



Special Report: Unauthorised Destruction of Records and State archives at the Department of Education – Student Information System

A report submitted to Parliament by the State Records Commission under section 64(2) of the *State Records Act 2000*.

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Acknowledgement of Country

The State Records Commission acknowledges the traditional custodians throughout Western Australia and their continuing connection to the land, sea, culture and knowledge. We pay our respects to all members of the Aboriginal communities and their cultures and to Elders both past and present.

OFFICIAL

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Contents

Chair of Commission's Overview	1
Executive summary.....	2
Introduction	2
Conclusions	2
Background.....	3
Scope of section 64(2) <i>State Records Act 2000</i>	3
What is a contravention of the <i>State Records Act 2000</i> ?.....	3
What is a record keeping plan?.....	3
What is set out in the Department's record keeping plan?	4
What is the School Information System and what records does it hold?.....	5
Why are these school records important?.....	6
Why is there a disposal freeze on all records related to the care, supervision, education and treatment of children?.....	6
What records have been destroyed without authorisation?.....	7
The role of the State Records Commission and the State Records Office.....	8
Conclusions	9
Some schools have deleted records without authorisation and did not comply with the Department of Education's record keeping plan.....	9
The loss of the school records and archives is related to poor practices and system configuration rather than malicious intent	9
Department of Education has made efforts to rectify the issue	9
Recommendations	10
1. Organisations to review system configurations to prevent and monitor unauthorised deletion of records	10
2. Organisations to improve and regularly update staff awareness of record keeping obligations	11
Response from the Department of Education	12

Chair of Commission's Overview

Under section 60(1) of the *State Records Act 2000* (the Act), the State Records Commission (Commission) is required to monitor the operation of and compliance with the Act, monitor government organisations' compliance with their record keeping plans, and inquire into breaches or possible breaches of the Act.

Monitoring is achieved through a range of mechanisms, including education, training and self-evaluation undertaken by government organisations. The Commission also conducts inquiries into reports of contraventions of the Act.

The Commission typically receives several reports a year regarding compliance with this Act, including in relation to contraventions of the Act. In some cases, such as the matter detailed in this report, these matters of non-compliance are self-reported by government organisations. The Commission encourages this practice in the interests of integrity and continuous improvement.

In most cases, the Commission seeks to assist government organisations to address issues through corrective actions and/or improvements to systems and processes to avoid similar issues recurring.

The Commission has powers to take other action, including making a special report to Parliament about a contravention of the Act by a government organisation.

The matter detailed in this report is considered by the Commission to be significant due to the loss of State records and archives and the lack of knowledge of what State records and archives are lost, and the Commission has decided that there are merits to document the matter in this first special report from the Commission to Parliament under section 64(2) of the Act.

The Commission acknowledges that this matter was self-reported to the Commission by the Department of Education (the Department) and that the Department has undertaken its own investigation into the matter and made corrective actions to prevent similar issues arising in future.



Caroline Spencer

Chair

State Records Commission of Western Australia (ex officio)

Auditor General for Western Australia

Executive summary

Introduction

This report highlights the significant issue of the loss of State records and archives at the Department of Education (the Department) that was reported by the Department to the State Records Office (SRO) in 2024.

The State Records Commission (Commission) has concluded that the deletion of student records from the School Information System (SIS) application by multiple schools constitutes a contravention of the *State Records Act 2000* (the Act) by the Department.

This report was prepared using information obtained by the SRO through enquiries with the Department and other information provided by the Department to the SRO in self-reporting this matter. The Department has provided a response, which is included in this report.

Conclusions

The Commission's view is that the premature deletion of records and loss of State archives stored in the SIS is a contravention of the Act and of the principles and standards of the Commission. Specifically, unauthorised destruction of these records contravenes section 17 of the Act which requires that a government organisation's record keeping plan must be complied with by the government organisation.

The following principles and standards of the Commission were also not complied with by the Department:

Standard 2, Principle 4 – requiring that government organisations must ensure that records are protected and preserved.

Standard 2 Principle 5 – requiring that government organisations ensure that records are retained and disposed of in accordance with an approved disposal authority.

Further details on how the Department had not complied with section 17(a) of the Act and the Commission principles and standards are provided in later sections of this report.

While the Department collects and manages student information in a number of systems that were not impacted by this matter, the premature loss of records from the SIS has the potential to impact the use and availability of schooling information regarding children for legal proceedings and other processes, such as attendance records, enrolment and admission records, addresses listed, behavioural and school reports. These losses may also impact the investigation of historical abuse allegations and other matters.

Background

Scope of section 64(2) State Records Act 2000

Section 64(2) authorises the Commission to submit a report to Parliament about a contravention of the Act by a government organisation.

What is a contravention of the State Records Act 2000?

A contravention under section 64(2) means anything done that constitutes a failure to comply with a requirement set out in the Act and captures conduct that constitutes an offence under the Act as well as conduct which constitutes a breach of a requirement set out in the Act.

The SRO receives several reports each year about compliance with the Act, including in relation to contraventions of the Act.

This report is concerned with a contravention by a government organisation who, in the opinion of the Commission, failed to comply with its record keeping plan.

What is a record keeping plan?

A record keeping plan is required of every government organisation under the Act and sets out:

- (a) the matters about which records are to be created by the organisation; and
- (b) how the organisation is to keep its government records.

For State government organisations such as the Department, these plans must be approved by the Commission and comply with principles and standards established by the Commission under section 61 of the Act.

Record keeping plans must ensure that the government records kept by the organisation properly and adequately record the performance of the organisation's functions; and be consistent with any written law to which the organisation is subject when performing its functions.

Importantly, and especially relevant to this report, record keeping plans must also set out —

- (a) those government records that will be State archives;
- (b) those State archives that will be restricted access archives and the ages at which they will cease to be restricted access archives; and
- (c) the retention period for those government records that are not State archives; and

(d) the systems to ensure the security of government records and compliance with the record keeping plan.

Minimum retention periods for State records are usually documented in retention and disposal authorities, which effectively form part of the record keeping plan of an organisation, and in the case of government organisations such as the Department, are approved by the Commission.

What is set out in the Department's record keeping plan?

The current record keeping plan (the Plan) RKP 20222026 of the Department was approved by the Commission on 28 November 2022. This Plan applies to the Department, including government schools.¹

The Department has Records Management Policy and supporting procedures in accordance with the Commission Standard 2 Principle 2 that government organisations ensure that record keeping programs are supported by policy and procedures.

The Procedures for business information system owners state that they must:

- establish record keeping compliance processes for new business systems or when current systems are upgraded;
- implement appropriate security and authentication controls;
- retain ownership of records, including the responsibility for conversion or migration of information, for its entire life; and
- oversee the storage of digital records and their metadata in appropriate media so that they remain accessible and usable for as long as they are required (including in legacy systems).

The Procedures for school-based employees state they must:

- refer to the *Manage records at your school* (staff only)
- for corporate and archival records:
 - maintain the currency, integrity and accuracy of records;
 - apply appropriate security to confidential and sensitive records created and/or received by them.

The document '*Manage records at your school*' advises staff that all student files must be retained indefinitely because of the Royal Commission into Institutional Responses into Child Sexual Abuse and not to destroy any inactive student files.

¹ This Plan also applies to other education-related entities including the Teacher Registration Board of WA and the School Curriculum and Standards Authority, as well as contractors and organisations performing outsourced services on behalf of the Department, TRBWA and the Authority including executive support. The Department has advised that the matter addressed in this report does not impact records of these entities and authorities.

Such records are currently subject to a disposal freeze issued by the SRO on 5 April 2018. This is also a requirement of the General Retention and Disposal Authority for State Government Information (DA 2023-004) approved by the Commission.

Each school has a Records Disaster Management Plan established under Commission Standard 2, Principle 4 that government organisations ensure that records are protected and preserved.

The Records Disaster Management Plan for each school lists attendance and enrolment records in SIS as vital records which are subject to the disposal freeze as they relate to records relating to the attendance, care, supervision and education of children.

The Department has retention and disposal authorities in accordance with Commission Standard 2 Principle 5, which requires that government organisations ensure that records are retained and disposed of in accordance with an approved disposal authority. The disposal authority for school, college and campus records RD 2007005 was approved by the Commission on 5 December 2007.

RD 2007005 lists the following records as State archives:

- Enrolment records or student admission records managed in SIS
- Significant student activities such as records of significant awards to students

According to RD 2007005, student records must be retained in SIS for 25 years after the student birthdate, or 7 years after mature age students leave school.

Temporary records can be disposed after the time periods specified in the disposal authorities. The Plan states that the Department undertakes a two-step verification process for disposal authorisation:

- Principal / Manager / Executive Director of the business unit or school to which the records belong review the records listings and sign the accompanying memorandum for destruction approval.
- Corporate Information Services review the list of records for destruction and sign off approval to formalise the destruction of records.

What is the School Information System and what records does it hold?

The SIS, also known as Integris, is one of the systems documented in the Department's record keeping plan.

SIS is an information management system that supports government schools, education regional offices and the Department's central office in improving learning, teaching and school administration.

SIS covers the areas of:

- student information including enrolments, absences, transfers and student behaviour
- curriculum planning including lesson planning, monitoring, evaluation and reporting on student academic performance
- preparing school census
- scheduling school events
- management of assets and resources
- finance including cash accounts and billing, and
- timetabling.

Note: The Department advises that from 2010 student academic reporting was moved to the Reporting to Parents (RTP) application, including historical achievement data from SIS. Data is not deleted from RTP when a student record is deleted from SIS.

SIS is used by most Western Australian schools to store and maintain student records. The records contain information about students including personal and contact information, demographic data, medical conditions, and attendance and behavioural data.

While SIS is the primary system for capturing student information, it is not the only business application used by the Department for this purpose. For example, the Department has advised that it has used the Reporting to Parents (RTP) system was utilised by the Department as a part of a remediation project to check for missing student records resulting from the matter considered in this report.

Why are these school records important?

Admission and enrolment records are designated as State archives and must be retained permanently as these records have evidential, historical and cultural value to government and the community.

Other student records may relate to the care, supervision, education and treatment of children where government employees, contractors, volunteers and outsourced service providers are in contact with children. These records are therefore subject to the disposal freeze.

Why is there a disposal freeze on all records related to the care, supervision, education and treatment of children?

The Royal Commission into Institutional Responses to Child Sexual Abuse (the Royal Commission) was established as an inquiry for the Commonwealth and each of the States and Territories. Its Final Report was presented to the Governor-General on 15 December 2017.

Volume 8 of the Report, concerning Record keeping and Information Sharing, contains 23 recommendations.

Recommendation 8.1 states:

“To allow for delayed disclosure of abuse by victims and take account of limitation periods for civil actions for child sexual abuse, institutions that engage in child-related work should retain, for at least 45 years, records relating to child sexual abuse that has occurred or is alleged to have occurred.”

Recommendation 8.3 states that Australian public records authorities should provide organisations with guidance on identification and retention of relevant records. The SRO is responsible for advising Western Australian government entities about the record keeping requirements presented in the Report.

The Disposal Freeze issued by the SRO on 5 April 2018 instructs that the following records in any format must not be destroyed until further notice:

All records of past or current actual and alleged incidents of child sexual abuse, and all records related to the care, supervision, education and treatment of children where government employees, contractors, volunteers and outsourced service providers are in contact with children.

The requirement to retain these records is also part of the General Retention and Disposal Authority for State Government Information (DA 2023-004), approved by the Commission.

What records have been destroyed without authorisation?

The Department first discovered in 2021 that some schools had been deleting student records from SIS. In response, the Department locked down schools' ability to delete student records and investigated the extent of the issue. The Department's investigation involved the following:

- An initial analysis of most recent SIS datafiles² obtained from a sample of 200 schools (there are around 800 government schools in WA), where the datafiles were compared to Reporting to Parents data for the school. When a student record is deleted from the SIS, the record is removed from all other student data systems except Reporting to Parents. This cross-checking indicated that around 660 schools had missing student records, in total 9,934 records.
- The current version of SIS was checked to identify all students on current and former enrolment rolls. These were compared with the data obtained from the schools' SIS datafiles, to identify any missing student numbers. Although 6,000 deleted students could be identified by name, approximately 41,000 other records did not match to a student name. These 41,000 orphan³ records may represent either an existing record being deleted or a school changing

² An electronic file, like a database, where student records are stored.

³ The Department advises that a record is referred to as an orphan record when it cannot be matched back to its associated record in the database. It is important to note that the 41,000 unmatched records do not equate to 41,000 missing student records.

the default reference number settings, meaning that certain numbers in the student number sequence may have been skipped entirely, rendering the record incomplete or orphan.

- The Department contacted 53 of the 200 sampled schools to request historic (prior to 2021) backups of SIS records that may exist to recover lost student information. Forty schools responded to the request but only nine schools reported that a backup existed. These were provided to the Department for analysis.
- The analysis found that only six backups contained information not already on school servers but most of the information was unrecoverable. The success rate for locating and restoring missing student data from the backups was lower than 7 per cent.

The role of the State Records Commission and the State Records Office

The SRO, on behalf of the Commission, receives and reviews reports about compliance with the Act including contraventions of the Act. The SRO conducts an initial review of the information received to assess if a contravention of the Act has occurred. If the assessment indicates that a contravention may have occurred, the SRO will then liaise with the affected organisation to gather more information. The SRO reports such matters to the Commission. The Commission considers the final report with its conclusions and recommendations.

The Department had self-reported the loss of the records and archives to the SRO. The SRO conducted an initial review and then conducted meetings with the Department. During its investigation, the Department corresponded with and submitted various investigation reports to the SRO. The SRO reviewed these investigation reports from the Department. At the conclusion of the Department's investigation, the SRO provided a final report to the Commission. This final report had been reviewed by the Department prior to being submitted to the Commission.

The Commission, upon consideration of the SRO's final report and Commission findings, is submitting the current report to Parliament.

Conclusions

Some schools have deleted records without authorisation and did not comply with the Department of Education's record keeping plan

The unauthorised deletion of the records and archives in SIS contravenes section 17(a) of the Act, which requires that a government organisation's record keeping plan must be complied with by the government organisation.

The Plan also states that any destruction of school records requires initial approval from the school's principal, and then the Department's Manager of Corporate Information Services ("Manage records at your school" manual, page 56).

At least 218 schools deleted records and archives from SIS without authorisation and therefore did not comply with the Plan.

The deletion of these records occurred without approval from the Department's Manager of Corporate Information Services. Records were also destroyed despite the requirements of the approved retention and disposal authorities and the Disposal Freeze issued by the SRO in 2018.

The loss of the school records and archives is related to poor practices and system configuration rather than malicious intent

According to the Department, the system was not configured properly, allowing schools to have the ability to delete records in SIS without the relevant approvals. Deletions occurred across at least 218 schools.

Schools were also able to change the default reference number settings resulting in certain numbers in the student sequence number being skipped. When the current version of SIS was checked to identify all students on current and former enrolment rolls with the schools' SIS datafiles, only about 6,000 deleted students could be identified by name, resulting in 41,000 unmatched records.

Department of Education has made efforts to rectify the issue

When the Department discovered that records were being deleted, it implemented several measures to mitigate the risk of any further loss of student records, including:

- Locking down schools' ability to delete student records or use the "Purge Leavers" function in SIS

- Locking down the SIS student reference numbering setting, so that numbers are sequential and cannot be skipped
- Review of student record deletion processes to require schools to apply to the Department ICT staff to delete a school record, including justification for the deletion
- Modifications to the “Current roll” on SIS to reduce potential errors in data entry
- Modifying SIS training to strengthen the focus on student records management
- Communicating the above changes to schools via several communication channels.

Recommendations

Although this special report relates specifically to the contravention of section 17 of the Act by at least 218 government schools, the Commission recommends that all organisations subject to the Act have regard to the following recommendations.

1. Organisations to review system configurations to prevent and monitor unauthorised deletion of records

The configuration of business systems used to store, process and manage State records are reviewed and enhanced to:

- restrict the deletion of records to only those staff (e.g. system and database administrators or records management employees) who are not involved in the day-to-day operational activity using the business systems
- monitor access, modification and deletion of records.

This will help prevent the inadvertent loss or compromise to the integrity of records and archives.

Remediation Example 1: Reviewing system configurations

To avoid unauthorised deletion of student records in future, the Department has amended system configurations such as:

- the removal of the ability to import a student record directly to the Current roll, reducing the number of mismatched (duplicated) records for the same student due to data entry errors
- the defaulting of bulk transfer of students from the Admission to Current roll to ‘No’ so users must actively select students that have attended the school. This reduces the likelihood of students being incorrectly enrolled at a school.

Remediation Example 2: Validating data after system migrations

The Department conducted an extensive investigation into data held in SIS to understand the impact of unauthorised destruction of records.

The SRO has previously received other reports of issues with loss of certain records following migration of data (records) from one system to another e.g. when a business system is upgraded or replaced by another.

It is important that the integrity of records is checked when data is migrated from one system to another to avoid the loss of records and/or more extensive work required to investigate data loss if discovered later.

2. Organisations to improve and regularly update staff awareness of record keeping obligations

Organisations review internal processes for record keeping including the deletion of records and ensure that employees are aware of relevant policies and procedures.

All employees onboarding are provided with record keeping training awareness to ensure they understand their roles and responsibilities in record keeping.

Training for use of a business system presents a timely opportunity to ensure staff are aware of these obligations.

Employees are also made aware of the organisation's record keeping policies and procedures, and how to access these documents.

Regular refresher record keeping training is provided to employees.

Response from the Department of Education

The Department acknowledges the findings of the report and accepts all recommendations.

In the interest of transparency and accountability – and continuous improvement in recordkeeping practices and compliance with the *State Records Act 2000* – the Department self-reported this matter and welcomed the guidance provided by the State Records Office.

The Department is committed to maintaining robust information governance over student records. Substantial resources have been allocated to investigate and remediate the issues identified, with lessons learnt informing enhancements to current processes and are being embedded in the design and implementation of the new student information system. This represents a significant advancement in the Department's student information management capability. The system is designed to meet contemporary expectations for metadata capture and comprehensive audit logging, and the application of robust user permissions, thereby supporting effective systems management and information governance.

Student information is created and maintained across a range of systems that reflect the various stages of a student's engagement with public education. Records such as enrolment forms, attendance registers, student files and school reports are generated for specific purposes and retained in distinct repositories. Collectively, these systems enable the discovery and management of student information across both physical and digital environments.

All Department staff are required to complete Records Awareness Training as part of their onboarding. The training provides an overview of staff responsibilities in maintaining compliant and effective recordkeeping practices. The Department has recently implemented an enhanced model for recordkeeping training and support to further strengthen staff capability and compliance.

Furthermore, the School Archives Service, established in 2019, continues to play an integral role in supporting the collection and long-term retention of school records, including student files. This initiative was introduced in response to the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse and the subsequent directive from the State Records Office to preserve child-related records. To date, more than 400 schools have participated in this service, contributing to the secure preservation of records of enduring value.

The Department will continue its ongoing reassessment of its compliance risk with the *State Records Act 2000* and review the adequacy of existing controls to ensure they remain effective and proportionate to identified risks.

The Department remains committed to strong information governance, transparent recordkeeping practices and the ongoing protection of the records entrusted to its care.

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