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1. Introduction

Plan International Australia’s approach to sharing information with stakeholders is in line with the core values of the organisation:

We are open and accountable; we create a climate of trust inside and outside the organisation by being open, honest and transparent.

We are inclusive and empowering; we respect all people, appreciate differences and challenge inequality in our programmes and our workplace.

We work well together; we succeed by working effectively with others, inside and outside the organisation.

We strive for lasting impact; we strive to achieve significant and lasting impact on the lives of children and young people, and to secure equality for girls. We challenge ourselves to be bold, courageous, responsive, focused and innovative.

2. Policy

This policy relates to how Plan International Australia (PIA) will provide stakeholders with access to information about its programs and operations, in line with the organisation’s commitment to transparency and accountability. Plan will disclose information that it believes is in the interests of beneficiaries, partners, donors, supporters, media and the general public. Information will be published and presented in formats that are accessible and comprehensible.

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Certain information will not be disclosed to respect commerciality, confidentiality or privacy. Plan will take into account legal, operational, child protection, and practical considerations in order to preserve Plans interests, as well as those of its staff, sponsors, donors, partners, and particularly the children and communities it works with.

Plan will use plain language, a consistent style and an appropriate tone to ensure target audiences can understand the information provided.

Much of Plan's information is already publicly available through various means, including through the [Plan International Australia website](#), the Annual Report and appropriate International, Regional, and Country Office websites, this Policy codifies existing principles, practices and procedures.

3. Accountability Standards

PIA is a member of the [Australian Council for International Development](#) (ACFID) and a signatory to the [ACFID Code of Conduct](#). The Code requires members to meet high standards of corporate governance, public accountability and financial management. Code of Conduct Clause 7.3 sets out minimum requirements of disclosure including the production and distribution of the Annual Report, newsletters and a website. The ACFID Code of Conduct Quality Assurance Framework Clause 7.3 lists the obligations of members, which includes proactively making information available to stakeholders that is accurate, accessible and timely; and being clear about what information will and will not be provided to stakeholders.

The department of foreign affairs and trade (DFAT) has a stated view that "The Australian Government is determined to make sure taxpayers' money spent on Australia's overseas aid program is responsible, affordable and sustainable." As a result they have adopted the [International Aid Transparency Initiative \(IATI\)](#), in line with the Freedom of Information Act, which requires it to publish a broad range of information online. IATI was established in 2008 with a coalition of donors, developing countries and non-government Organisations who are working to make public regular, detailed and timely information on aid programs and results of development expenditure transparency. As a recipient of DFAT funds we are obliged under the IATI standards to match the Government's commitments to accountability and to publish relevant information related to DFAT related programmes on their website.

DFAT is implementing the standards by regularly updating information and data about DFAT country program activities — including expenditure, results and annual performance reports, within more comprehensive web pages; by fully participating in the IATI standards that provides data for comparison and critical analysis of aid program results; publishing local language summaries of Australian aid programs in local media and on the web pages for Australia's major aid programs; publishing annual targets for improvement of transparency in the aid program; and increasing the number of documents published in DFAT's Information Publication Scheme. This includes partnerships agreements, the publication of fraud investigations and audit reports of Non-Government Organisations among others. As a recipient of DFAT funding, some information relating to Plan International Australia's work will be available via the [DFAT website](#).

4. Objectives

The objectives of this Policy are to:

- Provide stakeholders with a transparent process for accessing information;

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- Provide staff with direction in managing and providing information to stakeholders;
- Provide guidelines for managing access to information;
- Ensure stakeholders are advised of exemptions in determining requests for access to information;
- Ensure stakeholders are advised of the rights of review and appeal available under the Policy.

5. Information definition

Information is defined as printed or electronic documents that provide detail and knowledge about Plan activities, including, but not limited to, the programs and operations of Plan.

6. Requesting information

Stakeholders and the general public can access information that is already available on the PIA and related websites. If the information required is not readily available online or a hard copy of a publication is needed then a request can be made to PIA.

Requests for information must be made in writing::

- Email: info@plan.org.au
- Use our feedback form: <https://www.plan.org.au/contact/feedback-and-complaints>
- Send a letter: GPO Box 2818, Melbourne VIC 3001

Each request should specify the information and document that is sought, including titles and dates if appropriate.

The Information Disclosure Officer is responsible for ensuring that all requests for information are addressed as appropriate. Each request will be acknowledged within 5 business days, unless it will be completed within that time frame. A request for information will be responded to within 14 business days. Where a request is denied, reasons for this will be provided to the requestor.

Requests for information can also be made through the 'contact us' facility on the <https://www.plan.org.au/contact>

7. Confidentiality- what information will not be provided?

Whilst Plan is committed to having an open and transparent disclosure system in place, there are legal, operational, child protection, and practical considerations that are necessary to preserve the organisation's interests, as well as those of its staff, sponsors, donors, its various partners, and particularly the children and communities it works with.

The exceptions below are limited to what is necessary to preserve essential and legitimate public or private (e.g. personal privacy) needs.

Information under the following categories is deemed confidential and not available to the public:

- Minutes of Executive meetings, Board minutes and minutes of sub-committees.
- Information received from or sent to third parties, under an expectation of confidentiality;

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- Information whose disclosure is likely to endanger the safety or security of any individual, violate their rights, or invade their privacy;
- Information whose disclosure is likely to endanger the security of country states or prejudice the security or proper conduct of any operation or activity of Plan;
- Information covered by legal privilege or related to access to internal audit reports;
- Internal inter-office or intra-office documents, including e-mails and draft documents
- Commercial information where disclosure would harm either the financial interests of Plan or those of other parties involved;
- Information that, if disclosed, in Plan's view, would seriously undermine the policy dialogue with Governments, sponsors, donors, communities, or implementing partners; and
- Information that becomes confidential and sensitive as a result of changing circumstances.

8. Charges for information

Plan does not wish to create barriers to accessing information that is not available online and as such does not impose a cost on providing information and documents. The only exception to this is where a person will be making profit from the information e.g. using Plan photographs for profit.

Plan does not charge for lodging a request to access information, but we may charge for reasonable costs in supplying access to this information, for example if a requested document has a cost attached. Also refer to the Plan Australia Privacy Policy <https://www.plan.org.au/contact/privacy>.

9. Declining access

Plan will decline requests that are deemed frivolous, vexatious, not made in good faith, misconceived or lacking in substance. A request may also be declined if it falls within the list of 'Confidential Information not available to the public'. Plan will provide details as to why a request has been denied.

Where Plan considers that the cost of disclosure, whether as a time cost or a monetary cost, would be disproportionate to the request, Plan may decline disclosure.

10. Languages

All information relating to Plan Australia is published in English. Documents created in field offices are also published in English however there may also be some local language documents. Languages other than English will not be provided by Plan Australia but may be found on Plan related websites.

11. Access to archival records

PIA follows a data retention policy, keeping information for a maximum of seven (7) years unless otherwise required for operational purposes or in accordance with applicable legal, contractual and regulatory requirements. Information and documents from before this time will be considered, but may not be available.

12. Appeals Process

An Appeals process is available if the requestor is not satisfied with the denial of their request. This includes referral to the Chief Executive Officer in extreme circumstances where a full review and response will be provided within 10 business days.

In the most unusual circumstance the matter will be referred to a relevant independent authority if the complainant is not satisfied with the CEO's response. They will be able to provide a third party voice and opinion on the matter.

This is not the same as making a complaint. Refer to the [Complaint and Compliments Policy](#) to make a complaint regarding the Access to Information process.

13. Responsibilities

It is the responsibility of each Department to assist stakeholders in gaining access to documents and information as described by this policy. Overall responsibility for adherence to this Policy lies with the Information Disclosure Officer who for the purposes of this policy will be the Associate Director of Marketing and Communications at Plan International Australia or their delegate.

14. Our Commitment

PIA, its Board, Executive and Senior Management Team are fully committed to increasing the amount of information available to our stakeholders, including the public and media. We will review this policy and procedure every three years and update as necessary.

15. References

- [ACFID Code of Conduct](#)
- Plan International's [Accountability Commitments](#)
- [International Aid Transparency Initiative \(IATI\)](#)