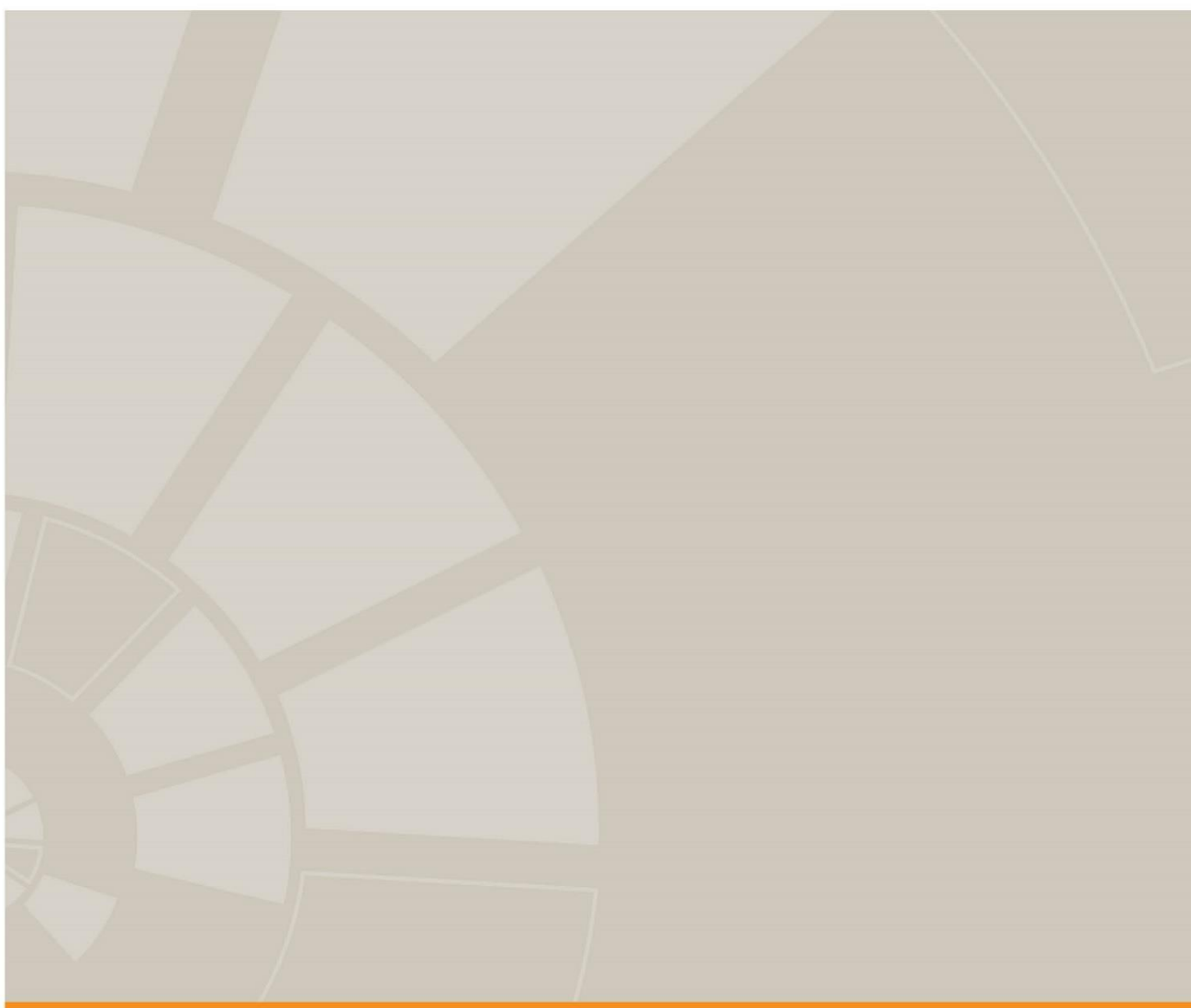


# Navigating Record Management

A GUIDE FOR INDEPENDENT SCHOOLS





# Introduction

Schools are responsible for holding significant quantities of records containing information about their students, staff and business transactions. These records are essential for the effective operation of schools and the provision of quality education. However, they also pose significant risks if they are not managed properly.

Recent high-profile data breaches have shown the potential consequences of poor record management, such as identity theft, fraud, reputational damage and legal liability. Schools need to ensure that their records are retained appropriately, stored securely, especially in digital formats, and that they have appropriate policies and procedures to prevent unauthorised access, use or disclosure.

Moreover, royal commissions have revealed the importance of record keeping practices in schools for supporting victims of abuse, both historic and into the future. Schools need to ensure that their records are accurate, complete and reliable, and that they can be accessed and retrieved when needed. Records can also provide evidence of accountability and transparency in school governance and decision-making.

To achieve legal compliance, schools need to be aware of the key legislation and standards that apply to their records, such as the *Education (Accreditation of Non-State Schools) Regulation 2017* (Qld), the *Australian Education Act 2013* (Cth), the *Civil Liability Act 2009* (Qld), the *Privacy Act 1988* (Cth), and the Australian Privacy Principles.

In complying with legislation there can be competing tension between retention and disposal of records. In light of increasing data security issues, record disposal is becoming a hot topic. Schools need to balance the risks and benefits of keeping or destroying records and follow best practice for secure disposal. Individual judgement is required to determine retention and disposal. Record retention and disposal schedules developed by Queensland State Archives and the Australian Society of Archivists support schools to make judgements and maintain compliance.

Independent Schools Queensland has developed this guide to support schools to understand and manage their records in ways that mitigate risks associated with both keeping and destroying records.

This guide is intended to provide general guidance and information for schools. It is not a substitute for legal advice or professional judgement. Schools should seek independent legal advice if they have any specific questions or concerns about their record management obligations or practices.

## Key Compliance Obligations

Records must be stored securely and safely but be locatable if they are needed, necessitating schools to have systems and processes for managing hardcopy and electronic records. Record retention should enable schools to meet compliance obligations and align with the school's privacy policy and the Australian Privacy Principles.

## Non-State Schools Accreditation (Qld)

As an ongoing obligation of a school accredited and regulated by the Non-State Schools Accreditation Board (NSSAB), schools need to demonstrate compliance with the *Education (Accreditation of Non-State Schools) Act 2017* (Act) and the subordinate regulation (Regulation).

Section 5 of the Regulation sets out the expectation for the retention of records relating to the Non-state school survey (State Census):

### **School survey data and associated documents**

*(1) A school must keep school survey data for the school, and associated documents—*

*(a) for at least 5 years after the day to which the data relates; and*

*(b) in a way that ensures the integrity and security of the data and documents.*

*(2) For a student mentioned in section 29(3) or 30(3), a school must keep a record of—*

*(a) the reason for the student’s absence from the school; and*

*(b) why the student’s absence was considered to be for a reason beyond the control of a person mentioned in section 29(3)(c)(i) or (ii) or 30(3)(c)(i) or (ii).*

*(3) In this section -*

*associated document means a document that records or includes a detail about a student mentioned in section 27, 29 or 30.*

NSSAB provided guidance about the expectation of non-state schools to retain copies of identity documents such as birth certificates in [a letter issued to principals](#) in February 2023. Further information, including the census guidelines are available on the [NSSAB website](#). Guidelines change regularly and should be reviewed as part of processes associated with enrolment and attendance.

## Commonwealth Funding

Section 37 [Australian Education Regulation 2013](#) (the Commonwealth Regulation) pertains to record keeping requirements of “an approved authority, block grant authority or non-government representative body for a school”

This sets out that an approved authority, block grant authority or non-government representative body for a school must keep the listed records, including records relating to enrolments and attendance rolls, for seven years.

The Commonwealth Census (the Census) occurs in the first week of August each year and collects information about student and staff numbers, students on a visa, students with disability and Indigenous Australian students. The data informs parts of the My School website and is used to calculate recurrent funding for each school. Read more on the [SchoolsHub website](#). Advice from the Department of Education in relation to the audit process related to the Census is that “as long as schools retain enrolment records (as required under State and Territory legislation) they will meet the requirements under the (Commonwealth) Regulation.”

## Royal Commissions

### *The Royal Commission into Institutional Responses to Child Sexual Abuse (Child Abuse Royal Commission)*

[Volume eight](#) of the Report from the Child Abuse Royal Commission is devoted to record keeping and has implications for non-state schools. The outcomes have resulted in legislation changes that place a positive duty on organisations to retain records.

In response to the Royal Commission, Queensland State Archives (QSA) has developed a [Vulnerable Persons Records Management Toolkit](#). The toolkit is designed to support Queensland Government and non-government agencies, including non-state schools, to identify, keep and manage records about their interactions with vulnerable persons, including children. The guideline does not require that a record of every interaction with a vulnerable person be kept. Schools should proactively consider which records may be needed in the event of future allegations of abuse.

Vulnerable persons, for the purpose of the findings of the Royal Commission, include all persons under the age of 18.

ISQ recommends that independent schools view the toolkit as best practice record keeping. Grammar Schools must use the toolkit.

### *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (Disability Royal Commission)*

The [Disability Royal Commission's final report](#) was presented to the Governor-General on 28 September 2023. Findings from the Disability Royal Commission may have record keeping implications for schools.

### *The Privacy Act 1988*

The [Privacy Act 1988](#) (Privacy Act) is the principal piece of Australian legislation protecting the handling of personal information about individuals. This includes the collection, use, storage and disclosure of personal information in non-state schools.

The Privacy Act provides 13 [Australian Privacy Principles](#) (APPs). The APPs place proactive requirements on entities, including non-state schools. APPs 3 and 11 are particularly relevant in considering record retention.

|                        |  |  |
|------------------------|--|--|
| <a href="#">APP 3</a>  | Collection of solicited personal information | Outlines when an APP entity can <a href="#">collect</a> personal information that is solicited. It applies higher standards to the collection of <a href="#">sensitive information</a> .   |
| <a href="#">APP 11</a> | Security of personal information             | An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances. |

A review into the Privacy Act commenced in 2020.

While the Privacy Act Review was underway, the Privacy Act was amended in December 2022 as part of the Australian Government's urgent reforms in response to data breaches. These amendments

increased maximum penalties under the Privacy Act and provide the Office of the Australian Information Commissioner with enhanced enforcement and information sharing powers.

The Australian Government [released its response](#) to the [Privacy Act Review Report](#) on 28 September 2023. Significant changes to the Privacy Act are anticipated as a result.

The Independent Schools Australia's [Privacy Compliance Manual](#) has been developed and updated to support non-state schools to understand their obligations under the Privacy Act and develop policies and processes to support compliance.

## Child Protection Legislation

The making and keeping of complete and reliable records is critical to be able to demonstrate that a school has taken all reasonable steps to prevent abuse in relation to a number of pieces of legislation.

### *Civil Liability Act 2003*

In 2019, the [Civil Liability Act 2003](#) was amended to impose new statutory obligations on institutions (including public authorities) to take all reasonable steps to prevent abuse of children under their control, supervision, control or authority by persons associated with the institution.

The amendments impose a 'reverse-onus' on institutions. An institution is taken to have breached the duty if abuse occurs, unless the institution is able to prove it took all reasonable steps to prevent the abuse.

### *Limitation of Actions (Child Sexual Abuse) and Other Legislation Amendment Act 2016*

In 2017, limitation periods for commencing an action for civil damages in relation to child sexual abuse in the [Limitation of Actions Act 1974](#) were removed to enable people who have experienced child sexual abuse to bring actions for personal injury damages despite the length of time that may have passed since the abuse occurred. This amendment also applies to a notice of claim made under the [Personal Injuries Proceedings Act 2002](#) (section 9) and to an action for damages arising under relevant sections of the [Civil Proceedings Act 2011](#).

### *Criminal Code (Child Sexual Offences Reform) and Other Legislation Amendment Act 2020*

Changes to the [Criminal Code Act 1899](#) in 2020 created offences for:

- failing to report sexual offence against a child
- failing to protect children.

Records should clearly identify steps taken, decisions made, and training delivered and participated in, in relation to child protection.

## Other Key Legislation

### *Corporations Act 2001*

For schools incorporated under the *Corporations Act 2001*, a number of requirements apply to maintain records for a minimum of seven years.

### *Other Commonwealth and State references*

Commonwealth and State legislation references or impacts the way schools keep and maintain records. Obligations exist as an employer, under workplace health and safety requirements, the keeping of animals, financial reporting, duty of care and many other activities schools undertake. CRICOS registered schools and those that operate early childhood and/or outside school hours care facilities have additional obligations. Record retention schedules support schools in complying with their legislative and regulatory obligations.

## Record Retention Schedules

All records must be managed so that they remain [complete and reliable](#) for the minimum retention period. To do this, schools need to understand:

- What records need to be kept
- Where and how they need to be kept
- How long they need to be kept for.

Given the complexity of the above compliance obligations, schools should consistently implement a record retention schedule that aligns with legal requirements and operational needs, noting some adaptations to identify school-based archiving processes.

These schedules specify how long records should be retained, when they can be disposed of, and under what circumstances they should be preserved. Schools must put systems in place to ensure data is destroyed or de-identified where needed and appropriate.

Two schedules that are appropriate for Queensland independent schools are produced by the Queensland State Archives and the Australian Society of Archivists.

### *The Queensland State Archives Disposal Schedules*

The Queensland State Archives (QSA) provide a sector-specific and a general retention and disposal schedule that schools can choose to adopt: The [Education and Training Sector Retention and Disposal Schedule](#) and [General Retention and Disposal Schedule](#).

The accompanying [disposal advice for record managers](#) supports the implementation of the QSA schedules.

Grammar school records are covered by the [Public Records Act 2002](#) and must therefore use the QSA schedules.

### *The Australian Society of Archivists*

The Australian Society of Archivist's [Record Retention Schedule for Non-Government Schools](#) and accompanying guides are designed specifically for the sector and are less complex than the QSA schedules. Schools may purchase this schedule directly.

## Guiding Principles for Record Management

### Evaluate Record Management Maturity

Understanding the current state of recordkeeping practices in a school is the first step towards establishing a mature and reliable record management system. This involves conducting a comprehensive review of existing systems, processes, and policies related to record management.

The *Recordkeeping Maturity Assessment Tool*<sup>1</sup> developed by the Queensland Government Chief Information Office can be a valuable resource for this purpose.

The tool contains a framework for assessing progress in achieving recordkeeping maturity and provides guidance on how to improve. Using the tool's five maturity levels applied to the context of an independent school, maturity could be described as below:

1. Undeveloped records management  
The school may have a limited understanding of its recordkeeping obligations, such as maintaining student records, staff documentation, and financial records. Recordkeeping practices within the school may be inconsistent, leading to issues like missing records, disorganised files, and difficulty in retrieving information. Due to limited time and resources, the school may struggle to allocate dedicated personnel or systems for effective records management.
2. Developing records management  
The school acknowledges weaknesses and gaps in its recordkeeping processes, such as inconsistent student data entry or incomplete staff documentation. Efforts are made to improve compliance with regulations related to school records, ensuring that the school adheres to data privacy laws. The school is beginning to explore the benefits of systematic records management, including better decision-making and improved administrative efficiency.
3. Acceptable records management  
The school is meeting policy requirements for recordkeeping, including proper archiving of student records and financial documents. A tailored plan is in place to address gaps in records management, with a focus on enhancing data accuracy and accessibility. The school starts considering future needs and goals, such as long-term data retention strategies and improved reporting capabilities.
4. Managed records management  
Records management processes run smoothly, and the school has a systematic approach to maintaining and retrieving records. Records management is integrated into various aspects of the school's activities, from student enrolment to academic planning. The school begins to explore how effective recordkeeping can contribute to achieving its strategic goals.
5. Embedded records management  
Records management practices align seamlessly with the school's strategic objectives, supporting data-driven decision-making and academic excellence. The school fully understands and utilises the value of records and information to enhance educational quality and administrative efficiency. Embracing digital ways of working, the school has clear short- and long-term digital goals and continuously strives to improve its record management.

The maturity tool contained in this publication is a helpful way to self-assess an organisation's record keeping maturity. It contains six tables listing descriptive indicators of behaviours and activities which assist the persons conducting the assessment to determine an overall maturity mark. The

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<sup>1</sup>The State of Queensland – Queensland Government Chief Information Office (2019). Recordkeeping Maturity Assessment Tool. Retrieved from <https://www.forgov.qld.gov.au/information-and-communication-technology/qgea-policies-standards-and-guidelines/recordkeeping-maturity-assessment-tool>



tables also provide performance indicators that can be used as goals for improving recordkeeping maturity.

## Regularly Audit Existing Records

Auditing a school's existing records is a key step in establishing a robust record management system. The process involves systematically reviewing all records held by an institution, regardless of their format (i.e., paper-based or digital). Auditing necessarily involves taking inventory, but it may also entail a comprehensive assessment of the quality, relevance, and compliance of the records.

The following steps could form part of an audit:

1. Identify the types of records the school holds, along with essential information such as their location, format, and custodian (individual or department).
2. Categorise records based on their purpose (see *Develop a Classification Process* below).
3. Identify redundant, outdated, or trivial records in alignment with the selected record retention schedule and flag them for deletion.
4. Identify high-risk records (e.g., records containing sensitive information).
5. Assess whether current risk controls and security measures are appropriate for each record type (e.g., can this record type be eliminated or substituted and if not, are the control measures adequate and effective).
6. Document the audit process that was implemented, including any discrepancies or compliance issues to be flagged for further review and action.

## Develop a Classification Process

Prior to the advent of digital record keeping, the process of record disposal was comparatively simple: Once records were no longer required to be kept in their original filing cabinets for day-to-day use, records of the same type were placed into an archiving box, labelled at least with the name of the record type and the scheduled date of disposal as per the record retention schedule. At regular intervals, those with the delegated responsibility for record disposal would identify boxes scheduled for disposal and enact the appropriate record disposal protocol (see below *Implement a Record Disposal Protocol*).

In the digital age, however, physical reminders to enact archiving and disposal procedures no longer exist, and records may continue to remain in their respective digital locations for years without being discovered or flagged for deletion. Many organisations think that organising their records in folders in a network drive is adequate. In the absence of a classification process through which files are tagged with metadata, which mirrors the act of labelling boxes with the necessary information, consistently enacting a retention and disposal process will be virtually impossible in all but the smallest of schools.

Classifying files and tagging them with this metadata removes the time spent manually working out in which folder a file was placed. It also makes it possible to instantly search for all documents in a particular category for which the retention period has passed and flag them for deletion.

Unclassified and untagged records on the other hand create significant challenges:

- low success in retrieving required records or information
- retrieval of too many records or too much information
- retrieval of unrelated and unwanted records and other information
- scattering of records and other information across different sources or information systems

- failure of searches on plurals of terms to retrieve any information or records
- multiple terms used to describe the same activity
- inability of users to decide on the best terms to use for searching.

Most organisations utilise a variety of business information systems to store records, adding complexity to their record management system. This needs to be considered when developing a classification process. Business information systems frequently used by schools include their accounting platform, school management system, email system, electronic document management system (e.g., SharePoint), learning management systems, and many more.

Further details about classification tools can be found in the National Archives of Australia document [Overview of Classification Tools for Records Management](#).

As a broad guide, the records classification scheme a school may develop to assist with the tagging of records with consistent metadata could align with the school's chosen disposal schedule.

| Classification level | Classification type  | Example classification types   |
|----------------------|--|--|
| Level one            | Function (align these headings to the headings found in your chosen Record Retention Schedule) | <ul style="list-style-type: none"> <li>- Governance</li> <li>- Administration</li> <li>- Student services</li> <li>- <b>Student management</b></li> <li>- Teaching and learning</li> <li>- Communications &amp; community relations</li> <li>- School-related groups</li> <li>- Spiritual programs</li> <li>- Objects</li> <li>- Ephemera</li> </ul>   |
| Level two            | Activity   | Using the above example for Level 1, <b>Student management</b> <ul style="list-style-type: none"> <li>- Student Master Record</li> <li>- Admissions</li> <li>- Attendance</li> <li>- Financial Assistance</li> <li>- Awards</li> <li>- Health and Welfare</li> <li>- Child Protection</li> <li>- Behaviour</li> <li>- Home Schooling</li> <li>- Work Experience</li> <li>- Co-curricular Activities</li> </ul> |
| Level three          | Short description  |  |
| Level four           | Disposal action  | According to the disposal schedule, when should this be considered for disposal.   |

## Implement a Record Disposal Protocol

A systematic process for the secure disposal of records that have met their retention period should be prescribed by policy and enacted at pre-determined intervals. This protocol should include

prescriptions on secure methods of disposal for various record types and the processes to verify destruction.

Only records that have been appropriately classified will reliably be identified as having exceeded their retention period.

The principal should authorise the destruction of school records, either on a case-by-case basis or using a sub delegation schedule. The board/council is responsible for decisions related to governance records.

Schools should keep a register of school records which have been destroyed, the date of the destruction and the name of the authorising person and the authority under which it was disposed of. The destruction of records should not be an entirely automated process to ensure records that are subject to or likely to be subject to, legal proceedings are not inadvertently destroyed.

The following steps could form part of the protocol:

1. Delegate responsibility to individuals or departments for overseeing the disposal process. Ensure those responsible are trained on the protocol and are aware of their role in the process.
2. Identify records that have reached the end of their retention period by consulting the record retention schedule and record classifications.
3. Determine if any reasons exist that may require extending the retention period beyond the schedule.
4. Identify appropriate methods for disposing of records securely. This may vary based on the type of records (paper or digital) and the sensitivity of the information.
5. Maintain a secure log of all destruction activities, including the date of destruction, the destruction method, the individuals involved and whether the destruction complied with the appropriate record retention schedule.
6. Regularly report on the disposal activities to management.

## Promote Staff Training and Awareness

All staff should be educated about the importance of record management, including the appropriate procedures for creating, storing, and disposing of records, as this promotes a culture of compliance throughout the organisation.

Training should be adapted to the specific needs of different user groups and the types of records they create and use.

## Managing Different Record Formats

Records may be retained in physical or digital formats and in schools, records are often retained in a combination of these formats, or schools may be transitioning or fully transitioned to a digital format. Regardless of the record retention format used, schools must ensure appropriate management of physical and digital records and the transition from physical to digital records.

### Physical format records

Retention of physical, usually paper-based records requires storage of records in a secure location, organised in a manner allowing easy and safe access. At the time of archiving, physical records must be classified before being placed into a container, and the container marked with its contents, allowing relevant records to be retrieved in the future.

It is also important to consider the preservation of physical records by avoiding damage from environment or storage conditions. Queensland State Archives provides guidance about [protecting and storing physical records](#) to ensure they are able to be retrieved in future.

### **Transition from physical to digital format records**

Before destroying an original physical record that has been digitised, schools must consider if the content of the record may be required for future court proceedings. Strict expectations exist around the admissibility of digital records as evidence in court proceedings, where the original source of the digital record was a physical record.

To ensure admissibility of a digital record for court proceedings, care must be taken to demonstrate an appropriate process of conversion has been undertaken. A [guideline](#) to support and understand a *defensible digitisation process* has been produced by the Queensland State Archives.

If not required for future court proceedings, original physical records need not be retained if they are kept digitally in a form that is readily accessible. The digital copy must be secure and must be convertible into hard copy if required.

### **Digital format records**

Retention of digital records requires an appropriate digital record storage system, that is accessible, but has restricted access, and takes account of changing file formats. [Store, protect and care for digital records](#), produced by the Queensland Government provides thorough consideration of these issues. The digital record storage system must also have a [classification process](#) in place, allowing for the retrieval of records in the future.

The digital record storage system must prioritise privacy and schools must have robust digital security measures in place, especially for records containing personal or sensitive information. Part D, section 9 of [Privacy Compliance Manual](#) discusses data security in detail.

When dealing with the digital records of key school policies, the digital record storage system should have version control mechanisms to track changes, edits, and revisions to policies. This will allow the school to retrieve an earlier version of policy, when asked to do so by a court or a regulator.

## **Roles and responsibilities**

The nature of independent schooling and differing levels of record management maturity mean there is not a singular approach to roles and responsibilities for records management in schools. The allocation of specific tasks and responsibilities may vary based on the size of the school and its unique needs. The following activities could be incorporated into existing roles or used to develop a role description for a record manager/archivist as appropriate.

1. **Develop and Implement Record Management Policies:** Create policies related to record creation, retention, disposal, and access.
2. **Educate Staff:** Provide training and guidelines to staff members regarding proper record-keeping practices, including classification, storage, and disposal protocols and conduct periodic training sessions for staff to reinforce record-keeping protocols and address any emerging challenges.
3. **Classify Records:** Develop a systematic classification process for different types of records within the school, ensuring consistency and clarity.

4. **Audit Existing Records:** Regularly review and audit existing records to ensure they are properly classified, stored, and meet compliance standards.
5. **Implement Record Disposal Protocols:** Oversee the secure disposal of records that have met their retention period, ensuring compliance with legal requirements and policies.
6. **Data Security:** Implement and monitor data security measures to protect digital records, including encryption, access controls, and regular security audits.
7. **Coordinate with Departments:** Collaborate with various departments to ensure records related to academics, finance, human resources, and student services are properly managed.
8. **Digital Records Management:** Oversee the transition from physical to digital records, ensuring digital records are well-organized, searchable, and accessible.
9. **Compliance Monitoring:** Stay updated with relevant laws and regulations concerning record management, ensuring the school complies with legislation and policies, applying a risk management approach to retention.
10. **Respond to Requests:** Handle requests for accessing specific records, ensuring that authorized personnel can retrieve necessary information promptly.
11. **Coordinate with IT:** Work closely with the IT department to ensure the proper functioning of digital record-keeping systems and troubleshoot any issues promptly.
12. **Regular Reporting:** Generate regular reports for school leadership/board, detailing the status of records, adherence to policies, and areas needing improvement.
13. **Disaster Recovery:** Develop and maintain a disaster recovery plan to safeguard records in case of emergencies like floods, fires, or cyber-attacks.
14. **Continuous Improvement:** Seek feedback from staff, assess the effectiveness of record management procedures, and implement improvements as necessary.

## Conclusion

This guide has been developed by Independent School Queensland to support schools in understanding and meeting their record management compliance obligations. To establish a robust record management system, schools should select a record retention schedule and follow the guiding principles within this document, starting with identifying the school's level of record management maturity and setting a goal for achieving a higher level of maturity over time.

Schools should then audit existing records, develop a classification process, implement a record disposal protocol, and finally train staff to ensure successful implementation. Throughout these processes, schools must be mindful of the format of their records and how these should be appropriately managed, and ensure that processes selected are customised to the school's unique context.

Once the school has implemented its record management system, regular monitoring will be needed to assess the level of compliance within the school. Ongoing monitoring will also assist in determining whether further staff training or adjustments to processes may be required, ensuring continuous improvement of the record management system.

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