

DATA MANAGEMENT POLICY

Records and information management

Proprietor	Global Village Learning Ltd (ABN 52 090 773 470)
School	Global Village Learning, New Gisborne Campus
Policy owner	Board of Directors
Responsible officer	Principal, with Campus Lead for day-to-day implementation
Date adopted	11 June 2021 (reviewed March 2026)
Review cycle	Every two years
Next review	March 2028
Regulatory context	Public Records Act 1973 (Vic); Privacy Act 1988 (Cth) and Australian Privacy Principles; Privacy and Data Protection Act 2014 (Vic); Ministerial Order No. 1359 (clause 11 - records management); Education and Training Reform Act 2006 (Vic); ISO 15489 Information and documentation - Records management

1. Purpose

The purpose of this Policy is to establish the framework needed for effective records creation, updating and management at Global Village Learning (GVL). This Policy provides guidance to employees on the creation, updating and use of GVL records, and sets minimum standards for classifying, managing and storing those records. It therefore provides a consistent framework for the management of GVL information.

GVL holds a substantial volume of records relating to its teaching, young people, staff, finances, child safety and other activities. In order to efficiently conduct its business, the update, storage, retrieval and management of this information is a significant governance responsibility.

A good recordkeeping program is fundamental to GVL's commitment to administrative transparency and accountability. It enables GVL to verify decisions and actions by providing essential evidence in the form of records, and ensures the preservation of the collective memory of GVL. This Policy seeks to ensure that GVL's business is adequately documented through the creation and maintenance of records that are then managed in accordance with better practice.

2. Scope

This Policy is applicable to all areas of GVL. It is intended to comply with relevant Victorian and Commonwealth legislation. The Policy establishes a framework for the control and management of records throughout GVL from their creation to their ultimate disposal or retention as school archives.

For the purposes of this Policy, records comprise information in any format, including hard copy and electronic files, emails, data in computer systems, bound volumes, maps, plans, books, registers, forms, photographs, microfilm and microfiche.

Staff should be aware that electronic documents have the same status as paper documents. Both electronic and paper documents are bound by the same legislative requirements and are subject to the same degree of confidentiality and care. Electronic records must be managed as part of a comprehensive recordkeeping program.

3. Definitions

- Appraisal: the process of evaluating business activities to determine which records need to be captured and how long the records need to be kept, to meet business needs, the requirements of organisational accountability and community expectations.
- Archive: the whole body of records of continuing value of an organisation or individual. Sometimes called 'corporate memory'.
- Archives: those records that are appraised as having continuing value.
- Business activity: umbrella term covering all the functions, processes, activities and transactions of an organisation and its employees.
- Capture: an action which results in the registration of a record into a recordkeeping system.
- Disposal: a range of processes associated with implementing appraisal decisions. These include the retention, deletion or destruction of records. They may also include the migration or transmission of records between recordkeeping systems, and the transfer of custody or ownership of records.
- Disposal Schedule: a systematic listing of records showing those records which have permanent value and those which can be destroyed after the period specified.
- Electronic records: records communicated and maintained by means of electronic equipment.
- Evidence: information that tends to prove a fact.
- Information systems: organised collections of hardware, software, supplies, policies, procedures and people, which store, process and provide access to information.
- Non-current records: records which are no longer required for current business but are required to be retained for the minimum period prescribed by disposal schedules.
- Recordkeeping: making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.
- Recordkeeping systems: information systems which capture, maintain and provide access to records over time.
- Records: information in any form, including data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.
- Vital records: those records that are essential for the ongoing business of GVL, and without which GVL could not continue to function effectively.

4. Legislative framework and standards

4.1 Legislation

GVL complies with the following key legislative instruments:

- Public Records Act 1973 (Vic)
- Privacy Act 1988 (Cth), including the Australian Privacy Principles
- Privacy and Data Protection Act 2014 (Vic)
- Ministerial Order No. 1359, in particular the recordkeeping requirements under clause 11
- Education and Training Reform Act 2006 (Vic) and associated regulations.

4.2 Standards

The relevant international standard on records management is ISO 15489 Information and documentation – Records management, adopted by Standards Australia. GVL's

recordkeeping practices are informed by this standard and by the Public Record Office Victoria (PROV) recordkeeping standards to the extent they apply to non-government schools.

5. Roles and responsibilities

5.1 Principal

The Principal has ultimate responsibility to ensure that GVL complies with the legislation and standards specified in section 4 of this Policy.

5.2 Campus Lead

The Campus Lead is responsible for the day-to-day implementation of this Policy at the New Gisborne Campus, including the operational recordkeeping practices that support it, staff awareness, and liaison with the Executive Director on significant recordkeeping matters.

5.3 Board of Directors

The Board endorses this Policy, ensures adequate resources are provided for its implementation, and reviews the Policy at the scheduled review date.

5.4 All staff

Recordkeeping is not the province of systems administrators alone. It is an essential role of all employees. Every member of staff is responsible for making and updating such records as may be necessary to fully and accurately record the functions, activities, transactions, operations, policies, decisions, procedures, affairs, administration and management of GVL. Staff are to follow authorised procedures in carrying out records management functions, and must observe security, privacy and confidentiality requirements at all times. Records should be handled sensibly and with care and respect so as to avoid damage to the records and prolong their life-span.

Staff must create full and accurate records of all school functions and activities, including registers and records relating to:

- school governance
- operations
- the handling of incidents, complaints and investigations
- young person management
- child safety.

6. Creation of records

All staff are required to create full and accurate records which adequately document the business activities in which they take part.

Records should be full and accurate to the extent necessary to:

- facilitate action by employees, at any level, and by their successors
- make possible a proper scrutiny of the conduct of business by anyone authorised to undertake such scrutiny
- protect the financial, legal and other rights of the organisation, its clients and any other people affected by its actions and decisions.

7. Child safety records

In accordance with Ministerial Order No. 1359 clause 11, GVL maintains records of child safety matters including complaints, concerns, incidents, investigations, and outcomes. Child safety records include, but are not limited to:

- the Child Safety Risk Register and its review records

- records of complaints made under the Complaints and Grievance Policy, including those relating to child abuse or child harm
- records of reports made to external authorities such as Victoria Police, the Department of Families, Fairness and Housing, or the Commission for Children and Young People
- records of actions taken under the PROTECT Four Critical Actions and the Child Safety Responding and Reporting Obligations Policy and Procedures
- records of staff and volunteer Working with Children Checks and suitability verifications
- records of child safety induction, training and refresher programs undertaken by staff, volunteers and members of the governing authority
- records of school board endorsement of child safety policies, procedures and the Child Safety Code of Conduct.

Child safety records are stored securely, retained for the minimum periods required by law, and are accessible to authorised persons including regulators such as the VRQA and the Commission for Children and Young People.

8. Control of records and security

Records must be made accessible to authorised users. School staff undertaking the normal course of their duties must have access to relevant GVL records. Personal information about staff and young people must be secured within all levels of GVL records.

Access to sensitive records is managed on a need-to-know basis, consistent with the Australian Privacy Principles and GVL's child safety obligations. Records containing personal information are not disclosed outside GVL except as authorised by law, by this Policy, or by the individual to whom the information relates.

9. Storage

All records, both current and non-current, must be stored in such a way that they can be accessed and retrieved upon demand. When determining appropriate storage for non-current records, due consideration must be given to the protection afforded by the storage area, sensitivity of the records, retention period and access rate.

Records should be stored in conditions that are clean and secure, with low risk of damage from fire, water, dampness, mould, insects and rodents. They should also be kept away from direct sunlight and other sources of light and heat. The storage area should be well ventilated and ideally maintained at a stable temperature and humidity.

Records in non-paper formats such as photographs, maps or computer disks require specialised storage conditions and handling processes that take account of their specific physical and chemical properties. Irrespective of format, records of continuing value require higher quality storage and handling to preserve them for as long as that value exists.

10. Disposal and destruction of records

Staff may only destroy or dispose of records in accordance with a documented retention and disposal schedule, or in accordance with Normal Administrative Practice for transitory records (for example, reference copies and routine working drafts that have no ongoing value).

The Retention and Disposal Schedule provides a listing of routine administration, personnel, accounting, young person and property records across GVL. It complies with Victorian legislation and should be accepted as the minimum retention period for records.

Child safety records are retained for the minimum periods required by law. In particular, records created in connection with a reportable conduct matter or an allegation of child abuse are retained for at least 45 years from the date of the record. Where records are scheduled for destruction, this is undertaken by methods appropriate to the confidentiality status of the records. All GVL records approved and eligible for destruction are destroyed under confidential conditions, unless the material is widely published. If staff are uncertain of the status of a record, it is to be treated as confidential and destroyed under confidential conditions.

Confidential records are destroyed as follows:

- paper records: by shredding or placement in secure destruction bins. They must never be placed in unsecured bins or rubbish tips.
- magnetic media: destroyed by reformatting at least once, with backup copies also destroyed. Deleting files alone is not sufficient.
- optical and solid-state media: destroyed by cutting, crushing or other physical means that render the data unrecoverable.

11. Privacy and information sharing

GVL collects, uses and discloses personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth). Personal information about young people and families is collected, held and used only for purposes directly related to the young person's education, safety and wellbeing, or as required by law.

Staff must not access, use or disclose personal information held by GVL for any purpose other than a legitimate work purpose. Information sharing with external authorities is undertaken in accordance with the Child Information Sharing Scheme (CISS), the Family Violence Information Sharing Scheme (FVISS), and other applicable law.

12. Audit and review

All record systems may be subject to audit and review to ensure compliance with legislative requirements and with the requirements of this Policy.

Responsibility for monitoring implementation and compliance rests with the Principal and the School Board. As employers, the Principal and School Board have the direct responsibility for ensuring the Policy objectives are fulfilled and that the necessary resources are provided to achieve effective implementation.

13. Related policies

- Child Safety and Wellbeing Policy
- Child Safety Code of Conduct
- Child Safety Responding and Reporting Obligations Policy and Procedures
- Complaints and Grievance Policy
- Digital Learning Policy
- Volunteer Policy
- Visitor Policy
- Procurement Policy.

Endorsement

Endorsement by Board	March 2026
Review date	March 2026
Next review date	March 2028