Melbourne Archdiocese Catholic Schools

Child Safety and Wellbeing Recordkeeping Procedures

1. Introduction

Melbourne Archdiocese Catholic Schools (MACS) schools operate with the consent of the Catholic Archbishop of Melbourne and are owned, operated and governed by Melbourne Archdiocese Catholic Schools Ltd.

The School Child Safety and Wellbeing Recordkeeping Procedures form part of MACS policies for child safety and wellbeing. The procedures take into account 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 MACS Schools) and the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth).

2. Purpose

These procedures ensure that Child Safety and Wellbeing records are created, maintained and disposed of in accordance with Public Record Office Victoria Recordkeeping Standards, including minimum retention periods.

Child Safety and Wellbeing records are any records that involve or relate 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.

3. Scope

These procedures apply to all MACS Staff, including those involved in religious ministry in MACS schools, and should be read in conjunction with related MACS policies and codes of conduct, including:

- Child Safety and Wellbeing Policy
- Code of Conduct for MACS Staff
- Complaints Handling Policy
- Privacy Policy

4. Recordkeeping

4.1. The Principal must ensure that full and accurate records, that meet legislative requirements and community needs, of school activities and decisions relevant to Child Safety and Wellbeing are created and captured.

4.2. All concerns and complaints associated with child safety and child wellbeing will be reported and recorded in accordance with the school's Complaints Handling Policy.

4.3. Support and training measures will be provided to ensure all staff are aware of and can comply with their recordkeeping obligations.

5. Access to and control of records

5.1. The Principal will ensure that Child Safety and Wellbeing Records can only be accessed, modified or used by those with relevant authority.

5.2. Systems and processes in place will ensure Child Safety and Wellbeing Records are kept secure from unauthorised access, amendment, use, release and disposal.

5.3. Only authorised staff have authority to access, modify, use, release or dispose of records as appropriate. Authorised staff are listed in Appendix 1: Authorisation for Child Safety and Wellbeing Records.

5.4. All printed or hard copy Child Safety and Wellbeing Records will be securely stored in locations that are locked, and which are only able to be accessed by authorised staff.

5.5. All digital / electronic Child Safety and Wellbeing Records will be securely stored in such a way as to prevent unauthorised access.

5.6. The Principal will ensure that Child Safety and Wellbeing Records are arranged and managed so they can be readily accessed and used for authorised purposes.

5.7. Systems are in place in the school to register Child Safety and Wellbeing Records with sufficient descriptive information to enable the records to be easily located and accessed.

5.8. The Principal will have systems and processes in place to ensure the authenticity and reliability of Child Safety and Wellbeing Records, so that they can be trusted as authoritative evidence, including:

- audit logs showing who created, accessed or modified an electronic record (and when).
- hard copy records will include dates that indicate when the record was created.

6. Record storage and preservation

6.1. The Principal will ensure that Child Safety and Wellbeing Records are stored in a way that protects them from misuse, loss, deterioration and damage.

6.2. The following processes will be in place to store and preserve records:

- All physical Child Safety and Wellbeing Records will be stored in a format and made of materials that are likely to survive and be readable for their required lifetime.
- All physical Child Safety and Wellbeing Records will be stored securely in environmental conditions that protect them from fire, water, pests and dust.
- Only authorised staff will have access to the records in these locations. Authorised staff are listed in Appendix 1.
- All digital / electronic Child Safety and Wellbeing Records will be preserved in formats that are expected to remain readable for the required lifetime of the record.
- Digital Child Safety and Wellbeing Records will be routinely backed up and / or restored on the school's systems.

6.3. The Principal will ensure that all storage locations used for the storage of Child Safety and Wellbeing Records are well maintained. The following processes will be in place to ensure that this is achieved:

- Digital storage systems and devices (on which Child Safety and Wellbeing Records are stored) will be regularly tested, backed up and replaced (as necessary).
- Updates and security patches will be 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) will be regularly inspected for water, heat and pest damage and are repaired where necessary.

7. Record retention and disposal

7.1. Child Safety and Wellbeing Records will be preserved in a readable and accessible format for their minimum required retention period.

7.2. The principal will ensure that Child Safety and Wellbeing Records are only disposed of:

- once they have reached their minimum retention period, in accordance with the Public Record Office Victoria Recordkeeping Standards and
- with the written authorisation of the Executive Director or their delegate.

7.3. The Principal will ensure that records are destroyed / deleted using secure and permanent methods.

7.4. When Child Safety and Wellbeing Records are destroyed / deleted, the Principal will retain a record providing evidence of the disposal of those records, including a register detailing the following:

- the type / description of the record (including the date of the record)
- when destruction of the record was authorised and by whom.
- the relevant disposal schedule and class reference number
- the date of destruction of the record.
- the method of destruction of the record.

7.5. No Child Safety and Wellbeing Records likely to be required in a legal proceeding are to be deleted or destroyed

7.6. The Public Records Victoria Schedule, PROS 19/08 outlines the retention period required for records of organisational response to child sexual abuse incidents and allegations and are summarised in Table 1 below.

Table 1: PROS 19/08 Retention and Disposal Authority for Records of Organisational Response to Child Sexual Abuse Incidents and Allegations

Function/activity	Disposal action
Policy, strategy and procedures	Permanent
Reporting and investigations	Destroy 99 years after action completed
Training and development	Destroy 45 years after action completed

8. Recordkeeping training

8.1. All Staff are required to understand their recordkeeping obligations in respect of Child Safety and Wellbeing Records and the school's recordkeeping systems and processes.

8.2. The Principal will ensure that all Staff engaged in child connected work receive training regarding their recordkeeping obligations in response of Child Safety and Wellbeing Records as soon as practicable, after their commencement.

8.3. Training provided to Staff will include guidance regarding how to:

- document work activities including decisions made, actions taken and notes of meetings and important conversations
- ensure records include relevant contextual information e.g. the date and location of a meeting and who was involved
- make sure records are complete, accurate and can be understood in the future
- keep records in authorised systems and designated storage areas
- protect records from unauthorised access and disclosure.

8.4. During training and information about their recordkeeping obligations with respect to Child Safety and Wellbeing Records, Staff will be 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.

9. Definitions

Child safety

Child safety includes 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 and Wellbeing 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.

Record

A record is information in any format created, received and maintained as evidence of business activities, transactions and / or decisions. A record may be digital (such as an email, Word, Excel, PowerPoint or finalised and / or scanned PDF documents) or hardcopy (paper / physical) format.

10. Related policies and documents

Supporting documents

Authorisation for Child Safety and Wellbeing Records

Related MACS policies and documents

Child Safety Code of Conduct
Child Safety and Wellbeing Policy
School Child Safety and Wellbeing Policy and Procedures
Complaints Handling Policy
Reportable Conduct Policy
Privacy Policy
Privacy Collection Notice – Students and Parents
Protect: Identifying and Responding to Abuse – Reporting Obligations Policy

Resources (external to MACS)

Retention and Disposal Authority for Records of Organisational Response to Child Sexual Abuse Incidents PROS 19/08
Information Sharing and MARAM online learning system https://training.infosharing.vic.gov.au/

Legislation and standards

Child Safe Standards – Ministerial Order 1359
Privacy Act 1988 (Cth)

Policy information table

Responsible director	Director, Child Safety and Risk
Procedure owner	General Manager, Child Safety
Approving authority	Director, Child Safety and Risk
Approval date	1 July 2025
Risk Rating	Extreme
Review by	July 2027
Publication	CEVN, internal school
POLICY DATABASE INFORMATION	
Assigned framework	Child Safety and Wellbeing
Related documents	See list of related MACS policies above
Superseded documents	Child Safety and Wellbeing Recordkeeping Policy – v1.0 – 2022 Child Safety and Wellbeing Recordkeeping Procedures – v1.0 – 2022
School document owner	Sr Mary Sarah
School review	19.6.26