Policy Statement

The objective of this procedure is to articulate Affinity Education Group's commitment to National Law and Regulations, including amendments, from the Education and Care Services National Regulations 2011 and the Education and Care Services National Regulations WA 2012 and Family Assistance Law (FAL).

A good record keeping program is fundamental to Affinity Education Group's commitment to administrative transparency and accountability. It enables the company to account for decisions and actions by providing essential evidence in the form of records and ensures the preservation of the collective memory of the company.

The keeping of records and documentation on all aspects of the child's enrolment and participation at the centre is an ongoing and important legislative requirement. A methodical and clear approach to record retention will allow documentation to be accessed if or when required by families or Regulatory Authorities.

The steps outlined in this procedure will guide Centre Managers and Centre Support personnel to the creation, classification, storage and retention requirements for the management of information and documentation

Scope of Policy

This procedure is applicable to all Centre and Centre Support areas and locations of Affinity Education Group. It is intended to comply with relevant legislation in all states and territories in which Affinity Education Group has presence.

Some departments within Affinity Education Group that create, store and maintain records may have separate guidelines for records management that supplement, but do not supersede, this procedure.

All employees should be aware that electronic documents have the same status as paper documents. Both electronic and paper documents are bound by the same legislative requirements and are subject to the same degree of confidentiality and care. Therefore, electronic records must be managed as part of this procedure.

Procedure Strategies

1.0 Roles and Responsibilities for Record Keeping

1.1 Managers

Management-level staff are responsible for implementing and maintaining sound record keeping practices within their respective centres, areas and/or departments.

Managers must ensure that records are created, maintained and stored in accordance with the standards outlined in this policy and that no records are destroyed.

1.2 Staff

Every member of staff is responsible for making and keeping records that may be necessary to fully and accurately record the functions, activities, transactions, operations, policies, decisions, procedures, affairs, administration and management of the Centre.

Staff members are to follow authorised procedures in carrying out records management functions, and must observe security, privacy and confidentiality requirements at all times, in accordance with Affinity Education Group's Privacy Policy.

Staff members are to handle records sensibly and with care and respect to avoid damage to the records and prolong their lifespan.

2.0 Creation of Records

All staff are required to create full and accurate records to the extent necessary to:

- Facilitate action by employees, at any level, and by their successors;
- Make possible a proper scrutiny of the conduct of businesses by anyone authorised to undertake such scrutiny;

- Protect the financial, legal and other rights of the organisation, its clients and any other people affected by its actions and decisions.

3.0 Timeframes for retention of records and documents

Type of Record	Timeframe	Additional Details
Child enrolment record	Until the end of 7 years after the child's last attendance	Enrolment records are digitally stored on XAP for the required timeframe. Paper copies are to be destroyed at the end of enrolment. Ensure all medical and dietary information is uploaded to the child's XAP enrolment
Child attendance record for every child at the service (regardless of whether they receive CCS)	Until the end of 7 years after the child's last attendance	Attendance records are digitally stored on XAP.
Absence records for every child at your service, including evidence for any additional absences if required	After the end of 7 years	Absence records are digitally stored in XAP
Child assessments and development records	Until the end of 3 years after the child's last attendance	Assessments and development records are stored on Storypark. Upload any paper copies of individual documentation to Storypark for digital storage
Incident, injury, trauma and illness record	Until the child is 25 years old	
Records relating to child sexual abuse that has, or is alleged to have occurred at the service	45 years	
Any notice given to a state or territory body about as child at risk of abuse or neglect.	After the end of 7 years	
Medication record	Until the end of 3 years after the child's last attendance	
Death of a child while being educated & cared for by the service	Until the end of 7 years after the death	
Regular transportation of children records	Until the end of 3 years after the child's last attendance	FRM 2-F70 Record of Embarking FRM 2-F71 Record of Disembarking
Staff Record	Until the end of 3 years after the staff member works for the service	Individual staff file with information as outlined in Regulation 145. FRM 4-F4 Staff Record is not required to be archived externally.
Record of replacement of educator, including: - Early Childhood Teacher or suitably qualified person - access to early childhood teachers or suitably qualified person	Until the end of 3 years after the staff member works for the service	FRM 4-F96 Staff Replacement Record
Record of educators working directly with children	Until the end of 3 years after the staff member works for the service	
Record of responsible person in day-to-day charge including	Until the end of 3 years after the staff	

nominated supervisors placed in day-to-day charge	member works for the service	

Type of Record	Timeframe	Additional Details
Record of volunteers and students, full name, address and date of birth details, days and hours in attendance, and working with children / vulnerable people check or teacher registration details	Until the end of 3 years after the volunteer or student attended the service	
Record of service's compliance history	Until the end of 3 years after the approved provider operated the service	
Records relating to banking, finance, family accounts	After the end of 7 years	
Motor vehicle records	After the end of 7 years	
Fire records including asset registers, safety certificate, occupier statement, evacuation plans, evacuation drills, equipment safety inspection records.	Kept onsite for 5 years	
All evidence and information supplied in a CCS Approval Application	After the end of 7 years	
All mandatory background checks and any evidence or information produced to obtain checks	After the end of 7 years	These are stored in PageUp and SuccessFactors
All Statements of entitlement, any statements issued to advise of a change to a statement of entitlement	After the end of 7 years	Statements are digitally stored in XAP
All invoices and receipts issued for fees	After the end of 7 years	Invoices and receipts are digitally stored in XAP
All records of prescribed third-party and provider-funded discounts	After the end of 7 years	Discounts applied are digitally stored in XAP
Any complaints made to a provider or any of its services relating to compliance with FAL	After the end of 7 years	

NOTE: All records are to be stored onsite for a period of 18 months unless otherwise stipulated
Daily information sheets and sleep charts will be kept for a period of 6 months onsite and nappy charts kept for 12 months. These records will be destroyed appropriately after this time unless related to a serious incident in which it will be retained.

4.0 Preparation of archive boxes
The Centre Manager is to create separate 'departures' boxes for children's records, educator's records and office records as needed. Boxes will be labelled according to their contents and time period of destroy:
Example: Feb 2025 – Jan 2026 Child Records – Up to 25 years

- Records for each box will be bundled either in a manila folder or with a rubber band with the person's name clearly evident and highlighted, or the type of office record clearly highlighted on the top page of the bundle.
- Any record pertaining to a child or employee who has departed the centre between February 2025 (or prior) and January 2026 will be stored in the departures box in alphabetical order according to the surname.

- Departures after February will fall into the following year's departure box of departures between February and January of the next year.
- Each box will be labelled with the archive barcode sticker on the short end of the box. A record of the box's contents and the barcode number will be retained on the Grace Archive Catalogue Register at the centre and a copy placed inside the box. This will be referred to when entering data for collection.
- The Regional Manager will view the archive box prior to approving the archiving of same.

5.0 Storage

All prescribed enrolment and other documentation pertaining to children, families, educators and other operational requirements as listed under, but not limited to, regulation 177 must be stored at the centre in an appropriately secure location.

- Each prepared box will be retained onsite for a period of 18 months to allow for ease of retrieval and evidence for assessment and rating, investigations, safety audits or funding audits, for example.
- Boxes should be stored onsite in conditions that are clean and secure, with low risk of damage from fire, water, dampness, mould, insects and rodents.
- They should also be kept away from direct sunlight and other sources of light and heat.
- They will need to be permanently relocated offsite to Grace Records & Information Management after 18 months. Grace's offsite storage facilities are strictly maintained at a stable temperature and humidity.

Records in non-paper formats such as photographs or computer drives require specialised storage conditions and handling process that take account of their specific physical and chemical properties.

- Electronic records should also be backed up using Affinity Sharepoint or OneDrive. External hard drives or USB storage devices should not be used due to the risk to data security.
- Strategies should be developed to ensure that these records remain accessible and useable in all future generations of software, for the entire period of their retention.

6.0 Security

Centre Managers and their staff must ensure the integrity and security of their data and records is maintained, and that this material is stored in a retrievable way.

- Personal information about staff and children of the Centre must be secured within all levels of records.
- Only an employee of Grace Information & Records Management is authorised to collect archive boxes for offsite storage.
- Records must be made accessible to all authorised users.

7.0 Collection

In July each year, the Centre Manager will contact Grace to arrange them to remove the boxes from the previous year to store at their secure site. For example, Feb 2022-Jan 2023 boxes will be collected in July 2024; Feb 2024-Jan 2025 boxes will be collected in July 2026, etc.

8.0 Disposal and Destruction of Records

Staff are not to destroy or dispose of any record identified in the previous timeframe for retention list. Any approved documents to be destroyed will be shredded and not disposed of whole. Records in archive will be destroyed by Grace at the end of the year according to their year of destroy schedule.

9.0 Audit and Review

All record systems may be subject to audit and review to ensure compliance with legislative requirements and with the requirement of this procedure. To accommodate changes in legislation, technologies, programs and resources available to Affinity Education Group, this procedure is to be reviewed on an annual basis.

References

Education and Care Services National Regulations 2011
Education and Care Services National Regulations WA 2012
Privacy Act 1988
What records you need to keep - Department of Education, Australian Government

ACECQA. 2025. Best Practice Record Keeping Supporting Child Protection.
www.acecqa.gov.au/sites/default/files/2026-01/QA7%20Best%20practice%20record%20keeping%20Supporting%20child%20protection.pdf

Version History

Version Control	Date	Author	Description of Change
V5.16	May 2016	AEG	New Procedure
V9.16	Sept 2016	AEG	Revision, addition of Grace and name change
V5.17	May 2017	AEG	Refined process
V10.17	Oct 2017	AEG	Minor amendment
V11.17	Nov 2017	AEG	18-month retention, archive month
V12.18	Dec 2018	AEG	Scheduled review
V2.20	Feb 2020	AEG	Scheduled review
V3.21	Mar 2021	AEG	Scheduled review
V3.22	Mar 2022	AEG	Scheduled review
V3.23	Mar 2023	AEG	Scheduled review
V11.23	Nov 2023	AEG	Added 45 years retention
V12.23	Dec 2023	AEG	Removed USB and external drives
V2.24	Feb 2024	AEG	Revised daily information and medication time frame
V1.25	Jan 2025	AEG	Updated dates. Added notes to table 3.0
V7.0	Jan 2026	AEG	Scheduled review
V7.1	Jun 2026	AEG	Minor additions to include Family Assistance Law requirements and timeframes of record storage, including enrolment and attendance records for 7 years