



Tanglin Gippsland Records Management Policy

1	Overview.....	2
2	Definitions.....	2
3	Details.....	3
4	Communication	4
5	Roles and Responsibilities.....	5
6	Related Tanglin Gippsland Policy.....	5
7	Policy Review.....	5
	Appendices	6

Prepared By	Approved By	Reviewed & Revised	Reviewed By	Next Review
Head of Campus	Tanglin Australia Board – September 2024			September 2026

1 Overview

- 1.1 Tanglin Gippsland is committed to ensuring that procedures are in place to govern what records are created, managed, and retained, and for how long they are retained.
- 1.2 This policy sets out the principles and framework governing the basis for the creation, control, storage, access and disposal of records and should be read together with the policy implementation documents listed in this policy.
- 1.3 This policy is intended to ensure that:
 - information can be accessed quickly and easily when required, read and used
- 1.4 records are appropriately secure, and that personal information is protected
- 1.5 records are only kept for as long as is necessary.
- 1.6 only information required for Tanglin purposes are collected, maintained and retained
- 1.7 Policy scope
 - 1.4.1 This policy covers all areas of record management.
 - 1.4.2 This policy covers records that exist in all media and formats, including hardcopy, digital, email and internet.
 - 1.4.3 This policy is applicable to all employees, directors, contractors and volunteers.

2 Definitions

- 2.1 *Board* refers to the board of Tanglin Australia Pty Ltd which operates Tanglin Gippsland.
- 2.2 *Leadership Team* refers to the people that make up the leadership of the campus which is the Head of Campus, Head of Learning and Head of Pastoral Care.
- 2.3 *Record Management Manager* (or similar) refers to the staff member/s given authority by the Leadership Team for the overall management of campus records.
- 2.4 *Record Retention Schedule* refers to a list of activities performed by the campus, the records relating to such activities, and the time period for retaining such records.
- 2.5 *Permanent records* are those records that the campus is required to retain forever.
- 2.6 *Temporary records* are those records that the campus is not required to retain forever, and which shall be destroyed after the prescribed period of time.
- 2.7 *Public Record Officer Victoria* refers to the agency with responsibility for the oversight of government record keeping.

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3 Details

- 3.1 Tanglin is committed to promoting a culture of good record management practice.
- 3.2 Tanglin believes that efficient record management supports organisational integrity and effectiveness, as well as its processes and practices.
- 3.3 In its record management, the campus is committed to accuracy and transparency wherever possible and appropriate.
- 3.4 Where personal information is recorded and/or collected, the campus’s Privacy Policy will apply.
- 3.5 The campus’s management of its records will comply with its Commonwealth and State legal and regulatory requirements.
- 3.6 Records management guidance
 - 3.6.1 In preparing the Record Retention Schedule, Tanglin accepts the Records Retention & Disposal Schedule for Non-Government Schools – Introduction and Guidelines for Use as the starting point.
 - 3.6.2 Tanglin has a responsibility to comply with and implement the following five principles recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse Final Report, and consistent with the Public Records Office Victoria, for records and recordkeeping, to a level that responds to the risk of child sexual abuse occurring within Tanglin.
 - 3.1 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.
 - 3.2 Principle 2: Full and accurate records should be created about all incidents, responses and decisions affecting child safety and wellbeing, including child sexual abuse.
 - 3.3 Principle 3: Records relevant to child safety and wellbeing, including child sexual abuse, should be maintained appropriately.
 - 3.4 Principle 4: Records relevant to child safety and wellbeing, including child sexual abuse, should only be disposed of in accordance with law or policy.
 - 3.5 Principle 5: Individuals’ existing rights to access, amend or annotate records about themselves should be recognised to the fullest extent.
 - 3.6.3 Specific record retention requirements apply to financial records (refer Corporations Act 2001 (Cth.) S.286), employment records (refer Fair Work Ombudsman Record-keeping & pay slip) and OHS records (refer Workplace OHS Victoria’s record keeping requirements).
 - 3.6.4 The Record Retention Schedule shall also list the position title of the person responsible for the disposal action for each record.
 - 3.6.5 Although there is no legislation regarding permanent records covering non-government schools, the campus is under a general obligation not to dispose of documents that might be relevant to future legal proceedings. Inactive permanent records shall be archived.
 - 3.6.6 In its day-to-day operations, the campus will also create and use ephemeral material that is, by its nature transitory (i.e. temporary records), such as working papers, drafts, duplicate copies of records stored elsewhere and unsolicited ‘junk mail’. The campus will aim to

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develop an organisational culture in which such temporary records are destroyed on a regular basis.

- 3.6.7 Although Public Record Office Victoria has no direct responsibility for record keeping in independent schools, the guidance offered is helpful in setting a benchmark of good practice. Key record management elements prescribed by Public Record Office Victoria may be found in Appendix 1.
- 3.6.8 Tanglin aims to properly manage its records by staying up-to-date with the destruction of ephemeral material and temporary records.

3.7 Policy implementation documents

3.7.1 The documents setting out the strategies and actions required to implement this policy are:

- 3.7.1.1 Record Retention Schedule that lists:
 - 3.6 the activities performed by the campus
 - 3.7 the records relating to such activities
 - 3.8 the time period for retaining such records.
- 3.7.1.2 Data control procedures that include:
 - 3.9 record storage procedures, with specific attention given to the security of personal information
 - 3.10 archiving procedures
 - 3.11 record disposal procedures
 - 3.12 good housekeeping guidelines.

3.8 Legal and regulatory basis for compliance

3.8.1 The following legislation is applicable to this policy:

- 3.12.1 Crimes (Document Destruction) Act 2006 (Vic.)

4 Communication

- 4.1 This policy shall be accessible to staff members on the staff portal.
- 4.2 This policy shall also be made available to directors, contractors, volunteers and casual relief teachers as appropriate.

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5 Roles and Responsibilities

- 5.1 The Leadership Team is responsible for ensuring that Tanglin has an up-to-date Record Management Policy and Record Retention Schedule.
- 5.2 The Head of Campus is responsible for promoting a culture of good record management practice.
- 5.3 The Leadership Team is responsible for ensuring that this policy is implemented in accordance with Commonwealth and State privacy legislation.
- 5.4 The Leadership Team are responsible for ensuring that procedures are in place to manage records efficiently and in line with this policy.
- 5.5 The Record Management Manager will have an overview of what records are created and for what purpose. He/she is responsible for creating record management procedures and for maintaining the Record Retention Schedule.
- 5.6 All staff members are responsible for applying good record management practices, including good housekeeping.
- 5.7 All staff members are responsible for ensuring that they are compliant with the Privacy Policy.

6 Related Tanglin Gippsland Policy

- Privacy Policy

7 Policy Review

- 7.1 This policy is approved by the Board of Tanglin Australia and will be reviewed at least every two years by Tanglin's Leadership Team. *Leadership Team* consists of the Tanglin Gippsland Head of Campus, Head of Learning and Head of Pastoral Care.
- 7.2 Any significant changes to this policy must be approved by the Board.

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Appendices

Appendix 1: Key record management elements prescribed by Public Record Office Victoria

1. Creation

Effective organisational practice requires that the actions and decisions of the school be accurately recorded. School records are maintained to enable the school to function efficiently (e.g. planning documents, employment files), for legal and compliance reasons (e.g. enrolment register, financial records), to provide a basis for future decision-making (e.g. performance management records) and for the school's historic record (e.g. minutes of meetings of the Board).

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 with regard to the records that it creates. Each type of record (e.g. student attendance record) will be clearly named and the data held within it clearly identified (e.g. student name, year group, reason for absence, etc.).

2. Control

Data, information, actions and decisions are captured in the records so created. The school will set out procedures for when records and related descriptive data is captured (i.e. saved), and where captured and by whom. Particular attention will be paid to the school's Privacy Policy when the data to be captured is personal information.

Records within the school's record management system are appropriately controlled to protect their integrity as evidence of the school's activities and decisions. In order to ensure the school-wide integrity of records, appropriate control procedures will be implemented. Responsibility for each record type will lie with the named management function.

3. 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. Specific procedures will be implemented to ensure the security of personal information.

Records no longer in current use (i.e. inactive records) are generally stored wherever possible in electronic form for the required period. Inactive records shall be catalogued so that records can be easily retrieved when required. Inactive records will be monitored against the Record Retention Schedule in order to determine when the record is to be destroyed or whether it is to be retained as a permanent record.

4. 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 transparency and security. For example, a parent would have access to his/her child's attendance records but not to those of other students, while attendance data would be appropriately aggregated for all parents to have access to that level of information.

5. Disposal

School records must be disposed of when they become inactive and when the retention period has expired. Proper disposal of public records reduces storage and other costs, and aids the efficient management of the school. Any destruction of school records must be lawful [refer Crimes (Document Destruction) Act 2006 (Vic.)] and recorded in the Destruction of Records Log.

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