

DOCUMENT REFERENCE: NPC-GOV-PAC-001 | APPROVED AND CURRENT - REVIEW/UPDATE SCHEDULED (NOT FOR WITHDRAWAL)

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CLUB IN CONFIDENCE / PERSONAL



PISTOL CLUB

NEWTEC PISTOL CLUB INCORPORATED

GOVERNANCE POLICY PACK

Conflict of Interest | Confidentiality and Sensitive Information

Applies to	Committee members and all persons elected, appointed, delegated, authorised or acting in a position for the Club
Policy owner	Public Officer/Secretary
Approval	24/06/2026 / july26meeting - APPROVED
Effective date	24/07/2026
Review cycle	Annually and after a relevant legislative or constitutional change
Version	2.0 July 2026

Purpose and status

This pack establishes minimum conduct, disclosure, information-handling and sign-off requirements for persons entrusted with the management or operation of Newtec Pistol Club Incorporated (Club). It supports the Club Constitution and the Newtec Privacy Policy and does not replace or override the Constitution, legislation, a lawful member-inspection right, a firearms reporting obligation, a protected report or a direction of a competent authority.

Priority: If this policy is inconsistent with the Associations Incorporation Act 2009 (NSW), the Firearms Act 1996 (NSW), regulations, an approval condition or the registered Constitution, the higher legal requirement prevails. The Committee must correct the policy promptly.

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Documents in this pack

- A** Conflict of Interest Policy.
- B** Conflict of Interest Declaration and Annual Acknowledgement.
- C** Confidentiality and Sensitive Information Policy.
- D** Confidentiality Undertaking and Position-holder Sign-off.

Key legislative foundations

Associations Incorporation Act 2009 (NSW), particularly sections 26, 28(5), 31, 32 and 33; Firearms Act 1996 (NSW), including section 79A; applicable regulations and NSW Police approval conditions; Privacy Act 1988 (Cth) and Australian Privacy Principles where applicable; and the Club Constitution, including its provisions concerning conflicts, conduct, records, inspection, privacy and return of Club property.

POLICY A

CONFLICT OF INTEREST POLICY

For Committee members and all persons acting under Club authority

1. Objective

- 1.1** The Club requires decisions to be made honestly, impartially, for proper purposes and in the Club's interests, consistently with the Constitution and law.
- 1.2** This policy provides a practical process to identify, disclose, record and manage actual, potential and perceived conflicts of interest.

2. Scope

- 2.1** This policy applies to every Committee member, office-bearer, Public Officer, authorised signatory, subcommittee member, coordinator, captain, range or safety officer, returning officer, delegate, employee, contractor, volunteer and any other person elected, appointed, authorised or acting in a position for the Club (position holder).
- 2.2** The statutory requirements in section 31 of the Associations Incorporation Act apply specifically to Committee members. The Club adopts equivalent standards for other position holders so far as relevant to their functions.

3. Meaning of conflict

- 3.1** An actual conflict exists where a private interest conflicts with the proper performance of Club duties.
- 3.2** A potential conflict exists where a private interest could conflict with a future duty or decision.
- 3.3** A perceived conflict exists where a reasonable, properly informed person could perceive that a private interest might improperly influence the position holder, even if it does not.
- 3.4** A private interest may be financial or non-financial, direct or indirect, and may concern the position holder, a relative, close associate, business, employer, another shooting body, supplier, competitor or organisation with which the person is connected.

4. Examples

- 4.1 Relevant matters include procurement or payments involving a connected person; employment or contracting decisions; disciplinary or membership matters involving a relative, close associate or adversary; use of Club information for another organisation; gifts or benefits; competing duties to another shooting body; and personal involvement in the facts of a complaint or appeal.
- 4.2 Membership of another club or body is not automatically disqualifying, but must be disclosed where it is relevant to a matter or could reasonably affect impartiality.

5. Duty to disclose

- 5.1 A position holder must disclose a conflict as soon as possible after becoming aware of the relevant facts and before receiving further confidential material, influencing discussion, recommending action or participating in a decision.
- 5.2 A Committee member must disclose at a Committee meeting the nature of any direct or indirect interest that appears to conflict with the proper performance of their duties, as required by section 31 of the Associations Incorporation Act.
- 5.3 Disclosures must be sufficiently specific to allow the non-conflicted decision-makers to understand the nature and extent of the interest. A person must update a standing disclosure if circumstances change.
- 5.4 Every position holder must complete the attached declaration on appointment and annually. Agenda papers should invite declarations at the start of each meeting and when each relevant item arises.

6. Recording and access

- 6.1 The Secretary must record Committee-member disclosures in the statutory disclosure-of-interests book and in the minutes to the extent required by law. The book must be stored with the register of Committee members in the form required by the Act.
- 6.2 The Club must permit inspection of the statutory disclosure book as required by section 31(3). Personal information that is not required to be recorded or disclosed should be minimised or redacted where lawful.
- 6.3 Declarations made by other position holders must be recorded in a controlled conflicts register accessible to the President, Secretary and authorised governance reviewers.

7. Managing a conflict

- 7.1 Unless the non-conflicted Committee lawfully determines otherwise, a conflicted Committee member must not be present during deliberation or take part in the decision. The conflicted member must not participate in the Committee's decision about whether they may remain, in accordance with section 31(5)–(6).
- 7.2 Management measures may include recording and monitoring the interest, restricting information access, abstention, leaving the meeting, appointing an independent person, reallocating duties, obtaining independent quotations or advice, or declining or ending the appointment or transaction.
- 7.3 The minutes must record the disclosure, the person's absence, the Committee's management decision, any participation permitted and the person's return. The minutes need not reproduce unnecessary sensitive details.
- 7.4 A conflicted person must not pressure, brief, lobby or privately communicate with decision-makers in a manner that circumvents the management decision.

8. Gifts, benefits and procurement

- 8.1** A position holder must not solicit a gift, hospitality, commission, discount or personal benefit connected with Club duties. A token benefit of nominal value may be accepted only if it cannot reasonably influence, or appear to influence, the person and is declared where appropriate.
- 8.2** A position holder connected to a proposed supplier or contractor must not design specifications to favour that supplier, access competing confidential bids, score the bids, negotiate for the Club, approve the engagement or certify payment unless a lawful, documented management plan expressly permits limited involvement.

9. Misuse, reporting and protection

- 9.1** Information or position must never be used dishonestly to obtain an advantage or cause detriment. Sections 32 and 33 of the Associations Incorporation Act create offences concerning dishonest use of information and position by Committee members.
- 9.2** Suspected conflicts or reprisals should be reported to the President or Secretary. If either is implicated, the report should be made to another non-conflicted Executive or Committee member. A report concerning suspected unlawful conduct may be made to an appropriate authority.
- 9.3** A person who raises a genuine concern in good faith must not be victimised. Knowingly false or malicious allegations may be dealt with under the Constitution.

10. Breach and review

- 10.1** A breach may result in withdrawal of delegation or access, removal from an appointed operational role, disciplinary action under the Constitution, referral to members where removal from elected office requires it, recovery action or referral to an authority. Procedural fairness must be observed.
- 10.2** The Committee must review this policy annually, maintain the disclosure register and include conflicts as a standing agenda item.

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FORM B

CONFLICT OF INTEREST DECLARATION

Appointment and annual acknowledgement

Instructions: Complete on election, appointment or commencement in an acting position; update immediately when circumstances change; and renew at least annually.

Full name _____

Position or function _____

Term / appointment period _____

Declaration of interests

I disclose the following current actual, potential or perceived interests, including relevant offices, employment, businesses, close personal connections, supplier relationships, gifts or benefits, competing duties and matters affecting impartiality:

Interest / relationship _____

Persons or organisations involved _____

Club matters potentially affected _____

Proposed management measures _____

If there is nothing to disclose, write "Nil". This declaration does not replace the obligation to disclose a conflict when a particular matter arises.

Acknowledgement

- B.1** I have received, read and understood the Conflict of Interest Policy and the relevant provisions of the Club Constitution.
- B.2** I will promptly disclose relevant interests, comply with restrictions on information, absence and voting, and not use Club information or position improperly.
- B.3** I understand that signing does not remove any duty imposed by law and that breaches may result in Club action or referral to an authority.

Signature _____

Date _____

Received for the Club by _____

Club officer signature / date _____

Committee management record

Register entry	
Risk assessment	Low / Medium / High / Not applicable
Risk Management plan	
Approved by	

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POLICY C

CONFIDENTIALITY AND SENSITIVE INFORMATION POLICY

Secure handling of member, governance, firearms and operational information

1. Objective

- 1.1** The Club must protect personal, sensitive, security, commercial, disciplinary and legally privileged information entrusted to it while enabling lawful governance, member rights, firearms compliance and transparent decision-making.
- 1.2** This policy applies whether information is written, electronic, photographic, recorded, spoken, observed or held in a person's memory.

2. Scope and continuing obligation

- 2.1** This policy applies to every position holder defined in Policy A and to any member or guest who receives confidential information through a Club process, appointment or authorised access.
- 2.2** The duty continues after a meeting, matter, appointment or membership ends. It does not prevent a disclosure that is required or protected by law.

3. Information covered

- 3.1** Personal information includes names, contact details, dates of birth, signatures, identification, emergency contacts, membership and attendance records, correspondence and financial details.
- 3.2** Sensitive and high-risk information includes health or disability information, allegations and disciplinary material, criminal-history or domestic-violence information, firearms licence or permit details, Firearms Prohibition Order information, security arrangements, safe-storage information, keys and access codes, incident reports and information that could identify a vulnerable person.
- 3.3** Governance and commercial information includes legally privileged advice, draft minutes, closed-session papers, tenders, quotations, passwords, banking data, personnel matters, complaints, investigations and information supplied in confidence.
- 3.4** Information is not confidential merely because it is inconvenient, embarrassing, critical or the subject of disagreement. The Club must not use confidentiality to conceal wrongdoing, silence dissent, prevent lawful scrutiny, obstruct a statutory or constitutional right, or avoid accountability to members.
- 3.5** Club in Confidence means information properly classified because unauthorised access or disclosure could reasonably harm a person, the Club, an investigation, legal privilege, safety or security, commercial interests, or a lawful process. Personal information, legal advice and litigation material, complaint and disciplinary material, firearms and security information, closed-session papers, tenders and information received under an obligation of confidence are treated according to their content and risk.
- 3.6** This policy is not a gag on ordinary governance. Unless a proper confidentiality basis applies, position holders may discuss general Club operations, policy options, proposals, member concerns, decisions already authorised for release, and their own views. They must distinguish personal opinion from an official Club position and must not reveal protected detail while doing so.
- 3.7** A label alone does not create legal professional privilege. Privilege applies only where the legal requirements are met and must not be waived by unauthorised circulation or summary.

4. Core handling rules

- 4.1** Collect and access only information reasonably necessary for an authorised Club function. Use it only for that function or another lawful, compatible purpose.
- 4.2** Share information only with persons who have a genuine need to know and only to the minimum extent required. Verify the recipient before sending or discussing information.
- 4.3** Do not disclose or discuss protected information with family, friends, other members, another club, social media, messaging groups, the media or an unauthorised person, even if names are omitted but identities could be inferred.
- 4.4** Do not copy, photograph, download, print, forward or retain Club information for convenience unless authorised and securely controlled.
- 4.5** Keep records accurate and distinguish verified fact, allegation, opinion and decision. Do not include unnecessary personal detail in minutes or general communications.

5. Meetings and communications

- 5.1** Agendas and papers must be classified according to content and distributed only to authorised recipients. A confidentiality marking must identify a proper basis, such as personal, legal, safety/security, commercial, complaint/disciplinary, privacy or information supplied in confidence. Highly sensitive items should be separated, access-restricted and, where appropriate, considered in a closed session permitted by the Constitution.
- 5.2** Blanket statements that “all committee matters are confidential” must not be used. The Chair or document owner should state the reason, authorised recipients and, where practical, the review event or end date. A person may ask the Chair or Secretary to review a classification; the review must be made by non-conflicted decision-makers and recorded where material.
- 5.3** Minutes should record the subject, decision and any declared conflict sufficiently for accountability, while omitting unnecessary personal, privileged, security-sensitive or prejudicial detail. Once confidentiality is no longer justified, the Committee should authorise an appropriate summary or release.
- 5.4** Participants must use a private setting, prevent others overhearing or viewing papers, and must not record a meeting unless the Committee has expressly authorised recording and all legal requirements are satisfied.
- 5.5** Use Club-controlled email, storage and collaboration systems where available. Do not use shared household accounts, unapproved cloud services or auto-forwarding to an unauthorised account.
- 5.6** Emails must be addressed carefully. Use blind copy for group communications where recipients do not need each other’s addresses. Sensitive attachments should use appropriate access controls or encryption.

6. Devices, physical security and access

- 6.1** Devices accessing Club information must use a passcode, current security updates, screen locking and reasonable malware protection. Lost or compromised devices must be reported immediately.
- 6.2** Paper files, registers, firearms records, keys, combinations and access credentials must be securely stored. Records must not be left unattended in vehicles, public places or unsecured homes.
- 6.3** Access must be role-based, reviewed periodically and removed promptly when no longer required. Shared passwords are prohibited unless an exceptional operational system requires them and the credentials are stored and changed securely.

7. Permitted and required disclosure

- 7.1** This policy permits disclosure with proper authority or where required or authorised by legislation, a court or tribunal, NSW Police or the Firearms Registry, NSW Fair Trading, an insurer, auditor, legal adviser, emergency service or another competent authority.
- 7.2** Nothing prevents a good-faith report of suspected unlawful conduct, a serious safety risk, corruption, abuse, harassment or a firearms concern to an appropriate authority or adviser. Section 79A of the Firearms Act protects specified good-faith disclosures by relevant club office holders to the Commissioner where made under regulatory requirements.
- 7.3** Member access to books, minutes, the disclosure-of-interests book or the register of members must be provided to the extent required by the Act, Regulation and Constitution. Lawful redaction, supervision and use restrictions should be applied where permitted to protect third-party privacy, safety, privilege and security.
- 7.4** A disclosure should be documented, limited to what is necessary and made through an authorised channel. If uncertain, the person should seek direction from the Secretary or President without disclosing the information more widely.
- 7.5** Nothing in this policy prevents a person from obtaining independent legal, regulatory, integrity, welfare or professional advice, making a protected or lawful report, participating honestly in an authorised investigation, or exercising a lawful member right. Only the minimum necessary information should be disclosed through the proper channel.

8. Privacy standard

- 8.1** The Club will comply with the Newtec Privacy Policy and apply necessity, transparency, data minimisation, purpose limitation, accuracy, role-based access, secure retention, access/correction and secure disposal controls, whether or not every provision of the Privacy Act 1988 (Cth) applies to the Club at a particular time.
- 8.2** If the Privacy Act and Australian Privacy Principles apply to the Club or an activity, they must be followed. This policy does not state that the Club is exempt or covered; coverage must be assessed when circumstances change.
- 8.3** Privacy incidents must be handled under the Newtec Privacy Policy. Personal information must not be entered into public generative-AI tools, personal cloud storage or unapproved systems. Access and correction requests must be directed to the Secretary / Privacy Officer.

9. Incident and breach response

- 9.1** A suspected loss, unauthorised access, disclosure, misdirected email, compromised password, missing file or inappropriate discussion must be reported immediately to the Secretary or President. If either is implicated, report to another non-conflicted Executive member.
- 9.2** The recipient must not conceal, delete or alter evidence. The Club must promptly contain the incident, preserve evidence, assess affected persons and risks, recover information where possible, change credentials, document decisions and make any legally required notification.
- 9.3** The Committee should consider notifying an affected person even where not legally mandatory if notification would enable reasonable protective action and would not compromise safety, an investigation or another lawful interest.

10. Return, retention and disposal

- 10.1** Club records must be retained for the period required by law, approvals, insurance, limitation periods and the records schedule adopted by the Committee. Records subject to a complaint, investigation, litigation hold or audit must not be destroyed.

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- 10.2** On request or when a role ends, a position holder must return all Club property and information, surrender keys and credentials, and permanently delete unauthorised copies. A former Committee member must ensure all Club documents in their possession are delivered to the Public Officer within 14 days after vacating office, as required by section 28(5) of the Associations Incorporation Act.
- 10.3** Disposal must be secure and appropriate to the medium, including cross-cut shredding, secure deletion and verified destruction by an approved provider.

11. Breach and administration

- 11.1** A breach may result in access suspension, withdrawal of delegation, removal from an appointed role, disciplinary action under the Constitution, recovery action or referral to an authority. Procedural fairness must be observed.
- 11.2** The Secretary maintains signed undertakings, access records and incident records. The Committee reviews this policy annually and provides induction before access to sensitive systems or records.

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FORM D

CONFIDENTIALITY UNDERTAKING

Position-holder acknowledgement and sign-off

Full name _____

Position or function _____

Term / appointment period _____

Undertaking

- D.1** I have received, read and understood the Confidentiality and Sensitive Information Policy and relevant provisions of the Club Constitution.
- D.2** I will access, use and disclose Club information only as authorised and necessary for my duties. I will protect personal, sensitive, firearms, security, disciplinary, commercial and legally privileged information.
- D.3** I will not discuss or distribute properly classified confidential information to an unauthorised person, including another member who has no proper need or entitlement to receive it. I understand that this does not prohibit ordinary discussion of general Club or committee matters that are not confidential.
- D.4** I will use reasonable physical, electronic and communication safeguards, promptly report an incident or suspected breach, and cooperate with containment and investigation.
- D.5** I understand that this undertaking does not prevent ordinary discussion of Club matters not properly classified as confidential, lawful member inspection, mandatory firearms reporting, compliance with legal process, obtaining advice, raising a genuine concern, or making a good-faith protected or lawful report to an appropriate authority.
- D.6** When my role ends, or earlier on request, I will return Club property and records, surrender access, and securely delete unauthorised copies. I understand that confidentiality obligations continue after my role or membership ends.
- D.7** I understand that breach may result in withdrawal of access or authority, disciplinary or recovery action, removal from an appointed role, referral to members where constitutionally required, or referral to an authority.

Access issued

Records / systems	
Keys / credentials	
Special conditions	
Induction completed	

Position holder signature _____

Date _____

Witness / Club officer name _____

Witness / Club officer signature and date _____

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End-of-appointment certification

D.8 I certify that I have returned Club documents, devices, keys and credentials; transferred required records to the authorised custodian; and securely deleted unauthorised copies in my possession or control.

Former position holder signature / date _____

Club officer verification / date _____

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ADMINISTRATION

ADOPTION, REFERENCES AND REVIEW

Committee resolution

Resolved that the Committee adopt the Newtec Pistol Club Incorporated Conflict of Interest Policy and Confidentiality and Sensitive Information Policy, together with their declarations and undertakings, effective from 12 July 2026, and require completion by each person elected, appointed, authorised or acting in a Club position before or as soon as practicable after access or authority is provided.

President _____

Secretary _____

Resolution date _____

Minute reference _____

Authoritative references

R.1 Associations Incorporation Act 2009 (NSW): sections 26, 28, 31, 32 and 33 and Schedule 1.

R.2 Associations Incorporation Regulation 2022 (NSW), as amended or replaced.

R.3 Firearms Act 1996 (NSW), including section 79A; Firearms Regulation 2017 (NSW); and applicable NSW Police club, range and licence approval conditions.

R.4 Privacy Act 1988 (Cth), Australian Privacy Principles, Notifiable Data Breaches scheme where applicable, and the Newtec Privacy Policy.

R.5 Shooting Australia Privacy Policy, Member Protection Policy, National Integrity Framework policies and current Officials Handbook privacy/confidentiality requirements, where applicable.

R.6 NSWAPA Constitution, Code of Conduct and Disciplinary Policy, as amended from time to time.

R.7 Sport Integrity Australia National Integrity Framework policies and privacy requirements, where applicable.

R.8 Newtec Pistol Club Incorporated registered Constitution, Privacy Policy and lawful Club Rules, as amended from time to time.

Document control

Next review	01/10/2027
Review triggers	Legislative, constitutional, approval-condition, technology or material incident change
Supersedes	Any inconsistent earlier Committee conflict or confidentiality policy
Controlled copy	Secretary / governance records — Club in Confidence
Implementation note: The Club should keep the signed forms securely, restrict access to those who need them, record statutory interests separately in the inspection book required by section 31, and issue each signer a copy of the policies.	

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AUTHORITATIVE DOCUMENT CONTROL RECORD

Document reference	NPC-GOV-PAC-001
Adopted	24/06/2026
Enacted / effective	24/07/2026
Minute reference	july26meeting
Owner	Public Officer/Secretary
Next review	01/10/2027
Status	APPROVED AND CURRENT - REVIEW/UPDATE SCHEDULED (NOT FOR WITHDRAWAL)

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