



RECORD KEEPING, DATA RETENTION AND STORAGE OF RECORDS POLICY

Best Practice – Quality Area 7

PURPOSE

Shine Bright EYM (Shine Bright), has overall responsibility for overseeing and ensuring records are maintained, archived and stored in accordance with relevant legislation and standards.

The purpose of establishing a Record Keeping, Data Retention and Storage of Records Policy is to clearly define how the organisation maintains and manages appropriate records in a private and confidential manner, working in accordance with legislative requirements and best practice standards.

The purpose of this policy also includes the requirements to take reasonable steps to protect Personal Information and Sensitive Information; prevent Data Breaches.

A Data Breach is defined as unauthorised access, disclosure or loss of Personal Information or Sensitive Information. Data Breach examples include:

- Lost or stolen papers, organisational electronic devices such as a laptop, phone, a USB drive and any other portable data storage device.
- When personal or sensitive information is mistakenly shared with the wrong person (e.g. an email sent to the wrong person)
- Unauthorised access to Shine Bright's systems and database by an employee or an external individual.
- The introduction of a portable storage device into the Shine Bright system with the potential result of a loss of control of information.

POLICY STATEMENT

SHINE BRIGHT RESERVES THE RIGHT TO ACCESS AND MONITOR ANY ORGANISATIONAL COMPUTER OR ELECTRONIC DEVICE TO ENSURE COMPLIANCE WITH THIS POLICY.

VALUES

Shine Bright is committed to ensuring that there are appropriate systems and processes in place to enable:

- Good governance and management of the organisation.
- Accountability to its stakeholders (children, families, staff, volunteers, students and the Department of Education).
- Compliance with all regulatory and legislative requirements placed on the organisation.
- Shine Bright to remain solvent and comply with all its financial obligations.

- The rights of all children to have access to high quality, safe early learning environments which promote learning including:
 - embedding Aboriginal and Torres Strait Islander perspectives into practice
 - promoting the cultural learning of Aboriginal children
 - promoting the cultural learning of children from culturally and linguistically diverse backgrounds/families
 - promoting the learning of children with a disability
 - taking reasonable steps to ensure the health, safety and wellbeing of children at all times, while also promoting each child's learning and development
 - continuously improving all of our services

SCOPE

This policy applies to Shine Bright, Nominated Supervisors, educators, staff (which, for the purpose of this Policy, includes full time, part time and relief staff) and appropriate contractors, advisors and representatives. This Policy is inclusive of its attachments.

RESPONSIBILITIES

Shine Bright is responsible for:

- Overall responsibility in ensuring that all documents and data records relating to children, families, staff, health and safety and financial and administrative matters are maintained, archived and stored in accordance with relevant legislation and standards and the principles of good governance.
- Reporting eligible Data Breaches as required to the Office of the Australian Information Commissioner (OAIC).
- Ensuring appropriate training and communication is provided to staff.
- Ensuring that internal corporate related information is readily and appropriately available to staff who require that information for the purposes of carrying out their work responsibilities

NOTE: Appropriate availability includes ensuring required authorisation has been obtained (or has been granted to a designated position title) and that such availability and access methods maintain the standards of confidentiality as are required and that approved procedures are followed.

Senior Managers are responsible for:

- Ensuring that all documents and records relating to children, families, staff, health and safety and financial and administrative matters in their areas of responsibility are maintained, archived and stored in accordance with relevant legislation and standards and relevant internal Policies. This will involve liaising with and communicating with relevant external organisations and internal staff.
- Keeping abreast of relevant regulation, legislation and Policy changes that might have an impact on current practice and follow up as appropriate.
- Provision of appropriate training and communication to staff.
- Eligible Data Breaches are reported to the Office of the Australian Information Commissioner (OAIC).

The Nominated Supervisors are responsible for:

- Ensuring records are kept in accordance with compliance requirements, stored appropriately in a secure manner and kept confidential at all times at service of responsibility. Queries are followed up with their Early Years Advisor.
- Possible Data Breaches are reported to the Early Years Manager or the People and Culture Manager.

All staff are responsible for:

- Working with their Nominated Supervisor and Educational Leader to ensure records are kept in accordance with compliance requirements, stored appropriately in a secure manner and kept confidential at all times.
- Reporting any suspected data breach to the Nominated Supervisor.

REVIEW

To assess whether the values and purposes of the policy have been achieved, Shine Bright will:

- Regularly seek feedback from everyone affected by this policy regarding its effectiveness.
- Monitor the implementation, compliance, complaints, data breaches and incidents in relation to this policy.
- Keep this policy up to date with current legislation and best practice and in-light of digital modernisation.
- Revise the policy and procedures as part of Shine Bright's policy review cycle, or as required.

ATTACHMENTS

Attachment 1: [Record Keeping, Retention Periods and Storage](#)

Attachment 2: [Electronic Records Approved Storage](#)

AUTHORISATION

This policy was adopted Shine Bright on 26/04/2023

REVIEW DATE:

APRIL 2026

RELATED POLICIES

Administration of First Aid

Administration of Medication

Complaints

Confidentiality and Privacy

Dealing with Medical Conditions

Delivery and Collection of Children

Determining Responsible Person

Emergency and Evacuation

Enrolment and Orientation

Excursions, Service Events and Regular Outings

Governance and Management of the Service

Incident, Injury, Trauma and Illness

Participation of Volunteers and Students

Staffing

Staff Recruitment and Induction

LEGISLATION AND STANDARDS

Relevant legislation and standards include but are not limited to:

- Education and Care Services National Law Act 2010
- Education and Care Services National Regulations 2011: Regulation 177, 181,183 and 184
- National Quality Standard, Quality Area 7: Leadership and Service Management Standard 7.1: Administrative Governance supports the operation of a quality service.
- Fair Work Regulations 2009
- Privacy Act 1988
- Occupational Health and Safety Act 2004
- Financial Management Act 1994