

# Confidentiality and Access to Information Policy

**Connect: Inner West Community Transport Group (Connect) requires Directors, staff, volunteers and contractors to respect and maintain the confidentiality of individuals and the organisation's business, while supporting appropriate transparency and accountability.**

**Directors, staff, volunteers and contractors may from time to time have access to information that is confidential to Connect, other agencies that have dealings with Connect, or to other Directors staff and contractors.**

**This policy balances the privacy and dignity of individuals, the protection of confidential and commercially sensitive information, and appropriate access to information in accordance with law, governance, and public interest considerations.**

**This policy applies to confidential information, records and unpublished materials of Connect, including personal and personnel records, client and service user records, Board and governance records, and corporate and commercial records.**

**Connect may vary, replace or rescind this policy at any time.**

Record of policy development		
Version	Date approved	Date for review
1	16 March 2026	March 2028

Responsibilities and delegations	
This policy applies to	Directors Employees Volunteers Contractors
Specific responsibilities	General Manager
Policy approval	Board

Policy context – this policy relates to:	
Standards	Aged Care Quality Standards
Legislation	Aged Care Act 2025 Privacy Act 1988 Privacy and Personal Information Protection Act 1998 (NSW)
Contractual obligations	TfNSW DoHA
Organisation policies	Code of Ethics and Conduct Privacy Conflicts of Interest

Forms, record keeping, other documents	
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## Definition

Confidential information includes, but is not limited to:

- Personal information about staff, volunteers, contractors, and or Directors information such as home address, telephone numbers, and other non-work-related information;
- Personal information provided by clients, members, or service users;
- Information obtained through performance reviews, supervision, grievances or disputes;
- Board papers, minutes and deliberations not approved for public release;
- Financial, contractual, tender and commercially sensitive information;
- Corporate plans, strategies and internal meeting records; and
- Any information identified by the Board or General Manager as confidential.

## Procedures and Obligations

**All persons covered by this policy must:**

- retain all confidential information in the strictest confidence and not disclose any confidential information to any person other than for purposes directly related to their position at Connect;
- only access confidential information for purposes directly related to their role;
- not use any confidential information which they have acquired in relation to the activities of Connect for their own interests or the interests or purposes of others not associated Connect
- not make copies of any confidential information for any other reason other than those essential to and directly related to their position and responsibilities with Connect
- upon the request, and in any event upon the cessation of their engagement or employment with Connect return or destroy materials containing confidential information which are in their possession

This policy does not prevent a person from:

- disclosing information to proper authorities in relation to concerns about improper conduct, breaches of laws or breaches of duty of care
- providing access for external reviewers to non-identified information for the purposes of formal audit processes
- making a formal complaint to appropriate authorities about an aspect of the organisation's operation
- disclosing any information that they may be required to disclose by any court or regulatory body or under applicable law.

## Access to Records by Category

### Client Records

- Client records are confidential to clients and authorised Connect employees.
- Disclosure requires client consent, unless the public interest outweighs confidentiality (e.g. risk of harm).

- Client records must be stored securely and managed in accordance with records management requirements.

Clients have the right to:

- Access their own records;
- Request correction of inaccurate or misleading information; and
- Appeal access decisions in accordance with documented procedures.

### **Board Records**

- Board minutes and papers are confidential to Board members, the General Manager and authorised employees.
- Requests for access must be made to the General Manager, who will make a recommendation to the Board where required.

### **Membership Records**

- Lists of members may be made available to members, Directors, the General Manager, and authorised employees.
- Personal contact details are confidential and restricted to the General Manager and authorised employees.

### **Personnel Records**

Personnel files are held securely and may contain employment, remuneration, leave and performance information. Access is limited to:

- The individual concerned;
- The General Manager; and
- Other authorised persons where access is reasonably required for their duties.

### **Corporate and Commercial Records**

Corporate records include, but are not limited to, financial, taxation, business plans, contractual, project, and governance documents, which includes related correspondence. Access is limited to:

- The General Manager;
- The Board;
- Other authorised employees where reasonably required.

### **Requests for Access to Information**

#### **General requests**

All requests for access to information must be directed to the General Manager. In determining such requests, the General Manager will consider:

- A presumption in favour of transparency;
- Constitutional and governance requirements;
- Privacy and confidentiality obligations; and

- Connect's business, legal and administrative interests.

A reasonable fee may be charged where requests require significant time and resourcing.

### **Client Requests**

Client access requests will be:

- Recorded in the Client Request to Access Confidential Information Register;
- Managed in accordance with documented client procedures; and
- Subject to professional advice where refusal may be contemplated.

### **Appeals**

Individuals refused access to their own records may appeal the decision to the Chairperson of the Board, who will review the decision in accordance with the terms of this policy.

### **Breaches**

Any breach of this policy may result in disciplinary action, up to and including termination of employment, and where necessary being reported to a relevant authority.

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*End of document*

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