



Catholic
Education
Commission
Tasmania

Records Management Policy

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1. PURPOSE

The purpose of this policy is to ensure a system-wide approach to the management of data, information and records across all Catholic Education Tasmania (CET) schools and activities.

The reference to records in this Policy includes any information and/or data that has been created, received and utilised by CET.

2. WHO THIS POLICY APPLIES TO

This Policy applies to all employees within all Catholic Schools operating in the Archdiocese of Hobart, St Patrick's Childcare Centre and the Tasmanian Catholic Education Office (TCEO).

This policy must be read in conjunction with all other system policies available on the CET website.

3. POLICY PRINCIPLES

3.1. Records Disposal Freeze Notice

CET is currently subject to a "Records Disposal Freeze Notice" which does not expire until 2029. While this is in place, no records are to be disposed of or destroyed without the prior express approval of the TCEO.

3.2. Records are a valuable resource

Records are an essential and valuable resource which enable CET to fulfil its duties and legal obligations, provide evidence and transparency of decisions that underpin the operation of the Catholic education system, improve the efficiency and effectiveness of operations and the quality of decision-making and long-term planning.

3.3. Records must be reliable

A consistent and co-ordinated approach to records management supports integrity, accountability, fulfils community expectations and meets CET's legal obligations.

CET must maintain the integrity of records by ensuring that records are complete, unaltered, and reliable.

Records must provide clear evidence of decisions and support accountability and transparency of the decision-making process.

3.4. Records must be kept safe

Records must be protected from unauthorised access or disclosure, alteration, misuse, deletion or destruction with controls applied to ensure records can be trusted as credible evidence.

3.5. Records must be accessible.

Records must be accessible (available, retrievable and readable), irrespective of format, for the required retention period, except where records qualify for restricted access due to privacy or other security reasons.

3.6. Commitment to Best Practice

CET is committed to ensuring that records are managed and disposed of in accordance with best practice records management principles.

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This policy ensures adherence with the standards and principles outlined in the Australian Society of Archivists Records Retention and Disposal Schedule for Non-Government Schools, the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse, the Bringing Them Home report and the National Catholic Safeguarding Standards.

3.7. Why have this policy?

This policy and its associated documentation have been developed to respond to and meet the requirements of the following:

- (a) Charter of Lifelong Rights in Childhood Recordkeeping in Out-of-Home-Care
- (b) National Catholic Education Commission Privacy Compliance Manual; April 2023
- (c) National Quality Framework for Early Childhood Education and Care
- (d) Royal Commission into Institutional Responses to Child Sexual Abuse; Final Report: Volume 8, Recordkeeping and information sharing
- (e) The Bringing Them Home Report
- (f) The National Catholic Safeguarding Standards
- (g) Recordkeeping obligations in accordance with; the Department of Education Capital Grants Program Guidelines; and Non-Government Reform Support Fund Guidelines

3.8. How will breaches be dealt with?

Breaches of this policy will be dealt with as a disciplinary matter which, in appropriate cases, may result in sanctions up to and including termination of employment.

4. POLICY REQUIREMENTS

4.1. Managing Records

- 4.1.1.** Records must be managed in accordance with the Information Management Handling Protocol.
- 4.1.2.** Digital records must be kept in good order, stored in a secure system approved by CET's Chief Information Officer (CIO), via the Technology Approval Application Process.
- 4.1.3.** Physical records must be kept in good order, in a secure storage environment or facility dedicated to the storage of records. Such storage areas must:
 - (a) Be free, so far as reasonably practicable, of any known hazard or risk.
 - (b) Have appropriate floors and shelving loading capacity that safely supports records and their containers.
 - (c) Protect, so far as reasonably practicable, records from damage, fire, dust, water, moisture and pests.
 - (d) Minimise the impact of sunlight and UV light on records.
 - (e) Protect magnetic storage media from magnetic fields, dust and other particles, such as acidic and oxidising gases.
- 4.1.4.** A register of all records, irrespective of format, must be maintained.

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4.2. Recordkeeping

All Catholic schools and the TCEO must implement and operate in accordance with the parameters set out in the following documentation:

- (a) Information Management Handling Protocol
- (b) Records Retention and Disposal Schedule for Non-Government Schools 2nd Edition April 2018 (Australian Society of Archivists)

5. RESPONSIBILITIES

ROLE	RESPONSIBILITY
All employees, contractors, clergy, religious, workplace participants and volunteers	<ul style="list-style-type: none">(a) Familiarise themselves with and comply with this policy and associated Information Management Handling Protocol.(b) Responsible for routinely creating and capturing full and accurate records of activities and must do so in accordance with this policy.(c) Appropriately securing CET records and documents to protect the confidentiality, privacy and sensitivity of records in using and sharing them internally and externally.(d) Ensure that records are created, captured and managed in CET systems for the required retention period.(e) Individuals must not maintain any CET records personally or privately.(f) Contractors are required to provide copies of records, as constructed drawings, plans and any information CET requires to meet its recordkeeping obligations in an agreed format in accordance with CET's procurement process, contract terms and legal obligations.
Directors, Senior Leadership (this applies to school and TCEO senior leadership).	<ul style="list-style-type: none">(a) Familiarise themselves with and comply with this policy and associated Information Management Handling Protocol.(b) Implement best practice records standards and ensure compliance with legislative requirements.(c) Ensure that schools and the TCEO have the appropriate resources required for recordkeeping obligations.
Principals, Leaders and Managers	<ul style="list-style-type: none">(a) Familiarise themselves with and comply with this policy and associated Information Management Handling Protocol.(b) Ensure that records are created, captured and managed for the required retention period in accordance with the policy and associated Information Management Handling Protocol.(c) Ensure staff have appropriate training in records management.(d) Ensure that this policy and associated procedures are accessible via the school/CET website and upon request.(e) Report all breaches of this policy and/or any damage or loss of records to CET Chief Information Officer and CET Privacy Officer.

ROLE	RESPONSIBILITY
CET Chief Information Officer and CET Privacy Officer	(a) Familiarise themselves with and comply with this policy and associated Information Management Handling Protocol. (b) Responsible for the CET's Records Management Program. (c) Report any notifiable data breaches in accordance with the Notifiable Data Breach Scheme.
CET Information, Communication and Technology Team	(a) Familiarise themselves with and comply with this policy and associated Information Management Handling Protocol. (b) Coordinate the management of all CET records and assist all business areas with their recordkeeping and records management. (c) Coordinate records management training, consultation and support. (d) Responsible for managing the ongoing review of the Records Management Policy and the Information Management Handling Guide to ensure continuous improvement and business requirements, technology and legislative changes.

6. COMPLIANCE (LEGISLATION AND OTHER DOCUMENTS)

This Policy relates to but is not limited to the following legislation and guidelines:

6.1. State Legislation (Tas)

- (a) [Child and Youth Safe Organisations Act 2023](#)
- (b) [Children, Young Persons and their Families Act 1997](#)
- (c) [Civil Liability Act 2002](#)
- (d) [Criminal Code Act 1924](#)
- (e) [Education Act 2016](#)
- (f) [Education Act Regulation 2017](#)
- (g) [Electronic Transactions Act 2000](#)
- (h) [Evidence Act 2001](#)
- (i) [Family Violence Act 2004](#)
- (j) [Limitation Act 1974](#)
- (k) [Office of Tasmania Assessment, Standards and Certification Act 2003](#)
- (l) [Public Health Act 1997](#)
- (m) [Registration to Work with Vulnerable People Act 2013](#)
- (n) [Work Health and Safety Act 2012](#)

6.2. Federal Legislation

- (a) [Australian Curriculum, Assessment and Reporting Authority Act 2008](#)
- (b) [Australian Education Act 2013](#)
- (c) [Corporations Act 2001](#)

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- (d) [Disability Discrimination Act 1992](#)
- (e) [Disability Standards for Education 2005](#)
- (f) [Family Law Act 1975](#)
- (g) [Privacy Act 1988](#)

6.3. Other

- (a) Documents listed under Clause 4.2
- (b) [All CECT policies and procedures](#)
- (c) Any requirements as issued by Government agencies such as the Australian Taxation Office

7. DEFINED TERMS

7.1. Metadata is information about records so people know what the records are about, are able to understand their context and purpose and makes records easier to find. Common examples of metadata for records and information include identifiers such as document, asset, contract numbers; dates; sensitivity; audit trail and workflow information that shows how records and information were tracked and actioned.

7.2. A record is any information and/or data that has been created, received or utilised, which provides evidence of any decisions made or any action taken.

This includes information in the form of a document or other types of digital or analogue information such as, a collection of data or other types of information created, captured and managed, in carrying out the operation of CET.

It is the context around the data and information that gives rise to its authenticity as a record, contextual metadata forms part of that record.

Records can be:

7.2.1. “Born digital” e.g. email, electronic document, application, image, video, audio recording.

7.2.2. “Physical source records” which means that they have a physical presence such as paper, folder, photograph, microfilm, USB drive, Compact Disc, etc.

7.2.3. Digitised Electronic Record - a digital copy of a physical source record (electronic format through scanning or other technologies).

7.3. Recordkeeping is the process of creating and capturing complete, accurate and reliable evidence of CET’s operations.

7.4. Recordkeeping Integrity - a record that is complete and unaltered. To maintain a records integrity, a record should be protected against unauthorised alteration. Any additions or annotation to the original record must be made in accordance with system processes.

7.5. Records management is the system utilised within CET to manage (preserve, control and dispose) of records in a way that meets legal, operational, business and long-term planning needs whilst simultaneously providing a high level of accountability, security, confidentiality, accessibility and meeting community expectations.

7.6. Definitions for all other key terms used in this document are included in the *CECT Terms and Definitions* available on the CET website.

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8. FURTHER INFORMATION AND ASSISTANCE

- 8.1.** For further information and assistance in relation to this Policy please contact Advisor:
Governance Policy and Research policy@catholic.tas.edu.au

9. REVIEW OF THIS POLICY

- 9.1.** This Policy will be reviewed every four years.
- 9.2.** Updated versions of this Policy will be available on the CET website and on request.

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The **Records Retention Schedule for Non-Government Schools** provides a schedule to enable regular, planned and authorised disposal of all records typically created by non-government schools.

This **Schedule is available in PDF and Excel formats from Hive**

WHAT IS A RECORD?



Records provide evidence of business activity.

Information created, sent and received while carrying out your job is potentially a record.

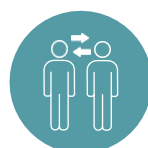
SOME COMMON RECORDS WE KEEP AT CET:

- Student enrolment data and documentation
- Student reports
- Student medical records
- Referrals to additional services (including allied health professionals)
- Extracurricular activities
- Applications for part-time attendance
- Communication with parents and/or carers.
- Funding applications
- Incident/accident/injury reports
- Complaints
- Course and Course outlines
- Awards, prizes and scholarships
- Payroll and employee records
- Recruitment and selection documentation
- Examination results
- School magazines/annuals
- CET Policies
- Strategic/business plans
- Legal agreements
- Authorisations / delegations
- Approved business cases
- Audits
- Capital projects

RECORDS CAN BE IN PAPER, ELECTRONIC OR MANY OTHER FORMATS

- Databases
- Documents
- Emails
- Letters
- Maps and plans
- Minutes
- Photographs
- Policy and briefing papers
- Samples and objects
- Social media
- Intranet/website
- Spreadsheets
- Research data
- Digital applications
- Text messages
- Transactional information in business systems
- CCTV recordings

WHY IS RECORD KEEPING SO IMPORTANT



Good recordkeeping: practices provides CET with accessible, trustworthy information that helps to enhance service delivery and improve decision making

Managing your information effectively makes your job easier and helps your colleagues. Regularly making records and keeping them in the right place makes it easier to:

- Locate information
- Reuse good work
- Determine the most recent version
- Produce evidence
- Protect yourself, students, employees and CET

WHAT ARE MY RECORDKEEPING RESPONSIBILITIES?

All employees, contractors, clergy, religious, workplace participants and volunteers have recordkeeping responsibilities. These include:

- Making work-related records
- Keeping records in your organisational recordkeeping system
- Ensuring you don't dispose of records without authorisation
- Complying with your organisational recordkeeping policies and guides.

WHEN SHOULD I MAKE OR KEEP A RECORD?

Some records – such as those in workflow or other business systems are automatically created for you. At other times, you must make a conscious decision to make or keep a record. Do so if you need to show:

- What happened, when it happened or who was involved
- What was decided or recommended and by whom
- What advice or instruction was given
- The order of events or decisions.

If you are not sure, ask yourself:

- Did I write, send, use or keep this in the course of my work?
- Am I (or is someone else) required to act on this?
- Will this information be needed in the future?

If you answer 'yes' to any of these questions, you should make or keep a record.

HOW SHOULD I TITLE OR NAME RECORDS?

Good titles and names make it easier to find the information you need. Find out if your school or area has guidelines to follow such as a file plan or naming convention. Some general tips for naming records include:

- Be meaningful – people should be able to understand what the record is about by reading the title
- Avoid vague terms like 'miscellaneous' or 'general'
- Provide details that distinguish between similar records – e.g. date, version or time
- Spell out abbreviations and acronyms

WHERE SHOULD I KEEP RECORDS?

Always keep records where your school or office need them to be kept, that is, in approved locations. If you keep records in systems or other approved locations, you don't have to worry about how long they need to be kept. Other people will look after them once they are in the right place. If your school is unsure of their approved locations for records please contact the CET ICT Team.

CAN I DELETE OR DESTROY RECORDS?

CET is currently subject to a records disposal freeze notice that does not expire until 2029. The effect of a disposal freeze notice is that no records are to be disposed without **first** seeking the approval of the TCEO. The retention or destruction of records is governed by legislation, and you must always seek approval by completing the 'CET Records Destruction Authorisation Form' when destroying or deleting records. The person destroying or deleting records must enter that information into the Register of Destroyed Records.

WHERE CAN I GET HELP OR MORE INFORMATION?

For specific information about recordkeeping policies or guides, contact Michelle Hack, Information Management Project Advisor via email michelle.hack@catholic.tas.edu.au.

Acknowledgements

This protocol is based on Office of the State Archivist 2020, Keep the Knowledge – Make a Record, OSA, viewed 5 September 2024, <https://www.osa.tas.gov.au/information-management-framework>. Keep the Knowledge – Make a Record is reproduced by agreement between the Office of the State Archivist and the National Archives of Australia. Text © Commonwealth of Australia 2002.