



**Queensland**  
**Government**  
Department of **Housing**

# **Privacy Plan 2007-2008**

October 2007

## 1. Introduction

People give us their personal information and expect that we will respect and protect their privacy when we deliver government services and conduct government business.

In response to these expectations, the Queensland Government introduced Information Standard 42 - Information Privacy, which was issued under the authority of the Financial Management Standard 1997, and which applies to all accountable officers and statutory bodies as defined under the Financial Administration and Audit Act 1977.

The information privacy standard outlines the Queensland Government's information privacy policy and the eleven information privacy principles that govern how we must collect and manage personal information. The Government is implementing the standard by administrative means rather than by legislation.

## 2. Our privacy plan

Our Privacy Plan has been developed as a requirement under Queensland Government Information Standard 42 – Information Privacy. Through the Privacy Plan we recognise the increasing importance to the community on how their personal information is managed. We have developed this privacy plan, which identifies:

- our privacy policy and our plan for implementing it;
- the legislation that impacts on our obligation to comply with information privacy principles;
- the personal information we collect and how we manage it;
- our information-sharing arrangements with third parties that have access to the personal information in our records, or who collect personal information on our behalf;
- the steps people can take to access or amend their personal information; and
- our privacy complaints and appeal procedure.

## 3. Our privacy policy

We will respect and protect a person's right to privacy.

We will collect, store, use and disclose personal information responsibly and transparently, in accordance with the information privacy principles identified in [Information Standard 42 – Information Privacy](#).

## 4. Legislation that affects how we manage personal information

Information Standard 42 – Information Privacy recognises that legislative provisions may conflict with the information privacy principles and acknowledges that if a conflict does exist, the legislative provisions will prevail despite the information privacy principles.

## 5. Personal information we collect and manage

In order to deliver government services and conduct government business, we collect and manage personal information about a wide range of people. For example, we may collect and manage information about:

- our clients;
- our employees, prospective employees and contractors;
- representatives of community organisations and local governments that receive funding through our funding programs to deliver housing services;
- our vendors and service providers; and
- advisory committee members.

Appendices B to I provide further details of how we manage the different categories of personal information.

## 6. Our information-sharing arrangements

If other agencies collect, store, use, or disclose personal information on our behalf, or if they have access to the personal information in our information systems, we include privacy clauses in contracts and agreements to ensure that personal information is protected from unauthorised access, use and disclosure.

We have contracts and agreements with:

- The Shared Services Agency - a corporate service provider for the delivery of financial and human resource services.;
- CorpTech – a corporate service provider for information technology;
- Project Services provides house design and construction services;
- QBuild provides property maintenance services;
- Department of Public Works for the provision of legal and library services;
- Community organisations and local governments that provide housing services on our behalf;
- Debt collection agencies;
- Department of Child Safety with whom we share information relevant to the protection of children; and
- Disability Services Queensland, Department of Communities, Department of Health, Commissioner for Children and Young People and Child Guardian and Queensland Corrective Services with whom we have signed memoranda of understandings(MOU) regarding service delivery to joint clients;
- Queensland Rural Adjustment Authority with whom we have a memorandum of understanding (MOU) to provide loan assessment services on our behalf;
- Residential Tenancies Authority with whom we share information relevant to the Bond Loan program; and
- Registered Valuers who provide valuation services on our behalf.

When we sign a MOU with another department regarding service delivery to joint clients, the MOU will document the manner in which the personal information of mutual clients may be shared to enable coordinated service delivery.

## 7. How to access or amend your personal information

The information privacy principles give people the same right to access their personal information as they have under the *Freedom of Information Act 1992*. Although people can apply to access their personal information, we may not be able to release some information because of the provisions of this legislation and because doing so might compromise the privacy of other clients.

Additionally, people can ask us to amend their personal information if they believe it is inaccurate, incomplete, out-of-date or misleading. When we amend their personal information, we will add a note to our records identifying the information that was amended and how it was considered to be incomplete, inaccurate, out-of-date or misleading. The department takes this action because it is responsible for the integrity and quality of personal information in its possession and control. To ensure that our records remain complete, we will not destroy original records.

People wanting to make a Freedom of Information access or amendment application can obtain help from the department's Internet website at <http://www.housing.qld.gov.au/about/foi/index.htm>.

Assistance is also available from the department's Freedom of Information Coordinator on (07) 3224 5245.

## 8. How long we keep your personal information for

Personal information records are retained according to the requirements of the Queensland State Archives and the *Public Records Act 2002*. Separate storage and security arrangements apply depending on where the records are held and the sensitivity of the information.

## 9. Our privacy complaints and appeal procedure

It is a mandatory requirement of Information Standard 42 (IS 42) to have a privacy complaints resolutions mechanism in place for the department. In addition to the current complaint resolution requirement of IS 42, OPSC Directive 13/06 requires as a minimum, the development of a whole-of-department policy, the Complaints Management Framework (CMF) and procedural documents specific to service area's business. The Privacy Complaints and Appeal Procedure supplement the CMF and address the operational details pertaining to privacy complaints and appeals. We believe that queries, concerns and complaints provide valuable feedback about how we can improve our services. If people believe that we have not collected, stored, used or disclosed their personal information in accordance with the information privacy principles, we will address their concerns promptly.

People can ask us to investigate and resolve their concerns by:

- discussing the issue informally with the employee providing the service or a supervisor or manager;
- discussing the issue with our privacy coordinator; or
- requesting that the issue be investigated formally in accordance with our privacy complaints and appeal procedure. In this instance, the complaint should be made in writing within six months of the date when the breach was suspected to have occurred.

Written complaints may be sent to:

The Privacy Coordinator  
Appeals and Review  
Department of Housing  
GPO BOX 690  
BRISBANE QLD 4001

Or by facsimile: (07) 3225 1912

Or by email: [Privacy@Housing.qld.gov.au](mailto:Privacy@Housing.qld.gov.au)

The privacy coordinator can provide more information about the complaints and appeal procedure and can be contacted on (07) 3227 7894.

## 10. Key privacy documents

- Information Standard 42 – Information Privacy
- Information Standard 42 – Information Privacy – Guidelines

## 11. Our contact information

Contact:	Telephone:	(07) 322 77894
	Email:	<a href="mailto:Privacy@Housing.qld.gov.au">Privacy@Housing.qld.gov.au</a>

## 12. Approval

Approved by the Director-General, Department of Housing.

## 13. Appendices

- [Appendix A](#): Our plan for implementing our privacy policy in 2006-07
- [Appendix B](#): Our clients
- [Appendix C](#): Our employees
- [Appendix D](#): Financial records
- [Appendix E](#): Information systems access records
- [Appendix F](#): Ministerial and Director-General records
- [Appendix G](#): Electronic mail
- [Appendix H](#): Contracts, license agreements and outsourcing arrangements which may contain personal information
- [Appendix I](#): Funded organisations

## Appendix A – Our plan for implementing our privacy policy in 2007-08

Goal	Tasks
Awareness	<ul style="list-style-type: none"> <li>• Publish information about privacy on our websites.</li> <li>• Include privacy obligations in our induction and orientation programs.</li> <li>• Conduct privacy refresher training for existing staff.</li> <li>• Maintain the proportion of staff that has completed privacy training at 90-95%.</li> <li>• Conduct a staff survey to assess understanding and knowledge of privacy requirements.</li> <li>• Develop additional privacy awareness training resources.</li> <li>• Monitor privacy complaints.</li> <li>• Reflect our commitment to privacy in business and operational plans.</li> <li>• Maintain a privacy officer network to assist with ongoing privacy compliance.</li> <li>• Provide privacy advice on new and ongoing projects.</li> <li>• Maintain a Privacy Precedents Register</li> </ul>
Policies and procedures	<ul style="list-style-type: none"> <li>• Review and update policies and procedures to ensure they reflect the requirements of the information privacy standard.</li> <li>• Implement procedures for privacy complaints and appeals.</li> </ul>
Legislation	<ul style="list-style-type: none"> <li>• Identify statutory requirements that impact on implementation of Information Standard 42 - Information Privacy.</li> </ul>
Contracts and agreements	<ul style="list-style-type: none"> <li>• Include privacy clauses in all contracts, service level agreements, memoranda of understanding and outsourcing agreements.</li> </ul>
Privacy notices	<ul style="list-style-type: none"> <li>• Include a privacy notice on forms that collect personal information.</li> <li>• Include a privacy notice on forms and letters that disclose personal information to third parties.</li> <li>• Maintain a privacy notice register to ensure notices are appropriately monitored and updated.</li> </ul>
Privacy plan	<ul style="list-style-type: none"> <li>• Publish our privacy plan on our websites and make it available to people on request.</li> <li>• Review and update the plan annually.</li> </ul>

## Appendix B – Our clients

### Personal information we collect

We collect, or community organisations and local governments receiving funding under our housing funding programs collect on our behalf, personal information from clients in order to assist them with their housing needs.

The personal information we collect from our clients may include:

- name and contact details
- date of birth
- client identification number
- medical/disability information
- representative/advocate/case worker/support worker details
- guardian/administrator details
- household member details including name, date of birth, income, type of income, role in the household e.g. dependent v spouse of tenant
- income amounts and types
- cultural background and first language
- financial and medical information
- other circumstances impacting on their housing
- if they are a foster carer approved by the Department of Child Safety
- citizenship/residency status
- previous name(s) and previous history with the Department
- residential property ownership details
- details of other assets
- location and type of housing assistance sought
- any pets they may have
- public transport use
- police statements
- next of kin, family or friend contact details.
- home insurance policies

### Our authority to collect this personal information

Collection of this personal information is authorised by the *Housing Act 2003*.

### How we use this personal information

We may use personal client information to assess eligibility for housing assistance, to prioritise a client for assistance based on an assessment of a client's housing needs, as well as for tenancy management, loan and grant management, rental or subsidy calculation and property management purposes.

Limited personal information may be used for housing related research and analysis, policy, reporting and planning functions. Where personal information is used for this purpose, the identity of the clients is not revealed. The Urban Renewal Program Evaluation Survey, February 2006, is an example of a departmental survey where the identities of respondents were kept confidential.

## **The people who can access this personal information**

Only authorised people can access this personal information, for example:

- Employees who use or manage the information.
- Courthouses and Queensland Government Agency Program (QGAP) offices in their role as agent for the department.
- Community organisations and local governments receiving funding from the department to deliver housing assistance products.
- Other government departments working in conjunction with the Department of Housing to deliver housing products and services.

## **When we disclose this personal information**

This information may be disclosed to other government agencies when legislation authorises such release.

It may also be disclosed to other government and non-government agencies when coordination of services is necessary to deliver housing products and services or to provide a holistic response to client needs. Where this occurs, disclosure is consistent with the information privacy principles.

Client information may be disclosed to community organizations and local governments, who receive funding from the department, to enable such organizations and local governments to deliver housing assistance products to clients. Personal information can only be released if clients consented as per Information Privacy Principle 11 of Information Standard 42.

We share client information with the Department of Child Safety if we are concerned for the safety of a child, or if the Department of Child Safety asks us for information necessary to protect a child.

We also share information with the Queensland Police Service if we believe an offence has been or is likely to be committed.

## **How clients can access their information**

Clients can find out how to access their personal information by contacting their local Department of Housing office or the department's Freedom of Information Coordinator on telephone number (07) 3224 5245.

## Appendix C – Our employees

### Personal information we collect

We collect, or the Shared Services Agency, our human resource service provider, collects personal information about our current, former and potential employees, including permanent, contract, temporary and casual staff. This information, which is stored on paper and electronic media, is held centrally by the Shared Services Agency, and in each service area of the department. Separate security arrangements apply for sensitive information.

Current and former employees and other persons (for example, spouses and next of kin who believe that the department's personnel records may also contain personal information about them) can obtain details of specific record handling practices of particular service areas by contacting human resource coordinators in those service areas.

We collect personal information on drivers' licenses to ensure that we can allow staff drivers to drive Department of Housing cars. This information includes date of birth and address details.

**Personnel and Payroll** records may include:

- name, address, date of birth, gender, next of kin;
- occupation, qualifications, employment history;
- equal employment opportunity group designation;
- physical and mental health issues, disabilities, medical records;
- details of pay and allowances and leave details;
- disciplinary investigation and action;
- employee identification number and security clearance details;
- adverse performance and security assessments;
- records relating to attendance and overtime;
- leave applications and approvals;
- performance appraisals;
- records relating to personal development and training;
- tax file numbers;
- payroll and pay-related records, including banking details, superannuation and other payroll deductions;
- declarations of pecuniary interests;
- declarations of conflicts of interests or potential conflicts of interest;
- work related travel documentation;
- records relating to personal welfare matters; and
- contracts and conditions of employment.

**Recruitment records** may include:

- recruitment and selection processes;
- records relating to relocation of staff and removals of personal effects, including expenditure vouchers; and
- records relating to referee checks and security clearances.

**Other records** may include:

- records of accidents and injuries;
- compensation case files;
- rehabilitation case files;
- records relating to counseling and discipline matters, including disciplinary, investigation and action files, legal action files, records of criminal convictions, and any other staff and establishment records as appropriate;
- complaints and grievances;
- recommendations for honours and awards; and
- appeals and selection and disciplinary actions.

### **How we use this personal information**

The purpose of these records is to maintain employment history and payroll and administrative information relating to all current and former employees, including permanent, contract, temporary and casual staff.

### **The people who can access this personal information**

The following departmental staff have access to most personnel records: executive and senior personnel management staff, supervisors, HR coordinators and members of selection committees (if appropriate), and the individual to whom the record relates.

### **How you can access your information**

Individuals can obtain information regarding access to their personal information by contacting the Manager, Human Resource Management (07) 3224 8413 or the department's Freedom of Information Coordinator (07) 3224 5245.

### **When we disclose this personal information**

Information held in personnel records may be disclosed outside the department, to:

- Australian Taxation Office;
- QSuper;
- Office of the Public Service Commissioner;
- Centrelink; and
- External parties such as banks and insurance companies (name and account numbers only)

## **Appendix D – Financial records**

### **Personal information we collect**

General content may include name, address and service or goods category. Sensitive content may include financial information including debts and banking details. The personal information may relate to creditors and debtors and outsourced service providers if they are identified personally.

### **How we use this personal information**

The purpose of these records is to process and account for expenditure and revenue.

### **The people who can access this personal information**

The department's administration staff who require this information in the pursuit of their duties have access to this personal information. Similarly the Shared Service Agency's administration staff have access to this personal information.

### **When we disclose this personal information**

This information is not disclosed to other persons or organisations.

### **How you can access your information**

Individuals can obtain information regarding access to their personal financial information by contacting:

Supervisor,  
Accounts Payable,  
Shared Services Agency  
(07) 3405 6587

or

Manager,  
Housing Ledgers,  
Shared Services Agency  
(07) 3224 2706

or

the department's Freedom of Information Coordinator (07) 3224 5245.

## **Appendix E – Information systems access records**

### **Personal information we collect**

The department's information systems routinely store for varying periods information about a person's access to departmental systems. Some of the information may be personal, and may relate to computer access, computer activities, and computer violations.

In addition to material described above, some personal information is specifically tailored to information technology system administration, including information technology system security identifiers and usage tracking records.

In some instances, the department allows external parties to access information systems for reporting and product identification purposes, e.g. Community Housing On-Line and the Smart Housing Product Register. External parties may provide personal information for the purpose of the department providing access to these systems; however the information content of these systems does not include any personal information.

Personal information held on information systems is not usually disclosed to people other than staff supervisors, system administrators and the individual officers concerned. Where information is disclosed, it is limited to provision of staff contact details for client assistance. Staff are routinely made aware of system usage rules and monitoring procedures concerning collection and use of the information.

Individuals can obtain information regarding access to their information systems access records by contacting the Manager, Information and Facilities Management on (07) 3836 0122 or the Freedom of Information Coordinator on (07) 3224 5245.

Location: Information and Facilities Management and service areas.

### **How we use this personal information**

The purpose of these records is to provide an audit trail of individuals access to departmental information systems should they be needed.

### **The people who can access this personal information**

Only authorised people can access this information, for example:

- General manager,
- Audit staff at the request of General manager
- Ethical Standards staff at the request of a General manager

### **When we disclose this personal information**

This information is only disclosed when required by legislation or departmental policy.

## **Appendix F – Ministerial and Director-General records**

### **Personal information we collect**

Correspondence from the public or other government agencies addressed to the Minister or Director-General may be referred to the department for consideration and preparation of advice and response. The department keeps copies of inwards and outwards documentation in electronic and paper form. These records may include personal information, including names, addresses, personal opinions about public administration matters, occupational and organisational information about people, complaints and grievances, and any other matter that the correspondent wishes to convey to the Minister or Director-General about themselves or personally identifiable third parties in government or among the public.

Departmental access to Ministerial and Director-General correspondence records are executive officers, senior officers and departmental officers who process the correspondence. The information is not usually disclosed to other people or organisations except if they are acting on the person's behalf.

Public Records should be kept in accordance with the Public Records Act 2002. In addition, records containing personal information are retained for periods provided under the standard retention and disposal schedule authorised by State Archives.

Individuals can obtain information regarding access to their personal information in executive correspondence records by contacting the department's Executive Services Unit, the relevant service area, or the department's Freedom of Information Coordinator on (07) 3224 5245.

### **How we use this personal information**

The purpose of these records is to transparently manage official correspondence and documentation received and forwarded by the Minister and Director-General.

Personal details contained within such correspondence and documentation is entered into the department's electronic document records management system.

### **The people who can access this personal information**

Only authorised people can access this information, including employees who manage the information.

### **When we disclose this personal information**

Personal information may be disclosed to other government agencies when legislation authorises such release of information. It may also be disclosed to other public officials or agencies when coordination of such information is necessary to provide holistic responses to government or its clients.

Any release of information is done in compliance with relevant legislation and information privacy standards.

## **Appendix G – Electronic mail**

### **Personal information we collect**

As the email network is part of Government infrastructure, all email is legally a public record of Government business and should not be considered private communication. The requirements of the *Public Records Act (2002)* apply to all electronic messages, including email. Consequently, personal messages may be accessed under FOI legislation or by other authorised officers within an agency.

Electronic mail sent and received by officers of the department is subject to the current [Electronic Mail Policy](#) and relevant standards and guidelines.

Personal information collected is in the form of sender details. In relation to official business, details include information such as name, official designation, business location and contact details. In relation to personal emails, details include the senders email identification and any other information contained as part of the signature section.

### **How we use this personal information**

This information is used to identify the authors and or recipients of electronic mail sent to or from the department using departmental infrastructure.

### **The people who can access this personal information**

Authorised IFM officers and other departmental officers authorised by the General Manager, Organisation Services and Strategy or the Director-General can access this personal information.

### **When we disclose this personal information**

We disclose this personal information in accordance with the usage and monitoring arrangements outlined in the department's suite of Information and Facilities Management Policies and Standards, or any legal requirement compelling the release of information by the department. Personal messages may be accessed under Freedom of Information legislation.

## **Appendix H – Contracts, license agreements and outsourcing arrangements which may contain personal information**

### **Personal information we collect**

The Department of Housing enters into contractual arrangements with a variety of external parties, for instance mailing houses (QM Technologies) and printers, for the supply of goods and services. The duration of these agreements varies widely with some extending over several years. Some of these contractual arrangements have been in existence prior to the department's requirement to comply with the privacy principles in contractual arrangements.

### **New contracts have been reviewed and amended to comply with the privacy principles.**

The department utilizes the Queensland Government's Standard Conditions of Contract, which include provisions to ensure compliance with Information Standard 42.

### **How we use this personal information**

Personal information is used to enable effective contract management. This would normally be limited to accessing the contact details of key personnel to facilitate discussion and deliberation over the ongoing provision of goods and/or services in accordance with contract terms and conditions or, where relevant, the changing needs of the department and the resulting need to renegotiate terms and conditions or service delivery aspects.

### **The people who can access this personal information**

Access to personal information in documents relating to the abovementioned contract arrangements is, within the capabilities of the records management system, limited to those officers tasked with the management of the arrangements. The department's code of conduct also supports the appropriate use of personal information.

### **When we disclose this personal information**

Any release of information is done so in accordance with accepted commercial in confidence practices and in compliance with relevant legislation and information privacy standards.

## **Appendix I – Funded organisations**

### **Personal information we collect**

We collect personal information from organisations receiving funding under the department's housing funding programs. The information may include the names of the office bearers of funded organisations, the names of staff members of funded organisations and the names of all persons attending each annual general meeting of funded organisations.

### **How we use this personal information**

The purpose of these records is to process and document funding under the *Housing Act 2003*.

Also, the department may use the information to ensure compliance with the conditions of funding or with the obligations of funded organisations under the *Housing Act 2003*.

### **The people who can access this personal information**

The department's administrative staff may in the pursuit of their duties have access to this personal information.

### **When we disclose this personal information**

This information is not usually disclosed to other people or organisations.

This information may be disclosed to independent contractors engaged by the department to assist funded organisations to meet their obligations under the *Housing Act 2003*.

### **How you can access your information**

Individuals can access their personal information by contacting the Manager of Funded Organisation Services (07) 3225 8934 or the department's Freedom of Information Coordinator (07) 3224 5245.