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General Records Management Policy (Privacy Act)

Why We Keep Records

Caroline Chisholm Catholic College is required to keep certain records in accordance with its legal and contractual obligations. Records may be required to be kept for the College's administrative purposes.

There are various legislative regimes in Australia which prescribe specific timeframes for document and record retention and destruction.

This policy addresses the legal requirements which apply to the records of School's staff, students, parents, volunteers, donors and visitors (former and current).

This policy does not address legal requirements which may apply to Caroline Chisholm Catholic College's financial, administrative, employment or occupational health and safety records, unless those records contain personal information.

Caroline Chisholm Catholic College needs to balance its requirements to retain documents in accordance with applicable legal requirements and destroy them when they are no longer required for any legitimate business purpose.

This policy identifies the minimum amount of time for which Caroline Chisholm Catholic College has determined it will retain its records.

Our Policy

Caroline Chisholm Catholic College is committed to ensuring that all records are managed in an efficient, systematic and transparent way.

It is our policy that records are:

- kept up to date;
- indexed in a logical manner that facilitates easy location, retrieval and association of related information; and
- preserved in a suitable physical or digital environment that ensures records are not subject to degradation, loss, alteration or corruption.

This policy is made available to the College through Caroline Chisholm Catholic College's public website.

What Records Are Retained?

This policy provides a high level overview of the different categories of records the College may retain and focuses on the retention of records which contain personal information. Records and personal information are terms defined by the Privacy Act 1988 (the Privacy Act).

Records containing personal information, in particular sensitive information, will be retained as a matter of good risk management practice. These may include records of accidents, reportable conduct under child protection laws, litigious history, student/staff complaints or critical incident reports.

Storage Period: General Personal Information

Caroline Chisholm Catholic College has determined that we need to store personal information until it is determined that it is no longer needed.

Storage Period: Enrolment and Attendance Records

Student enrolment and attendance records must be retained in accordance with any retention period prescribed by legislation or regulation. Refer to:

[Enrolment Compliance Policy](#) and [Student Attendance Policy](#).

Workers' Responsibilities

Caroline Chisholm Catholic College's *administration department* is responsible for administering this policy and managing the archiving and security of Caroline Chisholm Catholic College's records in accordance with this policy.

All staff must be aware of their obligations to:

- make and keep full and accurate records of their activities and their students' activities;
- ensure that these records are incorporated into Caroline Chisholm Catholic College's records management systems; and
- comply with all records management procedures.

How We Keep Records

Caroline Chisholm Catholic College has **a range of resources available to it for** the management of records. These include:

- digital storage facilities for electronic records; and/or
- physical storage facilities for paper/print records.

All digitally stored records are backed-up securely.

Digital storage is the preferred format for record storage and retrieval. The following records must be stored electronically:

- **Outgoing correspondence**
- **Student enrollment information**

For all other records, it is Caroline Chisholm Catholic College's policy that if the records are in hard copy, those records will transition from hard copy to digital format in accordance with a transition plan.

This policy does not differentiate between the period of retention required for paper/print records and digital records.

Where We Keep Records

Records are stored digitally at:

- **the College**

Records are stored at:

- **On College property, in a number of secure archival locations.**

Personal information is collected, stored and disposed of in accordance with our **Privacy Policy**.

Our Privacy Program - Principle 8: Cross Border Disclosure of Personal Information

Principle 8 of the Australian Privacy Principles requires that if personal information is disclosed to an overseas recipient (such as a cloud-based service provider or when we are arranging an overseas excursion), we must take reasonable steps to ensure that the overseas recipient does not breach the APPs otherwise we will be legally accountable if the overseas recipient mishandles the personal information.

This is because the overseas recipient assumes responsibility for hosting the personal information.

Caroline Chisholm Catholic College ensures that the cloud service provider agrees in contract to comply with the APPs or that the cloud service provider is subject to the laws of a country that has substantially similar privacy protections as the APPs.

Our Privacy Program -

Personal information is collected, stored and disposed of in accordance with our **Privacy Policy**.

Principle 11: Security of Personal Information

Principle 11 of the Australian Privacy Principles requires that personal information must be:

- protected from misuse, interference and loss, and from unauthorised access, modification or disclosure; and
- destroyed or de-identified when Caroline Chisholm Catholic College no longer needs it, except if the personal information is required to be retained under an Australian law, or a court/tribunal order.

Caroline Chisholm Catholic College considers each type of record individually when assessing if it is still needed or not.

Legal Proceedings

Caroline Chisholm Catholic College recognises that it is an offence to destroy or interfere with any document that is reasonably likely to be required in evidence in a legal proceeding.

'Reasonably likely' is not a defined expression. Each category of record needs to be assessed individually. However, as an example, documents that record sexual or physical abuse of students at the College should be retained, as it is reasonably likely that these records will be required either for investigatory or legal proceedings.

Destruction also includes rendering illegible, making undecipherable or otherwise making incapable of identification.

The College maintains a Register of Records Destroyed for the purposes of any future legal proceedings.

Amendments

From time to time, the Canonical Administrators or the Principal will determine that certain records will be kept for different periods of time. This policy will be updated to reflect those determinations.

Destruction of Records

If Caroline Chisholm Catholic College determines that records are no longer needed, any copies that have been archived or held as back-ups will be destroyed or the personal information de-identified. Personal information that has been de-identified is no longer personal information.

Records will be disposed of in an appropriate manner and in accordance with our **Document Security Policy**.

Only the Canonical Administrators or the Principal can authorise the destruction of College records as inappropriate or premature destruction of records may have ramifications for the College in any future legal proceedings or official inquiries.

The College maintains a Register of Records Destroyed in the Office of the Principal.

Before a document or record is destroyed, it will be entered into the Register with the following information:

- the title of the record;
- a description of the record;
- inclusive dates;
- destruction method; and
- the party who has authorised the destruction (usually the Principal's signature).

Implementation

This policy is implemented through a program of:

- staff training;
- effective communication and incident notification procedures; and

- initiation of corrective actions where necessary.

This policy is also updated from time to time by the Canonical Administrators and College Leadership Team.

Queries

If you are in doubt about the application of this policy, you should check with the Principal.

Related Documents

[Privacy Policy](#)

[Document Security Policy](#)