

Organisational policy

Privacy Policy

Introduction

The Queensland Information Privacy Act was introduced in July 2009. It forms part of a new information regime.

Information Privacy is about protecting the personal information of individuals in accordance with the Information Privacy Act 2009 (the Act). The Act provides for access and amendment rights for personal information held by Sunshine Coast Airport Pty Ltd (SCA).

Obligations about the collection, storage, security, access, amendment and use and disclosure of personal information are provided in the 11 Information Privacy Principles included in the Act.

Personal information is defined in the Act as information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Policy purpose

This policy articulates the framework for the use and disclosure, quality and security, and access and correction of personal information at SCA

Policy outcome

It is intended that the outcomes of this policy are:

- Compliance with the Act and the 11 Information Privacy Principles (IPP's).
- Awareness by members of the public of how personal information is managed within SCA and how they can seek assurance that their personal information is maintained in accordance with the Information Privacy Act 2009.
- Education of employees who deal with personal information and provide a strategic overview for achieving compliance by SCA with the Information Privacy Act 2009 and the 11 privacy principles.

Policy scope

This policy applies to all personal information collected, used and stored by SCA in every aspect of its operations and performance.

This policy applies to all SCA employees, volunteers, contractors, consultants and joint venture partners.

In accordance with the Act, the 11 IPP's do not apply to:

- Personal information about an individual arising out of an investigation of misconduct or official misconduct under the Crimes and Misconduct Act 2001.
- Personal information about an individual that is contained in a public interest disclosure within the meaning of the Whistleblowers Protection Act 1994, or that has been collected in the course of an investigation arising out of a public interest disclosure.
- Personal information where the authority to collect, use, store and disclose personal information has an overriding statutory base and where the personal information concerns a deceased person.
- Personal information does not include information contained in publications that are generally available. Generally available publications include, for example, magazines, books, a newsletter, or a newspaper article.

Policy statement

SCA is committed to protecting the personal information about individuals consistent with the Act and the 11 IPP's.

Guiding principles

The principles that guide the application of this policy are:

- SCA will collect, use and store personal information in accordance with the Information Privacy Act 2009
- SCA will inform itself, its staff and its community about protecting personal information
- SCA will apply the 11 Privacy Principles as an integral part of its business processes
- All SCA employees, volunteers, contractors, consultants and joint venture partners are bound by the principles of the Information Privacy Act 2009.

INFORMATION PRIVACY PRINCIPLES

The Act sets out 11 IPP's. The 11 privacy principles can be grouped into four categories and their application at SCA is described below.

Collection

SCA will only collect personal information that is directly related to the functions and services provided by SCA. Where possible, SCA will advise what the information will be used for either prior to or at the point of collection.

Storage and Security

SCA will make every effort to ensure that the personal information it collects, uses and stores is relevant and to the extent necessary, accurate, complete and up-to-date for the purpose for which it is to be used.

SCA will endeavour to maintain a secure system for storing personal information and will utilise appropriate technologies, security methods, operational policies and procedures to protect the information from unauthorised access, improper use, alteration, unlawful or accidental destruction and accidental loss.

All personal information will be removed from SCA systems where it is no longer required for any purpose.

Access and Amendment

Individuals may have access to their personal information and may seek to have this information corrected.

Written applications for access and correction will be (handled) by SCA. Applications will be (handled) in accordance with the provisions of the Act.

Use and Disclosure

SCA will use personal information it collects for the primary purpose for which it was collected. Additionally, SCA may use the information for other (identified/ non-identified) purposes where the individual has consented to the use or disclosure.

COMPLAINTS

An individual may lodge a complaint with the Management regarding the handling of personal information.

Alternatively, individuals may lodge a complaint with the Information Privacy Commissioner.

IMPLEMENTATION

This policy is supported by the Act, fact sheets from the Information Privacy Commissioner, and information on Sunshine Coast Airport's website.

Roles and responsibilities

All SCA employees have access to personal information subject to security authorisation clearance and operational need; and employees are routinely reminded of system usage rules and monitoring procedures concerning the collection and use of the information. Additionally, all SCA employees are bound by the five ethics principles and the Employee Code of Conduct. In this context, all employees have a responsibility to comply with the Information Privacy Act 2009 and the 11 Information Privacy Principles in the course of undertaking their duties.

Definitions

Personal information - Personal information is an opinion or information, whether true or false, that identifies or could identify an individual. It does not have to be written down – it could be spoken information, information in a database or on a computer screen, or a photograph or video recording.

Examples of personal information are:

- date and place of birth
- religious or political beliefs
- financial, criminal or medical records
- family arrangements
- street address, telephone number and email address
- where a person works or goes to school.

Depending on the type of information and the context, the information or opinion does not have to include the name of an individual to be personal information¹.

Information Privacy Principles - 11 privacy principles that set out how SCA should collect, use, store, secure, and disclose personal information.

Related policies and legislation

Privacy Act 1988 (Commonwealth)

National Privacy Principles (Commonwealth)

SCA Code of Conduct

Fraud & Corruption prevention

Right to Information Act 2009

CLASSES OF PERSONAL INFORMATION HELD

INTRODUCTION

Sunshine Coast Airport Pty Ltd (SCA) collects, stores, uses and in certain instances discloses personal information as both an employer and service provider to the community.

Depending on the purposes for the collection of personal information, personal information may be retained in SCA's record management system, payroll system, financial management system, electronic databases and PD Online.

In all cases personal information is retained in accordance with *regulations* and according to the categories set out in the general retention and disposal schedule. Records may be stored on both paper and electronic media.

This document provides examples of where SCA may collect, use, store and disclose personal information. The details contained in this document are not an exhaustive list and serves only as a guide.

EMPLOYEES AND RECRUITMENT

SCA collects stores and uses employee personal information to administer employment, recruitment, workforce planning, training and payroll and maintain historical employment and payroll records. Some of this information may also be used to administer access to library and information technology services.

As an example personal information contained in these records may include:

- ▶ records relating to attendance and overtime
- ▶ leave applications and approvals
- ▶ medical records
- ▶ payroll and pay related records including banking details
- ▶ tax file numbers declaration forms
- ▶ personal history files
- ▶ performance appraisals
- ▶ records relating to personal development and training
- ▶ graduate, volunteer and work experience scheme participation
- ▶ qualifications or licences
- ▶ CCTV Photographic imagery retained for employee and public safety

Only portions of the information held in SCA employee records are disclosed outside the organisation, for example:

- ▶ the Australian Taxation Office
- ▶ superannuation providers
- ▶ compensation providers
- ▶ the staff members financial institution

VENDORS/CONTRACTORS

SCA collects, stores and uses vendors' personal or business information to administer the purchasing of goods and services and to administer the tendering process.

Personal information contained in these records may include:

- ▶ Contact details of vendors and where volunteered of nominated officers or staff
- ▶ records relating to tenders, ordering, invoicing and payment and related records including banking details
- ▶ records relating to complaints and investigations

Information held in SCA records is normally disclosed outside SCA to the vendor's financial institution.

TENANCY AND SHORT TERM HIRING OF SCA PREMISES

SCA collects stores and uses business operator's personal or business information to administer the tenancy of business premises on its owned and/or controlled land, to administer the short term hiring training and conference facilities on SCA controlled property.

Personal information contained in these records might include:

- ▶ Contact details of tenant business's principals, and where volunteered, of other nominated officers or employees
- ▶ Contact details of hirers, and where volunteered, of other nominated officers or employees
- ▶ Records relating to requests for tenancy, to hire, or to reside, invoicing and payment and related records including banking details
- ▶ Records relating to complaints and investigations

Only portions of the information held in SCA records are disclosed outside SCA to the hirer's or tenants financial institution, and in the event of arrears of payment, to a debt collection agency.

INFORMATION SERVICES CLIENTS

SCA collects stores and uses personal information about clients who may not be employees of SCA in order to administer access to library and information technology services. The type of personal information held in these records includes:

- ▶ name, contact address and details

- ▶ records relating to requests for library and information technology access and approval
- ▶ records relating to replacement costs for lost library items
- ▶ records relating to complaints and investigations

CONTRACTS, JOINT VENTURES AND PARTNERSHIP ARRANGEMENTS

SCA collects stores and uses personal information about SCA employees and the community of various organisations in order to administer contracts and partnership arrangements. For some of these arrangements this information is also used to administer services etc. The types of personal information contained in these records include:

- ▶ Contact details of organisations and where volunteered of nominated officers or employees;
- ▶ records relating to contracts, tenders, ordering, invoicing and payment and related records including banking details;
- ▶ records relating to contract performance, complaints and investigations

There are no requirements to disclose this information outside the SCA except where required by law.

ENFORCEMENT NOTICES

SCA collects stores and uses personal information to administer the issuing of parking permits, the collection and issuing of penalty enforcement notices (PINS) and to process vehicle infringement notices received from outside organisations in relation to SCAPL vehicles. The type of personal information contained in these records may include names and addresses, driver's licence number, vehicle details, records relating to requesting and approving parking permits, and records relating to PINS.

Some portions of this information are shared with payroll who administer employee payments for PINS, and cashiers for referencing when receiving PINS payments. Information relating to unpaid PINS is also provided to and held by the State Penalties Enforcement Registry (SPER).

Portions of this information relating to unpaid PINS are disclosed outside SCA to SPER in accordance with the State Penalties Enforcement Act 1999 and regulations. Information relating to any SCA vehicle infringement notice is disclosed outside the SCAPL to the organisation issuing the infringement notice e.g. Queensland Police Service.

INSURANCE

SCA collects stores and uses personal information in order to secure insurance cover in relation to SCA activity and also to assist in the settlement of insurance claims. These claims include but are not limited to personal property, vehicle comprehensive insurance, corporate travel and workers compensation insurance. Personal information is collected based on the requirements of the insurance company involved and may include medical history and financial information.

The information held in SCA records is disclosed outside the organisation to the SCA's insurers and insurance brokers.

INFORMATION TECHNOLOGY MANAGEMENT SYSTEMS

SCA's information technology management systems network routinely carries, enables processing of, and stores for varying periods, much of the core business and the supporting corporate service business of SCA.

Personal information contained in these records might include:

- ▶ Names of employees and their contact details
- ▶ Content of emails as well as email aliases both SCAPL, and if supplied, ones of a private nature
- ▶ Details of web sites visited while using the SCAPL's internet
- ▶ Details of phone numbers called
- ▶ Files and information created on the SCAPL's servers
- ▶ Records relating to requests for information technology access, and problems relating to such access
- ▶ Summaries of information such as status and nature of employment as required in order to administer information technology access

This information is not usually disclosed except to managers, systems administrators and the person concerned.

INTERNAL AUDIT

SCA's Internal Audit Unit may collect personal information during the conduct of audits performed in accordance with the International Standards for the Professional Practice of Internal Auditing as pronounced by the Institute of Internal Auditors. For instance, payroll reports and leave forms.

Access is limited to the Chief Executive Officer and Internal Auditors. Information contained in these records may be disclosed outside the SCA to an external auditor as required by the Queensland Audit Office.