



Privacy, Confidentiality and Records Management Policy

This policy applies to all financial members, volunteers and employees (“members”) of Balgownie Public School P&C Association (“the Association”) when undertaking any P&C role or activity.

It outlines how the Association collects, stores, uses, protects and disposes of personal information and official records (physical and digital).

As an ACNC-registered charity, the Association must comply with the ACNC Governance Standards. This includes maintaining accurate financial and operational records for a minimum of seven (7) years and retaining all documents required to prepare and lodge the Annual Information Statement (AIS).

The Association is committed to:

- Protecting privacy
- Maintaining accurate and secure records
- Ensuring confidentiality where required
- Complying with legislative and Federation requirements
- Preserving proper governance documentation

1. Types of Records Maintained

In accordance with the By-Laws, the Association maintains the following official records:

1.1 Governance Records

- Constitution and By-Laws
- Sub-committee rules
- Incorporation and ABN documentation
- Insurance policies
- WHS and risk documentation

1.2 Membership and Meeting Records

- Membership register
- Attendance records
- Agendas and minutes
- Reports, motions and resolutions
- Correspondence

1.3 Financial Records

- Bank statements
- Receipts and invoices
- Cash handling and float records
- Float distribution records
- Fundraising tallies
- Audit reports and annual statements

1.4 Digital Records

- Website and platform login registers
- Email and social media access records



2. Collection of Personal Information

Although the Association is generally exempt from the Commonwealth Privacy Act 1988 and is not bound by the NSW PPIP Act or HRIP Act (which apply only to NSW government agencies), the Association adopts responsible information-handling practices consistent with privacy best practice

The Association may collect personal information for legitimate Association purposes, including:

- Membership registration
- Volunteer coordination
- Event organisation
- Financial reimbursement
- Executive nominations
- Complaints and grievance handling
- WWCC compliance (where required)

Information collected will be limited to what is reasonably necessary.

3. Use of Personal Information

Personal information will only be used for:

- Administration of Association business
- Communication with members
- Legal or regulatory compliance
- Financial accountability
- Child safety compliance

Information will not be used for personal, political or commercial purposes unrelated to Association objectives.

The Association applies privacy best-practice principles consistent with guidance from the NSW Information and Privacy Commission (IPC), including limiting access, ensuring secure storage, and using information only for legitimate Association purposes.

4. Confidentiality and Sensitive Matters

Certain matters require strict confidentiality, including:

- Complaints and grievances
- Child protection concerns
- Sensitive Executive decisions
- Financial hardship matters
- Information relating to children

Where confidentiality is required:

- Information must not be disclosed publicly
- Identifying details of children must never be disclosed
- Access must be limited to relevant Executive Officers
- Documentation must be stored securely

5. Record Storage and Security

5.1 Physical Records

- Converted to digital format wherever possible
- If cannot be converted to digital, it must be stored in a secure location
- Accessible only to authorised Officers
- Not removed without approval

5.2 Digital Records

- Password protected



- Stored on secure platforms
- Access restricted to authorised roles
- Passwords updated following AGM handover
- Login registers maintained by Website Administrator

5.3 Banking and Financial Records

- Maintained by the Treasurer
- Provided to the Auditor annually
- Stored securely for audit compliance

6. Handover of Records

Following an Annual General Meeting:

- Outgoing Officers must hand over all records, files, passwords and documentation within 14 days
- Financial records must be handed to the incoming Treasurer within required timeframes
- Digital passwords must be updated to maintain security

Timely transfer of records, passwords and documentation is required under the ACNC Governance Standards, which impose duties of care and diligence on Responsible Persons (Executive Members). Delays or incomplete handover may breach these obligations.

7. Retention Periods

The Association will retain records as follows; Records may be retained longer where legally required;

Record Type	Minimum Retention	Record Type	Minimum Retention
Financial records	7 years	Audit reports	7 years
Meeting minutes	Permanent	Event risk assessments	7 years
Constitution & By-Laws	Permanent	Complaint records	Complaint records relating to financial matters, safety, or risk management should be retained for a minimum of 7 years.
Annual Information Statement (AIS) supporting documents	7 years		

Annual Information Statement (AIS) -related documentation must be retained in accordance with ACNC requirements.

8. Access to Records

- Members may request access to non-confidential records.
- Confidential or sensitive records will not be disclosed without lawful authority.
- Requests should be made in writing to the Secretary.

The Executive may refuse access where disclosure would:

- Breach privacy



- Identify a child
- Breach legislation
- Breach confidentiality obligations

9. Destruction of Records

When records reach the end of their retention period:

- Paper records must be securely shredded
- Digital records must be permanently deleted
- Disposal must be authorised by the Executive

10. Breach of Privacy

Any suspected privacy breach must be reported immediately to the President.

The Executive will assess risk, take corrective action and notify relevant authorities where required.

The NSW Mandatory Notification of Data Breach Scheme applies only to NSW public sector agencies; however, the Association will internally investigate any suspected breach to ensure good governance and compliance with ACNC Governance Standards.

11. Responsibilities

Executive Committee	Ensure secure record management and compliance
Secretary	Maintain governance and membership records
Treasurer	Maintain financial records and audit compliance
Website Administrator	Maintain digital access register and update passwords after handover

12. Document Information and Review

This policy will be reviewed annually or as required by the Delegated Custodian to ensure compliance with P&C Federation NSW guidance and best governance practice. Prompts to review the policy outside of the annual cycle may include;

- Following legislative change
- After any data breach

Any updates to this policy must be adopted or approved at a general or special meeting before becoming effective. Seven days' notice is required for adoption or alteration.

Custodian: P&C Secretary or agreed delegate

Next review due: April 2027

Version	Changes made	Prepared by	Reviewed by	Date Adopted
Draft	Creation with content taken from NSW P&C Federation template	Eleisa Cajna 26/2/2026	Ash Hally Burton, Julia King	
BPS PC Privacy, confidentiality and record management 2026	Remove draft watermark and update document name	Eleisa Cajna	BPS P&C Association Members	6 May 2026 at Association General Meeting