



DAUGHTERS OF OUR LADY OF THE SACRED HEART
AUSTRALIAN PROVINCE

RECORDKEEPING POLICY

1. Introduction

- 1.1 The Daughters of Our Lady of the Sacred Heart ('**OLSH**') is dedicated to ensuring the safeguarding of children and vulnerable adults.
- 1.2 OLSH is committed to upholding best practices in recordkeeping to protect the rights, safety, and privacy of individuals associated with our organisation.

2. Purpose

- 2.1 This Recordkeeping Policy sets out the procedures for maintaining, storing, and disposing of records to ensure compliance with legal, ethical, and safeguarding obligations.
- 2.2 This Policy is designed to provide a comprehensive framework for the creation, maintenance, and secure management of records to support transparency, accountability, and safeguarding compliance across the Province and its ministries.

3. Scope

- 3.1 This policy applies to OLSH and its related entities.
- 3.2 The principles of this policy apply whether records are in hard copy or digital format.

4. Principles

- 4.1 OLSH recognises the five key recordkeeping recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse, which have been endorsed by all Commonwealth, state and territory governments. OLSH supports indicators of compliance with the Principles as foundational to the implementation and maintenance of comprehensive record management.
 - a) Creating and keeping full and accurate records relevant to child safety and wellbeing, including child sexual abuse, is in the best interests of children and should be an integral part of institutional leadership, governance and culture.
 - b) Full and accurate records should be created about all incidents, responses and decisions affecting child safety and wellbeing, including child sexual abuse.
 - c) Records relevant to child safety and wellbeing, including child sexual abuse, should be maintained appropriately.
 - d) Records relevant to child safety and wellbeing, including child sexual abuse, should only be disposed of in accordance with law or policy.
 - e) Individuals' existing rights to access, amend or annotate records about themselves should be recognised to the fullest extent.

4.2 OLSH recognises that:

- a) It has a duty of care to retain appropriate records.
- b) Good recordkeeping practices and accurate records can contribute to better outcomes in complaints handling, redress and criminal proceedings.
- c) These principles are intended to promote child safety, institutional accountability and just outcomes for victims and survivors of child sexual abuse.

4.3 In addition to child sexual abuse, OLSH accepts these principles as being applicable in all forms of abuse including physical abuse, neglect, psychological harm, domestic violence, and grooming.

5. Maintaining Appropriate Records

5.1 All Sisters, employees, volunteers, and contractors, have an obligation to maintain appropriate records and data in relation to the protection of children, young people and vulnerable adults.

5.2 A record serves an essential administrative, legal and historical purpose. Records can include class rolls, student assessment records, emails, electronic documents, digital image and audio recordings, meeting minutes, correspondence, statements, records of interviews, files, forms, plans, drawings, notes, photographs and films.

Types of Records Maintained

5.3 The following categories of records are maintained:

- a) Safeguarding Records: Incident reports, complaints, risk assessments, and training records.
- b) Personnel Records: Employment agreements, history of appointments, background checks, working with children checks (WWCC), and professional development records.
- c) Financial Records: Budgets, invoices, and donation records.
- d) General Administrative Records: Meeting minutes, correspondence, policies, administrative and contractual arrangements with any diocesan or government entity.

Record Storage and Security

5.4 OLSH will take all reasonable steps to protect personal information it holds from misuse, loss, unauthorised access, disclosure or modification.

5.5 Physical records must be stored in locked cabinets with restricted access.

5.6 Electronic records must be stored in a secure, password-protected system with regular backups.

5.7 Confidential information should only be accessed by authorised personnel in accordance with the *OLSH Privacy Policy*.

5.8 Any data breaches must be reported and managed in accordance with the relevant policies and legal requirements as outlined in the *OLSH Privacy Policy*.

Record Retention and Disposal

Records should be retained for the following minimum periods:

- a) Safeguarding Records: At least 50 years.
- b) Personnel Records: At least 50 years after employment ends.
- c) Financial Records: At least 7 years.
- d) General Administrative Records: At least 50 years.

Upholding the Recordkeeping Principles

5.9 In upholding the recordkeeping principles, OLSH is committed to applying the following requirements:

- a) Maintaining complete and accurate records, which are created and maintained for all incidents, complaints, responses, decisions and outcomes.
- b) Ensuring that records are created at the time of, or as soon as practicable following an incident, complaint, response or decision.
- c) Ensuring that records are titled, organised and filed logically.
- d) Ensuring that information and/or records are treated as confidential, and records are appropriately secured.
- e) Individuals' rights to access, amend or annotate records about themselves are recognised to the fullest extent.

The Quality of Records

5.10 OLSH understands that good recordkeeping practices include maintain records of a high quality.

5.11 Records created and maintained by OLSH should:

- a) Be clear, accurate and factual.
- b) Document relevant events and other matters fairly and impartially.
- c) Contain sufficient detail for the purpose for which they are created and kept.
- d) Include the identity of the person who created the record.
- e) Specify when the record was created.

6. Maintenance of Archives

- 6.1 The OLSH archives exist to capture and retain the records of OLSH which are deemed to have ongoing value for administrative, legal and historical purposes. It is a safe and secure repository for the archival records of OLSH.
- 6.2 Access to archived records is restricted to authorised personnel and must be logged to ensure accountability.
- 6.3 It provides access to those records (or the information contained therein) to the Provincial Leader and Council, and to *bona-fide* researchers interested in the history of OLSH.

7. Confidentiality & Privacy

- 7.1 The *OLSH Privacy Policy* outlines the requirements of OLSH with respect to confidentiality and privacy. This policy is supplemented by the *OLSH Privacy Policy*.
- 7.2 In accordance with the *OLSH Privacy Policy* and the *Privacy Act 1988* (Cth), OLSH is committed to the protection of the privacy of all with whom we come into contact including children and adults at risk.
- 7.3 OLSH may hold information in relation to individuals, including but not limited to a professed member of the Congregation, a novice or a woman wishing to enter the Congregation, an employee, volunteer, contractors, stakeholder or job application.
- 7.4 OLSH will treat all confidential or private records respectfully, including by:
 - a) Exercising caution and sound judgment in discussing other people's confidential and personal information.
 - b) Comply with relevant laws and regulations regarding the collection, dissemination, use and security of records.
 - c) Only use such confidential or private information for work-related and/or other authorised purposes.
- 7.5 OLSH takes all reasonable steps to protect personal information it holds from misuse, loss, unauthorised access, disclosure or modification in accordance with the *OLSH Privacy Policy*.
- 7.6 The sharing of confidential or private information with external persons or agencies may only occur as established by the *OLSH Privacy Policy*.

8. Conclusion

8.1 Effective record keeping is essential to the integrity and accountability of OLSH.

8.2 By adhering to this policy, we ensure compliance with legal and ethical obligations, safeguard sensitive information, and maintain transparency in our operations. This policy reflects our commitment to best practices in record management, supporting the mission and values of our organisation.