

3 October 2016

The Hon. Justice Peter McClellan AM  
Chair  
Royal Commission into Institutional Responses to Child Sexual Abuse  
GPO Box 5283  
Sydney NSW 2001

Emailed to: [records@childabuseroyalcommission.gov.au](mailto:records@childabuseroyalcommission.gov.au)

Dear Justice McClellan,

### **Response to Consultation Paper: Records and Recordkeeping Practices**

The Association of Heads of Independent Schools of Australia (AHISA) acknowledges the work of the Royal Commission in preparing the way for improved child protection policies and practices in Australia.

Our response to the Consultation Paper on Records and Recordkeeping Practices is set out in four sections:

- A. The five Key Principles
- B. Current recordkeeping practices in independent schools
- C. Encouragement vs enforcement
- D. Recommendations.

In preparing its response, AHISA conducted an online survey of its members covering current recordkeeping practices in members' schools. Our aim was to identify any gaps between current practice and best practice as suggested by the Royal Commission's five principles, and to canvass what might be most helpful to principals in bridging such gaps. The results of the survey are addressed directly in Section B and also inform comment in the other sections.

#### **A. THE FIVE KEY PRINCIPLES**

AHISA acknowledges that institutional records and recordkeeping are integral to creating safe environments for children, accountability for organisations and a platform for justice and redress for victims and survivors of abuse.

AHISA agrees that good records management is linked to good governance of institutions.

## About AHISA

The primary object of AHISA is to optimise the opportunity for the education and welfare of Australia's young people through the maintenance of collegiality and high standards of professional practice and conduct amongst its members.

AHISA's 410 members lead schools that collectively account for over 11 per cent of total Australian school enrolments and 20 per cent of Year 12 enrolments.

Almost a third of AHISA members lead schools with boarding facilities, collectively providing for over 15,000 boarding students. Some 85 per cent of members' schools have an early learning centre.

AHISA's members lead a collective workforce of some 40,000 teachers (full- and part-time) and 24,000 full- and part-time non-teaching staff.

AHISA is also of the view that commitment to published policies and procedures in relation to records management is vital in helping institutions establish and maintain relationships of trust with stakeholders, including the wider community.

AHISA is therefore in broad agreement with the five key principles proposed by the Royal Commission in relation to implementing and maintaining comprehensive record management in institutions, including in schools.

Comment specific to each principle is provided below.

### **1. *Creating and keeping accurate records is in the best interest of children.***

- *Institutions that care for or provide services to children should keep the best interests of the child front of mind in all aspects of their conduct, including their recordkeeping.*
- *It is in the best interests of children that institutions foster a culture in which the creation and management of accurate records is an integral part of the institution's operations and governance.*
- *Institutions should ensure their staff and volunteers have the knowledge, training and resources necessary to create and manage records about children appropriately.*

AHISA notes that good record making and recordkeeping cannot be separated from good reporting practices, which are the precursor to recording complaints or observations. Good reporting, record making and recordkeeping in relation to child protection are only achievable when institutional cultures prioritise children's safety and wellbeing.

The Royal Commission notes that, depending on jurisdiction, non-government schools do not necessarily have the same record keeping requirements as government-owned schools (pages 22-23) and that there may be variance in the records management practices among non-government schools. It should be noted,

however, that common law duty of care and state and territory laws covering mandatory reporting apply across all school sectors.<sup>1</sup> That is, variance in policies and procedures between non-government schools and government schools, or between independent and systemic schools, should not be interpreted as an accountability deficit.

As the Royal Commission notes:

Most institutions that care for or provide services to children are now aware that they have a responsibility, if not a legal obligation, to create records about their business operations and decision making, their child protection policies and practices, and critical incidents affecting children under their care. (Page 24)

The Consultation Paper also notes that ‘contemporary records continue to be affected by poor maintenance and retention practices’ (page 29).

Like the Royal Commission, AHISA is also concerned that the creation and maintenance of detailed and accurate records – at least to current best practice standards – is ‘still a problem’ for some institutions. (We address this in Section B, below.) However, AHISA believes that while there may be advantages in a ‘single unified approach to recordkeeping and archiving’ across government and non-government sectors (page 23), it is not the diversity of approaches that is a critical issue but whether the organisation – public or private – is meeting accepted standards.

If records management is to be embraced as a strategic operation within organisations (as AHISA recommends), organisations must have the freedom to adopt and adapt information management frameworks, even while incorporating – or even exceeding – best practice standards. In AHISA’s view, legislating for uniformity in approaches may simply encourage tick-the-box compliance, not the child-focused cultures the Royal Commission advocates.

Child abuse prevention organisation, Child Wise, in its information about its program for Child Safe Certification, also notes the importance of diversity in practice – although not in standards – if organisational culture is to be harnessed for child protection:

Child Wise recognises that there is variability across and within sectors in organisations’ level of child safety. Child Wise also recognises that while the Standards must be met for Certification, each organisation needs an individualised approach to build child safe cultures, and robust systems and processes to protect children in their specialised area of service delivery.<sup>2</sup>

This is not to say that regulation does not have a role to play in promoting good institutional record making and recordkeeping. An example of how such regulation might be applied can be seen in recent revisions to the registration requirements for non-government schools in Western Australia.

The Western Australian Department of Education Services recently published revisions to the registration standards for non-government schools in that state, to apply from 1 January 2017.<sup>3</sup> In relation to Standard 12: Child Abuse Prevention, the Department’s *Guide to the Registration Standards and Other Requirements for Non-Government Schools* includes provision for non-government schools to establish a Staff Code of Conduct governing compliance with the school’s child protection policies and procedures and further

outlines a requirement covering procedures for the detection and reporting of breaches of that Code (Standard 12.2; page 40).

The Guide states that supporting evidence to demonstrate application of the Standard may be requested of schools:

It will not be sufficient to demonstrate compliance through a suite of policies, procedures, practices and strategy documents alone. Various evidence or records showing active implementation and review will be required to satisfy the Director General. (Page 41)

The Guide also states that: ‘It is generally expected that compliance with this standard will be demonstrated through the comprehensive implementation of a relevant child-safe organisation framework benchmarked as better practice by a peak body.’

AHISA believes registration requirements for, and registration inspections of, non-government schools are both a stringent and practical means through which state and territory governments can set and monitor standards in child protection generally as well as in the creation, maintenance and disposal of records pertaining to child protection.

Independent schools should not, however, be burdened with the requirement to meet one set of regulations from their state/territory government and another duplicate or similar set from the federal government. AHISA believes the federal government has a role to play through the Education Council to encourage the application of similar standards across the jurisdictions: it should not increase unnecessary red tape and the compliance burden of schools with a further level of regulation and reporting.

Some AHISA members have expressed concern with the notion of having to provide confidential records as ‘evidence’ of compliance with school registration requirements on reporting and recordkeeping policies. Conflicts with privacy and workplace laws, as well as the possibility of undermining a police investigation, were all raised as potential issues.

Some Heads are also concerned by the keeping of records of staff members’ suspicions of a colleague’s behaviour where the behaviour was clearly not grooming behaviour.

AHISA believes it is vital that any extended reporting requirements on schools – and therefore record making and recordkeeping requirements – need to be accompanied by information about the intersection of these requirements with schools’ obligations under legislation and/or regulations pertaining to privacy, freedom of information and employment conditions.

While some AHISA members are seeking certification of their child protection policies and practices and staff training through external agencies (such as Child Wise), there is a place for governments to support the development of resources for schools, including free-to-access online staff training modules to address issues relating to training relief staff as well as for staff induction, and sharing of best practice. Several suggestions to this effect were detailed in AHISA’s submission to the Royal Commission in response to *Issues Paper 9: Addressing the risk of child sexual abuse in primary and secondary schools*.<sup>4</sup>

AHISA believes a similar approach to developing online materials would also be valuable to both highlight the importance of best practice record making and recordkeeping and training staff in best practice. For example, some AHISA members have expressed interest in learning how other schools are using their electronic document management systems to maintain accurate records.

AHISA members stress the importance of the principal's role in being the sole officer within the school to whom any and all reports relating to child protection should be presented. This is seen as a key measure to support identification – through multiple reports over time – of a child or children at risk and a staff member or members who might be engaging in grooming behaviours.

Members also note that the shift to electronic filing systems was supporting improved recordkeeping practices.

**2. Accurate records must be created about all decisions and incidents affecting child protection.**

- *Institutions should ensure that records are created to document any identified instances of grooming, inappropriate behaviour (including breaches of institutional codes of conduct) or child sexual abuse and all responses thereto.*
- *Records created by institutions should be clear, objective and thorough. They should be created at, or as close as possible to, the time that the incidents they document occur, and clearly indicate the author (whether individual or institutional) and the date of creation.*

Again, AHISA stresses the role of institutional culture in the practical application of the proposed principles.

The Royal Commission notes the case in one non-government school (pages 25-26) where set policies and procedures were in place but ignored by key school personnel. That is, policies and procedures are of themselves insufficient to ensure best practice; it is the depth of institutional culture that supports best practice.

AHISA acknowledges the role of the principal in setting culture. In independent schools, it is also the principal's responsibility – under the delegated authority of the school Board – to create and sustain the staff educational programs and monitoring mechanisms that underpin good practice.

AHISA believes the transition to digital record making and recordkeeping in schools – especially in those schools without the resources for dedicated information management staff – may pose a risk to meeting best practice standards. (This issue is noted by the Royal Commission on page 15 of the Consultation Paper.) AHISA suggests that the Royal Commission includes recommended practice for transitional periods within any guidelines for best practice records management that it may produce for schools.

**3. Records relevant to child sexual abuse must be appropriately maintained.**

- *Records relevant to child sexual abuse should be maintained in an indexed, logical and secure manner.*

- *Associated records should be co-located or cross-referenced to ensure persons using those records are aware of all relevant information.*

AHISA is in broad agreement with this principle, and notes the case described in the Consultation Paper of an independent school in Perth where the dispersal of records contributed to the failure of the school to identify abusive behaviour by a staff member (pages 29-30). However, AHISA has some concerns regarding the practical application of this principle.

As mentioned above, some AHISA members have expressed concern about the keeping of records pertaining to any reported suspicions in regard to the behaviour of a staff member who may be under police surveillance, when that staff member may have the right to view these files or their union might apply to see the files under freedom of information or workplace legislation. AHISA members would appreciate advice on recordkeeping practices that would meet the intent of the principle in circumstances where legal access to records could prejudice the outcomes of an investigation or prosecution.

#### **4. Records relevant to child sexual abuse must only be disposed of subject to law or policy.**

- *Records relating or relevant to child sexual abuse should only be destroyed in accordance with records disposal schedules or published institutional policies.*

AHISA agrees that improper or early disposal of records would undermine the purposes of good records management.

The Royal Commission notes that the records of non-government schools are not subject to the disposal schedules applying to public institutions (page 22). AHISA affirms that the Royal Commission's suggestion (page 32) of further guidance on best practice in records retention where there is no legal obligation or disposal schedule would be welcomed by Heads of independent schools.

Feedback from AHISA members indicates that legislation would be unnecessary to initiate best practice in this regard: principals are now well aware that survivors of child sexual abuse may not be ready to disclose or report the abuse they suffered until many years after the abuse occurred. AHISA members are also aware of the move by state and territory governments to abolish statutory limitation periods for both reporting of abuse and civil litigation by victims and survivors. Some Heads report their school now has a policy of permanent retention of records relating to sexual and other forms of abuse (such as domestic violence), suspicion of abuse or suspicion of grooming behaviours.

The willingness of Heads to implement best practice in their schools is apparent. Which policies and procedures might represent better or best practice is less clear; hence guidelines would be welcomed. The guidelines could incorporate advice on practices such as keeping a register of destroyed records. For example, AHISA would not expect the register to record destruction of duplicate records, but only the destruction of those records where no other copy exists; however, it would be helpful if preferred practices were described to a level of detail that avoided confusion, especially for organisations shifting to digital recordkeeping.

**5. *Individuals’ rights to access and amend records about them can only be restricted in accordance with law.***

- *Individuals whose childhoods are documented in institutional records have a right to access records made about them. Full access should be given unless contrary to law. Specific, not generic, explanations should be provided in any case where a record, or part of a record, is withheld or redacted.*
- *Individuals should be made aware of, and assisted to assert, their rights to request that records containing their personal information that are inaccurate, misleading or out of date be amended or annotated, and to seek review or appeal of decisions refusing access or amendment.*

AHISA notes the Royal Commission’s discussion of third party privacy issues in its Consultation Paper (page 37ff). As mentioned above, AHISA has concerns about recordkeeping and schools’ legal obligations to protect the privacy of other students, parents or carers, and staff.

AHISA asks the Royal Commission to note, in regard to the operation of the *Commonwealth Privacy Act 1988* (page 38), that the majority of independent schools would be covered by this Act. The Productivity Commission calculates the average government recurrent expenditure on a student attending a government school as \$16,177 in 2013-14 (latest available data).<sup>5</sup> Using this figure as a proxy for the average annual cost of educating a student in a non-government school, it can be approximated that, in general, a school with an annual turnover of \$3 million would be relatively small – say, between 185 and 200 students. The Independent Schools Council of Australia notes that 62 per cent of independent schools in Australia have over 200 students.<sup>6</sup> Of AHISA’s membership, which includes principals of independent Catholic schools, almost all Heads (97 per cent) lead schools of over 200 students.

The Royal Commission notes that many victims and survivors are baffled if immediate family members are treated as ‘third parties’ in requests for access to records (page 43). AHISA would be concerned if schools did not have the option to treat parents or other family members as third parties. The Royal Commission would be aware from its investigation of historical abuse cases that, before the introduction of mandatory reporting, some cases would not have been reported to police by school personnel at the time of the abuse due to the specific request of parents who wished to shield their children from the trauma of a police investigation and possible trial. Even today, as discussed at length in the Royal Commission’s *Consultation Paper on Criminal Justice*, not all survivors of past abuse wish to report, and the parents of children who are victims of recent abuse that is reported to police may still refuse permission for a prosecution to proceed.

As already suggested above, guidelines on records creation, maintenance and disposal would be welcomed by Heads of independent schools, including the intersection of recommended best practice with relevant laws and regulations. To be most helpful, such guidelines should be jurisdiction-specific. Different laws and regulations – including those covering freedom of information, right to information and privacy – may pertain across the states and territories. Schools are likely to more effectively embed those practices in school cultures, if they are confident their practices are in keeping with the law and their obligations to third parties.

The importance of recognising and satisfying the urgent need of individuals to establish their identity underpins many recommendations suggested in *Access to Records by Forgotten Australians and Former Child Migrants: Access Principles for Records Holders and Best Practice Guidelines in Providing Access to Records*. AHISA commends the quality of this document, but suggests sector-by-sector guidelines should be developed so that recommendations directly speak to the issues pertaining to each sector, including the proper application of third party privacy exceptions.

Guidelines that are sector-specific are more likely to support best practice than more generic guidelines. If users have to weigh up whether or not a recommended practice applies in their case, the risk of making poor decisions, taking wrong actions – or even failing to act – is amplified.

The Royal Commission notes in its Consultation Paper (page 12) that it is only since the 1980s that institutional records management has begun to reflect the standards more typically found in public authorities.

It is also worth noting that it was not until 2012 that Standards Australia published AS/NZS/ISO 30300-2012 and AS/NZS/ISO 30301-2012 (Management Systems for Records), which aim to align an organisation's records management with 'the achievement of its mission, strategy and goals'.<sup>7</sup> According to Australian and international records management consultant Barbara Reed of Recordkeeping Innovation Pty Ltd, the purpose of developing the 30300 and 30301 standards was 'to elevate recordkeeping "out of the basement and onto the management agenda"'.<sup>8</sup>

In other words, the strategic implications of records and recordkeeping for organisations have only recently been recognised and formalised in published standards.

AHISA believes placing records management on the agenda of independent school Boards is a necessary step if best practice record making and recordkeeping are to be readily and effectively embedded in schools' management protocols and organisational cultures. As already noted, policies, protocols, guidelines and checklists may support compliance, but will not necessarily support the development of child safe cultures.

To achieve the Royal Commission's aims in promoting best practice recordkeeping in relation to child protection, AHISA recommends that the Royal Commission produce, or recommend the production of, high-level documentation that is suitable for schools to present or adapt for presentation to their Boards. This will assist school governors and the principal to successfully mesh all aspects of child protection – including reporting and subsequent record making and recordkeeping – with the values and ethos of the school and its strategic objectives.

## **B. CURRENT RECORD MAKING AND RECORDKEEPING PRACTICES**

The Royal Commission notes that Australian schools have a range of reporting obligations that require them, for example, 'to create and manage records about student enrolments, attendance and achievement, and about critical incidents that occur on school grounds' (page 19). However, as mentioned above, records management has only recently begun to be recognised as integral to the achievement of an organisation's

mission, strategy and goals, including – for schools – their goal to be a child safe environment. This suggests that schools may sit at several points along a continuum of recordkeeping – from meeting regulated or legal obligations as the starting point, to managing all school records within a comprehensive recordkeeping framework that informs schools’ organisational performance monitoring and strategic planning and is aligned to their values and culture.

AHISA fully accepts the Royal Commission’s case that good records management is a fundamental element of child protection. It is therefore in the best interests of children that schools move as rapidly as possible along such a continuum toward full integration of best recordkeeping practices in school management.

### **AHISA member survey**

To help inform the Royal Commission’s deliberations and to ascertain how AHISA might best assist its members to reach new and better standards in recordkeeping, AHISA undertook a survey of members to try to ascertain where their schools currently sit along this continuum and what support would be most useful in adopting better or best practice.

Although the online survey coincided with the 2016 third-term break, when many school leaders typically attend conferences, some 20 per cent of members responded. AHISA believes the survey findings represent a fair sampling of the range of its members’ views. (It is important to note, however, when considering these findings, that AHISA’s membership does not embrace the entire independent schools sector. Membership of AHISA is contingent on the level of autonomy delegated to the principal.)

### ***Survey findings***

- Recordkeeping practices vary according to the state or territory in which a school is located and also size or whether the school has an affiliation with a system or diocesan authority.
- Schools within a system or affiliated with a diocesan authority implement policies and procedures as set by those authorities. Even so, some 35 per cent of respondents reported their schools do not have overarching information and records management frameworks or policies and protocols, although some of these schools do have retention schedules for permanent and non-permanent records and related privacy policies. In other words, a third of schools could be considered to be at the starting point of the recordkeeping continuum.
- The majority of schools (65 per cent) have moved beyond this point and have records management frameworks and/or policies and procedures either in place or are in the process of implementing these. Of these schools, nearly 90 per have policies that include protocols on the making and retaining of records relating to child protection, including non-mandatory reporting; the remainder have a separate records management policy relating to child protection issues.
  - While just over half of those schools with records management frameworks and/or policies and procedures do not publish all of these documents in a format that makes them accessible to all in the wider school community, all documents are available on request.
  - Some 55 per cent of schools had revised their frameworks or policies in the last two years.

- In developing their policies and procedures, most of these schools referred to external standards as a benchmark or guide or relied on consultants.
- The most commonly used standards or guides were, in order of frequency of mentions:
  - Records Retention Schedule for Non-Government Schools developed by the Australian Society of Archivists
  - AS/SNZ/TR/ISO 16175.2:2012, Information and documentation – Principles and functional requirements for records in electronic office environments – Guidelines and functional requirements for digital records management systems
  - AS/NZS/ISO 30300:2012, Information and documentation – Management systems for recordkeeping – Fundamentals and vocabulary; or AS/NZS ISO 30301:2012, Information and documentation - Management systems for recordkeeping – Requirements
  - AS/NZS 1015:2011, Records management – Physical storage
  - ISO 15489-1:2016, and ISO 15489-2:2016, Records Management; or an earlier version of the Standard, such as AS/ISO 15489.2-2002 (revised 2013)
  - HB 278-2009, Handbook – Recordkeeping compliance.
- Some 54 per cent of Heads responding to the survey reported their school did **not** have a dedicated staff member tasked with the responsibility of developing and maintaining the school's records and recordkeeping practices or for training school staff in record creation; 42 per cent reported a part-time staff member was tasked with this responsibility; 5 per cent had a full-time staff member in the role. Cost was a factor in making such appointments; the larger the school, the more likely there was to be a staff member in the role either part-time or full-time.
- Some 57 per cent of Heads reported that report and record making protocols are covered in their school's staff induction programs. Some schools cover aspects of record making when staff are inducted, with faculty or departmental heads following up with further training at a later point.
- 25 per cent of schools revise report and record making policies and protocols annually in staff professional development programs. The remaining schools (75 per cent) revise these with staff on an irregular basis.

### **Helping schools to improve practice**

Because records management beyond that required by regulatory and legislative obligations is relatively new to most schools' management agendas, Heads responding to the survey enthusiastically welcomed all suggestions of support, including the development by the Royal Commission of guidelines of best practice for both systemic and non-systemic schools.

Most frequently mentioned as a helpful means of support was for AHISA to provide template policies and procedures to members that could be adapted to suit the circumstances of their schools.

### **C. ENCOURAGEMENT VS ENFORCEMENT**

The Consultation Paper raises the ‘additional matter’ of whether a sixth principle to enforce the five principles is required (page 46). The issue of whether schools should be among those institutions held to a higher standard than other institutions is also canvassed.

The Royal Commission notes:

We recognise that the practices of some institutions (for example, in complying with existing legal obligations, or in line with their own policies) may already satisfy the spirit of these principles. (Page 46)

AHISA members are keen to adopt and demonstrate the best possible child protection measures; that is, their current policies and practices may already reflect the highest possible standards of recordkeeping or Heads see the need to move forward to that point – for the sake of students, staff, their schools and themselves. As one Head commented in AHISA’s survey, to do otherwise is akin to ‘professional suicide’.

While there is general agreement among AHISA members that enforcement is no longer a necessary precursor to the readiness of schools to adopt best practice child protection measures, Heads also recognise that there is value in incorporating standards into the school registration regulatory framework in so far as school registration is a public endorsement that schools are meeting accepted community standards.

AHISA has noted above that a strong regulatory framework is already in place for non-government schools through state and territory school registration authorities. Independent schools are also regulated by the federal government through the conditions applied to federal funding. While AHISA is wary of increasing the regulatory burden on schools, if enforcement is considered a necessary means to ensure all schools are adopting – and applying – appropriate policies and procedures for records creation, maintenance and disposal, we see the incorporation of regulations covering records and recordkeeping in state and territory school registration requirements as the most appropriate mechanism for enforcement. School registration bodies are already well established and resourced. Also important is that, typically, registration authorities are not simply punitive in their approach to school inspection; they can also play an educative and supportive role to help schools meet required standards.

### **D. RECOMMENDATIONS**

#### **Guidelines for schools**

AHISA believes the Royal Commission is well placed to produce or commission the production of guidelines on best practice in records and recordkeeping for schools, including independent schools. The Royal Commission can ensure there is an overarching national framework guiding best practice, and how national guidelines are best interpreted against state or territory laws and regulations.

There is a particular value in making such resources available to independent schools. The majority of independent schools are free to adopt policies and practices beyond those promoted by jurisdictions or systems and can therefore act as lighthouse schools for best practice in keeping with national guidelines.

*Response to Consultation Paper – Records and Recordkeeping Practices, page 12*

AHISA has several recommendations in regard to guidelines on best practice in records and recordkeeping for schools, as discussed above. In brief:

- National guidelines should be sector specific, that is, there should be guidelines that are directly appropriate for schools, including boarding schools.
- National guidelines that are sector specific should also be jurisdiction specific. Different laws covering freedom of information, privacy, mandatory reporting and employment, for example, apply across the states and territories. If guidelines describe how recommended practices intersect with the laws and regulations applying within each jurisdiction they are more likely to be successfully implemented.
- Guidelines should include recommended practice for the transition to digital record making and recordkeeping.
- To support the embedding of best practice recordkeeping in school cultures, the Royal Commission should consider producing a document that sets out a high-level case for ‘raising recordkeeping from the basement to management agendas’ which can be adapted by schools for presentation to their Boards.

AHISA recognises the pivotal role of the principal in creating a child safe school. As a professional association of Heads of independent schools, AHISA wishes to assist its members to achieve excellence in all aspects of school leadership. We commend the work of the Royal Commission in expanding the knowledge base on child protection measures and national awareness of its importance.

AHISA would welcome further inquiry on this submission.

Yours sincerely,

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AHISA National Chair 2015-17  
Principal of St Aidan’s Anglican Girls’ School, Qld

Further inquiries may be addressed to Ms Beth Blackwood, AHISA CEO, at AHISA’s National Office, telephone 02 6247 7300, email [Beth.Blackwood@ahisa.edu.au](mailto:Beth.Blackwood@ahisa.edu.au).

## NOTES

<sup>1</sup> Mathews B & Walsh K (2014) Mandatory reporting laws. In Hayes A & Higgins D (eds) *Families, policy and the law: Selected essays on contemporary issues for Australia* (2014); Melbourne: Australian Institute of Family Studies; pp131-142.

<sup>2</sup> Child Wise, Child Safe Certification: Building safe organisations and environments for children; accessed at <https://www.childwise.org.au/page/11/child-protection-consulting>, 26 September 2016.

<sup>3</sup> Department of Education Services WA (2016) *Guide to the Registration Standards and Other Requirements for Non-Government Schools*; accessed at [http://www.des.wa.gov.au/schooleducation/nongovernmentschools/info-ngs/School\\_registration/Pages/Registration-2017.aspx](http://www.des.wa.gov.au/schooleducation/nongovernmentschools/info-ngs/School_registration/Pages/Registration-2017.aspx).

<sup>4</sup> AHISA submission to the Royal Commission into Institutional Responses to Child Sexual Abuse, 14 August 2015; available at <http://www.ahisa.edu.au/wp-content/uploads/2015/11/AHISA-Response-to-Royal-Commission-Issues-Paper-9-August-2015-2.pdf>.

<sup>5</sup> Productivity Commission, *Report on Government Services 2016*; accessed at <http://www.pc.gov.au/research/ongoing/report-on-government-services/2016/childcare-education-and-training/rogs-2016-volumeb-sectorb.pdf>.

<sup>6</sup> Independent Schools Council of Australia, *Independent Schooling in Australia Snapshot 2016*; accessed at <http://isca.edu.au/wp-content/uploads/2011/03/ISCA-Snapshot-2016-A4-2pp.pdf>.

<sup>7</sup> Standards Australia media release, 27 August 2012; accessed at <http://www.standards.org.au/OurOrganisation/News/Documents/Management%20Systems%20for%20Records.pdf>.

<sup>8</sup> Barbara Reed, 'Raising standards for record keeping', 10 August 2010; accessed at <http://idm.net.au/article/007995-raising-standards-record-keeping>.