



Department of
Education

Recordkeeping principles for non-government schools

SELF-EVALUATION GUIDELINES

in response to the
Royal Commission into Institutional Responses to Child Sexual Abuse

May 2020

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1. BACKGROUND

Recommendation 8.4

The *Royal Commission into Institutional Responses to Child Sexual Abuse* (RCIRCSA) recommended that all institutions engaging in child-related work should implement the *Records and Recordkeeping Principles under Recommendation 8.4* to a level that responds to the risk of child sexual abuse occurring within their institution.

Recommendation 8.4 comprises five (5) recordkeeping principles which contain one or more minimum requirements. This will ensure the relevant records relating to child safety and wellbeing meet the minimum compliance requirements.

Recommendation 8.5

The RCIRCSA recommends that non-government schools are required to comply, at a minimum with recordkeeping standards applicable to government schools in relation to the creation, maintenance and disposal of records relevant to child safety and wellbeing, including sexual abuse.

2. PURPOSE

This document may be used by non-government schools to assess their recordkeeping practices against the requirements of the *Royal Commission into Institutional Responses to Child Sexual Abuse Recommendation 8.4. — Records and recordkeeping principles*.

Use these **Self-evaluation guidelines** in combination with the **Self-evaluation form** to address the five (5) principles. This will ensure proper recordkeeping requirements are met in relation to the creation, maintenance and disposal of records relating to child safety and wellbeing.

3. RECORDS AND RECORDKEEPING PRINCIPLES

Principles	Description	Activities and practices to meet minimum requirements
Principle 1	Creating and keeping full and accurate records relevant to child safety and wellbeing, including child sexual abuse, is in the best interests of children and should be an integral part of institutional leadership, governance and culture. <i>Institutions that care for or provide services to children must keep the best interests of the child uppermost in all aspects of their conduct, including recordkeeping. It is in the best interest of children that institutions foster a culture in which the creation and management of accurate records are integral parts of the institution's operations and governance.</i>	1.1 Recordkeeping training Training is delivered to staff in relation to recordkeeping to ensure all staff are aware of their recordkeeping responsibilities. 1.2 Brochures, intranet and other publications Recordkeeping information is provided to staff. 1.3 Induction programs The induction program informs new employees of their role and responsibilities in relation to recordkeeping. 1.4 Evaluation of staff training and information sessions • Regular reviews and updates of relevant information, including presentations, provided to staff. This includes ensuring that information provided in brochures, intranet and other publications is reviewed, updated and re-distributed regularly. • Staff are advised in a timely manner when processes change. 1.5 Areas for improvement Document areas for improvement including a timeline for completion.

Principle	Description	Activities and practices to meet minimum requirements
Principle 2	Full and accurate records should be created about all incidents, responses and decisions affecting child safety and wellbeing, including child sexual abuse. <i>Institutions should ensure that records are created to document any identified incidents of grooming, inappropriate behaviour (including breaches of institutional codes of conduct) or child sexual abuse and all responses to such incidents.</i> <i>Records created by institutions should be clear, objective and thorough. They should be created at, or as close as possible to, the time the incidents occurred, and clearly show the author (whether individual or institutional) and the date created.</i>	Records management policies and procedures overview • There is a records management system in place to manage records. • The records management system is a manual or automated, paper-based, electronic or hybrid system. 2.1 Policies and procedures for records management • The school has policies and procedures in place for recordkeeping. • The policies and procedures manual adequately covers recordkeeping content. 2.2 Certification of policies and procedures The policies and procedures are formally authorised by the principal or senior delegated officer. Note: The certified self-evaluation form is acceptable as evidence. 2.3 Evaluation of policies and procedures Policies and procedures are regularly evaluated and include possible areas for improvement. 2.4 Areas for improvement Document areas for improvement including a timeline for completion.

Principle	Description	Activities and practices to meet minimum requirements
Principle 3	Records relevant to child safety and wellbeing, including child sexual abuse, should be maintained appropriately. <i>Records relevant to child safety and wellbeing, including child sexual abuse, should be maintained in an indexed, logical and secure manner. Associated records should be colocated or cross-referenced to ensure that people using those records are aware of all relevant information.</i>	3.1 Records indexing and maintenance • Dedicated files or folders are used. For example, student files and personnel files. • Administrative files or folders are managed with clear rules and permissions. • Folders and files are named according to conventions ○ For example: file plan, list of subject headings, list of authorised headings, Keyword AAA. • Records are stored in a safe environment. • Files are securely stored and access is limited to specific staff members. • If a data centre or cloud storage is used, details of any arrangements with the third party provider are documented. This includes storage, backup and security information. • Backups of onsite electronic records are completed regularly and safely stored. • A business continuity plan or disaster management plan is in place for school records. 3.2 Evaluation of records control and access • Filing is easy and information can be located in a timely manner. • Storage areas are appropriate and secure. • Electronic information is backed up appropriately in case of data loss. 3.3 Areas for improvement Document areas for improvement including a timeline for completion.

Principle	Description	Activities and practices to meet minimum requirements
Principle 4	Records relevant to child safety and wellbeing, including child sexual abuse, should only be disposed of in accordance with law or policy. <i>Records relevant to child safety and wellbeing, including child sexual abuse, must only be destroyed in accordance with records disposal schedules or published institutional policies. Records relevant to child sexual abuse should be subject to minimum retention periods that allow for delayed disclosure of abuse by victims, and take account of limitation periods for civil actions for child sexual abuse.</i> It is recommended that records relevant to child safety and wellbeing, including child sexual abuse are not destroyed until further notice.	4.1 School records retention and disposal activities A retention and disposal schedule, standard or policy is used to dispose of school records. 4.2 Disposal program A disposal program is conducted on a regular basis. For example, annually or every two years. 4.3 Register of records destroyed The school retains a controlled register of destroyed records. 4.4 Authorisation for disposal of records Before any records are destroyed, a list of those records due for destruction is reviewed by a principal or a senior delegated officer in the school and authorised and signed off for destruction. 4.5 Areas for improvement Document areas for improvement including a timeline for completion.

Principle	Description	Activities and practices to meet minimum requirements
Principle 5	Individual's existing rights to access, amend or annotate records about themselves should be recognised to the fullest extent. <i>Individuals whose childhoods are documented in institutional records should have a right to access records made about them. Full access should be given unless contrary to law. Specific, not generic, explanations should be provided in any case where a record, or part of a record, is withheld or redacted.</i> <i>Individuals should be made aware of, and assisted to assert their existing rights to request that records containing their personal information be amended or annotated, and, to seek review or appeal of decisions refusing access, amendment or annotation.</i>	5.1 Policies and procedures for access to records Records management policies: • contain information outlining an individual's rights to access, amend and annotate records. • are accessible. For example, they are published either as hard copy or available on the intranet or a school system. 5.2 Authorisation of policies and procedures for access to records The principal or a delegated senior officer formally approves access requests and amendments and annotations to the policies and procedures manual. 5.3 Evaluation of policies and procedures • The school records management policies and procedures contain relevant information and are regularly updated. • Staff members are aware of the policies and procedures and have access to these. • Requests for access, amendment or annotation are dealt with in a timely manner. 5.4 Identify areas for improvement Document areas for improvement including a timeline for completion.

4. IDENTIFICATION OF RECORDS THAT MAY BE RELEVANT TO AN ACTUAL OR ALLEGED INCIDENT OF CHILD SEXUAL ABUSE

The RCIRCSA discovered that, on average, it takes survivors of child sexual abuse 23.9 years to disclose the abuse.

Institutions need to consider which records should be retained because it is reasonable to expect that they may, now or in the future, become relevant to an actual or alleged incident of child sexual abuse.

These records could include:

- children's case files
- child attendance or registration records
- carers' case files
- records documenting the operations and monitoring of individual out-of-home care providers such as:
 - qualifications
 - working with children clearances
 - suitability assessments
 - details of other people living in or frequently visiting carer households
 - complaints and investigations of complaints
- workers' employment records, including period of time employed and places worked
- complaints and discipline records relating to workers
- records outlining programs of service and how services are delivered
- evaluation records of services, comments or complaints
- agreements, contracts, joint venture agreements, memoranda of understanding related to the care of children, including outsourcing arrangements
- policies, procedures, reporting mechanisms and training material relating to the provision of services, particularly services to children.

If your school is advised of an actual or alleged incident of child sexual abuse, records which are likely to be of relevance include:

Records of relevance	Examples, where applicable
Letters or emails or other records making an allegation, or relating to allegation. Where notification occurs verbally, then a file note should be made of the allegation or report.	
Incident reports and witness statements	
Records of meetings or discussions, including notes.	
Case files and other records of the child who is alleged to have been abused.	• school attendance and admission records • work experience and placements records • reports of accidents and injuries, • medical records • counselling records
Relevant personnel and work placement records, including records relating to volunteers.	• counselling, mediation, and discipline records • minutes and agendas of meetings • travel records
Relevant worker employment records including personnel files and terms of employment.	• rosters • attendance sheets and permission slips, employee contracts • leave requests • day-trips and excursions • off-site visits
Reports or other records received from medical practitioners, health professionals, teachers, counsellors and other third parties.	

Records of relevance	Examples, where applicable
Records documenting actions taken to address allegations and cases of sexual abuse of children including reviews of actions, cases or decisions by external authorities.	
Records documenting support and remedial action for the child who is alleged to have been abused.	• claims • assessments • reviews • appeals

5. DEFINITIONS

ALLEGATION¹

A statement, made without giving proof, that someone has done something wrong or illegal.

DISPOSAL

The process of removing records from an organisation by either destroying them or sending them to the school's archives collection for permanent retention.

The system will maintain appropriate contextual information (metadata) and the links between the records to support their value as evidence.

GROOMING²

The use of a variety of manipulative and controlling techniques with a vulnerable subject in order to establish trust or normalise sexually harmful behaviour with the overall aim of facilitating exploitation and/or avoiding exposure.

INCIDENT

An instance of something happening; an event or occurrence.

RECORD

Any recorded information created or received by an organisation in the course of their business or conduct of their affairs. A record provides evidence of activities.

Records may be in any format that can be read and understood, such as: paper files and documents, emails, spreadsheets, PDF documents, databases, photographs, maps, tape recordings, text messages from mobiles, and social media posts.

RECORDKEEPING

The systematic organisation and control of recorded information in any format from the time it is created to its final disposition.

RECORDKEEPING SYSTEM

A manual or automated system which captures and provides access to records over time that has features for maintaining authentic, reliable, complete and usable records that function as evidence of business transactions.

RETENTION AND DISPOSAL SCHEDULE

Establishes the minimum retention period for each type of record listed in the schedule regardless of medium, and dictates the final action for the record.

THESAURUS

Controlled list of terms linked together by hierarchical, associative or equivalence relationships.

¹ Macquarie Dictionary

² Registration Standards for Non-Government Schools

6. FURTHER INFORMATION

The State Records Office of Western Australia has published advice on [Recordkeeping Basics](#) which provides basic information for creating and managing records. Non-government schools may also find this guide useful for developing records management programs.

The Council of Australasian Archives and Records Authorities' Royal Commission Working Groups has prepared [Guidance for identifying and retaining records which may become relevant to an actual or alleged incident of child sexual abuse](#) addressing Recommendation 8.3: *The National Archives of Australia and state and territory public records authorities should provide guidance to government and non-government institutions on identifying records, which, it is reasonable to expect, may become relevant to an actual or alleged incident of child sexual abuse; and on the retention and disposal of such records.*

The above guidance document published by the State Records Office of Western Australia can be adopted to assist non-government schools with records and information management.

7. ACKNOWLEDGEMENTS

State Records Office of Western Australia

State Government Organisations RKP Self-Evaluation Guideline and Checklist

Guidance for identifying and retaining records which may become relevant to an actual or alleged incident of child sexual abuse – October 2019

Public Record Office of Victoria

Creating, Managing and Retaining Records for Current or Future Child Sexual Abuse Allegations

REFER TO RECORDKEEPING PRINCIPLES FOR NON-GOVERNMENT SCHOOLS – SELF-EVALUATION FORM

Recordkeeping principles for non-government schools – guidelines

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This document is based on the recommendations and templates of the [State Records Office of Western Australia](#)

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