



## POLICY

# Confidentiality

November 2025

### 1. Purpose

The Occupational Therapy Council of Australia Ltd (OTC) has a duty to ensure information gained in the course of its work is used appropriately, and ensures this information is managed confidentially.

Such information must:

- be used only for the purposes intended by the OTC
- not be communicated without permission from the OTC's Board of Directors or its delegated committee.

### 2. Scope

This policy applies to the following personnel, whether they are in a paid, unpaid or in a voluntary capacity, including:

- members of the OTC Board, committees, working or project groups, or other such structures within the OTC
- all staff whether full-time, part-time, casual, temporary or permanent
- assessors and other such roles appointed by the OTC
- contractors and sub-contractors.

### 3. Definition - Confidential information

Confidential information includes, but is not limited to:

- internal deliberations, meeting minutes, and strategic documents
- OTC accounts and financial documents
- banking and personal details of personnel
- personal and professional details of internationally qualified practitioners
- accreditation materials and assessments
- information shared with the OTC by education providers
- any material designated as confidential by the OTC.

#### **4. Obligations**

OTC personnel covered by this policy must:

- treat all OTC-related information as confidential unless explicitly stated otherwise
- not disclose confidential information to unauthorised persons
- not use confidential information for personal, financial, or third-party gain
- not make public statements or media disclosures unless authorised
- continue to uphold confidentiality obligations after their term of engagement/employment ends.

#### **5. Confidentiality agreement**

Upon commencing engagement with the OTC, all personnel must sign a confidentiality agreement or non-disclosure agreement depending upon the nature and extent of their involvement. These agreements:

- formalise the commitment to confidentiality
- are stored in OTC's document library
- must be signed prior to commencement of duties.

#### **6. Assessor responsibilities**

- Assessors must treat all information and intelligence acquired during assessments – both for program accreditation and assessment of international candidates – as confidential and not gain any benefit from the information for any person or institution.
- Confidential and commercially sensitive information related to education providers or international applicants must be stored securely and be accessible only to authorised persons.
- Accreditation reports and associated documents must be kept in a secured storage system when not in use.
- Communication of accreditation or international assessment materials must occur only via secure electronic means, ensuring the recipient is an authorised OTC representative.
- Upon completion of a review or assessment, assessors must:
  - permanently delete all electronic documents and confidentially dispose of hard copy documents containing sensitive information
  - confirm deletion and disposal to OTC via email, as requested
- The OTC will request confirmation of deletion following the finalisation of accreditations or international assessments.

#### **7. Breach of confidentiality**

Any suspected or confirmed breach of confidentiality will be investigated by the CEO or designated officer. Consequences may include:

- revocation of access to confidential materials
- disciplinary action up to and including termination of engagement or employment
- legal or regulatory action, including penalties under the Privacy act or other applicable Commonwealth laws.

#### **8. Related documents**

- OTC Values

- Code of conduct – OTC Board members
- Code of conduct - OTC Personnel
- Policy: Conflicts of interest
- Confidentiality agreement
- Non-disclosure agreement

## 9. Document information

Policy location	OTC Governance Manual		
Date	November 2025	Version	V2
Approved	23 February 2026 – OTC Board	Review due	November 2028

The Occupational Therapy Council of Australia Ltd acknowledges the traditional custodians of the lands where we work and live. We celebrate the diversity of Aboriginal and Torres Strait Islander Peoples and their ongoing cultures and connections to the lands and waters of Australia. We pay our respects to Elders past, present and emerging.