

Information Privacy Policy

Owner:	Legal	CS/LEG/0007
Last reviewed:	06/08/2025	Version: 1.00

1 Purpose

The [Information Privacy Act 2009](#) (IP Act) and its Queensland Privacy Principles (QPPs) set the rules for how Queensland government agencies – including the Queensland Academy of Sport (QAS) – handle personal information. These rules include a requirement, under QPP 1, that every agency must have a QPP privacy policy.

This policy explains how QAS manage personal information, including:

- the kinds of personal information we collect and hold, how we collect and hold that personal information, and the purposes for which we collect, hold, use and disclose personal information.
- how you may complain about our handling of your personal information, and how we will deal with the complaint.

This policy is supported by the following documents:

- Information Privacy Framework
- Data Breach Policy
- Right to Information Policy
- Privacy and Visual Recording Devices and Systems Procedure
- Complaint Management Framework.

2 Statement

QAS is committed to ensuring all personal information is managed in accordance with the IP Act and QPPs.

2.1 Collection of personal information

The definition of 'personal information' is set out in the '[Definitions](#)' section of this policy.

QAS collects personal information about employees, athletes, coaches, partners, officials, contractors, and other individuals who interact with QAS, in order to properly and efficiently carry out our activities and functions.

QAS will not collect personal information from a person if the purpose for which the information is intended to be collected is not permitted under the IP Act, including the QPPs.

QAS might collect that personal information in one or more of the following ways:

- through a person's employment with QAS
- through an athlete scholarship agreement, athlete training agreement, visiting athlete agreement or similar arrangement with QAS



- through a contract with QAS
- through QAS providing services to a person
- via the QAS Website
- when a person provides personal information to QAS by filling in a QAS-approved form, whether such a form is downloaded from the QAS Website or not
- when a person contacts QAS
- when a person engages with QAS via an approved application
- when a person engages with QAS via social media
- when a person subscribes with QAS to receive newsletters or other information.

QAS may collect personal information through forms, applications, the internet, over the telephone, in person, in writing, through images or by recording information provided verbally.

If it is reasonable and practical to do so, QAS will collect personal information directly from the persons concerned and with their consent.

QAS may also need to collect personal information from other people or organisations. In the case of a “minor” (that is a person aged under 16 years or younger) QAS may collect personal information about that person from the person’s parent(s) or guardian(s). This information is collected with the person’s consent, except for in circumstances allowed for by legislation. Sometimes this may happen without direct involvement.

Some examples of the people or organisations from which the QAS may collect personal information about persons are:

- sporting organisations
- publicly available sources of information
- person’s representatives (such as a parent, coach, legal adviser, medical practitioner)
- person’s employers
- other government agencies
- law enforcement agencies.

2.1.1 Sensitive information

We may also collect sensitive information. The definition of ‘sensitive information’ is set out in the [‘Definitions’](#) section of this policy.

We will generally only collect sensitive information directly from the individual it is about or with their consent, or otherwise consistently with our obligations under the IP Act.

For the purposes of this policy, all references to “personal information” include both personal information and sensitive information as defined in the IP Act.

2.1.2 Kinds of personal information

The kinds of personal information collected and held by QAS, depends on the nature of the activity or service may include without limitation:

- | | |
|---|--|
| • a person’s name and gender information | • date, place and country of birth |
| • street, postal and email address | • identity documents |
| • telephone, mobile and facsimile numbers | • photograph or another electronic image |

- voice recording
- sporting participation and playing histories
- sports science information and data
- information relating to a person's fitness, including information obtained through monitoring an athlete's fitness
- information collected through consultations between a person and QAS personnel, including medical information
- residence history
- family background and demographic information
- emergency contact details
- information about health
- disability
- racial or ethnic origin
- criminal convictions
- human resources files
- employment histories and tax file numbers
- occupation details
- credit card and bank account details
- cookies.

2.2 Use and disclosure of personal information

QAS uses and discloses personal information for the purpose for which the personal information was collected, including:

- performing our statutory functions and duties
- managing associated business processes, such as recruitment and human resources administration.

QAS may also share personal information with third parties to support its operations, aligned with its objectives and as permitted under the IP Act. These third parties may include:

- sport partners (state and/or national sporting organisations with whom we have agreements to provide funding or services)
- authorised representatives of QAS
- relevant sporting bodies such as Australian Olympic Committee, Paralympics Australia, Commonwealth Games Australia, Sport Integrity Australia, Australian Institute of Sport, the National Institute Network, National and State sporting organisations, amongst others
- disciplinary committees and investigative bodies
- companies we engage to carry out functions and activities on QAS's behalf, including advertising agencies or for direct marketing
- external service providers that provide QAS with financial, legal, administrative, information technology, banking, travel, uniform manufacturing, publications and other services
- person's representatives (for example, a parent, coach, legal adviser, or manager).

QAS may also need to provide personal information to others outside of the organisation without prior informed consent where:

- the information is related to the performance of the functions of Sport Integrity Australia and as such may be provided to Sport Integrity Australia
- QAS is compelled by the law or has a public duty to provide information by way of subpoena, court order or police request
- persons have expressly consented to their personal information being supplied to others for particular purposes.

2.3 Disclosure out of Australia

QAS will reasonably refrain from providing personal information to overseas recipients. QAS may need to provide personal information to overseas recipients, where:

- the information relates to providing information to an international sporting organisation for the purposes of administering or assisting sport and sporting competition
- information relates to a sports drug and/or safety matter or is otherwise relevant to the functions of the World Anti-Doping Authority
- the information is provided in the management of travel or logistics for administrating staff, athletes and teams
- a person has expressly consented to their personal information being supplied to overseas recipients.

QAS will take reasonable steps to ensure that the overseas organisations to whom personal information is disclosed will abide by applicable privacy standards.

2.4 Access and correction of personal information

Access and correction rights are contained in the *Right to Information Act 2009* (RTI Act). The Right to Information Policy sets out how QAS complies with its obligations under the RTI Act, and how a member of the public may exercise their rights to access or amend their personal information.

2.5 Engaging with QAS anonymously or using a pseudonym

In accordance with the QPP 2, individuals have the option of engaging with QAS anonymously or under a pseudonym. However, certain requests such as applying for an internal review or lodging a privacy complaint, will require QAS to collect information such as your name, contact details and details of your matter so we can deal with you and your matter effectively and in accordance with our statutory duties.

2.6 Contractors

QAS will ensure that all contracts entered into will include specific clauses that:

- require contractors to comply with the IP Act to the extent that they perform functions or provide services on behalf of QAS
- ensure that any subcontractors engaged by them are also aware of and comply with these obligations.

2.7 Security of personal information

QAS holds personal information securely and takes reasonable steps to protect it from misuse, interference, loss, unauthorised access, modification or disclosure.

QAS complies with the Queensland Government [*Information Management Framework*](#) to protect personal information and ensure it can be accessed by authorised staff members only.

Where permitted by the *Public Records Act 2023*, QAS will destroy or deidentify unsolicited personal information or personal information no longer required for any of its functions in accordance with our obligations under the QPPs if it is lawful and reasonable to do so.

2.8 Privacy management practices

QAS have implemented robust privacy management practices, including the following measures:

2.8.1 Privacy Impact Assessments (PIAs)

QAS conduct Privacy Impact Assessments (PIAs) for new projects, systems, or processes that involve the collection, use, or disclosure of personal information. PIAs help identify and mitigate potential privacy risks, ensuring that QAS activities comply with privacy obligations and uphold the rights of individuals.

2.8.2 Risk Registers

QAS maintain risk registers to document and manage privacy risks across the organisation. The risk registers help monitor, assess, and address risks to personal information, ensuring that appropriate controls are in place to safeguard all data.

2.8.3 Personal Information Register

The Personal Information Register provides a comprehensive record of the types of personal information QAS collect, the purposes for which it is used, and how it is managed. This register ensures transparency and accountability in the handling of personal information.

2.8.4 Information Asset Register

QAS maintain an Information Asset Register to document all information assets held by the organisation, including those containing personal information. This register supports effective information governance and helps ensure that personal information is managed securely and in compliance with privacy requirements.

2.8.5 Collection Notices

When QAS collect personal information, clear and concise collection notices are provided to inform individuals about the purpose of the collection, how the information will be used, and their rights under the IP Act. These notices ensure that individuals are fully informed and can make decisions about their personal information.

2.9 Privacy complaints

A person who believes that QAS has not handled their personal information in accordance with the IP Act, can make a privacy complaint.

A privacy complaint can only be made on behalf of another person if they have been authorised to do so, or if person is a minor/child or the person lacks capacity. If making a privacy complaint for someone else, the person must include an authority from them or other evidence (e.g. a birth certificate showing that they are a minor/child and the person is their parent).

Complaints must be submitted within 12 months of becoming aware of the act or practice a complainant thinks constitutes a breach by QAS of the IP Act.

QAS has 45 business days to resolve the privacy complaint. If this does not occur, or if the complainant does not consider QAS's response to be satisfactory, the complainant can escalate the complaint.

Please refer to our Complaint Management Policy and procedure for more information.

3 Authority

[Information Privacy Act 2009](#)

Information Privacy Act 2009 - QPP 1 and QPP 2

[Information Privacy Regulation 2009](#)

Right to Information Act 2009

Public Sector Act 2022

Public Sector Ethics Act 1994

Human Rights Act 2019

Queensland Public Service Code of Conduct

4 Scope

This policy applies to:

- the personal information we collect, store, manage, use and disclose in discharging most of our statutory functions. These functions are set out in the IP Act and *Right to Information Act 2009* (RTI Act).
- all persons who perform work for QAS including:
 - Employees
 - permanent, fixed-term and temporary
 - secondees from other agencies (including staffing approved under interchange or mobility arrangements)
 - work placement staff (such as trainees, work experience students, cadets)
 - PhD students (engaged via a university contract)
 - non-executive employees engaged via a fixed term contract
 - senior officers and senior executives including those engaged via a section 155 contract remunerated at SES level or above.
 - Contractors
 - sub-contractors
 - consultants
 - their employees (including labour hire staff) who are engaged via contract or agreement.
 - QAS Board

Note: For application of this policy and supporting documents, the term ‘worker’ is used collectively to describe persons who perform work for QAS.

5 Delegations

Delegations in relation to this document are to be exercised in accordance with the QAS Human Resource Delegation Instrument and Financial and Contractual Delegation Instrument.

Note: Delegation Instrument are reviewed on a regular basis to ensure they remain current and relevant to operational needs. It is recommended that delegate authority levels are confirmed prior to exercising any powers.

6 Responsibilities

Chief Executive Officer:

- ensure QAS has appropriate policies, guidelines and tools that support the principles of the IP Act
- promptly forward all formal correspondence regarding privacy complaints from the Office of the Information Commissioner (OIC) directly to the Privacy Officer and respond to that correspondence where necessary
- maintain accountability for the delivery of the information privacy function.

Executive Director Corporate Services:

- ensure oversight of QAS's information privacy function, and that QAS maintains:
 - compliance with the IP Act, this policy and other associated documents as listed in Section 3
 - clear management responsibilities and controls for activities which may have information privacy implications.
- ensure that investigations of privacy complaints are facilitated
- ensure, where evidence of a systemic breach of the IP Act is identified, remedial action is implemented.

Executive Directors/Directors:

- identify privacy issues when implementing new systems
- include privacy risks during risk register reviews in Senior Leadership Team meetings
- ensure business areas provide relevant information to the Privacy Officer in response to privacy complaints and investigations
- endorse the response to the privacy complainant on behalf of their business unit
- ensure, where a one-off breach of the IP Act is identified, remedial action is implemented in their business unit.

Privacy Officer:

- QAS contact for all privacy matters
- develop and maintain an information privacy framework that supports the principles of the IP Act and other associated information privacy related documents
- provide advice and assistance to staff in undertaking information privacy activities
- coordinate and provide advice to information privacy related communication and maintain updates relating to information privacy content on QAS's intranet site
- coordinate information privacy complaint investigation and recommendations and facilitate responses to external mediation and resolution of privacy complaints with the OIC and Queensland Civil and Administrative Tribunal
- provide ongoing training and education of staff about their obligations under the IP Act.

All employees:

- undertake annual information privacy training
- ensure information privacy processes undertaken comply with this policy and associated information privacy documents, whole-of-government requirements and relevant policies
- ensure information privacy is managed in a transparent and accountable way and is able to withstand external scrutiny

- adequately document and file information privacy approvals and decisions
- immediately notify the Privacy Officer if the OIC contacts them about a privacy complaint
- address any privacy complaint issue assigned to them, by the nominated deadline
- ensure the Privacy Officer is kept informed on progress in addressing the issue.

7 Reporting requirements

Privacy complaints are reported yearly in the QAS annual report, in terms of numbers of complaints received during the reporting period and those which required further action (e.g. staff training or updates to policies and procedures).

Per section 63 of the [Financial Accountability Act 2009](#) and section 21.4 of the [Annual report requirements for Queensland Government agencies](#), Ministers are required to table annual reports for their portfolio agencies and statutory bodies in the Queensland Legislative Assembly by 30 September each year.

8 Storage of information

All information will be managed in accordance with the:

- [Public Records Act 2023](#)
- [Queensland Government Recordkeeping and Information Management Framework](#)
- [Queensland Government Records Governance Policy](#)

In addition, personal information will be managed in accordance with the [Information Privacy Act 2009](#), in particular the QPPs in that Act.

9 Employee grievances and appeals

An employee who is the subject of an administrative decision or action is entitled to lodge a complaint in accordance with the Managing Employee Grievances Policy should they feel the administrative decision is unfair or biased.

Employees who are unsatisfied with the outcome of their employee complaint may be entitled to lodge an appeal in accordance with [PSC Appeals Directive 04/23](#).

An appeal may be started by giving the Industrial Registrar an appeal notice. Further information on starting an appeal and appeal rights is available from the [Queensland Industrial Relations Commission](#) website.

10 Human rights considerations

The human right relevant to this policy, specifically the right to privacy has been considered. This policy does not limit those human rights.

This document was last reviewed in 25/06/2025 to ensure actions and decisions under the policy are made in a manner compatible with human rights. Please note, when implementing this policy, workers must still consider if any human rights are relevant to and likely to be impacted by a particular decision, and whether any limitation of human rights are reasonable and justified.

11 Definitions

Word/Term/Acronym	Meaning
Complainant	The person who makes a complaint.
Complaint	Expression of dissatisfaction, verbally or in writing, about the products, policies, services or actions of QAS and or the associated conduct of officers or representatives of QAS.
Disclose	According to section 23 of the IP Act, an entity (the <i>first entity</i>) <i>discloses</i> personal information to another entity (the <i>second entity</i>) if— - the second entity does not know the personal information, and is not in a position to be able to find it out; and - the first entity gives the second entity the personal information, or places it in a position to be able to find it out; and the first entity ceases to have control over the second entity in relation to who will know the personal information in the future.
Personal information	According to section 12 of the IP Act, personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable from the information or opinion— (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not. Personal information <u>does not</u> include: - information about a person whose identity is not known or who cannot be readily identified (deidentified information) - information about a deceased person - whilst private in nature, it is not considered personal information for the purpose of the IP Act - information about a company (however, it does apply to personal information about an employee of that company) - routine personal work information for public sector employees.
QPP	Queensland Privacy Principles stated in schedule 3 of the IP Act. The QPPs set the rules for how agencies deal with personal information.
Privacy Officer	Legal Counsel has been designated as the Privacy Officer.
Routine personal work information	Relates only to the work duties of a public-sector employee, is found in almost all documents held by agencies and Ministers and includes: - a work email address or work phone number - authorship of a work document, for example, where the person's name is listed as one of the authors of a report

Word/Term/Acronym	Meaning
	• a professional opinion given wholly in a professional capacity • a position classification • a work responsibility.
Sensitive information	According to schedule 5 (Dictionary) of the IP Act, sensitive information for an individual, means the following: • information or an opinion about an individual's: - racial or ethnic origin; or - political opinions; or - membership of a political association; or - religious beliefs or affiliations; or - philosophical beliefs; or - membership of a professional or trade association; or - membership of a trade union; or - sexual orientation or practices; or - criminal record; • health information about an individual; or • genetic information about an individual that is not otherwise health information; or • biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or • biometric templates.
Unauthorised access	Occurs when personal information held by an agency is accessed by someone who is not permitted to do so.
Unauthorised disclosure	When an agency (intentionally or accidentally) discloses personal information in a way that is not permitted by the IP Act.
Use	According to section 23, an entity <i>uses</i> personal information if it— • manipulates, searches or otherwise deals with the information; or • takes the information into account in the making of a decision; or transfers the information from a part of the entity having particular functions to a part of the entity having different functions.

12 Date of effect and review

This policy and its supporting documents:

- come into effect from the date of delegate approval
- will be reviewed within two years of the approval date unless otherwise:

- stipulated in statutory obligations
- triggered by circumstances determined appropriate by QAS.

13 Delegate approval

DAVID LYONS

Chairperson

Queensland Academy of Sport Board

Date: 06 August 2025

14 Version history

Version	Date	Author	Amendment description	Action
1.00	6/08/2025	Corporate Services	New document	Approved by the Board