

Policy Title:	Record Keeping Policy
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Owner:	Chief Executive Officer
Endorser:	Lionheart Board
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INTRODUCTION

Lionheart Camp for Kids (Lionheart) is committed to maintaining accurate and secure records to ensure compliance with Western Australian (WA) and Commonwealth (Cth) legislation, Australian Charities and Not-for-profits Commission (ACNC) governance standards, and best practices in record management. This policy establishes a framework for the creation, storage, access, retention, and disposal of records to support transparency, accountability, and operational effectiveness.

PURPOSE

The purpose of this policy is to ensure the consistent, secure, and legally compliant management of records across all areas of operation at Lionheart. It supports the protection of personal and sensitive information, adherence to legislative and regulatory obligations, and the implementation of best-practice standards in transparency, accountability, and informed decision-making.

This policy is designed to work in conjunction with key organisational policies and governs the creation, maintenance, access, and disposal of records generated through recruitment, program delivery, participant engagement, complaint resolution, digital operations, and stakeholder feedback.

DEFINITIONS

- **Records:** Documents (physical or digital) that provide evidence of Lionheart's activities, decisions, or financial transactions.
- **Retention Period:** The legally required duration for keeping records before disposal.
- **Confidential Records:** Sensitive information requiring restricted access, such as participant, financial, or employment records.
- **Data Breach:** Unauthorised access, disclosure, or loss of personal or sensitive information.
- **Grievance Records:** Documentation related to complaints or conflicts involving staff, volunteers or participants as outlined in the *Internal Grievance Policy* and *External Feedback Policy*.

- *Recruitment & Onboarding Records:* Records generated during hiring, screening, induction, and training of staff and volunteers.
- *Feedback Records:* Verbal or written responses received from stakeholders, families, or participants, including post-program surveys, compliments, and complaints.
- *Home Visit Records:* Notes, risk assessments, consent forms, and follow-up documentation produced during or after home visits or community visits.
- *Child Safety & Bullying Incident Reports:* Documentation of any observed or reported incidents, including details of actions taken, and any follow-up.

POLICY

Legal and Regulatory Compliance

Lionheart will comply with all relevant legislation, including:

- Privacy Act 1988 (Cth) – Handling personal and sensitive information.
- Corporations Act 2001 (Cth) (if applicable) – Financial record-keeping obligations.
- Australian Charities and Not-for-profits Commission Act 2012 (Cth) – ACNC governance and reporting requirements.
- Fair Work Act 2009 (Cth) – Employment and payroll records.
- Associations Incorporation Act 2015 (WA) – Record-keeping for incorporated associations.
- State Records Act 2000 (WA) (if applicable) – Best practices in managing organisational records.

Types of Records Maintained

Records maintained by Lionheart include:

- Corporate Governance Records (Board meeting minutes, policies, and conflict of interest registers).
- Financial Records (invoices, payroll, receipts, tax records).
- Employment & Volunteer Records (contracts, working with children checks, training records).
- Participant Records (registration, case notes, attendance records, medical forms).
- IT & Digital Records (emails, cloud storage backups, website logs).
- Grievance records (internal and external)
- Post-program feedback and evaluation forms
- Volunteer screening and onboarding documents
- Home visit records (including pre-visit checklists and mileage logs)
- Accident, Incident or Injury reports
- Diversity, equity, and inclusion monitoring records

Data Storage and Security

- Physical Records: Stored securely in locked filing cabinets with restricted access.
- Digital Records: Encrypted and stored in secure cloud-based or server

systems.

- Access Controls: Staff and volunteers only access records relevant to their role.
- Cybersecurity Measures: Multi-Factor Authentication (MFA), antivirus software, and regular security audits.
- Document Upload Requirements: Staff must upload any paper-based documentation (e.g., home visit notes, incident reports) to the secure system as soon as possible, and within one working week.
- Prohibition of Personal Storage: To maintain data security and compliance with the IT Policy, staff and volunteers are strictly prohibited from storing any Lionheart records on personal devices, USB drives, or external storage platforms. Exceptions may only be granted under exceptional circumstances and with prior written approval from the CEO.

Record Retention Periods

Retention periods align with legal requirements and best practices:

- Financial Records: 7 years (ATO and ACNC requirement).
- Employment Records: 7 years after termination (Fair Work Act 2009).
- Participant Records: 7+ years (or 45 years for records involving children or vulnerable individuals).
- Governance Records: Indefinitely (Board meeting minutes, key policies).
- Recruitment and Onboarding: Retained for 7 years following termination or withdrawal (in line with Fair Work Act and *Our People Policy*).
- Home Visit and Community Visit Records: Retained for 7+ years; longer where the child or vulnerable individual is involved.
- Grievance Records: Retained for a minimum of 7 years after resolution (in accordance with *Internal Grievance Policy*).
- Feedback and Survey Data: Retained for at least 5 years to support continuous improvement, reporting, and strategic planning.

Disposal and Destruction of Records

- Confidential Documents: Secure shredding for paper records.
- Digital Records: Permanent deletion from systems, including backups.
- Legal Hold Exception: Records must not be destroyed if subject to an investigation or legal proceedings.
- Records containing feedback, grievance information, or sensitive participant data (such as from home visits or bullying reports) must be disposed of securely, either through: Cross-cut shredding (for physical records), and permanent deletion from cloud platforms and backups, verified by the IT delegate.
- Legal holds override disposal protocols, including during ongoing complaints or external investigations.

PROCEDURE

1. Record Creation and Storage

All records must be accurately dated, labelled, and securely stored only on Lionheart's SharePoint system.

2. Access and Security Management

Role-based access controls ensure data confidentiality.

Records should be readily accessible to Fair Work Inspectors, as required by the act.

3. Annual Compliance Review

- Records will be reviewed annually to confirm retention and compliance with legal requirements.
- An annual audit of record-keeping practices will be undertaken to confirm compliance with retention schedules, data security protocols, and confidentiality standards. This includes a cross-sample review of:
 - Feedback forms (*External Feedback Policy*)
 - Grievance case records (*Internal Grievance Policy*)
 - Volunteer and employment files (*Our People Policy*)
 - Home visit documentation (*Home Visiting Policy*)
- Any deficiencies will result in corrective actions, including refresher training or system access review.

4. Data Breach Response

In the event of a breach, procedures will align with the Notifiable Data Breaches (NDB) scheme under the Privacy Act 1988 (Cth).

REVIEW

This policy will be reviewed every two years or when significant legislative or operational changes occur to ensure continued compliance and effectiveness.

RELATED DOCUMENTS

- Privacy Policy
- IT Policy
- Financial Management Policy
- External Feedback Policy
- Our People Policy
- Internal Grievance Policy
- Bullying Policy
- Access and Equity
- Home Visiting Policy

REFERENCES

- Privacy Act 1988 (Cth)
- Notifiable Data Breaches (NDB) Scheme
- Fair Work Act 2009 (Cth)
- Australian Charities and Not-for-profits Commission (ACNC) Governance Standards
- Associations Incorporation Act 2015 (WA)
- State Records Act 2000 (WA)

KEY CONTACT PERSON

For further information please contact the Operations Manager by emailing enquiries@lionheartcampforkids.com.au.