

Data and Information Management Policy

July 2022

Summary

This policy applies to Community Language Schools SA and all member schools.

Table 1: Document Details

Policy Number	ES20
Related Policies	ES01: Child Safe Environments Policy and Procedures ES02: Risk Management Policy ES03: Teacher Selection Procedures and Recruitment Policy ES04: Grievance and Complaints Policy and Procedures ES07: Enrolment Policy and Procedures ES07A: Student Online Enrolment Form ES07B: General Student Health Support Form ES07C Trial Lesson Enrolment Form ES08: Emergency and Critical Incident Policy and Procedures ES10: Personal Information and Photograph Release Form ES11: Communications Policy and Guidelines ES12: Principal Job Description Policy ES24: Volunteer Policy (Including Visitors) ES35: Behaviour Support Policy and Procedures ES36: Excursion and Incursion Policy and Procedures ES37: Medication, Accident and First Aid Policy and Procedures ES37A: Medical Management Forms ES37B: Medication Authority Form ES40: Special Needs Policy ES39: Cyber-Safety Policy and Guidelines ES41: Gender Identity Policy and Guidelines ES42: Student Personal Care Policy and Procedures ES47: Immunisation and Infection Control Policy and Guidelines (including Covid-19)
Version	2.1
Created by	CLSSA Policy Officer
Reviewed by	CLSSA Executive Officer
Applies to	All Community Language Schools
Key Words	Records; Student data; Privacy; Security; Confidentiality; membes; Retention schedule; General disposal schedule; Freedom of Information Act 1991; <i>Privacy Act 1988</i> ; Information Privacy Principles and Child Protection;
Status	Approved
Approved By	CLSSA Board <i>(Administrative updates approved by Executive Officer)</i>

Approval Date	July 2022
Review Date	December 2023
Notes	Administrative update only

Table 2: Revision Record

Date	Version	Revision Description
November 2016	1.0	New policy developed
30 th June 2019	2.0	<ul style="list-style-type: none"> Addendums to introduction and security sections to include the suite of policies and forms used by Ethnic Schools; correction to government department names change 'of' to 'for'; added section: retention of records and materials; Change name of Government Departments Amend policy to make it generic by replacing individual school details with "Community Language Schools" Added Privacy Act 1988, Information Privacy Principles and Child Protection; Retention of Records and Information Schedule to a different form- ES20A Changes in 'Created By' and 'Reviewed By' in Table 1; Changed Contents to Table of Contents; Reformatting of table and titles; Added new key words; Changed Other Documents to References and Other Documentation; Formatting of policy
18 th January 2021	2.1	<ul style="list-style-type: none"> Added Policies to Related Policies (Table 1) Added 'School Administrator and/or' to Responsibilities
December 2021	2.1	<ul style="list-style-type: none"> Added Policies to Related Policies (Table 1)
July 2022	2.1	<ul style="list-style-type: none"> Administrative update only

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Data and Information Management Policy

Introduction

Community Language Schools collects data from students and families to assist in enrolling students at the school, and to ascertain student medical issues and needs, and family details in the case of an emergency. Community Language Schools use other forms to document critical incidents, injuries, trauma and illness, complaints, and visitors. Data is also generated by the school for the purpose of grading and reporting and analysis of student achievement.

Community Language Schools 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 a Community Language School. This policy is based on the DfE Information Management Policy – Privacy and Confidentiality, DfE 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, 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 Community Language Schools' educational programs and curriculum development. Information regarding to the school program, activities and curriculum may contain general information and may not be deemed sensitive.

Documents created within the school pertaining to the school's activities and programs may be reviewed and any refinements to these documents will be kept. Community Language Schools 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. Community Language Schools will follow the set procedures for dealing with personal information.

Personal Information

Community Language Schools follows closely with the *Privacy Act 1988* and certain sections of the Information Privacy Principles (IPP) that relates to Child Protection which provides a guide to the collection, storage, use and disclosure of personal information (please refer **ES10: Personal Information and Photograph Release Policy** for more details relating to IPP)

The following protocols have been established by Community Language Schools to ensure appropriate safeguards 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, Community Language Schools 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.

Community Language Schools 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 Community Language Schools may be passed on or disclosed to other agencies including but not limited to the following:

- Community Language Schools SA (CLSSA).
- The Department for Education
- The Department of Human Services
- Department for 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. Community Language Schools will not disclose personal information about an individual to a third person that is not for the purpose(s) outlined above without prior consent.

Security

Community Language Schools have implemented the following controls to ensure that data is stored securely and are accessed appropriately:

- All personal information (e.g., medical advice forms; teacher forms; incident, injury, trauma, and illness form; complaints form; CARL report form and checklist; students' needs assessment or any other school form with personal student information) 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 desks are 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 and returned to the school as soon as possible.
- 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

Community Language Schools have developed the following procedures to ensure data is current, accurate, valid, reliable, and is recorded and reported accurately.

- Student online 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 (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.

Retention of Records and Information

A retention schedule has been developed for all Community Language Schools. The retention schedule outlines the types of documents that all schools are required to retain, the length of retention and any statutory provisions. Please refer to **ES20A: Retention of Records and Information Schedule** for further details. All language schools will need to document and retain information regarding:

- School registration
- School policies and procedures
- Child sexual abuse
- Alleged child abuse and/or neglect
- Risk management records
- Complaints about school personnel
- Complaints about school personnel pertaining to alleged sexual or physical abuse
- Annual census data
- Teachers and volunteers' playground duties and rosters

- Visitors and parental volunteers sign-in registers
- Curriculum documents and evaluations
- Any activity where parental consent is obtained
- Student and teachers and/or volunteers' attendance records
- Student behaviour records including significant events, cases, activities or vandalism
- Health and safety records including accident, personal injuries first aid and infectious disease registers
- Students needs assessments
- Special education programs and adjustments
- School and ground maintenance records
- Records related to security breaches
- Emergency and critical incidents
- Recruitment and selection of teachers, volunteers, management or parent committees
- Accounting and financial records
- Grant funding
- Management committee or any school committee meeting agenda and minutes
- Any other form or document deemed important by the principal or management committee.

Destruction Methods

To ensure Community Language Schools 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 Community Language Schools 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.

Responsibilities

It is the responsibility of the School Administrator and/or Principal to:

- Maintain records and records 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.

It is the responsibility of all school personnel to:

- Ensure that all particulars of students enrolled on the online enrolment and attendance system 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.

References and Other Documentation

- Government of South Australia: Department of the Premier and Cabinet - [Microsoft Word - PC 012 - Information Privacy Principles Instruction \(dpc.sa.gov.au\)](#)
- Government of South Australia Attorney-General's Department: State Records of South Australia- [Appraisal and Disposal | State Records of South Australia \(archives.sa.gov.au\)](#)