

## Theme Six: Improving School Systems

### **Recommendation No.12: Develop a policy document registry.**

“We recommend that the Dilworth Trust Board develops a central registry of all policy documents by category.”

#### **Progress to date**

Dilworth has worked extensively on its policy development and implementation since 2018. Review and continuous improvement of all policies, processes and procedures is critical. An audit of all Dilworth policies and procedures is currently underway to ensure they are up to date, with all child safety documents to be reviewed every two years (at a minimum) and key policies updated annually. Today the School has a dedicated and experienced full time Director of Health & Safety who as part of his role oversees the policy development and implementation process.

#### **Next steps**

The School accepts that this is a valid and pragmatic recommendation by the Inquiry and having investigated the most suitable technology and processes for such a central registry, that is easy to access for all parties, it will prepare for the Trust Board’s review by mid to late 2024 a costed proposal and time plan for delivery in 2025.

The School will meantime continue to develop a comprehensive and cohesive (manual) register of policies, including review cycles and approval approach.

Concurrently, the School will investigate new technology options for a centralised register, including a guide as to how best to manage sensitive documents. A management recommendation will be developed for the Trust Board.

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## **Recommendation No.13: Maintain complete student file records and retain them indefinitely.**

“We recommend that the Dilworth Trust Board ensures school records of students, in addition to academic, cultural and sporting achievements, include all relevant aspects of a student’s life at the school, such as those relating to student health and welfare, activities, complaints, discipline and behavioural concerns, in both boarding houses and day school.”

### **Progress to date**

In 2022, the Board approved the investment by the School in a programme of digitisation of all student records. More than 5,000 student files are now electronically maintained.

### **Next steps**

The Dilworth Trust Board and the School are committed to electronic retention of files and are exploring how to do this within the provisions of the Privacy Act 2020 and other laws relating to personal data.

A legal review of this issue has begun and is due to report to the Board by early 2024 after which recommendations for implementation will be finalised.

The Board will then be in a position to confirm what further work is required, including consideration of cyber security issues, and to consider to what extent further external review is required.

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## **Recommendation No.14: Retain and archive staff disciplinary files relating to sexual abuse and serious physical abuse indefinitely.**

“We recommend that the Dilworth Trust Board includes all investigation materials relating to staff disciplinary matters on staff files with a reference, where relevant, to the existence of this file on the student’s file, and retained there securely indefinitely.”

### **Progress to date**

Now that digitisation of more than 5,000 student files is complete, the School is planning to undertake the digitisation of records for all staff, including its paper-based historical archive (which is held securely, mindful of all Privacy Act provisions).

### **Next steps**

The School will provide the Trust Board with a cost analysis and timeline for the completion of its digital archiving by the end of 2023, with the programme of implementation commencing in 2024, subject to Trust Board approval.

The School has sought legal advice regarding noting on a student’s file the existence of an investigation into staff disciplinary matters that relate to that student. If the advice affirms this is acceptable practice, the practice will be put in place.