



Record-Keeping Policy & Procedure

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Written by: Gah Siong Lam

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Approved by: Stephen Connell, Full Committee

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Bodhinyana Buddhist Monastery

216 Kingsbury Drive
Serpentine WA 6125
+61 (0)8 9525 2420

Dhammasara Nuns Monastery

203 Reen Road
Gidgegannup WA 6083
+61 (0)8 9574 6583

Jhana Grove Meditation Retreat Centre

283 Kingsbury Drive, Serpentine WA 6125
+61 (0)8 9525 3314
jhanagrove@bswa.org

PURPOSE

This policy has been developed for the Buddhist Society of Western Australia (BSWA) to provide a framework for all staff, committee and subcommittee members, and volunteers to ensure that full and accurate records of all activities of the BSWA are created, managed and retained or disposed of appropriately.

SCOPE

This policy applies to all financial and operational records in all formats including digital records, and all computer applications used to create or store information, records and content.

POLICY

The BSWA:

- must keep certain written financial and operational records;
- can keep the records in any format the BSWA choose, as long as they are easy to find (including in electronic form);
- can develop its own system or process;
- must keep the records for 7 years. It is important to ensure that there is enough storage space to keep the records for this duration. Other laws may require records be retained for a longer period (for example, health records, documents relevant to potential litigation);
- must keep records in English, or in a form that can be easily translated to English; and
- is not required to provide the records to the ACNC unless requested.

Most records can be kept in hard or electronic copy. For records in hard copy, it is important to ensure that your records are readily accessible and are stored securely in accordance with any applicable privacy laws.

For electronic records, it is not required to keep the original hard copy unless the original document has some value that will be lost in the electronic copy (for example, if the original document has evidentiary value). It is important to make sure that:

- the electronic copies are true and clear (legible) reproductions of the original;
- a back-up of electronic records is kept;
- the documents are easy to find;
- the documents can be converted to hard copy (for example, by printing the records); and
- the electronic records are stored securely. If the records contain personal information or health information, the records should be stored in accordance with relevant privacy laws.

As the BSWA operates overseas it is required to obtain and keep records relating to its overseas activities. The records must be sufficient to enable the ACNC (or others) to assess the BSWA's:

- entitlement to charity registration;

- charitable purpose and registration category or sub-type;
- compliance with the ACNC Act and ACNC Regulations (this is particularly broad given the governance standards under the ACNC Regulations); and
- compliance with taxation laws, which is assessed by the Australian Taxation Office (ATO).

Why Keep Records?

When the BSWA keeps good records of how it is run, this can help:

- to show it is continuing to be run as a not-for-profit and working towards its charitable purposes (and so should remain eligible to be registered as a charity);
- members and the public understand whether the BSWA as a charity is in good financial health;
- to assess whether the right kinds of decisions are being made (operational and financial);
- communicate about our charity's activities and finances;
- to prepare reports to meet our reporting obligations to the ACNC, other government regulators; donors and members (if relevant); and
- to show that the BSWA meets its obligations under the ACNC Act, tax and other relevant laws.

Meeting ACNC and Other Obligations

Good record-keeping also helps BSWA to meet ACNC obligations, including:

- ACNC Governance Standards 1, 2 and 5; and
- ACNC External Conduct Standard 2.

The BSWA may also need to report to other government regulators with their own record-keeping requirements, including the Australian Taxation Office (ATO). If you are following the ACNC record-keeping requirements it is likely that you are meeting most of your obligations to the ATO.

Under the ACNC Act, the BSWA must keep two types of records:

- Financial records; and
- Operational records.

What Type of Records We Keep

a) Financial Records

The BSWA must keep financial records to correctly record and explain financial transactions, position and performances. This is also to allow financial statements to be prepared and audited.

Financial records that need to be kept may include but limited to:

- General account books – including general journal and general and subsidiary ledgers;
- Cash book records – including receipts and payments;

- Banking records – including bank and credit card statements, deposit books, cheque butts and bank reconciliations;
- Creditors’ records – including creditors ledger, invoices and paid bills;
- Debtors’ records – including debtors ledger, invoices and receipts;
- Details of any contracts – including service agreements, office equipment leases, property rental agreements;
- Details of any grant payments and acquittals;
- Tax invoices and other relevant tax records. Special emphasis needs to be given to DGR records and ATO compliance;
- Stock records;
- Records of expenses – for example, motor vehicle expenses;
- Records of payments relating to staffs – including ‘pay as you go’ (PAYG) withholding, superannuation and fringe benefits provided;
- Assets list or register; and
- Emails, letters and other communication about finance – for example, an email about repaying unspent grant funds.

b) Operational Records

An operational record is any information about the BSWA’s activities that shows it complies with the ACNC Act and tax law, and that it continues to be a charity or continues to be entitled to be registered as a particular subtype, for example, as a public benevolent institution (PBI).

Operational records that need to be kept may include but not limited to:

- Governing documents – such as a constitution, rules or trust deed;
- Certificate of Incorporation;
- Employment;
- Safety;
- Insurance;
- Service delivery;
- Membership;
- Meeting minutes;
- Operating policies and procedures;
- Annual reports, donor reports or other reports – for example on results of programs, projects or services;
- Strategic plans and program plans;
- Monitoring and evaluation reports;
- Contracts and agreements – including funding and other agreements;
- Memorandum of Understanding;
- Media releases – such as those released by your charity, and discussing its activities;
- Charity promotional materials – including pamphlets, posters; and
- Any other records to show your charity is working towards its charitable purpose – this includes electronic, written or multimedia records, for example a short film about your charity’s project.

Meeting Minutes

Meeting minutes should be taken for all meetings, especially the annual general meeting (AGM) and committee, as they serve as record of what happened during a meeting. The minutes must also record when a committee member has disclosed a material personal interest in a matter being considered by the committee. Approved minutes provide an official record of:

- attendance;
- business discussed;
- correspondence received;
- reports tabled;
- decisions made; and
- resolutions adopted.

The level of detail recorded in the minutes may vary between associations but any decisions recorded should clearly state:

- what decision has been made;
- who will be responsible for its implementation;
- when the decision is to be implemented by;
- if the decision is to be reviewed, and if so, when and by whom; and
- who should be notified of the decision and how.

Notice of Meeting

Notice of the BSWA's meetings and special resolutions must be given to all members within the notice periods specified in the rules of association. Copies of notices showing the date issued should be kept in case of a later dispute. Notices are often filed with the related minutes.

Certificate of Incorporation

The certificate of incorporation is issued when the association is first incorporated or if a change of name occurs. It is important the certificate is stored safely as it is evidence of the BSWA's corporate status. The certificate can be required for example, when applying for funding grants or opening a bank account.

Annual Report

There is no set format for an annual report, but it is usually submitted to members at the AGM and includes:

- Chairperson's report;
- Staff report;
- Activity report;
- Annual statistics;
- Annual financial report;
- Interest stories, highlights and low points; and
- List of staff, management and volunteers.

Employment Records

In addition to the records required by the Australian Taxation Office (ATO) and State and Commonwealth industrial laws (see Employment and volunteering), the BSWA may wish to set up employment-related record systems. These could include:

- recruitment records such as job descriptions, selection criteria, related industrial agreements, advertisements, selection processes and outcomes;
- formal records of any meeting or discussion related to issues of employee performance and position review;
- formal documentation of all proceedings related to any grievance;
- records on staff training and professional development; and
- copies of all correspondence and memoranda relating to individual conditions of employment, changes or requests.

Safety Records

The following health and safety records should be kept in a separate file for easy access and reference:

- complaints;
- incidents;
- risk management analysis;
- training details;
- safety committee minutes; and
- copies of specific management committee resolutions.

Insurance Records

Copies of all insurance policies should be kept in a secure place. Changes to policies should be updated on the files immediately when they are received. Insurance policies may require an association to keep specific records for the purposes of validating a policy. BSWA must notify their insurer as soon as possible after events such as an accident, theft or fire. It is important BSWA keep copies of all notifications and correspondence to prevent the possibility of any dispute regarding BSWA's obligations.

Service Delivery Records

BSWA may keep service delivery and activities in order to:

- acknowledge achievements;
- minimise risk of professional negligence;
- facilitate communications and change overs;
- ensure industry or professionally-based requirements are met; and
- assist in evaluation and planning.

This may take the form of statistic sheets, case files or employee reports. Funding arrangements may also require certain records to be kept and reported on.

Members' Access to Records

Constitution

The BSWA must give each new member the Constitution when their membership starts. The association can comply with this obligation by:

- providing a hard copy of the Constitution;
- emailing an electronic copy of the Constitution to the member; or
- providing the details for a website where the member can download a copy.

Please note that if the member specifically requests a hard copy of the Constitution, the BSWA must provide the document in this format. At any time a member can request to inspect and make a copy of the Constitution or ask the BSWA to provide them with a copy of the Constitution or any particular part in force at the time of the request (free of charge).

Members may also request to see a copy of the Member Register as outlined in the constitution.

Record-keeping When Working Remotely or From Home

The BSWA record-keeping responsibilities do not change if a staff or volunteer is working from home or remotely. The staff or volunteer will still need to:

- make and keep copies of operational and financial records;
- keep records safe, ensuring no unauthorised access to records, nor unauthorised or illegal disposal of records; and
- comply with the BSWA's record-keeping policies and procedures.

Privacy and Confidentiality of Records

The BSWA need to ensure they comply with legal requirements regarding any personal information it holds about clients, employees, members and other individuals. Any personal information collected must be kept private and confidential and individuals have a right to:

- have their privacy rights respected;
- be assured their information will not be passed onto a third person unless it is authorised by law or they have given their consent;
- know what information will be kept and why; and
- be assured that information will only be used for the purpose it was supplied.

Custody and Handover of Records

The BSWA should include details of who will have custody and responsibility for keeping the records. If a person ceases to be a member of the committee through the ending of their term, resignation or death, it is a requirement that any records they hold be delivered to a current member of the committee as soon as practicable.

Record-Keeping and annual ACNC reporting

The BSWA information statement is required to be lodged with the ACNC after its AGM in accordance with the ACNC's due dates. This includes the Annual Information Statement and Financial Report, and any audited versions required by the ACNC.

The BSWA is obligated to update the ACNC for any changes in responsible persons.

Record-Keeping System

BSWA records should be:

- clearly titled;
- show authorisation;
- show date of authorisation;
- show date of review;
- title original copies as 'Original Copy'; and
- title any non-original document as 'Copy'.

The way in which records are stored will depend on:

- the purpose of the records;
- the type of records;
- how long records must be kept; and
- access needs.

Policies and procedures are stored online, either on the GDrive or on bswa.org if they are public facing.

Physical records are stored on-site at the BSWA's administration office. If there is insufficient and appropriate space, records can be stored off-site by storage companies. It is essential that documents are stored in safe, secure and appropriate facilities.

Record-Keeping and The Constitution

The BSWA is required to make provision for the following matters, related to record-keeping, as per the Constitution:

- The register of members of the association;
- The custody of books and securities of the association; and
- The inspection by members of the association's records and documents.

Should a member request access to records, we are obligated to do so per the constitution.

Destruction of Records

Some records may be destroyed after their legal retention period has expired (in most cases this period is 7 years). Records will not be destroyed unless the BSWA is absolutely certain that this can be done both safely and legally.

Records that must be kept permanently should be archived and not destroyed. Records that have permanent value are historical documents, minutes of meetings and legal documents. Archived records can be stored on-site or at an off-site storage facility.

Roles and Responsibilities

Operations Manager

The Operations Manager should ensure record-keeping policy and procedures are known and adhered to in their area of responsibility. It is also important to ensure that staff or volunteers have been trained on the record-keeping process and system.

Administration Officer

The Administration Officer is responsible for maintaining the operational record-keeping system.

Treasurer and Accountants

The Treasurer and Accountants are responsible for maintaining the financial record-keeping system.

Other staffs, subcommittees, committee and Volunteers

All staff, subcommittees, committees and volunteers should create, collect and retain records relating to the activities they perform. This includes decisions made, meeting minutes, and meeting agendas, which must be shared with the Administration Officer.

They should ensure significant records are captured into the record-keeping system and that all records are handled in accordance with the procedures for record-keeping.

PROCEDURE

Keeping Paper Records

Paper records may be kept in accordance with the following:

- Organise the paper records into files, boxes, folders or envelopes that allow the records to be found easily;
- Separate the different paper records into categories (bank statements, communication, bills, receipts); and
- Separate these records according to your charity's reporting period (for example, financial year 1 January to 31 December).

Filing System and Maintenance

Financial Records

All financial records are kept in the MYOB Advance accounting system based on the filing structure presented in Table-1 below.

Table-1 Financial Records Filing Structure

Record Type	Physical Storage Location	Electronic Storage Location
All financial records	Treasury	MYOB

The financial records should be maintained by the Treasurer and Accountants.

Operational Records

All operational records should be kept based on the filing structure presented in Table-2 below.

Table-2 Operational Records Filing Structure

Record Type	Physical Storage Location	Electronic Storage Location
Governing documents	Administration Office, Dhammaloka	Google Drive /a/ bswa.org/bswa-filing-cabinet/
Meeting minutes	Administration Office, Dhammaloka	Google Drive /a/ bswa.org/committee-minutes/
Reports	Administration Office, Dhammaloka	Google Drive /a/ bswa.org/committee-reports/
Written details of BSWA's activities	Administration Office, Dhammaloka	Google Drive /a/ bswa.org/bswa-filing-cabinet/
Programs or services	Administration Office, Dhammaloka	Google Drive /a/ bswa.org/bswa-filing-cabinet/
Contractual agreements	Administration Office, Dhammaloka	Google Drive /a/ bswa.org/bswa-filing-cabinet/
Strategic plans	Administration Office, Dhammaloka	Google Drive /a/ bswa.org/bswa-filing-cabinet/
Policies and procedures	Administration Office, Dhammaloka	Google Drive /a/ bswa.org/bswa-filing-cabinet/ S:\Policies and Procedures - BSWA\Approved Policies
Project proposals	Administration Office, Dhammaloka	Google Drive /a/ bswa.org/bswa-filing-cabinet/
Media releases	Not Applicable	Not Applicable
Charity promotional material and project documentation	Administration Office, Dhammaloka	Google Drive /a/ bswa.org/bswa-filing-cabinet/
Membership	Administration Office, Dhammaloka Library, Dhammaloka	MYOB and Excel Spreadsheet \\192.168.0.128\asec\Documents\Asec 2011\Membership Reports\2020

The operational records are maintained by the Administration Officer.

Sensitive Records

Sensitive physical financial records should be kept in the locked cabinet and cupboard in the Treasury office. Sensitive electronic financial records should be kept in the MYOB Advance accounting system. Only the Treasury team is allowed to access these records.

Back-up of Electronic Records

Financial records should be kept in MYOB Advance, a cloud-based software. Operational records are kept in Google Drive, a cloud-based storage. The records are backed-up in the cloud systems.

Annual Update

The committee should receive an annual update of whether the BSWA is meeting record-keeping requirements or not.

APPENDIX A

Record-keeping Checklist



Australian Government



Australian Charities and Not-for-profits Commission

This record-keeping checklist promotes good record-keeping practice and supports charities to meet their obligations to the ACNC. It is an indicative list only and does not intend to be exhaustive.

Does your charity:

Keep financial and operational records?

- We have a policy about record-keeping which includes what records we keep, how we keep them securely and who is responsible.
- We have records that show all of our financial transactions.
- We have records that show our activities as a charity.

Keep records in English or in a form that can be easily translated into English?

- We can quickly translate our records into English if needed.

Have a system or process for record-keeping?

- We have a specific role in our charity responsible for record-keeping.
- We have other staff/volunteers/board members who have had training on the record-keeping system and process.
- We have a procedure that describes how our records (for example, written, print-outs, electronic, other?) are kept and secured and who is responsible for record-keeping.

Keep records in a way that are readily accessible (easy to find)?

- Our record-keeping policy describes where our records will be kept and who is responsible.
- Our record-keeping procedure describes our filing system and how this is maintained.

Secure any sensitive records?

- Our record-keeping policy describes how we keep sensitive records secure and who is authorised to access sensitive records.

Back up any electronic records?

- We keep a back-up of our records in a different and secure place to our computers.
- Our cloud-based systems and records are secure and backed up.
- We print out only the records we need to.

Keep paper copies of important electronic records?

- We organise paper records into files, boxes, folders or envelopes.
- We separate different paper records into categories (bank statements, communication, bills, receipts).
- We separate the paper records by reporting periods (financial years)?

Keep all records for seven years?

- Our record keeping policy includes the requirement to keep all records for seven years.
- We have enough storage space (which may include electronic storage) to keep the records for seven years.

Report to other regulatory bodies which have their own record-keeping requirements?

- Our record-keeping policy recognises our other record-keeping compliance requirements under state or Commonwealth legislation, statutory contracts or accreditation requirements.
- Our board receives at least an annual update of whether we are meeting record-keeping requirements or not.

If your charity can tick these off and follows good record-keeping practice it is likely to meet ACNC record-keeping obligations.



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