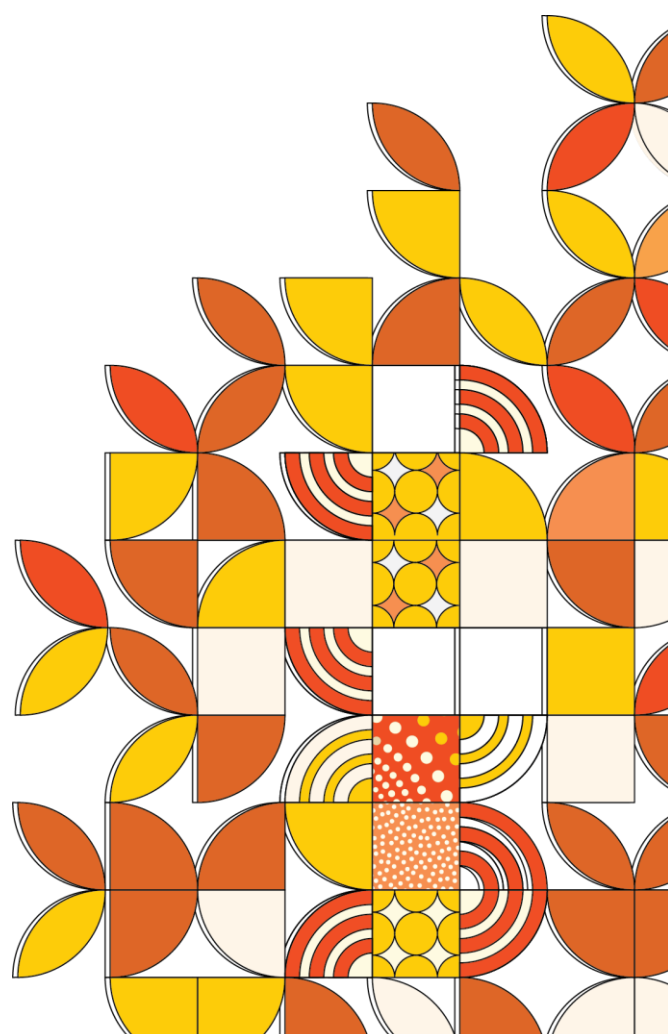


Accessing Staff Personal File Policy



SECTION 1

Purpose

1. This policy outlines the terms and conditions that apply to accessing personal files of IHM employees.

Scope

2. This policy applies to all employees of IHM, including past members of staff whose personal records are maintained by IHM People and Culture.

SECTION 2

Policy Principles

3. IHM is committed to open and transparent relationships with employees within the constraints of relevant legislation. Staff will not be asked to provide a reason or justification when requesting information held about them.
4. Access to information will be granted to the relevant staff member unless there is a valid reason for withholding it. Where information is withheld, the onus falls upon IHM to provide a valid justification for withholding it.
5. A request for information by employees will not require them to identify the document or location where the information is held. An information request may take the form of a question, in which case an onus is placed on IHM to locate and document the answer unless there is a valid reason not to provide it or the information that would answer the question is not held by IHM.
6. IHM will manage requests under this Policy based on the principle of non-disclosure of personal information to a third person.

Procedure

Informal Requests for Personal Information

7. Employees can access their personal file, and staff reports within the People and Culture Office, and in the presence of a human resources (HR) staff member.
8. Staff members are not permitted to remove from the People and Culture Office personal files and staff reports to which they have been given access.
9. Staff members are permitted to make notes of material appearing on their personal files.
10. The following material held on personal file will not be available to the employee concerned:
 - 10.1 referee reports, obtained in confidence by IHM unless the referee gives permission; and
 - 10.2 correspondence between IHM and its solicitors relating to litigation pending, in progress, or completed between IHM and the employee concerned.

11. Access to a personal file is limited to the staff member concerned, that staff member's manager, the Chief Executive Officer, and the Manager, People and Culture. Any of these three parties may be excluded if a potential conflict of interest exists. Where any adverse notation is recorded on the employee's personal file, the notation is shown to the employee, and the employee signs the file on that occasion.
12. After reading his/her file, an employee may record notes, comments, or explanations on the file in relation to any document that he/she has read.
13. Whenever someone examines a file, he/she must sign a record of access and that record of access must be shown, on request, to the employee to whose personal file it refers.

Information Request Procedure

14. If a staff member wishes to formally request information held by IHM pertaining to them, the following procedure applies:
 - 14.1 Staff member submits a Personal Information Request Form, either electronically or in hard copy to the Human Resource Manager;
 - 14.2 The Human Resource Manager examines the form and determines whether, and in what location, the information requested is stored; and
 - 14.3 At this point, Manager, People and Culture may make a request to have the information withheld from the staff member who requested it, by following the Application to Withhold Personal Information Procedure, outlined below.
15. If the information is to be released, the Manager, People and Culture decides to provide the staff member with the information pertaining to the request, ensuring that no extraneous information is released that could potentially be sensitive or pertain to other staff members. These arrangements may include:
 - 15.1 Blacking out or covering part of a document that is to be released in response to the request;
 - 15.2 Including only certain pages in the released version; or
 - 15.3 Creating a separate electronic compilation of the relevant sections.
16. The requested information is sent to the staff member through a means of secure transmission, ensuring it will not be disclosed to other parties or staff members.

Withholding Personal Information

17. In the instance that the Manager, People and Culture receives from a staff member a request for information under clause 14 and they believe that there is a valid reason to withhold the information, the following procedure applies:
 - 17.1 The Manager, People and Culture completes a Request to Withhold Personal Information Form and submits it to the Director, Quality Management, either electronically or in hard copy, accompanied by any supporting evidence.

- 17.2 If the Director, Quality Management has a potential conflict of interest, the application may instead be submitted to the Chief Executive Officer (CEO), who assumes the role of the Director, Quality Management for the remainder of the procedures/process below.
18. The Director, Quality Management examines the form and evidence and determines whether to:
- 18.1 Uphold the request; or
 - 18.2 Deny the request; or
 - 18.3 Refer the request to the Audit and Risk Committee.
19. The application will only be upheld if it is found that IHM has no legal or moral obligation to provide the information, and the information requested has the potential to pose a significant risk if released. If this rule applies to a part of the document in which the information requested is contained, the remaining parts of the document will still be released to the staff member who requested information under clause 14.
20. If the request is upheld, the staff member applying for the information is sent a written notification by the Manager, People and Culture indicating the reasons for withholding the information, referring to any relevant clause in legislation or a relevant code of ethics, outlining the procedure by which the staff member may make an appeal and highlighting their right to do so.
21. If the staff member making the request wishes to **appeal a decision to withhold the information** they have requested, they may do so by appealing to the Chief Executive Officer.
22. Where the Chief Executive Officer acted as the Director, Quality Management under clause 17.2, the appeal shall be made to the Audit and Risk Committee.
23. The appeal and the staff member's request for information are tabled at the next scheduled meeting of the Audit and Risk Committee. The staff member has the right to attend the meeting after the conclusion of any confidential agenda items and may choose to be accompanied by an advocate of their choice.
24. The Audit and Risk Committee deliberates upon the application and any relevant legislation and evidence and may choose to either allow or reject the appeal against decision to withheld information. If the appeal is allowed, the decision to withhold information will be revoked.
25. The staff member is issued a written notification of the Committee's findings and minutes of the meeting. The notification includes advice that they have the right to appeal to an external body such as a court or tribunal, should they remain dissatisfied with the outcome provided by the Committee on their appeal.

Confidentiality

26. All information relating to a staff member and their personal file shall be handled confidentially and in accordance with IHM's Privacy Policy and Procedure as well as Australian privacy law including the Privacy Act 1988.

27. Any information concerning health and medical conditions of any staff, if applicable, shall be handled in accordance with laws relating to health data protection in addition to policies and laws cited in clause 26.

Responsibilities

28. Manager, People and Culture has responsibility to examine a staff member's request for information and release the information.
29. Director, Quality Management decides whether the information sought can be withheld wholly or partially.
30. Chief Executive Officer or the Audit and Risk Committee, as appropriate, has responsibility to dispose of a request for appeal against a decision to withhold or not to release information requested.

SECTION 3

Associated Information

Related Internal Documents	<ul style="list-style-type: none"> • Privacy Policy • Privacy Procedure • Records Management Policy • Records Management Procedure
Related Legislation, Standards, and Codes	<ul style="list-style-type: none"> • Higher Education Standards (Threshold Standards) Framework 2021 (HESF) – Domain 6: Governance and accountability • Fair Work Act 2009 (Cth) • Privacy Act 1988 (Cth) • Australian Privacy Principles • Freedom of Information Act 1982 (Cth)
Date Approved	09/05/2025
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Approval Authority	Audit and Risk Committee
Responsibility for implementation	Head, People and Culture
Document Custodian	Manager, People and Culture
IHM Doc ID	IHM–ASPFP–2.0

Change History

Version Control	Version 2.0	
Change Summary	Date	Short description of the change, including version number, changes, who considered, approved, etc.
	23/11/2013	Approval by the Board of Directors.

	Version 1.1	
	13/1/2023 Version 1.2	Updated to new template. Language and grammar correction. Updated with the current positions. Approval line changed to Audit and Risk Committee (which approved on 15/01/2023).
	29/11/2023 Version 1.3	The definitions have been relocated to the IHM glossary, and the template has been updated.
	10/02/2025 Version 2.0	Updated in new template and logo, and full review after the life cycle (that ended on 15/01/2025). 'Staff' added in the title for clarification. Appeal against decisions withholding information added. Lines of responsibilities revised. New clause on responsibilities included.