

TRANSCRIPT

FAMILY AND COMMUNITY DEVELOPMENT COMMITTEE

Inquiry into the handling of child abuse by religious and other organisations

Melbourne — 5 April 2013

Members

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Ms D. Prout, company director, and

Ms R. Edge, Victorian branch councillor, Records and Information Management Professionals Australasia.

The CHAIR — Good afternoon. On behalf of the committee, I welcome Ms Ruth Edge, and Ms Debbie Prout, company director of Records and Information Management Professionals Australasia. Thank you for being before us this afternoon. All evidence taken by this committee is taken under the provisions of the Parliamentary Committees Act, attracts parliamentary privilege and is protected from judicial review. Any comments made outside the precincts of the hearings are not protected by parliamentary privilege. All evidence given today is being recorded. Witnesses will be provided with proof versions of the transcript. Please note that these proceedings are not being broadcast.

Following your presentation to committee members this afternoon, we will ask questions relating to the terms of reference of the inquiry that we are conducting. I now call on Debbie to commence. Thank you very much again.

Ms PROUT — Thank you very much. We appreciate the opportunity to come and have a chat to you today. Records and Information Management Professionals Australasia, otherwise known as RIMPA, have been deeply concerned about record keeping and the legislative and enforcement model in Victorian government for some time. RIMPA addressed our concerns on 23 August 2011 in a letter to the Honourable Premier Baillieu; the Honourable Robert Clark, MLA; the Honourable Daniel Andrews, MP; the Honourable Martin Pakula, MLC; George Brouwer, the Victorian Ombudsman; and Des Pearson, the Victorian Auditor-General. We would like to emphasise at this point that, with the exception of the Victorian Ombudsman's office and the Victorian Auditor-General's Office, RIMPA has to date received no response other than an acknowledgement of our concerns.

This letter emphasised our concerns. An analysis of Victorian Auditor-General's reports between 2005 and 2011 and Ombudsman's reports between 2007 and 2011 has demonstrated that record keeping compliance breaches are prolific, with approximately 300 references of recurring and high-risk implications for government agencies, the community and outsourced organisations. The frequency of these breaches and the criticality of the impacts are of particular concern to RIMPA.

A 1996 Public Accounts and Estimates Committee report and a 2008 Victorian Auditor-General's Office report reinforce that the corresponding regulatory model remains chiefly unchanged, ineffective and fails to address the current high risks with government record keeping. Currently there is no agency monitoring, no agency compliance reporting and no defined community complaints process, and the penalties for destruction are woeful. In Victoria we have legislation that is almost non-enforceable.

The March 2012 Victorian Ombudsman's report *Investigation into the Storage and Management of Ward Records by the Department of Human Services* reinforced our concerns. This record keeping failure is of great significance because it adversely impacts a group of some of the most vulnerable Australians, and Ruth will talk briefly on that. The report found that the department does not have a thorough appreciation of the number of persons whose personal history is contained in its archives, nor where to find all the records relevant to these people. This presents significant barriers in trying to locate all relevant records relating to a person's time in care.

The department currently holds in storage around 80 linear kilometres of historical records stored in boxes at numerous locations, and the department has not inspected or indexed, which is a major concern, a considerable portion of these records. Accordingly it cannot provide an accurate estimate of what portion of this total holding relates to wards of the state. Despite having had the majority of the records in its archives for over 15 years, the department has indexed and catalogued records relating to only 26 of the 150-plus years of records relating to wards and institutions that it holds. The majority of these records remain, in large part, uninspected, unindexed and unscanned.

The department is aware that private institutions hold documents relating to many wards of the state housed by them in the past. The department has advised that, while it has a contractual arrangement with a large number of these institutions, they do not cover the storage and management of ward records. The Ombudsman considered that the department should implement a series of key recommendations and compelled the department to take immediate action to ensure that it has a thorough understanding of the records it holds in its collections so that care leavers can be assured that they have been provided with all the available information regarding this often traumatic chapter of their lives.

In April 2012 the Victorian Auditor-General tabled a report on freedom of information, examining the extent to which Victorian public sector departments and Victoria Police meet the requirements of the Freedom of Information Act 1982 and associated guidelines. The report found that 21 per cent of DHS ward of the state hard copy records could not be located in response to FOI requests. DHS estimated that 90 per cent of its documents are not properly managed as records. DHS does not have a robust record keeping system, and records are stored on network drives, on hard drives, on portable devices and in emails. Records that are not managed in accordance with better practice are difficult to locate, requiring more resources to search for them. In some cases these records cannot be located and may never be found.

One of the report's recommendations concluded that the department should improve its records management practices to minimise loss of documents and enhance access to information. RIMPA is limited in its ability to provide the committee with assurance that any of the recommendations in these reports have progressed satisfactorily, have been implemented in accordance with legislated government recordkeeping standards, or adequately resourced to ensure satisfactory completion. RIMPA has no power to compel DHS to confirm whether implementation of these recommendations has progressed satisfactorily.

Any information regarding progress with the successful implementation of the recommendations as provided by RIMPA is primarily consolidated information that has been made publicly available by DHS. To that extent RIMPA has provided a professional evaluation commentary on what DHS has reported in relation to meeting the recommendations. RIMPA has endeavoured to alert the committee to some of the key risks associated with implementing a project of this size, complexity and contentious nature.

We are aware that a ward records plan has been developed, and we acknowledge it is a valuable start. The DHS ward plan, though, is not detailed enough to ascertain whether DHS has addressed the serious risks associated with a project of this complexity. Consequently RIMPA has the following questions and concerns. DHS will have to confront the conflict of interest of ensuring accessibility and discoverability of records, as per legislated records management obligations and making records with evidence of abuse discoverable. That will likely increase the potential for litigation as a consequence of communicating the existence of such records. RIMPA is concerned at how it will deal with this profound conflict of interest. We would like greater independent scrutiny and transparency of DHS's processes.

We would like to emphasise that there is also a conflict of interest that non-religious and non-government agencies will face in light of evidence requirements of the royal commission. Consequently, how will this conflict be managed? What level of external scrutiny or independent quality assurance will be implemented? How will DHS capture records containing abuse, secure records and protect these records from destruction? These processes should be open to public scrutiny. Obviously we are concerned that records will get deleted or destroyed. Have records relating to former wards already been destroyed? A legal freeze or hold on any ward or care leaver records should have been in place for years, yet we have no assurance on whether DHS's procedures have met or currently meet the Public Record Office Victoria requirements and are adequate in protecting records from destruction.

The ward plan does not provide details on the adequacy of funding considerations. This project is an expensive undertaking. What funding has been allocated to the project, and what business modelling has been undertaken to ensure its adequacy? These projects are notoriously costly, and past endeavours to address issues based on limited funding have only rendered the records even more problematic. Inadequate funding will undermine the discoverability of the records. Former care leavers are ageing, often of compromised health and face the statute of limitations for commencing litigation. This project should not be delayed any more. It should be dealt with in a defined and short time frame.

The DHS ward plan does not provide details on the adequacy of project governance. Currently the governance is comprised of seemingly internal DHS representatives. There is no detail on how the public record office will be involved as a key stakeholder. What measures will be implemented to ensure that records are sentenced, disposed of and stored in accordance with all government standards and legal requirements? Has DHS identified the unique qualifications and skills needed to complete the project? Staff should have professional qualifications and experience. DHS mentions that this project will be undertaken by internal staff. Inexperienced and unqualified staff may worsen the state of these records. DHS does not give examples of the logistics and type of priority action that it has or will employ to locate and provide access to records of care leavers with either foreshortened life expectancy or those care leavers engaged in legal proceedings. How will it deal with

these significant requirements? Obviously we are concerned about those who are getting older and are still not being able to access their records.

How will this further evidence discovered impact past compensation settlements with care leavers? Has a record of outsourced service provision strategy or plan been developed? Recommendation 5 asks DHS to negotiate agreements with each non-government agency holding records of former wards of the state in order to either identify and index all such records and hand them to the department for further conservation and management, or maintain them and provide assumed access under protocols formally agreed with the department.

In relation to the VAGO recommendations, DHS states in the ward records plan that it will develop an electronic document and records management business case for the departments of human services and health. This will address their current record-keeping issues as opposed to historical records issues. The Ombudsman's reports highlighted the existence of the Department of Human Services Electronic Document and Records Management System Business Case of 6 May 2011, pending departmental approval. What is the department's level of progress with this, and why are they developing yet another business case?

RIMPA also has concerns with current care leaver records. Records management is becoming increasingly electronic, and as such insufficient integration of data and inadequate future planning means that electronic records as evidence of lives — and, in some cases, records integral to litigation arising from abuses and negligence — may not be managed to ensure discoverability.

Currently the Department of Human Services outsources services for child protection through funding agreements with not-for-profits and uses the CRIS and CRISSP systems to manage client information in both electronic and hard copy form. Religious and non-government organisations would also be producing electronic records and documents. Careful future planning should be put in place to ensure that these records are made available in the future and not be subject to technological obsolescence or maladministration. We need to consider what is happening in the future, not just what has happened in the past. Will these records be accessible to clients in the future? I am going to hand over briefly to Ruth.

Ms EDGE — I wanted to talk about the human impact on people who have not had access to their records. We had a look at the 2004 *Forgotten Australians* report. That report put through a number of recommendations. We thought what we would do is put out a survey to care leavers and get feedback on what their experience was in accessing their records post the implementation of recommendations of the 2004 report. Our catalyst for this is clearly that it is our professional interest in good records management, because we know that records form an integral part of the governance of legal and social relationships. It supports the legal rights and obligations within the legal system, and they are required to regulate business and social activity. The records provide evidence of proof of events, sometimes horrific and sometimes unspeakable and unimaginable, and records underpin the personal, organisational and democratic accountability that underpins government and the legal system. Records are important in protecting the human rights, in this case of our most vulnerable Australians.

We conducted a survey, and it was interesting what it revealed. Seventy per cent of the respondents believed that they did not receive their records in full. Only 10 per cent believed they did receive their records in full. More than 65 per cent of respondents were disappointed with the level of details in the records received, and 30 per cent were frustrated with the level of censorship. Fifty per cent reported mistakes and inaccuracies, with 8 per cent stating that the records were not actually about themselves. Forty per cent of the respondents were angry with the way the events were interpreted. Forty per cent said the information was not truthful, and 25 per cent required counselling after receiving their records. These results provide a clear example of the continuing detrimental effects of poor records management of institutional care providers. They also suggest that little has changed since 2004, detailing the obstacles to accessing records and the emotional trauma experienced by care leavers and their frustrated attempts at piecing together the facts of their lives and identities.

These are some of the replies of respondents to some of the questions. Survey respondents provided insight into the value of the records and what that value holds for them. One person said:

I know who I really am and where I have come from.

Another person said:

My mother's letters that were sent to me, that I was never allowed to read, were in my file. They tell a story that I have not been able to understand for most of my life.

Another person said:

I am no longer a member within a system that did not care that I was a human. I would like to know the reasons why.

The survey asked respondents to detail their attempts to access their records. One response was:

We never got anything.

Another said:

The DHS person contacted me by phone and said they found the folder with my name on it but nothing inside it. It took three months after I applied.

I have tried to apply for my files three times and on one occasion the Uniting Church told me that there were so many old files to go through and they wouldn't go through them.

Another said:

I tried to get more information but was denied access by the FOI.

The respondents also described the impact of not having access to their records or where records were incomplete or inaccurate. They said that they had feelings of disconnectedness, abandonment and betrayal when denied full and accurate records of the time they were in care. One person said:

The blacking out of information in my records left me wondering about what and why, causing me to have no way of knowing the truth and leaving me feeling hopeless and sad.

Another person said:

It's as though I was invisible to the governments of Victoria and the Mercy nuns for 13 years.

Another person said:

... a lost soul looking for a paper trail ...

Another person said:

I didn't get all the facts about my past. I was put in a mental ward with adults as a 12-year-old. Caulfield convalescent and two others. Men sexually touched me and I was suicidal. None of this was in my records. None of my health records provided rheumatic fever, arthritis and most probably from sleeping in wet beds as a part of my institutional abuse.

In addition to the survey questions detailed, respondents were also asked to provide their opinions on potential courses of action to resolve the issues they continue to face when accessing their records. I will provide only some of the examples to convey properly the frustration, outrage and erosion of trust in the transparency and accountability of care provider institutions that were caused when their approaches to records management repeatedly fail those who rely on these records the most.

One person said:

For government and past providers to be honest and do not block out any information. It is our information not the government's or past providers'. Also give original photos, letters and envelopes — not copies! I firmly believe that all information on holiday hosts, foster families, names should be given as these people were adults, and they knew what they were doing in taking a child from an orphanage and in foster parents getting paid to do so. Their names should be released. I also would like to know who, when and where has had access to my family — the names of DHS workers who had access to my state ward files. I want Australia to commit to the UN rights of the child that state governments have an obligation to provide a child with identity.

Another said:

DHS needs to be open and honest, to speak up if our records have been destroyed or if accessed by other family members. It's cruel to leave us thinking they are still there somewhere. DHS needs to contact us and not wait for us to apply for access. Just send the files to Care Leavers — even DHS need closure on historical files.

There are others, but I think that gives you a fair idea of the feeling that is out there. There is a series of recommendations that we have put together as RIMPA that might help to address this.

The CHAIR — Have you finished or can we go to questions?

Ms PROUT — Yes, I'm happy for you to do that.

The CHAIR — Thank you both for your presentation. I just want to get some context in relation to RIMPA. I notice in your submission that you did speak about the previous inquiries that have been undertaken, and you have obviously been fairly involved in those past two inquiries. In relation to our current inquiry, can you offer us some information that is relevant for the record management, because in your presentation there were lots of questions you asked of us? Do you have some view on how information is kept today, because obviously we have technology — there are a whole range of other different record-keeping initiatives. From your perspective, could you give us a view?

Ms PROUT — RIMPA is the professional body for representing records and information management professionals. We probably have somewhere in the vicinity of 3500 to 4000 members across Australasia, including New Zealand. We can only go on what information we have been provided. We cannot say with all certainty that we have evidence to back it, except for the information we have provided in relation to DHS. There are definitely concerns in relation to the way the information is managed. Even in today's environment, in terms of electronically, it is still very fragmented. It is not indexed appropriately. I would not like to be trying to find information in the future.

The CHAIR — Out of those 3000 or 4000 organisations that are members of your body — is that right?

Ms PROUT — Yes.

The CHAIR — What do you actually do for them? Could you just give the committee an idea about who they are and what you do for them?

Ms PROUT — It is very much a case of keeping abreast of the changes in the industry in terms of information management. We provide training. We provide an advocacy role. We are very active in making sure that we are addressing any of our members' concerns or issues. In terms of where we have got to this point today, we initially raised concerns across government. That was the first instance. Then the next instance was when the CLAN members approached us, and I understand you do not want — —

The CHAIR — No — —

Ms PROUT — I am just trying to explain how we got to this point today.

The CHAIR — Our terms of reference are looking for policies and procedures, so what I want to know is, perhaps out of those 3000 or 4000 organisations, you are highlighting one, and we are very aware of the issues you have highlighted to us, but we want to look at improving our systems and policies and procedures. So my question is: out of those 3000 or 4000 organisations, is there any one organisation or a number of organisations that are doing record keeping that you would use as a model that could be applied to organisations that fit within our terms of reference for better improvements for child safety in relation to what we are dealing with?

Ms PROUT — It is difficult in terms of state government. Coming from my own professional understanding, I would not be able to comment on state government. I know there is a lot of work being done in the local government sector in terms of improving processes and procedures — just frameworks in place.

The CHAIR — But we are talking about non-government organisations and religious bodies. We are looking to try, through our terms of reference, to assist those organisations with their improvements in their systems and in record keeping, so I am asking: in your professional capacity, is there an organisation that is doing this very well?

Ms PROUT — In non-government or religious organisations?

The CHAIR — Yes.

Ms PROUT — I could not say. I could not give you a recommendation that 'This organisation is doing a good job'. I do not have one I would definitely point you to.

The CHAIR — Thank you.

Ms HALFPENNY — Just because it is a government or non-government organisation, it should not matter if they have a good record-keeping system.

Ms PROUT — No, it should not make any difference whether it is government or non-government.

Ms HALFPENNY — So are you saying it does? I am not an expert in record keeping. In point 6, recommendations, you have a third point there that talks about a record-keeping assessment framework to be developed and about how you make it compliant. If we are talking about, say, complaints about abuse or suspected abuse, and then you are talking about children who are in state care but within maybe housing places run by non-government organisations, how should that look? Should there be central files, and there are not? Should each organisation keep their own files? These are the sorts of things we have been looking at.

Ms PROUT — Even though there are these non-government agencies providing these services, my understanding — if anyone can tell me if I am wrong here, they should — is that DHS has an overarching responsibility to ensure that these organisations are providing the relevant services or whatever, but also they need to be aware that the records of these organisations need to end up under the DHS responsibilities, and therefore there need to be processes and systems around that. Our concern is that that is not actually happening, and that is where we would be wanting to help them to develop some sort of framework to ensure that those records are being properly managed, accessed and provided to DHS at some point in time. So that can be managed for the future.

Ms HALFPENNY — So how do you do that? Through the contracts the government have with them?

Ms PROUT — Absolutely, yes. There would be a contractual arrangement, I would assume, between DHS and the organisation, and there should be record-keeping requirements within those contracts.

The CHAIR — And what about private organisations or non-government organisations that do not have to report to DHS per se, but this is still an issue for them in relation to that good record management? I think that is what Ms Halfpenny is trying to say.

Ms PROUT — If you develop a robust enough framework, it could be used by any organisation to manage their records. It does not matter whether it is government or non-government. If you have a framework that can be provided, then it should be utilised by those organisations. It just needs to be robust.

Ms HALFPENNY — What is the framework then? Just step us through the way the records should be kept in terms of our making recommendations about how records should be kept for the future to ensure that people have access to them to know what happened to them and why and to make sure, if there are previous cases of abuse of children there, that we can find out about them later if we need to.

Ms PROUT — There are standards that have been developed by the Public Record Office. There are concerns about the fact that we have these wonderful standards but there is no real compliance behind it in terms of there is no reporting or monitoring or complaints process. That is from a government perspective. But the actual standards are in place, and there is no reason why they cannot be utilised by these non-government agencies. The other thing too is that our professional body would be more than happy to assist in developing a more detailed framework, even from what has been developed from PROV.

Ms HALFPENNY — Do you think it is cost thing that it does not happen or is there a lack of understanding, or what do you think is going on?

Ms PROUT — It is probably a combination of both. I mean, let us face it, most things come down to cost to a large degree. But also I think the benefit of government is we are used to having to be compliant, whereas these non-government agencies do not have that element quite as much. Therefore the understanding is probably not there as much as it should be, so it is probably a combination of both a lack of understanding, but also a lack of funding.

Mr O'BRIEN — Just picking up on what you said about how we need to consider what happens in the future as well as the past, and picking up on what Ms Halfpenny said, looking at organisations that have not kept records, particularly of complaints, I know that is a recommendation or problem identified in the Senate committee report on your page 3, which says:

Former care leavers and their legal representatives cannot access records ... because records have not been kept.

It may seem obvious to you, but for the sake of our inquiry could you explain to us the importance of maintaining thorough records in relation to complaints and perhaps some of these standards. I think you have identified them in recommendation 3 — for example, AS ISO 15489. The last little bit of information in that question is that we got a detailed submission from the New South Wales Ombudsman which also talked about the importance of keeping detailed records of complaints. I am not sure if you are aware of this, but it is at least a helpful document to us and we would like to see other helpful documents.

Ms PROUT — I have lost track there.

Mr O'BRIEN — Can you explain the importance of keeping records? What sorts of standards are there and how do these standards work in relation to complaints?

Ms PROUT — In the older days you would generally have a client file. It would be a paper file and generally you would hope that the majority of information would end up in that client file. Now obviously we have had indications that a lot of that information is missing, but generally, if you were dealing with a client, the information would end up in a client file. In terms of where we are now in the electronic environment, our biggest concern or problem is we have information sometimes in paper format, we have information that is sitting in their CRIS system — I think they call it — plus there is also stuff sitting on network drives and in emails and it is not consolidated in one place. Therefore in the future when people are wanting to access this information, it is fragmented, and unless you have got it indexed properly and in one place, it is going to be awfully difficult to locate. It is actually going to be a lot harder than it was 10 or 15 years ago, when we were predominantly working in a paper environment.

Mr O'BRIEN — That is records sent generally.

Ms PROUT — Yes, correct.

Mr O'BRIEN — My question was sort of directed as well to the keeping of complaint records for child abuse. That is the information we got from the Ombudsman, who has that role in New South Wales. Obviously there are a lot of details, but you referred to the standards in your recommendations. There are such things as the names, a response, reporting to police, advice.

Ms PROUT — Certainly with complaints, the reason why you would want to keep complaints is that you can then create a story, basically. If something is continuing, or we get complaint after complaint after complaint, you are starting to build up a history of what is happening. If you do not have that, how are you going to be able to then track back in the future when an incident has been raised, or when a concern has been raised? You need to keep those records. They are pretty important.

Ms EDGE — Can I just add that you also need to have your policies and procedures around managing complaints, so you need that to complete the story as well.

Mr WAKELING — Thank you very much for your presentation. As I understand it, effectively there are two issues here when we look prospectively, but obviously when we are looking at the records you are talking about, information that is not in the file, regardless of what form it is kept in, is obviously information that is not there. So looking at future management of files, there is the issue of how it is managed. You have raised those issues as to whether it is electronic, or whether it should be in a central repository. But then the secondary issue is about what content goes into the file.

Obviously someone in the future may wish to access a file created today, but the information in that file still may not meet their expectations because they may well believe that organisations, institutions, departments — whoever they may be — is keeping detailed daily accounts of that person's life and that simply may not occur. The file may only have basic information on that person and it may not provide the daily account about which that person is seeking information in the future. I am just putting it in that context, that the information you are talking about may not ever appear because a lot of that information may never be recorded.

Ms PROUT — This is where disposal schedules that come from the public record office are quite good, because they give guidance to people as to what information they would expect the organisation to have. So that when you do put in an FOI request, you know what you are looking for. The problem with the non-government

agencies is they do not have that rigorous legislation behind them, so therefore it really is up to them what they decide to keep. Government organisations have basically said, 'You must have this for this period of time', or whatever; so that if someone is doing an FOI search in the future, you can say, 'Here is our index. Here is our business classification scheme. Here is our disposal schedule. That will tell you the type of information that we would still be storing'. Then it makes it much clearer as to the information that you are looking for. Unfortunately that is not necessarily clear at the moment, especially for the non-government organisations where they have not had that tight stringency that government organisations have.

Ms EDGE — Can I just add to that? Do you understand what a business classification scheme is?

Mr WAKELING — Perhaps you could explain it.

Ms EDGE — A business classification scheme is basically naming conventions that standardise what types of records you put against a particular file. Generally it is function based, activity based and then transaction based: so they are the names. Function would be 'finance'; activity might be 'accounts payable'; and transactions might be 'invoices'. It could be something as simple as that. The other thing you need is business rules around what sort of information you capture and how you name it. The VERS standard has metadata standards that tell you what sort of information needs to be captured against a file. The information is out there and it is publicly available, it is just not being used.

Ms PROUT — It is not being used and that is our concern. A lot of this information is already there, but organisations are not using it and are not applying it, and therefore their recordkeeping is not good because they are not following the protocols, the rules, the standards and the suggestions about the way things should be done.

Ms EDGE — We have certainly taken this to the private sector too. We had an invitation from VECCI, I think it was in 2011, to present on the Evidence Act and good recordkeeping. We pointed them back to the standards and to the Public Record Office standards.

Mr WAKELING — I have worked in local government, so I am certainly used to the records management system, and you may have an effective records management system but it still may not capture all of the information from which somebody in the future may seek information — that is, an incident occurred that was never recorded on a piece of paper.

Ms PROUT — There is no doubt that there is going to be the human factor in any of this, and that is why you need to make sure that you have good protocols and rules in place so that at least staff are aware of their responsibilities and what they should be doing. Whatever way you look at it though, you are never going to get away from that; there is always going to be a human element. But the more robust, and the more the rules and regulations are in place, the more you have a chance of having a true and accurate record. And of course it comes back to your education as well.

I was listening to the witness earlier who was talking about the change management aspects — that any change affects or any systems or processes you put in place is critical to the success of ensuring that the information is adequately captured and kept accordingly.

The CHAIR — I do not believe there are any further questions. On behalf of the committee, I thank you both very much indeed for your presentation and for your time this afternoon. Your evidence has been most helpful. Thank you.

Ms PROUT — Good luck.

The CHAIR — Thank you.

Committee adjourned.