



HUNGARIAN COMMUNITY SCHOOL, ADELAIDE INC.

**Data and Information Management Policy
May 2017**

Summary

This information applies to all Ethnic Schools of South Australia.

Table 1: Document Details

Policy Number	ES20
Related Policies	Enrolment Policy Child Protection and Child Safe Environments Medication, Accident and First Aid Policy Excursions and Incursions Policy Behaviour Management Policy
Version	1
Created by	Policy Officer: Kate Quane
Reviewed by	Executive Officer: Darryl Buchanan
Applies to	Ethnic Schools South Australia
Key Words	Records; student data; privacy; security; confidentiality; roll-books; retention schedule; general disposal schedule.
Status	Approved
Approved By Executive	ESASA Executive Committee
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Review Date	April 2018

Table 2: Revision Record

Date	Version	Revision Description
November 2016	1	New policy developed



The Ethnic Schools Association
of South Australia Inc.

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Introduction

Hungarian Community School, Adelaide Inc. collects data from students and families to assist in enrolling students at the school, and to ascertain student medical issues, and family details in the case of an emergency. Data is also generated by the school for the purpose of grading and reporting and analysis of student achievement. Hungarian Community School, Adelaide Inc. recognises effective and efficient management of records will ensure that the school complies with its legal and regulatory obligations. School records provide evidence for demonstrating performance, accountability and for protecting the legal rights and interest of the school.

This policy has been developed to ensure that records and data are used appropriately to support quality education outcomes for all students at Hungarian Community School, Adelaide Inc. This policy is based on the DECD Information Management Policy – Privacy and Confidentiality, DECD Data Protocols: Student Information, South Australia Government Information Privacy Principles and General Disposal Schedule from State Records South Australia.

Definitions

Record: written, graphical or pictorial matter, a disk, film or other object that contains information or from which information may be reproduced (with or without the aid of another object or device).

Data: number, characters, images or other methods of recording, in a form which can be accessed by a human or especially input into a computer, stored, and processed there, or transmitted on to another processing site. Data on its own usually has no meaning; only when interpreted by some kind of data processing system does it take on meaning and become information

Educator: someone who works directly with students in a school.

Information: is created from the collection, analysis, display and summary of data.

Policy

In providing quality education outcomes for students at Hungarian Community School, Adelaide Inc. educators have a responsibility to use their professional judgement to:

- determine the progress and achievement of learners
- monitor the achievement of individuals and groups of learners
- monitor the effectiveness of their own educational programs, teaching approaches, strategies for assessing and record keeping
- provide learners and their families with information about learner progress, and
- review the curriculum for renewal and improvement;

This will involve the collection of data and in turn the analysis and summary of data. Student records may be kept as a record and retained to provide evidence of the school's activities and aid in the development of Hungarian Community School, Adelaide Inc.'s educational program and curriculum. Information regarding to the school program, activities and curriculum may contain general information and may not be deemed sensitive. Documents



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created within the school pertaining to the school's activities and programs may be reviewed and any refinements to these documents will be kept. Hungarian Community School, Adelaide Inc. will not keep records of drafts, revisions or documents that are no longer relevant to the school's educational programs and/or activities.

Information that is of a personal nature must be handled with care. Hungarian Community School, Adelaide Inc. has outlined set procedures for dealing with personal information.

Personal Information

The following protocols have been established by Hungarian Community School, Adelaide Inc. to ensure appropriate safe guards have been implemented around the accessibility, security, privacy and integrity of any data that is collected by the school.

Personal Information and Privacy

In accordance with the South Australian Information Privacy Principles Hungarian Community School, Adelaide Inc. will ensure the following when collecting personal information about a member of the school community:

- Personal information will not be collected by unlawful or unfair means or collected unnecessary.
- The purpose for which the information is being collected is conveyed to the relevant people providing the information and how the information obtained will be used and disclosed to other members of the school.
- The school will not collect data that is excessively personal or irrelevant.
- Any incomplete forms submitted by parents and/or students will be returned to ensure data collected is up-to-date, accurate and complete.
- Personal information will not be used except for the purpose to which it is relevant;

Hungarian Community School, Adelaide Inc. will take measures to ensure that personal information in its possessions or under its control is securely stored and is not misused. An individual (student/parent/guardian) may have access to any personal information that is collected by the school pertaining to the individual in accordance with the Freedom of Information Act 1991.

Personal information collected by Hungarian Community School, Adelaide Inc. may be passed on or disclosed to other agencies including but not limited to the following

- The Ethnic Schools Association of South Australia (ESASA),
- The Department of Education and Child Development (DECD),
- Department of Child Protection Offices and
- The Office of Non-Government Schools.

Personal Information may also be passed on if the use is required by or under law, including but not limited to criminal law, unlawful activity, illegal conduct or serious misconduct.

Hungarian Community School, Adelaide Inc. will not disclose personal information about an individual to a third person that is not for the purpose(s) outlined above without prior consent.



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Security

Hungarian Community School, Adelaide Inc. has implemented the following controls to ensure that data is stored securely and are accessed appropriately:

- All personal information (e.g. student enrolment forms, medical advice forms, teacher forms) will be kept in a lockable filing cabinet which is locked when the room is unattended.
- Personal information kept electronically will be adequately password protected.
- Information displayed on a computer will not be left unattended. Computers that are left while there is work in progress will be locked or logged off.
- Hard-copies of sensitive or personal information will not be left on desks when the desk is unattended
- Where possible, sensitive personal information should not be sent by e-mail.
- If files need to be taken off the premises (e.g. examinations, assessment items, and student work) they should be secured in the boot of a car or in a lockable container.
- All information stored on a computer will be backed up regularly and the back-up stored securely and if possible off-site.
- Information contained in email or fax should be filed into the appropriate electronic or manual filing system.

Integrity

Hungarian Community School, Adelaide Inc. has developed the following procedures to ensure data is current, accurate, valid, reliable, and is recorded and reported accurately.

- Student enrolment forms will be completed annually to ensure correct, valid and up-to-date information regarding contact methods, emergency contacts, medical issues and family court orders.
- Incomplete forms (enrolment forms, medical forms, consent forms, student code of conduct or any other forms) will be photocopied and then returned to the family to complete to ensure information provided to the school is accurate and reliable.
- The school may ask families to confirm information is accurate, current and valid throughout the year if they have been made aware of changes to personal circumstances or if the school deems necessary.

Responsibilities

It is the responsibility of the Principal to:

- Maintain records and record keeping systems in accordance with the regulatory environment.
- Provide guidance about good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way.
- Monitor compliance with this policy by checking records are stored securely and can be accessed appropriately.
- Limit access to the electronic and manual storage of data to appropriately authorised personnel, through the provisions and application of secure technology/infrastructure.
- Dispose or destroy information in accordance with the retention schedule.



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It is the responsibility of all staff to:

- Ensure that all roll-books are accurate, and maintained with student attendance.
- Ensure that all records for which they are responsible for are accurate, maintained and securely stored.
- Any record that is no longer required is disposed of in accordance with the retention schedule.
- Ensure confidentiality of personal information by not passing of personal information to a third party unless required by law.

Destruction Methods

To ensure Hungarian Community School, Adelaide Inc. meets legislative requirements, a retention schedule has been developed. Documents, student records, personal information and school records should be destroyed in line with the attached retention schedule. This process will be carried out by Hungarian Community School, Adelaide Inc. on an annual basis.

Paper records containing personal information will be shredded or disposed of in a dedicated secure bin which is collected by a third party. CDs or DVDs should be cut into pieces and disposed. Electronic data should be archived and deleted appropriately at the end of the retention period.

Other Documents

Government of South Australia: Department of the Premier and Cabinet Circular (June 2016). *PC012 Information Privacy Principles (IPPS) Instruction*

Department of Education and Child Development (October 2013); Data Management and Information Systems: DECD Data Protocols: Student Information

Department of Education and Child Development (February 2016); DECD Information Management Policy – Privacy and Confidentiality

Government of South Australia: State Records of South Australia (February 2016); General Disposal Schedule No. 30 State Government Agencies in South Australia Version 1.1. Effective from 1 January 2016 to 30 June 2026.

<http://government.archives.sa.gov.au/sites/default/files/20160317%20General%20Disposal%20Schedule%20No.%2030%20Final%20V1.1.pdf>

Government of South Australia: State Records of South Australia (2016) General Disposal Schedule No. 31 for Department of Education and Child Development – Early Childhood Services (and predecessors) Version 3. Effective from 21 June 2016 to 30 June 2023.

[https://government.archives.sa.gov.au/sites/default/files/20160809%20GDS%2031%20Versi on%203%20Department%20for%20Education%20and%20Child%20Development%20-%20Earl%20Final%20V3.pdf](https://government.archives.sa.gov.au/sites/default/files/20160809%20GDS%2031%20Version%203%20Department%20for%20Education%20and%20Child%20Development%20-%20Earl%20Final%20V3.pdf)

Government of South Australia: State Records of South Australia (March 2013) General Disposal Schedule No. 32. Records of Relevance to the Royal Commission into Institutional Responses to Child Sexual Abuse. Version 2. Effective from 18 February 2014 to 31 December 2023.



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http://www.government.archives.sa.gov.au/sites/default/files/20140321%20General%20Disposal%20Schedule%20No.%2032%20Final%20V2_Copy.pdf



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Retention Schedule

Basic File Description	Data Protection Issues Record Examples/Description	Statutory Provisions	Retention Period	Action at the end of the administrative life of the record
All Schools				
The following item is not exhaustive and has been modified from the General Disposal Schedule No. 32. For more details refer to the General Disposal Schedule Number 32 which can be downloaded at: http://www.government.archives.sa.gov.au/sites/default/files/20140321%20General%20Disposal%20Schedule%20No.%2032%20Final%20V2_Copy.pdf				
Child Sexual Abuse	All records pertaining to the child must be kept Where child sexual abuse which has occurred or is alleged to have occurred involving South Australian Government Programs or activities and/or South Australian officials (including volunteers, contractors as well as employees) and/or South Australian Government Premises.	General Disposal Schedule No 32. Version 2 (Royal Commission into Institutional Responses to Child Sexual Abuse in Australia)	Temporary. 31 st December 2023 and for any additional period that may be determine by review	Documents to be stored securely and NOT destroyed.
Preschools				
The following items are not exhaustive and have been modified from the General Disposal Schedule 31. For more detail refer to the General Disposal Schedule Number 31 which can be downloaded at: https://government.archives.sa.gov.au/sites/default/files/20160809%20GDS%2031%20Version%203%20Department%20for%20Education%20and%20Child%20Development%20-%20Earl%20Final%20V3.pdf				
Alleged abuse of Children and Former children within a Preschool setting	All records pertaining to the child must be kept including: <ul style="list-style-type: none"> • Assessment and achievement • Attendance • Significant events • Behaviour and discipline • Financial assistance to children • Case files of children • Reports of accidents, incidents or injuries • Reports relating to suspected abuse sustained at home • Health and hygiene matters of children • A child's medical or psychiatric condition • Individual child observation • Enrolment • Photographs of child 	General Disposal Schedule No. 31. For DECD –Early Childhood Services and Predecessors	Temporary. Retain until 31 December 2023, retention subject to a review at that date	Documents to be stored securely and NOT destroyed
Complaints about staff	Records relating to complaints against employees or contractors where no investigation is required or where matter is resolved at	General Disposal Schedule 31. For DECD –Early	TEMPORARY Retain until 31	Documents to be stored securely and NOT destroyed



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	the service level.	Childhood Services and Predecessors	December 2023, retention subject to a review at that date	
Complaint about staff pertaining to alleged sexual or physical abuse	Records relating to complaints / allegations of a sexual or physical nature where the subject is a child, against employees or contractors where no investigation is required or no further action taken or where further action is required.	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Retain until 31 December 2023, retention subject to a review at that date	Documents to be stored securely and NOT destroyed
Financial Matters - GRANTS	Records relating to specific grants or program funding sought by an early childhood service from the Department where the request is successful, including: <ul style="list-style-type: none"> • Applications • reports 	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Destroy 8 years after action completed	Documents to be shred documents after 8 years.
Personal Administration – staff photographs	Photographs of individual educators and other staff members associated with the early childhood service.	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Retain until 31 December 2023, retention subject to a review at that date	Documents to be stored securely and NOT destroyed
Reporting – statistics	Statistics, abstracts and returns prepared on a term, annual or other periodic basis. <ul style="list-style-type: none"> • Annual Census Data Collection Submission Summary • Preschool Data Collection Submission Summary Report 	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Destroy 2 years after last action	Data is also captured and maintained by DECD Corporate. ???????
Rostering and Routine	Records relating to educator and staff time management and staff rosters, including: <ul style="list-style-type: none"> • Educator and staff playground duties and rosters • Educator and staff diaries • Communication/Memo books 	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Retain until 31 December 2023, retention subject to a review at that date	Documents to be stored securely and NOT destroyed
Visitors – including incursions	Records relating to visits by other persons or organisations external to the early childhood service. <ul style="list-style-type: none"> • Visitor Books • Visitor Registers <p>And</p>	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Retain until 31 December 2023, retention subject to a review at that date	Documents to be stored securely and NOT destroyed



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	Records relating to musical and theatrical groups performing in early childhood sites or facilities. <ul style="list-style-type: none"> • Communications from performance groups • Applications from sites or facilities requesting a performance take place 			
Evaluation	Curriculum and subject evaluation reports created by individual early childhood services or facilities.	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Destroy 7 years after action completed	Shred documents after 7 years
School Registration/ implementation	Records relating to the registration of activity programs.	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	Permanent	Documents to be stored securely and NOT destroyed
Activities	Records relating to permissions or consent given by parents/caregivers for children to attend or participate in various activities held off-site where further action may be required due to significant incidents (a significant incident is considered to be anything recorded in IRMS) or where no further action is required. Records relating to permissions or consent forms for children to engage or participate in routine activities. Including: <ul style="list-style-type: none"> • Permission notes • Consent forms for educational excursions • This may include annual consent forms sent to parents/caregivers regarding permission to photograph child, use the internet, etc. • Excursion records • Advice to parents/care givers • Costs and approval letters • Administrative and travel details • Requests for approvals for early childhood services to attend or participate in activities • Photographs 	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Retain until 31 December 2023, retention subject to a review at that date	Documents to be stored securely and NOT destroyed
Admission/ enrolments	Forms which support admission of children into an early childhood service, including: <ul style="list-style-type: none"> • Enrolment forms • Enrolment update forms 	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Retain until 31 December 2023, retention subject	Documents to be stored securely and NOT destroyed



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			to a review at that date	
Assessment and Achievement	<p>Copies of child assessment reports and certificates provided to parents/care givers, including:</p> <ul style="list-style-type: none"> • Formative & summative reports • Progress Reports • Statement of learning • Learning Story • Development record 	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Retain until 31 December 2023, retention subject to a review at that date	Documents to be stored securely and NOT destroyed
Attendance	<p>Individual child attendance records held by early childhood services either managed separately or contained in the central database, including:</p> <ul style="list-style-type: none"> • Daily Attendance Sheets • Weekly Attendance Sheets • Booking and Attendance Reports • Absence Reports • Weekly Attendance Summary Reports 	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Retain until 31 December 2023, retention subject to a review at that date	Documents to be stored securely and NOT destroyed
Behaviour	<p>Records of significant events, cases, activities or vandalism. Records of routine behaviour management events, cases or activities.</p> <p>Records relating to the provision of information concerning behaviour within the early childhood service. Including:</p> <ul style="list-style-type: none"> • Records of contact & correspondence between the site and other parties involved including external agencies • Behavioural plans • Review panel reports • Behavioural reports • Records of admonitions and associated correspondence • Behavioural reports • Behaviour diary • Circulars and correspondence 	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Retain until 31 December 2023, retention subject to a review at that date	Documents to be stored securely and NOT destroyed
Health and Safety	<p>Reports of children’s accidents, injuries and incidents, including records held in the central reporting system and records created before commencement of the central electronic reporting system.</p> <ul style="list-style-type: none"> • Site copies of Accident and hazards reports • Site copies of Incident reports (IRMS reports) <p>Records relating to the registration of accidents, injuries,</p>	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Retain until 31 December 2023, retention subject to a review at that date	Documents to be stored securely and NOT destroyed



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	incidents or illness. <ul style="list-style-type: none"> • Accident registers • First aid registers • Infectious diseases registers 			
Special Education Programs	Records relating to the management of individual children with learning difficulties or physical disabilities. <ul style="list-style-type: none"> • Negotiated Education Plans • Referrals • Assessments • Diagnostic Reports 	General Disposal Schedule 31. For DECD –Early Childhood Services and Predecessors	TEMPORARY Retain until 31 December 2023, retention subject to a review at that date	Documents to be stored securely and NOT destroyed
Other Schools				
The following items are not exhaustive and have been modified from the General Disposal Schedule No 30. State Government Agencies in South Australia. For more detail refer to the General Disposal Schedule Number 30 which can be downloaded at: http://government.archives.sa.gov.au/sites/default/files/20160317%20General%20Disposal%20Schedule%20No.%2030%20Final%20V1.1.pdf				
Maintenance	Records relating to routine/day-to-day cleaning and waste management services related to property . <ul style="list-style-type: none"> • Audits and inspections of cleaning services 	General Disposal Schedule No. 30 State Government Agencies in South Australia	TEMPORARY Destroy 2 years after action completed	Documents to be stored until the end of the retention period and then shredded.
Security – emergency and/or critical incidents	Records relating to breaches of security or incidents that are intentional and cause significant/major disruption to the agency’s operations, such as: <ul style="list-style-type: none"> • Hacking • Intrusion to restricted areas • Terrorism • Bomb threats • Intentional damage • Fires Records including: <ul style="list-style-type: none"> • Records of investigation • Records of liaison with law enforcement agencies 	General Disposal Schedule No. 30 State Government Agencies in South Australia	PERMANENT	Documents to be stored securely and NOT destroyed
Security - visitors	Records relating to attendance at properties as proof of being onsite , including: <ul style="list-style-type: none"> • Building admittance registers • Visitor logs 	General Disposal Schedule No. 30 State Government Agencies in South Australia	TEMPORARY Destroy 100 years after action completed	Documents to be stored until the end of the retention period and then shredded.
Stocktake	Records relating to stocktakes of equipment and stores, including:	General Disposal Schedule No. 30 State Government	TEMPORARY Destroy 5 years	Documents to be stored until the end of the retention



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	<ul style="list-style-type: none"> • Inventories • Lists • Stocktake reports 	Agencies in South Australia	after action completed.	period and then shredded.
Recruitment	<p>Records relating to the process of recruitment and selection of nominees for specific roles.</p> <ul style="list-style-type: none"> • Establishment of selection panel • Unsolicited applications • Job & person specifications • Role descriptions • Applications & supporting documentation • Record of interviews • Selection report • Recommendations • Delegate's approval 	General Disposal Schedule No. 30 State Government Agencies in South Australia	TEMPORARY Destroy 2 years after action completed.	Documents to be stored until the end of the retention period and then shredded.
Security	<p>Copies of criminal history information and certificates provided to the agency by an applicant as part of the recruitment process, including:</p> <ul style="list-style-type: none"> • Information and certificates obtained by an individual as part of pre-engagement/pre-employment/pre-appointment process • Copies of Criminal History Checks & Certificates • Child-related employment screening • Disability services screening • Vulnerable persons/aged care screening • Other general employment screening 	General Disposal Schedule No. 30 State Government Agencies in South Australia	TEMPORARY Destroy 3 years after action completed.	Documents to be stored until the end of the retention period and then shredded.



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Accounting	<p>Records relating to the management of banking matters.</p> <ul style="list-style-type: none"> • Management of bank accounts, eg applications, approvals, closures • Bank account summaries • Bank deposit, withdrawal & direct debit statements • Cancelled, lost, replaced & dishonoured cheques <p>Records relating to the management of deficiencies and losses.</p> <ul style="list-style-type: none"> • Write-offs & losses • Overpayments • Recovery of debts • Summaries of material losses 	General Disposal Schedule No. 30 State Government Agencies in South Australia	TEMPORARY Destroy 7 years after action completed.	Documents to be stored until the end of the retention period and then shredded.
Grant Funding	Records relating to successful applications made by the agency for grants.	General Disposal Schedule No. 30 State Government Agencies in South Australia	TEMPORARY Destroy 8 years after action completed.	Documents to be stored until the end of the retention period and then shredded.
Risk Management	<p>Records relating to the implementation of major risk management plans and initiatives.</p> <ul style="list-style-type: none"> • Implementation of Disaster/Risk Management Plans 	General Disposal Schedule No. 30 State Government Agencies in South Australia	Permanent	Documents to be stored securely and NOT destroyed
Risk Management	<p>Records relating to risk assessment and management of hazards in agency work places, including:</p> <ul style="list-style-type: none"> • Hazard identification & risk assessment, including dangerous chemicals, air-borne contaminants, radiation • Measures taken to eliminate or control risks • Measures taken to prevent accidents occurring • Measures taken to prevent or minimise exposure • Surveillance & monitoring of workplace environments • Maintenance & distribution of hazardous substances notices & labels • Risk assessment reports • Regular hazard surveys • Material safety data sheets • Carcinogen authorisations & inspection reports 	General Disposal Schedule No. 30 State Government Agencies in South Australia	TEMPORARY Destroy 100 years after action completed.	Documents to be stored until the end of the retention period and then shredded.
Accidents and Injuries –	Records relating to the management of personal injuries to	General Disposal Schedule	TEMPORARY	Documents to be stored until

