EASTERN CHINESE LANGUAGE SCHOOL INC. 新金山东区中文学校

# Information Privacy and Records Management Policy

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| **Document no.** | ECLS-POL-04 | **Version** | 1.0 |
| **Policy owner** | Principal | **Approved by** | School Committee |
| **Date approved** | Pending (next Committee meeting) | **Next review** | Two years after approval |
| **Applies to** | All staff, volunteers and Committee members who collect, use, store or dispose of personal, health or financial information on behalf of ECLS | **Status** | Draft: new policy for Committee approval |

## 1. Purpose

This policy explains how ECLS collects, uses, stores, shares and disposes of personal, sensitive and health information, and how long it keeps school records. It supports the Financial Management Policy (record keeping and retention) and the DE requirement to keep records for audit.

## 2. Privacy principles

ECLS handles personal, sensitive and health information in line with the *Privacy and Data Protection Act 2014* (Vic), the *Health Records Act 2001* (Vic) and the Department of Education's standard privacy policy, as required by the *CLS Accreditation and Funding Guide*.

- **Collection:** we collect only the information we need to enrol and care for students, employ staff, run the school and meet DE funding and accreditation requirements.
- **Notice:** families receive a Privacy Collection Notice at enrolment and each year, explaining why information is collected, how it is used and disclosed, and how to access or correct it. A link to the DE privacy policy (https://www.vic.gov.au/department-of-education-privacy-policy) is published on the school website.
- **Use and disclosure:** information is used only for the purpose it was collected for, or as the law allows. It may be disclosed to DE (funding and data verification), CLV and VCAA (VCE), and to emergency services, Victoria Police or Child Protection where needed to protect a child.
- **Access and correction:** individuals or their authorised representatives may ask to see and correct information ECLS holds about them, unless access would increase a risk to a child's safety.
- **Information sharing for child safety:** staff may share information under the Child Information Sharing Scheme and must report child safety concerns as set out in the ECLS Child Safety Policy. Privacy never stops a staff member from reporting a child safety concern.

## 3. Information we hold

| Category | Examples |
|---|---|
| **Students and families** | Enrolment forms, contact details, mainstream school details used for VSR matching, medical and allergy information, custody/court orders, attendance, progress reports, photos (with consent) |
| **Staff, volunteers and Committee** | Applications, references, WWCC/VIT details, qualifications, first aid certificates, signed Codes of Conduct, training records, bank and tax details, timesheets |
| **Visitors and contractors** | Visitors Register entries, WWCC details where required |

| Category | Examples |
|---|---|
| **Finance and governance** | Bank statements, invoices, claims, fee records, minutes, funding applications and acquittals |

## 4. Storage and security

- **Digital records** are kept in the school's secure systems (student management system and shared drive) with access set by role. Only staff who need the information for their role can see it. Accounts use strong passwords and are removed when a person leaves.
- **Paper records** containing personal or health information are kept in a locked cabinet. Class rolls and student medical summaries are given to teachers for the session and returned to the office afterwards.
- Personal information is not left in unattended cars, classrooms or public areas. Information sent by post is sealed and marked "Confidential".
- Student health information (allergies, anaphylaxis and asthma plans) is shared with the teachers and First Aid Officer who need it to keep the student safe.
- Data breaches (for example a lost device or an email sent to the wrong recipients) are reported to the Principal immediately, contained, assessed and recorded. Affected people are notified where there is a risk of serious harm.

## 5. Records retention schedule

| Record | Minimum retention | Basis |
|---|---|---|
| **Student enrolment forms** | 7 years after the student leaves | DE Funding Guide s.3.9; CFA Record keeping |
| **Attendance rolls and records** | 7 years | DE Funding Guide s.3.9 |
| **Student progress reports** | 7 years | DE Funding Guide s.3.9 |
| **Early collection forms and sign-in/out registers** | 30 years (child safety records) | DE *Collection of Students* policy (government school standard adopted as best practice) |
| **Child safety concerns, incident reports, disclosures and related complaint files** | Permanently / at least 45 years | Child Safety Policy; National Royal Commission recommendations on records |
| **Accident, injury and first aid registers** | 7 years after the student turns 18 (minimum) | OHS and limitation periods |
| **Accreditation documents (Charter, policies, EMP, registers)** | 7 years after superseded | DE Funding Guide s.3.9 |
| **Financial records (see ECLS-POL-02)** | 7 years | DE Funding Guide; CFA |
| **Staff HR files, WWCC/VIT verification, Code of Conduct and training records** | 7 years after the person leaves | CFA; Child Safety Policy |
| **Committee minutes, AGM minutes, annual financial statements** | Permanently | Associations Incorporation Reform Act |
| **Visitors Register** | 7 years | Child safety audit trail |

- Records are only destroyed after the retention period, with the Principal's written approval, by shredding or secure deletion. A destruction log is kept.
- Records relating to a complaint, investigation, legal claim or audit are not destroyed while the matter is open, whatever the retention period.

## 6. Responsibilities

- **Principal:** privacy contact for ECLS; approves access, disclosure and destruction of records.
- **Operations Manager:** maintains student, staff and financial records and the retention schedule.
- **All staff:** collect and use information only for their role, keep it secure and report any breach immediately.

## 7. Basis and references

- DE, *CLS Accreditation and Funding Guide 2024*: s.3.9 Audits and record keeping (7 years) and s.3.10 Information privacy and records.
- Victorian Common Funding Agreement 2025–2027 (GIN13960): Record keeping.
- CLV, *Operational and Administrative Procedures Manual* (V4, 2023): s.1.11 Privacy, s.1.12 Security of Information, s.2.19 Student Records.
- Privacy and Data Protection Act 2014 (Vic); Health Records Act 2001 (Vic); Child Wellbeing and Safety Act 2005 (Vic), Part 6A (Child Information Sharing Scheme).
- ECLS School Charter 2026: Privacy Policy and Security of Information Policy; ECLS *Information Privacy and Records Policy* (school website).

## 8. Version history

| Version | Date | Change | Approved / endorsed by |
|---|---|---|---|
| 1.0 | October 2026 | New policy | For approval at the next School Committee meeting (date _____, minute ref. _____) |