Where Child Safety Records are disposed of, the school retains a record evidencing the disposal of those Records. This includes a register of all Child Safety Records disposed of, which records the following:

- a description of the Record (including the date of the Record)
- the type of record and the required retention period for the Record
- the date on which the required retention period for the Record was reached.
- the date of disposal of the Record.
- the method of disposal of the Record.

Records Training

Clarendon ensures that all School staff, contractors, and volunteers understand their record keeping obligations in respect of Child Safety Records and the school's recordkeeping systems and processes (as appropriate). This school is to have the following processes in place to ensure this is achieved:

- On an annual basis, all school staff engaged in child-connected work receive training regarding their recordkeeping obligations in respect of Child Safety Records.
- Where appropriate to the nature and responsibilities of their role, volunteers engaged in
- child-connected work are provided with training and information regarding their recordkeeping obligations in respect of Child Safety Records.

When providing training and information to school staff and volunteers regarding their recordkeeping obligations with respect to Child Safety Records, school staff and volunteers are made aware that they must do the following in respect of matters relating to Child Safety:

- document work activities including decisions made, actions taken and notes of meetings and important conversations;
- ensure records include relevant contextual information – for example, the date and location of a meeting 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;
- understand the school's records management policy and processes; and
- protect records from unauthorised access and disclosure.
- When providing training and information to school staff and volunteers regarding their recordkeeping obligations with respect to Child Safety Records, school staff and volunteers are made aware that they must not:
- destroy, delete or alter Child Safety Records without authorisation;
- damage or lose Child Safety Records in their care;
- keep Child Safety Records on personal devices or personal cloud storage locations or in portable storage devices such as USBs; or
- remove Child Safety Records from school premises without authorisation.

information sharing

Ballarat Clarendon is an authorised organisation under the following information sharing schemes.

The Child Information Sharing Scheme and Family Violence Information Sharing Scheme (the Information Sharing Schemes) provide authorised organisations, including Victorian schools, with an expanded ability to share confidential information with other authorised services to promote the wellbeing or safety of children or to assess or manage family violence risk.

Under the Information Sharing Schemes, organisations that are prescribed as Information Sharing Entities (ISEs):

- must acknowledge they have received a request for information
- must respond to requests for information and provide all relevant information to other ISEs that meets the requirements of the scheme it was requested under and do so in a timely manner
- must consider the information sharing legislative principles for the schemes
- if declining to share all or part of a request for information, must advise the requesting ISE in writing
- can request information from other ISEs
- can proactively share information with other ISEs
- must meet the record keeping requirements of the Information Sharing Schemes.

All Clarendon staff are subject to the Child Information and Family Information sharing scheme. If there is a concern in relation to an information sharing request, this should be communicated with the Principal or Head of Student Wellbeing immediately.

References

Education and Training Reform Act 2006 (Vic.)
Public Records Act 1973 (Vic.)
<https://prov.vic.gov.au/recordkeeping-government/standards-framework>

- Related Documents**
- Child Safety Framework Policy
Child Safety Code of Conduct
Child Safety Reporting Policy
Child Safety Reporting Procedure
Child Safety Concern Complaint Policy
Complaints Resolution Policy
Acceptable Workplace Behaviour Policy
Staff Electronic Communication and Database Policy



Owner: Infrastructure	Approved: Principal	Child Safety Record Keeping Policy
Date Created: Mar 2025	Last Review: June 2025	Next Review: Dec 2028