



**POLICY TITLE: CHILD SAFETY AND WELLBEING RECORD KEEPING POLICY**

**DEVELOPED / REVIEWED BY**

Deputy Principal Wellbeing and Strategy  
Siena College Policy Committee  
Melbourne Archdiocese Catholic Schools (MACS)

**REVIEW SUMMARY**

The purpose of this policy is to ensure that all school records relating to Child Safety and Wellbeing 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 Siena College).

**DOCUMENT DEVELOPMENT PROCESS**

This document was first developed by Deputy Principal Wellbeing and Strategy, Antonella Rosati, and Human Resources Manager, Sarah Egan, in November 2022 based on a review of the new Child Safe Standards which came into effect from 1 July 2022.

**RATIONALE**

At Siena College, we hold the care, safety and wellbeing of children and young people as a central and fundamental responsibility of our school. Our commitment is drawn from and inherent to the teaching and mission of Jesus Christ, with love, justice, and the sanctity of each human person at the heart of the gospel (CECV Commitment Statement to Child Safety).

*The Dominican Ideals are a commitment to truth explored in dialogue, a vibrant preaching of the Gospel, a critical appreciation of culture and cultures, and a love of the beautiful. Our goal in each of our Educational Ministries is to foster these values, together with a spirit of prayer and contemplation, respect for the dignity and uniqueness of each individual, and the pursuit of excellence. (Dominican Education Australia)*

**DEFINITIONS**

<b>child</b>	A child or young person who is under the age of 18 years
<b>child abuse</b>	Child abuse includes:  (a) any act committed against a child involving: (i) a sexual offence (ii) an offence under section 49B(2) of the <i>Crimes Act 1958</i> (grooming) (b) the infliction, on a Child, of: (i) physical violence (ii) serious emotional or psychological harm (c) serious neglect of a Child

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<b>child-connected work</b>	Work that involves direct contact with children that is regular and not incidental to the work.
<b>child safety</b>	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 ( <a href="#">Ministerial Order No. 1359</a> ).
<b>child safety and wellbeing record</b>	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: <ul style="list-style-type: none"> <li>• concerns or complaints relating to child safety or the safety or wellbeing of a child</li> <li>• safety incidents involving a child</li> <li>• Mandatory reporting</li> <li>• Reportable allegations</li> <li>• Reportable conduct</li> <li>• other matters relating to child safety or the safety or wellbeing of a child</li> </ul>
<b>mandatory reporting</b>	Is the legal requirement under the <i>Children, Youth and Families Act 2005</i> (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 ( <a href="#">PROTECT: Identifying and responding to all forms of abuse in Victorian schools</a> ).
<b>NCCD</b>	The Nationally Consistent Collection of Data on <b>School Students with Disability</b> (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.
<b>record</b>	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.
<b>reportable allegation</b>	Any information that leads a person to form a reasonable belief that an employee has committed either: <ul style="list-style-type: none"> <li>• reportable conduct</li> <li>• misconduct that may involve reportable conduct</li> </ul> <p>whether or not the conduct or misconduct is alleged to have occurred within the course of the person's employment (as defined in the <i>Child Wellbeing and Safety Act 2005</i> (Vic)).</p>



<b>reportable conduct</b>	<p>As defined in the <i>Child Wellbeing and Safety Act 2005 (Vic)</i> means:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• sexual misconduct committed against, with or in the presence of a child</li> <li>• physical violence committed against, with or in the presence of a child</li> <li>• any behaviour that causes significant emotional or psychological harm to a child</li> <li>• significant neglect of a child</li> </ul>
<b>school environment</b>	<p>Any of the following physical, online or virtual places used during or outside school hours:</p> <ul style="list-style-type: none"> <li>• the school campus</li> <li>• online or virtual school environments made available or authorised by Siena College for use by a student (including email, intranet systems, software, applications, collaboration tools and online services)</li> <li>• 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 (<a href="#">Ministerial Order No. 1359</a>).</li> </ul>
<b>school staff</b>	<p>An individual working in a school environment who is:</p> <ul style="list-style-type: none"> <li>• directly engaged or employed by a school governing authority</li> <li>• 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</li> <li>• a minister of religion, a religious leader or an employee or officer of a religious body associated with Dominican Education Australia (<a href="#">Ministerial Order No. 1359</a>).</li> </ul>
<b>volunteer</b>	<p>A person who performs work without remuneration or reward for Siena College in the school environment.</p>

### PRINCIPLES / GUIDING PRINCIPLES

<p>At Siena College we are committed to ensuring that we have good recordkeeping processes in place, particularly with respect to Child Safety and Wellbeing Records. We recognise that good recordkeeping helps to:</p> <ul style="list-style-type: none"> <li>• protect the rights of students, school staff, volunteers and the school community</li> <li>• support collaboration and informed decision-making</li> <li>• ensure transparency and accountability by providing proof of school practices, communications, decisions and actions</li> <li>• support continuity and consistency in management and administration</li> </ul>
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- provide an audit trail to meet operational and legal requirements
- reduce the risk of being unable to produce evidence of school activities

Siena College will ensure that:

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

**Child Safety and Wellbeing Recordkeeping procedures** set out more detailed guidance for processes that Siena College has in place to ensure that it meets the Public Record Office Victoria Recordkeeping Standards in relation to the creation, maintenance and disposal of Child Safety and Wellbeing Records.

## PROCEDURES

### Recordkeeping

**Siena College ensures that full and accurate Records of all decisions and activities relevant to Child Safety and child wellbeing are created and captured.**

Siena College 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 the Siena College School Complaints Handling Policy.
- To ensure all College staff, contractors, volunteers and clergy 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

**Siena College ensures that Child Safety and Wellbeing Records can only be accessed, modified or used by those with relevant authority.**

**Siena College** has the following processes in place to ensure that this is achieved:

- Only authorised personnel have authority to access Pastoral Notes as appropriate. Staff authorised to access Pastoral Notes are Principal, Deputy Principal, Heads of House, College Counsellors and Head of Learning Diversity, if required to support NCCD documentation.

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- Only certain authorised personnel have authority to access, modify and use Pastoral Notes, as appropriate. Authorised staff for these purposes include: Principal, Deputy Principal, Heads of House, College Counsellors and Head of Learning Diversity, if required to. support NCCD documentation.
- All *physical* Child Safety and Wellbeing 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 and Wellbeing Records are securely stored, by password protection and encryption where possible. This utilises the Siena Central System.

**Sienna College ensures that Child Safety and Wellbeing Records can be readily accessed and used when and as required.**

**Sienna College** 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 and Wellbeing Records to be easily located and accessed when they are needed.

**Sienna College has systems and process in place to ensure the authenticity and reliability of Child Safety and Wellbeing Records, so that they can be trusted as credible evidence.**

**Sienna College** has the following processes in place to ensure that this is achieved:

- **Sienna College** has put in place audit logs that show who has created or modified an electronic Record (and when).
- **Sienna College** requires all staff to date hard copy Records confirming when the Record was created.
- **Sienna College Counsellors** also utilise Halaxy to record details of counselling notes

### **Record storage and preservation**

**Sienna College ensures that Child Safety and Wellbeing 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 and Wellbeing 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 and Wellbeing 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 and Wellbeing Records are preserved in formats that are expected to remain readable for the required retention period of the Record.
- Digital Child Safety and Wellbeing Records are routinely backed up and / or restored on Siena Central

**Sienna College ensures that all storage locations used for the storage of Child Safety and Wellbeing Records are well maintained.**

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**Sienna College** has the following processes in place to ensure that this is achieved:

- Digital storage systems and devices (on which Child Safety and Wellbeing 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 and Wellbeing Records are stored.
- Physical storage locations (in which physical Child Safety and Wellbeing Records are stored) are regularly inspected for water, heat and pest damage and are repaired where necessary.

### **Records retention and disposal**

**Sienna College** ensures that Child Safety and Wellbeing 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 Melbourne Archdiocese Catholic Schools Ltd (MACS) Director of Governance and Strategy.

**Sienna College** ensures that records are disposed of using secure and permanent methods.

Where Child Safety and Wellbeing Records are disposed of, the school retains a record evidencing the disposal of those Records. This includes a register of all Child Safety and Wellbeing 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, as advised by MACS Information Management and Administration Team.
- 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**

**The College ensures that all College staff, contractors, volunteers and clergy understand their recordkeeping obligations in respect of Child Safety and Wellbeing 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 and Wellbeing 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 and Wellbeing Records.

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

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- 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 and Wellbeing Records, school staff and volunteers are made aware that they must not:

- destroy, delete or alter Child Safety and Wellbeing Records without authorisation;
- damage or lose Child Safety and Wellbeing Records in their care;
- keep Child Safety and Wellbeing Records on personal devices or personal cloud storage locations or in portable storage devices such as USBs; or
- remove Child Safety and Wellbeing Records from school premises without authorisation.

### RESPONSIBILITY

- Principal (Primary responsibility)
- Leadership Team
- All staff

### RELATED LEGISLATION

- Education and Training Reform Act 2006 (Vic.)
- Public Records Act 1973 (Vic.)

### RELATED SIENA COLLEGE POLICIES

- Safeguarding Children and Young People: Code of Conduct 2022
- Child Safety and Wellbeing Policy 2022
- School Complaints Handling Policy 2022
- Staff Digital Technology Policy 2022

### RELATED DOCUMENTS

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- *Ministerial Order No. 1359: Implementing the Child Safe Standards – Managing the Risk of Child Abuse in Schools and School Boarding Premises*
- [Public Record Office Victoria Recordkeeping Standards](#)

### RISK

In the Committee's deliberations it is important to consider the College's main strategic processes and the identification of associated risks. Some sample questions are included for referral. Answers are to be documented as part of the policy.

1. **Faith and Catholic Identity.** Identify any risks to Catholic Identity or Dominican charism of the school. How will this policy harm or enhance either?
2. **Reputation.** Identify if there are any reputational risks to the College. How will this policy impact Siena and wider communities?
3. **Financial.** Identify any financial risks to the College. How will this policy impact the financial stability of the College?
4. **Contemporary Learning and Teaching.** Identify any risks to learning and teaching. How will this policy impact the academic performance of the College?
5. **Wellbeing.** Identify any risks to safety and wellbeing. How will this policy impact the mental and physical wellbeing of the College community?
6. **Community Engagement.** Identify any risks to building community engagement. How will this policy impact community relationships?
7. **Governance and Leadership.** Identify any risks to governance and leadership in the College. How will this policy affect the strategic direction of the College?

Do any risks identified above warrant changes to the proposed policy? If so, the policy should be referred back to the developer/s.

### NEXT REVIEW

November 2023

### POLICY LOCATION

Xxxxx to be included once ratified

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