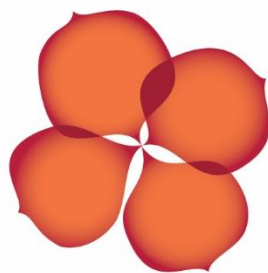


POLICY

Records Management Policy



NT
CHRISTIAN
SCHOOLS

DOCUMENT INFORMATION

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Policy
Feedback



AMENDMENT HISTORY

Version	Date	Changes Made
1.0	06/2025	Need identified to assist operational requirements and meeting registration and legislative requirements.Ratified by Board circular resolution.

1 Preamble

NT Christian Schools is an organisation that exists to advance the Christian religion through the provision of high-quality education and training services and religious instruction. A holistic and relational approach to learning for each individual student, underpinned by a biblical world view provides an education for the whole person, for the whole of life.

We believe that the Christian faith is a life-transforming faith that will be authentically evidenced in a believer's actions. The bible exhorts us to pursue godliness and to model biblical standards of behaviour. Everything we do, our practices, our conduct, our use and stewardship of resources is an act of worship to God and a witness to those around us.

All members of the NT Christian Schools community are to be committed to ensuring a safe and caring environment for students, staff and the whole community in a manner that is consistent with the Christian ethos and beliefs of NT Christian Schools.

Employees are fully supported by NT Christian Schools to meet compliance with these documents.

NT Christian Schools is committed to achieving and maintaining workable solutions for our organisation.

We may make changes to this policy from time to time to improve the effectiveness of organisational operation or to meet legislative requirements. Notification of changes will be communicated to those a policy applies to, and it is their responsibility to read updated policies and relevant related documents as soon as reasonably practical. Any NT Christian Schools stakeholder who wishes to provide feedback about this policy may forward their suggestions to the policy monitor or policy@ntchristianschools.com.au.

2 Purpose

As an organisation NT Christian Schools has responsibility for managing significant quantities of records containing information about students, staff, volunteers and contractors along with business transactions. This policy recognises the complexity and necessities related to managing information and data acquired and generated in the daily operations of NT Christian Schools. The policy will assist schools and education and care services governed by NT Christian Schools to:

- correctly and efficiently manage, create, maintain, store and dispose of information and data records;
- obtain and retain quality information with consistency;
- comply with legal and regulatory obligations;
- mitigate risk by assisting with protection from misuse, loss and unauthorised disclosure of records.

Correct management and archiving of records will support and contribute to the overall effective governance and operation of the organisation and its entities and contribute to practices supporting NT Christian Schools to provide child safe environments.

3 Policy applies to

This applies to all information and data records created, received or maintained by the staff, volunteers and Board of Directors of NT Christian Schools and its associated entities in the course of carryout its functions.

The policy is available to all staff and Board members via the NT Christian Schools *Policy and Advisory Library* and on request from any office of NT Christian Schools as required.

4 Policy

Records are defined as all documents and data received, collected, created and recorded, either in digital or hard copy format that facilitate the business carried out by all entities of NT Christian Schools and which provide evidence of its decisions, transactions, activities, and the activities and actions of stakeholders. Records may be information in any of the following digital or hardcopy forms (but not limited to):

- Written communications (including emails and SMS) minutes and meeting notes, reports, contracts and agreements and documents;
- Curriculum related plans and assessment;
- Maps, plans, diagrams and graphs, drawings, photographs, pictorial or graphic work, video and sound recordings;
- Event planning and decision-making processes and determinations;
- Anything on where there are figures, symbols or marks having a meaning for persons qualified to interpret them.

Many records retain personal information; therefore, all reasonable steps must be taken to protect that information from misuse, modification, unauthorised disclosure through:

- good governance (including policy and procedures), culture and training regarding record keeping,
- strong ICT and access securities to personal information and Record Management Systems (RMS), including digital cloud-based systems,
- methods to mitigate and respond to data breaches¹,
- timely and irretrievable disposal of records, including backups,
- regular monitoring of, and reporting to the operation of RMS.²

This policy interacts closely with NT Christian Schools Privacy Protections Policy.

Records of all categories may be permanent or temporary. A temporary record must be retained for a certain period of time before being destroyed (which may require prior written approval). Permanent records must be archived (stored) forever as they have historical value or to meet legislative requirements.

All entities of NT Christian Schools must create and manage new records in digital formats, whenever practicable avoiding creating and managing records in hardcopy.

NT Christian Schools is committed to ensuring that records are:

¹ Refer to NT Christian Schools' Privacy Protections Policy and Responding to Privacy Data Breach Procedures.

² Summarised from: Office of the Information Commissioner, *Australian Privacy Principles guidelines*.

- accurate, complete and reliable,
- are usable and can be accessed and retrieved with efficiency,
- provide evidence of accountability and transparency,
- meet legal compliance and relevant standards,
- are protected, and when retention requirements are met, destroyed.

NT Christian Schools will provide the schools, education and care and training services it operates with suitable secure and usable RMS that support the needs of the entity to fulfill its record management requirements for maintaining, storing and easily retrieving required records, and means to appropriately dispose of hardcopy and digital records.

- Hardcopy files are to be stored in safe, secure locations, as reasonably practicable protected from fire, water and pest damage.
- Permanent records and those with long retention requirements must be stored in conditions that ensure their long-term integrity and preservation.
- Digital files are to be stored in RMS determined suitable and provided by NT Christian Schools IT Manager.

Protocols for using system wide subscribed RMS will be documented and communicated to allow staff to perform their roles and responsibilities in maintaining appropriate records regarding:

- Students and children enrolled in schools or programs of NT Christian Schools;
- Student learning, education and activities programs;
- Business and financial operations (Corporate record);
- Governance;
- Handling of incidents, complaints and investigations, including the determinations, management of resolutions and reporting to authorities³;
- Staff and those seeking employment with any entity of NT Christian Schools;
- Volunteers and community engagement.

All entities of NT Christian Schools will develop and document clear file management mapping and protocols for their local and online file share drives. This will include:

- drive mapping and content guides,
- file naming protocols,
- access security layering,
- management strategies that support the needs of stakeholders,
- archiving and destruction strategies that abides by this policy and the NT Christian Schools Record Retention Framework,
- custodian (individual or department) responsible for oversight of file management in each area.

All staff are required to actively participate in supporting their workplace to meet record management requirements by following policy and processes determined by NT Christian Schools and the campus; and respecting and protecting the privacy of the records they handle.

Feedback to help guide ongoing improvement of processes is invaluable.

³ Non-Government Schools Registration Standards, std 2.10

Any breaches of privacy protections must be reported, investigated and addressed in accordance with Privacy Protection Policy.

Line Managers are to ensure their staff teams receive appropriate induction and ongoing training to RMS to support them to perform the duties and responsibilities of their role and meet policy compliance.

Early Learning Centre (ELC) Approved Provider is responsible for ensuring compliance with record keeping requirements in accordance with Education and Care Services National law and National Regulations are met. To maintain approval for Child Care Subsidy, providers must also keep certain records in accordance with Family Assistance Law. Refer to *NT Christian Schools' ELC Required Records Framework*.

If any entity of NT Christian Schools closes, all records with retention requirements must be transferred into the custody of the Chief Executive Officer. If NT Christian Schools ceases to operate, the Board will follow direction from the Department of Education and Training NT – Registrar of Non-Government Schools and NT Information Commissioner to determine new custodian of records with retention requirements.

4.1 School and Education and Care Services Records

Schools and Education and Care services governed by NT Christian Schools will maintain records capturing the required information regarding students and children enrolled with them. The records include the following information⁴:

- Child/student name,
- child/student's residential address,
- child/student's age and DOB,
- child/student's unique pupil number given by the governing body,
- the name and contact details of a parent of the child/student,
- the date the child/student was enrolled at the school,
- the name of the person who enrolled the child/student at the school or program,
- the child/student's level of education when they were enrolled at the school/program,
- the name and address of the last school/program at which the child/student was enrolled,
- the child/student's attendance at the school/program and engagement with any events, excursions or extra-curricular activities,
- welfare and behaviour observations, interventions and outcomes,
- the child/student's educational performance including a comparison with any national standards of education that are the subject of intergovernmental agreement to which the school/program is a party,
- any known medical conditions or allergies suffered by the child/student and any medications taken by the child/student,
- the child/student's immunisation record,
- any injuries or illnesses suffered by the child/student at the school/program and notes related to handling of incidents, complaints and investigations.

Refer to *NT Christian Schools' ELC Required Records Framework* for detailed list.

⁴ Education Regulations

4.2 Governance, Finance and Corporate Operations Records

Governance, Finance and Corporate Operations records will provide accountability and transparency to:

- decision making,
- daily operations,
- compliance with all areas of legislation relevant to the operations of NT Christian Schools,
- incidents and complaints investigations, determinations and reporting,
- all financial transactions and asset management,
- third party contracts including determination methods, evaluation and selection,

4.3 Human Resources Records

NT Christian Schools will keep records for all staff in accordance with Fair Work requirements⁵ and those determined by legislation and awards relevant to employee roles.

Human Resources records have to be:

- true and correct, and not changed except to correct an error,
- kept up to date,
- readily accessible to those with appropriate authority to interact with them, and the employee,
- legible,
- secure with privacy protection in place.

4.4 Providing Copy of Records to Third Parties

Please refer to the Privacy Protections Policy for additional information regarding sharing records.

Where a third party such as a legal firm or historical records (such as for students not currently, but who previously attending a school of NT Christian Schools) are requested, the request is to be communicated to the Director of Business Services who will advise if the request will be met and any additional requirements that are required before copies of the records can be provided. The Director of Business Services may seek legal advice in regard to the request.

It must be recorded on the file which records or information has been provided to third parties including:

- a copy of the request,
- any related communications,
- any legal advice provided,
- which records / information was provided,
- date and format records where provided (ie digital scan / photocopy).

4.5 Record Retention

All records have a required lifespan that is determined by various legislations and Australian

⁵ [Record-keeping - Fair Work Ombudsman](#)

standards. The *NT Christian Schools Record Retention Framework* provides a detailed determination of how long all entities of NT Christian Schools must retain their various categories of records for.

Some records may be considered permanent, meaning they must be retained permanently. Others with a defined retention period are considered to be temporary records.

The *Record Retention Framework* presents the required minimum period for retention and is calculated after a trigger event such as 'destroy after X years after Date of Birth (DOB)', 'destroy X years after agreement expires', 'destroy X years after action completed'.

Temporary Records may be kept for longer retention periods than stated in the framework if:

- The record is relevant to an internal or external investigation or inquiry in progress;
- NT Christian Schools Board, CEO or an Operational Director determines they are required;
- There is an identified business need;
- The records are subject to an information access application;
- The records are subject to disposal freeze.

In these cases, all relevant records must be identified and retained until all actions are completed. If a record is required for any action before the original retention period is completed, the retention period begins again after the time the action is completed for the later/second time.

4.6 Archiving and Storing Records

When records or files (digital or hardcopy) are no longer needed or utilised regularly, they can be archived or moved to storage to wait out their required retention period.

Before doing so, identify the retention requirements for the types of records you wish to archive. Refer to the *NT Christian Schools Record Retention Framework*.

- Digital files may be moved to established archive files on entity file share drives or have appropriate milestone settings added to remove them from daily operational platforms.
- Where records are hardcopy, use storage contains/boxes/folders to store similar record types, with correlating trigger events together.
- Complete Record Inventory Forms to request authorisation to move records to a new physical location or into a different file share drive for archiving.

Each entity of NT Christian Schools must establish and maintain a digital *Archives Record Register File* where *Record Inventory Forms* and approvals are to be saved.

Some records will be selected for permanent preservation as part of NT Christian Schools' archives for historical value. This will be done in accordance with *Record Retention Framework* and will contain the minimum amount of personal data required in compliance with information protection laws.

4.7 Record Disposal

If records have met their retention requirements, it may be appropriate to dispose or destroy

them. Before doing so, complete a *Records Inventory Form* to record authorisation and provide an account of the record destruction.

With written approval, temporary records may be disposed of if they have:

- reached the required retention period,
- are not reasonably likely to be required any further by the organisation for operational need or in a legal proceeding (refer to section 4.4 Record Retention).

The Principal or operational Director must approve the disposal in writing (using *Record Inventory Form*) to provide an account of the disposal activity.

Some records created through normal administrative practice (referred to as Ephemeral Records) may be destroyed without approval once administrative use has ended. These records include:

- working papers,
- drafts,
- duplicate copies of records stored elsewhere,
- short-term facilitative records (such as phone messages),
- unsolicited 'junk mail'.

Staff must securely dispose of records and ensure electronic, and hardcopy records are destroyed in a way that ensures the records are unreadable and irretrievable.

4.8 Annual Record Management Audit

It is recommended Principals and operational Directors undertake an annual audit to support compliance and security. Documented the audit, recording:

- when the audit was conducted and by whom;
- the process implemented to undertake the audit,
- any discrepancies or compliance issues identified for review or requiring further action.

The audit will monitor and provide opportunity to correct:

- compliance with NT Christian Schools policy and file management protocols;
- compliance with file management protocols for local file share platforms;
- identify areas requiring maintenance for improved record quality, consistency and compliance;
- identify need for further staff training or additional supports;
- identify records needing to be archived or destroyed.

Principal or operational Director approval must be requested and documented using *Record Inventory Form* to:

- move hard-copy files for archive storage,
- move digital files onto other file share drives,
- destroy digital or hardcopy documents that have exceeded their retention period.

5 Roles and responsibilities

Evidence of Compliance	
Board of Directors	
Ensure Board records are created, retained, stored and destroyed in accordance with <i>NT Christian Schools Records Retention Framework</i> , and relevant legislative and Australian standards requirements ⁶ .	Board and Company meeting minutes. Registers Record files
Records of relevant training undertaken by members, for example mandatory reporting, ICAC training are recorded ⁶ .	Training register
CEO	
Ensure schools and education and care services operated by NTCS have systems to meet their record management and storage requirements.	Communication with leaders Audit Reports
Senior Director of Education	
Include appropriate clauses regarding record keeping obligations in staff contracts.	Contract templates
Director of Business Services	
Provide oversight to ensure schools and education and care services operated by NTCS use the determined systems appropriately to meet their record management and storage requirements.	Procedure documents Record Management Audit Reports ICT Audit Reports Communication with leadership
Provide guidance on record sharing to third parties, determining what can be shared, redacting unnecessary inclusions, seeking legal advice if needed etc.	Communication records
Director of Finance	
Ensure practices and protocols within their line of management adhere to policy and legislated obligations and the <i>NT Christian Schools Records Retention Framework</i> .	Regular review of records and practice Regular review of legislative requirements Regular review of policy with staff team Annual Audit
Include appropriate clauses regarding record keeping obligations in contractor contracts.	Contracts
IT Manager	
Ensure all entities of NT Christian Schools have digital RMS that support the operational needs of the entity and provide secure, accessible ongoing capacity to create, manage and store required records.	Communication with leadership ICT Audits

⁶ Non-Government Schools Registration Standards, std1.1.

Evidence of Compliance	
Annually audit NTCS cyber security • review third-party data security measures • ensure subscriptions to protective software, • ensure policy and procedure continue to provide appropriate guidance and instruction, • ensure staff training packages are current and supporting required practice.	ICT Audit Reports
Principals, Operational Directors Line Managers	
Ensure their staff and any relevant volunteers and contractors are regularly made aware of the record keeping responsibilities and protocols.	Compliance or PD records
Oversee the creation, retention and storage of all required records, ensuring practices and protocols within their line of management adhere to policy and legislated obligations and the <i>NT Christian Schools Records Retention Framework</i> .	Records and reporting
Authorise archiving and disposal of records in accordance with this policy and the <i>NTCS Records Retention Framework</i> .	Archives Record Register Records Inventor Forms
Ensure annual audits are undertaken to ensure compliance with record-keeping requirements.	Audit records.
Line Managers	
Oversee the creation, retention and storage of all required records, ensuring practices and protocols within their line of management adhere to policy and legislated obligations and the <i>NT Christian Schools Records Retention Framework</i> .	Record Management Audits
Staff	
Create and retain all records in accordance with policy and protocols established by NT Christian Schools, and campuses.	
Seek and undertake training to ensure clear understanding of record keeping obligations and requirements.	Induction and Professional Development records
Create, retain, and store all records relating to student management, teaching and learning, school programs and other relevant records.	Data records Files

Evidence of Compliance	
Capture all corporate hardcopy and digital records (including text messages) relating to student care/business/education activities that are received and/or created into the entity's record keeping systems.	Data records Files
Maintain the currency, integrity and accuracy of records.	Data records Files
Apply appropriate security to confidential and sensitive records created and/or received.	
Use secure storage and restricted physical access to confidential records.	
Volunteers	
If your volunteer role supports NT Christian School with information collection or record creation, do so in accordance with relevant policy and procedure.	
Parents	
Ensure the accuracy and timely provision of required information for school records.	Student master files

6 Definitions & Acronyms

The following terms used throughout this policy are defined as follows:

Term	Definition
Archive / Archive Record	A record that is to be preserved for a period of time or even permanently for its historical or evidential value. Period of retention is determined in the <i>NT Christian Schools Record Retention Framework</i> .
Corporate Record	Information evidencing the business activity of the organisation and its entities that: - contain information which is of administrative, legal, fiscal, evidential or historical value and is not recorded elsewhere on the public record, including electronic messaging, - important communication and/or transaction between employees or between an employee and another party; - document the rationale behind policy, senior employee decisions and directives.
DOB	Date of Birth
Digital record	Any information that requires computer hardware/software to read such as: - emails, - SMS mobile text messages,

	• web sites • database applications • word processed documents • spreadsheets and • digitised reproduction of documents.
Disposal / Destruction	The removal of records from the organisation and their subsequent destruction so the information contained in them cannot be read or accessed further.
Ephemeral Record	A record which only has short-term value to the organisation with no on-going administrative, fiscal, legal, evidential or historical value and does not need to be captured into the recordkeeping system.
Financial Acquittal	Keeping records to clearly provide evidence that funding & grants are spent efficiently, effectively & ethically per the funding or grant agreement
Normal Administrative Practice	Working papers, drafts, duplicate copies of records stored elsewhere, short-term facultative records (such as phone messages) & unimportant records such as unsolicited 'junk mail' which may be destroyed without prior approval once administrative need for the information has ended.
Permanent Records	A record with enduring value to NT Christian Schools or the Northern Territory community that must be retained in archives.
Private Information	Refer to Privacy Protections Policy
Public Records	Work-related records in any format or media made or received by staff, volunteers, Board Directors, company members of NT Christian Schools
Record Management Systems	RMS – a record-keeping system used by NT Christian Schools to create and store records. For example, Compass, Technology 1, or Kangarootime
Record Retention Framework	A documented schedule that establishes the minimum retention period for each type of record listed in the framework regardless of medium and dictates the final action for the record.
Retention Period	The minimum period of time a record must be kept for before it can be legally destroyed.
Student	A person enrolled in a school or early learning service or program delivered by NT Christian Schools
Temporary Records	Records that do not need to be permanently retained. Most temporary records created and maintained by NT Christian Schools will be subject to varying retention periods pending record type.

7 Early Learning Compliance

QUALITY AREA 7: GOVERNANCE AND LEADERSHIP

7.1	Governance	Governance supports the operation of a quality service.
7.1.1	Service philosophy & purposes	A statement of philosophy guides all aspects of the service operations.

7.1.2	Management systems	Systems are in place to manage risk and enable the effective management and operation of a quality service.
7.1.3	Roles and responsibility	Roles and responsibilities are clearly defined and understood and support effective decision making and operation of the service.
7.2	Leadership	Effective leadership builds and promotes a positive organisational.
7.2.1	Continuous improvement	There is an effective self-assessment and quality improvement process in place.
7.2.2	Educational leadership	The educational leader is supported and leads the development and implementation of the educational program and assessment and planning.
7.2.3	Development of professionals	Educators, co-ordinations and staff members performance is regularly evaluated, and individual plans are in place to support learning and development.

EDUCATION AND CARE SERVICES NATIONAL LAW AND REGULATIONS

S162A	Persons in day-to-day charge and nominated supervisors to have child protection training
29	Condition on service approval—insurance
31	Condition on service approval—quality improvement plan
55	Quality improvement plans
56	Review and revision of quality improvement plans
74	Documenting of child assessments or evaluations for delivery of educational program
87	Incident, injury, trauma and illness record
92	Medication record
102	Authorisations for excursions
102D	Authorisations for service to transport children
102E	Children embarking a means of transport—centre-based service
102F	Children disembarking a means of transport—centre-based service
118	Educational leader
126	Centre-based services – general educator qualifications
145	Staff record
146	Nominated Supervisor
147	Staff Members
149	Volunteers and students

150	Responsible person
151	Record of educators working directly with children
152	Record of access to early childhood teachers
152A	Record of replacement of educator
152B	Record of replacement of early childhood teacher or suitably qualified person
158	Children's attendance record is to be kept by approved provider
160	Child enrolment records to be kept by approved provider and family day care educator
161	Authorisations to be kept in enrolment record
162	Health information to be kept in enrolment record
167	Record of service's compliance
168	Education and care service must have policies and procedures
170	Policies and procedures are to be followed
173	Prescribed information to be displayed
177	Prescribed enrolment and other documents to be kept by approved provider
180	Evidence of prescribed insurance
181	Confidentiality of records kept by approved provider
183	Storage of records and other documents
184	Storage of records after service approval transferred
185	Law and regulations to be available

8 Related legislation and policy

8.1 NT Christian School policies and procedures

- Record Retention Framework
- ELC Required Record Framework and Checklist
- Record Inventory Form
- Privacy Protection Policy
- Stewardship Policy
- Safety and Wellbeing policy suite
- Early Learning policy suite
- Finance policy suite
- Business Operations policy suite
- Human Resources policy suite
- Administrative procedures & guidelines.
- Protected Disclosures (Whistleblower) Policy

8.2 Legislation

- Education Act NT 2015
- Education Regulations (NT) 2015
- Education Regulations (Cth) 2013; sections 36, 37, 38, 39
- Care & Protections Act 2007 (NT)
- Corporations Act (Cth) 2001
- Associations Act 2003 (NT)
- Privacy Act 1988
- Fair Work Act 2009
- Health Records (Privacy and Access) Act 1997
- Work Health and Safety Act 2011
- Family Law Act 1975

8.3 Other relevant resources

- Non-Government Schools Registration Standards, standards 1.1, 3.3, 3.4
- National Principles for Child Safe Organisations, principles 1, 5, 7
- National Quality Framework, QA7
- Australian Privacy Principles (APPs)
- Australian Accounting Standards
- Australian Society of Archivists – Records Retention & Disposal Schedule for Non-Government Schools, 2nd Edition April 2018
- Royal Commission into Institutional Responses to Child Sexual Abuse, volume eight
- Disability Royal Commission
- Child Care Subsidy Secretary's Rules 2017
- Child Care Subsidy Minister's Rules 2017
- A New Tax System (Family Assistance) Act 1999
- Family Assistance Law – Incorporating all related legislation as identified within the Child Care Provider Handbook <https://www.education.gov.au/early-childhood/resources/child-care-provider-handbook>