



VIC-EDU-P-004 Child Safety Recordkeeping Policy

1. Policy Scope

This Policy and the *VIC-EDU-P-033 Child Safety Recordkeeping Procedure* applies to all school staff and, where indicated in the Policy, to relevant Volunteers and Contractors.

This policy and its procedure should be read in conjunction with the *VIC-EDU-P-001 Child Safety and Wellbeing Policy*.

2. Policy Outline

Context

Our values of respect, hope, justice, compassion, and collaboration inform the quality of relationships we establish and all that we do to ensure our learning community is a place of welcome and safety. MacKillop Education celebrates diversity, and we are committed to inclusion, so that every student, regardless of race, religion, culture, gender identity or personal circumstances, including barriers to learning, can access education and experience success.

Our model, Reframing Learning and Teaching Environments (ReLATE), supports our trauma-informed practice and highlights the critical partnership between students, guardians, and staff, as we work together, to enhance the learning outcomes for every child.

Purpose

The purpose of this Policy is to ensure that all MacKillop Education records relating to child safety and wellbeing are created, maintained and disposed of in accordance with Public Record Office Victoria Recordkeeping Standards, including minimum retention periods.

Policy statement

MacKillop Education will ensure that:

- Full and accurate records of school activities and decisions relating to Child Safety and Wellbeing are created and kept according to legislative requirements.
- 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 and disposal*.
- Child Safety and Wellbeing Records are stored in secure physical locations and/or electronic 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 minimum required retention period*.

*As of July 2019, there is a 'freeze' on destroying records relating to child safety, health and wellbeing in schools and early childhood programs, until further notice.

Definitions

Refer to the *VIC-EDU-P-001 Child Safety and Wellbeing Policy* for definitions of key Child Safety terms.

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 but is not limited to: <ul style="list-style-type: none"> ▪ 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
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3. Procedures

Records of Child Safety Incidents or Concerns and MacKillop Education’s Response

Where a school staff member or volunteer ‘forms a reasonable belief’ that a student needs protection due to suspected or alleged:

- Child abuse, including sexual & grooming offences, physical violence, serious emotional or psychological harm, serious neglect
- Student sexual offending, including if a student needs therapeutic treatment for sexually abusive behaviour,

they must gather and record supporting information. Reference should be made to the *PROTECT: Responding to Suspected Child Abuse: A Template for all Victorian Schools* to ensure that all required information is recorded.

The information recorded should include the following:

- details of the concerns and the reasons for those concerns
- the author’s involvement with the child or young person
- details of any other agencies which may be involved with the child or young person.

If a Mandatory or Non-Mandatory Report is made to DFFH Child Protection or Victoria Police, this must be recorded as an incident in Family Journey. A MacKillop Education Leader will check the Family Journey Incident report and will complete the Manager Response section of the incident report. The reference number of the Family Journey incident report should be recorded as a case note in the students file in Synergetic.

Any information initially recorded on the *PROTECT: Responding to Suspected Child Abuse: A Template for all Victorian Schools*, the incident report in Family Journey and any additional information provided to either Victoria Police or DFFH Child Protection are to be stored securely by MacKillop Education.

For more detailed information about responding to child safety concerns, including informing school leaders and making external reports, refer to the *VIC-EDU-P-003 Child Safety Responding and Reporting Obligations Policy and Procedure*.

Complaints

RiskMan is the official system used by MacKillop Family Services for recording and managing complaints, including complaints in relation to Child Safety and Wellbeing. The MacKillop Complaints Officer ensures that accurate records of the complaints handling process are maintained. They are also responsible for monitoring and analysing complaints data to ensure continuous service improvements.

Records of Working with Children Check Documentation

MacKillop Family Services' (MacKillop's) Human Resources team maintain an electronic register of Working with Children Checks (WWCC) for all staff members and relevant MacKillop contractors. Teachers who have current registration with the Victorian Institute of Teaching are exempt from a WWCC.

MacKillop's WWCC register includes:

- full name
- date of birth
- WWCC Application Receipt Number
- WWCC Card Number
- date and outcome of WWCC clearance verification
- WWCC expiry date

MacKillop's Human Resources team maintain a record of any WWCC notifications provided by the school staff member or MacKillop contractors.

Each Campus Principal and Program Leader maintains a register of WWCC for all other adults engaged in child-related work and for adults engaged in child-connected work, as required by the WWCC Policy.

The register includes:

- Full name
- WWCC Card Number
- WWCC expiry date
- Date and outcome of WWCC clearance verification

For further information regarding WWCC refer to the *VIC-EDU-P-032 Working with Children Check Policy*.

Records of Teacher Registration and VIT notifications

MacKillop's Human Resources team maintain an electronic register of the registration status of all teachers at MacKillop Education.

The register includes:

- each teacher's full name
- each teacher's registration number
- the VIT category of registration
- the expiry and renewal date of the teacher's registration

MacKillop keeps a record of the date and type of any notifications made to the Victorian Institute of Teaching (VIT) by the School about a registered teacher.

For information about notifications to VIT, refer to the *VIC-EDU-P-003 Child Safety Responding and Reporting Policy and Procedure* and the *VIC-EDU-P-007 Reportable Conduct Policy*.

Reportable Conduct Records

When a reportable conduct allegation is made, an incident report must be created in Family Journey. All documents associated with the reportable conduct allegation and its investigation must be uploaded to Family Journey. This includes:

- the details of the allegation
- MacKillop Education’s initial response to the person making the allegation, the alleged victim(s) and the employee who is the subject of the allegation
- any communication with the Police, Melbourne Archdiocese of Catholic Schools, Victorian Institute of Teaching or other authorities
- the Investigation Plan, detailing how the investigation is to be carried out
- the Stage One risk assessment
- all interviews, including details of questions and responses. Details should also include the location of the interview, who was present and start and finish times
- any decisions made, both during and at the conclusion of the investigation, including their rationale, the position and name of the person making the decision and the date the decision was made
- any personal contact, discussions or emails with anyone about the matter (including dates, details of discussions, questions, advice, outcomes, the name of the person making the contact, details of their position and, where appropriate, the reason for the contact)
- the Investigation Report
- the final report for the Commission for Children and Young People (CCYP) that sets out details of the findings in relation to each allegation and the reasons for the findings, the final risk assessment which includes any final decision about the employee and the factors that have been considered and any subsequent action that is to be or has been taken.

For information about the Reportable Conduct Scheme, refer to the *VIC-EDU-P-007 Reportable Conduct Policy* and the *VIC-EDU-P-003 Child Safety Responding and Reporting Obligations Policy and Procedure*.

Child Safety Human Resources Management Records

MacKillop’s Human Resources team store the following records for staff engaged by MacKillop Education, in Aurion:

- recruitment, screening and suitability assessment (including transcripts of qualifications, written applications, interview notes, referee checks)
- supervision, work development plans, performance reviews
- personnel files.

MacKillop Education keeps a record of professional learning activities provided to staff including Child Safety training activities.

For information about the MFS Human Resources procedures, refer to the *HR-P-001 Recruitment Selection and Appointment of Employees*, *HR-P-036 Supervision*, *HR-P-016 Managing for Growth and Change Procedures*.

Recordkeeping about Information Sharing

MacKillop Education is a prescribed Information Sharing Entity (ISE). This means that, where legislated requirements are met, it can share confidential information with other ISEs to promote child wellbeing or safety under the Child Information Sharing Scheme (CISS) or Family Violence Information Sharing Scheme (FVISS).

MacKillop Education must record the following information when sharing, or responding to a request to share, information about the safety, welfare and wellbeing of a student at MacKillop Education:

- who requested the Information and the date of the request (if any)
- who shared the Information

- why the Information was shared (e.g. whether it was shared pursuant to a statutory or other legal obligation)
- who the Information was shared with
- whether informed consent was sought from, and if so whether it was provided by, the student and/or their parent/carer
- the approval of the MacKillop Privacy Officer to share the Information
- the date that the Information was shared.

For more information, refer to *PR-P-005 Information Sharing – Family Violence and Child Information Sharing Schemes (Victoria)*. This documents the procedures to be followed when requests for sharing information:

- are received from other Information Sharing Entity (ISE) and Risk Assessment Entity (RAE), or
- voluntarily initiated with other ISE and RAE's by relevant MacKillop staff.

Child Safety Risk Register

The Child Safety Risk Register documents the risks relating to child safety and wellbeing and the risk controls to prevent and mitigate these risks.

The risk register is maintained in RiskMan by MacKillop's, Manager Risk and Compliance, and will be reviewed annually.

Documentation of Child Safety Induction and Training for School staff, Contractors and Volunteers

All school staff, contractors, and volunteers where appropriate to the nature and responsibilities of their role, will receive training regarding their recordkeeping obligations in respect to Child Safety and Wellbeing Records. This training will be provided as part of the induction process and then repeated annually.

When providing training and information to school staff, contractors and volunteers regarding their recordkeeping obligations with respect to Child Safety and Wellbeing Records, school staff, contractors and volunteers are made aware that they must not:

- destroy, delete or alter Child Safety and Wellbeing Records without authorisation of the Campus Principal or Program Leader
- 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
- remove Child Safety and Wellbeing Records from school premises without authorisation of the Campus Principal or Program Leader.

MacKillop Education keeps a record of staff professional learning and a register of MacKillop Education Child Safety training activities.

MacKillop Education staff, contractors, and volunteers where appropriate to the nature and responsibilities of their role, will receive guidance on their information sharing obligations as outlined in *PR-P-005 Information Sharing – Family Violence and Child Information Sharing Schemes (Victoria)*.

The MacKillop Education Induction Procedures provide the details of this recordkeeping training.

Notes regarding Child Safety and Wellbeing Records:

- As of July 2019, there is a 'freeze' on destroying records relating to child safety, health and wellbeing in schools and early childhood programs, until further notice.
- Records must only be disposed of with written approval of the school's principal, after the minimum retention period has been met. (Note: short-term information created through normal administrative practice can be destroyed without needing the written approval of the principal).

4. Responsibilities

Compliance, monitoring and review

Retention and Disposal of records

MacKillop will retain information in accordance with legal obligations. The retention schedule is outlined in *PR-P-006 Privacy and Confidentiality of Information*.

Breach of Child Safeguarding Record Keeping Policies and Procedures

MacKillop Education enforces this Policy and its Procedures. In the event of any non-compliance, we will instigate a review, in a timely and fair manner, that may result in a range of measures including (depending on the severity of the breach):

- remedial education
- counselling
- increased supervision
- the restriction of duties
- suspension
- in the case of serious breaches, termination of employment, contract or engagement.

Policy review

A review of the *VIC-EDU-P-004 Child Safety Recordkeeping Policy* conducted every two years or earlier if required, such as due to changes in legislation.

5. Related legislation, policy, guidelines and resources

MacKillop Education and MacKillop Family Services Policies and Procedures

HR-P-001 Recruitment Selection and Appointment of Employees

HR-P-016 Managing for Growth and Change Procedures

HR-P-036 Supervision

PR-P-005 Information Sharing – Family Violence and Child Information Sharing Schemes (Victoria)

PR-P-006 Privacy and Confidentiality of Information

VIC-EDU-P-001 Child Safety and Wellbeing Policy

VIC-EDU-P-003 Child Safety Responding and Reporting Obligations Policy and Procedure

VIC-EDU-P-007 Reportable Conduct Policy

VIC-EDU-P-032 Working with Children Check Policy

VIC-EDU-P-033 Child Safety Recordkeeping Procedure

Legislation

Ministerial Order 1359

Worker Screening Act 2020 (Vic)

Education and Training Reform Act 2006 (Vic)

Wrongs Act 1958 (Vic)

Resources

PROTECT: Responding to Suspected Child Abuse: A Template for all Victorian Schools.

6. Approval and Review Details

Approval and Review	Details
Approval Authority	Group Director, The MacKillop Institute and MacKillop Education
Approval Date	22 May 2023
Advisory Committee to Approval Authority	MacKillop Education Leadership Team
Next Review Date	1 May 2025
Version	1