

Queensland Privacy Principles Policy

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1 Purpose

The *Information Privacy Act 2009* (Qld) (Act) establishes a framework for the fair collection, handling and management of Personal Information within the Queensland public sector. The Act identifies 13 QPPs with which Stadiums Queensland must comply.

The Stadiums Queensland's QPP Privacy Policy and sets out how Stadium's Queensland manages Personal Information in accordance with the Queensland Privacy Principles (QPPs) at Schedule 3 of the *Information Privacy Act 2009* (Qld) (the Act).

A summary of the QPPs is provided in Appendix 1 - Queensland Privacy Principles.

The purpose of this Policy is to provide guidance to:

- (a) individuals to assist them to understand how Personal Information is managed by Stadiums Queensland, specifically providing information regarding:
 - i. the kinds of Personal Information that Stadiums Queensland collects and holds;
 - ii. how Stadiums Queensland collects and holds Personal Information;
 - iii. the purposes for which Stadiums Queensland collects, holds, uses and discloses Personal Information;
 - iv. how an individual may access their Personal Information held by Stadiums Queensland and how they can seek correction of the Personal Information;
 - v. how an individual may make a privacy complaint about a breach of a QPP or any QPP Code and how Stadiums Queensland will deal with the complaint;
 - vi. the circumstances in which Stadiums Queensland discloses Personal Information to offshore entities.
- (b) Stadiums Queensland employees who deal with Personal Information.

2 Application

This Policy applies to all staff (including contractors) and third-party service providers of Stadiums Queensland that access, store, process, or transmit personal information, other confidential business information, or other data critical to Stadiums Queensland.

3 Definitions

The following definitions apply to this Policy:

Personal Information is defined in the Act as information or an opinion about an identified individual or an individual who is reasonably identifiable from the information or opinion, whether or not that information or opinion is true or recorded in a material form. It includes information held in paper or electronic form and includes photographs and videos.

Privacy Officer refers to the individual responsible for organisational compliance with privacy laws and regulations. The Information Management Coordinator is the Privacy Officer for Stadiums Queensland.

Sensitive Information is a type of Personal Information defined under the Act as information or an opinion about specific traits or characteristics of an individual including:

- racial or ethnic origin; or
- political opinions or membership of a political association; or
- health information; or
- religious beliefs or affiliations; or
- philosophical beliefs; or
- membership of a professional or trade association or trade union; or
- criminal history/record; or
- sexual orientation or practices.

4 Stadiums Queensland – what we do

Stadiums Queensland (formerly the Major Sports Facilities Authority) was constituted pursuant to the *Major Sports Facilities Act 2001*(Qld) (MSF Act). Under the MSF Act, Stadiums Queensland's functions are to:

- (a) manage, operate, use and promote major sports facilities and facility land, including for a community purpose.
- (b) undertake development of any of the following:
 - i. major sports facilities;
 - ii. sports, recreational or entertainment facilities for declaration as major sports facilities;
 - iii. infrastructure associated with major sports facilities or proposed major sports facilities; and
- (c) provide services in relation to the operation and management of other facilities or land held or administered by the department and used for –
 - i. sports, recreational or entertainment purposes or events; or
 - ii. special events.

The MSF Act obliges Stadiums Queensland to perform its functions in a way that is consistent with sound commercial principles and has regard to the requirements of tenants at the venues under its control.

The sporting facilities and venues that Stadiums Queensland is responsible for, as relevant to this Policy, include:

- The Gabba;
- Queensland Country Bank Stadium;
- Queensland Sport and Athletics Centre;
- Sleeman Sports Complex;
- Suncorp Stadium; and
- Cbus Super Stadium.

Stadiums Queensland collects and holds Personal Information for the purposes of undertaking these functions and carrying out associated activities, including activities connected to the above sporting facilities and venues.

5 How Stadiums Queensland Collects Personal Information

Stadiums Queensland collects Personal Information, including Sensitive Information, through a variety of methods including through:

- (a) capturing images of individuals, for example through Closed Circuit TV (CCTV), when individuals are outside and inside Stadiums Queensland sporting facilities and venues;
- (b) event registration;
- (c) membership programs;
- (d) potential and actual contractors and service providers to Stadiums Queensland;
- (e) when individuals interact or deal with Stadiums Queensland including by receiving a service from or visiting a Stadiums Queensland sporting facility or venue or contacting Stadiums Queensland, for example by submitting an enquiry form; and
- (f) for employment purposes including from individuals who are employees and those applying for employment with Stadiums Queensland.

In dealing with Stadiums Queensland, individuals have the option of not identifying themselves or of using a pseudonym. However, Stadiums Queensland may be unable to deal with individuals anonymously if:

- (a) Stadiums Queensland is required or authorised by law to deal with individuals who have identified themselves; or
- (b) it is impracticable for Stadiums Queensland to deal with individuals who have not identified themselves or who have used a pseudonym.

6 Types of Personal Information collected and held by Stadiums Queensland

Stadiums Queensland collects a range of types of Personal Information, including Sensitive Information, given the nature of Stadiums Queensland's functions or activities. This includes Personal Information associated with:

- (a) employee personnel records;
- (b) correspondence;
- (c) financial management information systems;
- (d) information systems;
- (e) administration records;
- (f) Closed Circuit Television (CCTV) footage; and
- (g) member, patron, attendee, and hirer records.

Further details about the above types of Personal Information, including Sensitive Information, that Stadiums Queensland collects and holds are set out below.

6.1 Employee personnel records

Stadiums Queensland collects employee personnel information for the purposes of maintaining employment history, payroll and administrative information relating to all permanent, contract, temporary and casual employees of Stadiums Queensland, including for example:

(a) Personnel and payroll

- records relating to overtime and higher duties;
- leave applications and leave approvals;
- medical records;
- payroll and pay related records, including banking details and deduction records;
- tax file number declaration forms;
- personal history files;
- performance appraisals;
- records relating to personal development and training;
- trade, skill and aptitude test records;
- records relating to relocations; and
- contracts and conditions of employment.

(b) Recruitment

- applications for employment and resumes;
- records relating to character checks and security clearances;
- selection reports; and
- advice relating to successful or unsuccessful applications.

(c) Other

- records of accidents and injuries;
- compensation files;
- rehabilitation files;
- records relating to counselling and discipline matters, including disciplinary, investigation and action files; legal action files, records of criminal convictions, and any other employee and establishment records as appropriate; and
- complaints and grievances.

The following employees of Stadiums Queensland are authorised to access the personnel records outlined above:

- senior management and human resources management and payroll employees, to undertake their day-to-day duties;
- members of selection committees, for the purposes of selection assessments only; and
- the individual to whom the record relates.

Stadiums Queensland may disclose Personal Information (including Sensitive Information) contained in personnel records to:

- the Australian Taxation Office;
- QSuper and other superannuation funds, as nominated by employees;
- the Queensland Audit Office;
- Stadiums Queensland's internal audit service provider;
- Crime and Corruption Commission; and
- third party organisations such as banks and insurance companies, with the employee's written consent.

Personal Information, including Sensitive Information, contained in personnel records will only be used or disclosed to the above agencies where:

- (a) it relates to the primary purpose in which it was collected; or
- (b) the employee the subject of the Personal Information, has consented to it being disclosed for a secondary purpose; or
- (c) where authorised or required by law.

Personnel records are stored within the Human Resources Unit in the Corporate Office.

Employees can seek access to, or correction of their Personal Information by contacting the Privacy Officer at RTI-Privacy@stadiums.qld.gov.au.

6.2 Correspondence

Correspondence that has been addressed to the Chief Executive or Stadiums Queensland employees from the public or other Government agencies is referred to the relevant areas within the organisation for consideration and preparation of advice and responses.

External correspondence may include Personal Information arising from any subject matter related to Stadiums Queensland's functions and venues. This may include name, address, personal opinions about Stadiums Queensland's venues or events, complaints and grievances and any other matter that the correspondent wishes to convey to Stadiums Queensland.

Personal Information contained in external correspondence will only be used or disclosed where:

- (a) it relates to the primary purpose in which it was collected; or
- (b) the individual to whom the Personal Information relates, has consented to it being disclosed for a secondary purpose; or
- (c) where authorised or required by law.

External correspondence is stored at the Corporate Office and at Stadiums Queensland's venues.

Where Stadiums Queensland receives external correspondence containing Personal Information which it did not solicit, and could not have lawfully collected, Stadiums Queensland will deal with that information in accordance with its Retention and Disposal Schedule.

6.3 Financial management information systems

Stadiums Queensland collects and holds Personal Information contained in financial records to process and account for expenditure and revenue.

The kinds of Personal Information contained in financial records may include: name, address, bank account numbers and types of goods and services being provided. This Personal Information may relate to creditors and debtors.

Finance officers, at the Corporate Office and at Stadiums Queensland venues are authorised to use Personal Information contained in financial records.

Personal Information contained in financial records may be disclosed outside of Stadiums Queensland, as appropriate to:

- (a) the Queensland Audit Office; and
- (b) Stadiums Queensland's internal audit service provider.

Personal Information will only be disclosed to the above agencies where:

- (a) it relates to the primary purpose in which it was collected; or
- (b) the individual the subject of the Personal Information has consented to the Personal Information being disclosed for a secondary purpose; or
- (c) authorised or required by law.

Financial records are stored in Stadiums Queensland's information management systems at the Finance Unit at the Corporate Office and at the administration offices of each venue.

6.4 Information systems

Stadiums Queensland collects and holds Personal Information in its information systems for network and system administration, and access purposes. The kinds of Personal Information collected and held by Stadiums Queensland's information systems includes: names, phone numbers and e-mail addresses.

Personal Information collected for the above purposes will not be used or disclosed for another purpose unless:

- (a) the individual to whom the Personal Information relates, has consented to it being disclosed for a secondary purpose; or
- (b) where authorised or required by law.

The following persons are authorised to access to Personal Information stored on Stadiums Queensland's information management systems:

- (a) individuals via their e-mail contacts list; and
- (b) employees within the Technology Services Team.

6.5 Administration records

Stadiums Queensland maintains a number of records and registers for administrative purposes. These include:

- (a) correspondence registers;
- (b) fleet information;
- (c) corporate memberships and subscriptions;
- (d) travel bookings; and
- (e) emergency action plans and contact lists.

These records and registers may contain Personal Information.

Relevant Stadiums Queensland employees are authorised to access the Personal Information contained in the above records and registers.

Stadiums Queensland may use and disclose Personal Information contained in its records and registers where:

- (a) it relates to the primary purpose in which it was collected; or
- (b) the individual the subject of the Personal Information, has consented to it being used or disclosed for a secondary purpose; or
- (c) authorised or required by law.

6.6 Member, patron, attendee, and hirer information

Stadiums Queensland collects, stores and uses Personal Information, including Sensitive Information about the members, patrons, attendees and hirers, of its sporting facilities and venues. Stadiums Queensland will not use or disclose Personal Information, including Sensitive Information, for another purpose unless:

- (a) the individual to whom the Personal Information relates has consented to it being used or disclosed for a secondary purpose; or
- (b) where authorised or required by law.

Personal information, including Sensitive Information, may be collected from gym members, venue members, organisations hiring, or individuals attending or using any of Stadiums Queensland's sporting facilities or venues.

The kinds of Personal Information (including Sensitive Information) collected may include:

- (a) contact details including names, addresses, phone numbers,
- (b) date of birth,
- (c) gender, health and fitness information,
- (d) emergency contact details,
- (e) financial/payment details and
- (f) details of incidents/accidents which occur at Stadiums Queensland's venues and sporting facilities (which may include Sensitive Information in the form of health information).

Personal Information, including some Sensitive Information, in connection with incidents may be disclosed to Stadiums Queensland's third party claims management service providers in connection with the handling of any actual or potential claims in respect of such incidents.

Personal Information of this kind is stored throughout Stadiums Queensland, both at the Corporate Office and at Stadiums Queensland venues.

Relevant Stadiums Queensland employees are authorised to access Personal Information to effectively undertake their duties.

6.7 Closed Circuit Television (CCTV) Footage

Stadiums Queensland operates CCTV systems at its venues for the purposes of venue security and public safety. These systems may capture Personal Information, including Sensitive Information.

Stadiums Queensland's CCTV systems will only capture Sensitive Information where:

the individual has consented to the collection of the information and it is reasonably necessary for, or directly related to one or more of Stadiums Queensland's functions or activities; or

where authorised or required by law.

For the purposes of Stadiums Queensland's Banning, Refusal of Entry and Removal Policy, CCTV footage may be disclosed to third party entities including (but not limited to) the Queensland Police Service, Stadium managers, Stadium hirers, security contractors, and the governing body of the applicable sporting code.

Sensitive Information will only be disclosed to the above entities where it:

- (a) relates directly to the purpose in which the Sensitive Information was collected;
- (b) the individual has consented to the disclosure of their Sensitive Information; or
- (c) where authorised or required by law.

All Personal Information, including CCTV footage, is managed in accordance with Stadiums Queensland's Privacy Policy and this Queensland Privacy Principles Policy.

6.8 Retention of records

Stadiums Queensland's records are kept in accordance with Stadiums Queensland's Retention and Disposal Schedule and the Queensland Government General Retention and Disposal Schedule. When disposing of records in accordance with Stadiums Queensland's Archiving and Disposal of Records Policy, Records Management Policy and Records Management Procedure, additional care is to be taken when disposing of documents that contain Personal Information.

7 Disclosure of Personal Information under third party contracts, licences and outsourcing arrangements

Stadiums Queensland may in the ordinary course of its operations disclose Personal Information, including Sensitive Information, to third parties where required in connection with the purpose in which the Personal Information was collected by Stadiums Queensland, including in connection with:

- (a) consultancy agreements;
- (b) venue and event operation arrangements and contracts;
- (c) tenancy and hirer agreements;
- (d) insurance broking and claims management arrangements.
- (e) service level agreements; and
- (f) licence agreements.

Stadiums Queensland will not disclose Personal Information, including Sensitive Information for another purpose without your consent or unless otherwise authorised under the Act.

Stadiums Queensland ensures that the disclosure of Personal Information, including Sensitive Information, to third parties is in accordance with Stadiums Queensland's Privacy Policy and Stadiums Queensland's Administrative Delegations.

8 Disclosures outside Australia

In certain circumstances, Stadiums Queensland may disclose Personal Information to an entity outside of Australia (in particular, where its third party service providers have operations outside of Australia which are used to provide services to Stadiums Queensland).

Stadiums Queensland will not disclose Personal Information outside of Australia unless:

- (a) you agree to the disclosure;
- (b) the disclosure is authorised or required by law; or
- (c) an exception exists under the Act.

Stadiums Queensland will take all reasonable steps to ensure that overseas providers to comply with the Act. This includes services provided in connection with Stadiums Queensland's claims management service provider, who may disclose Personal Information to its related entities in the United States of America.

9 Access or Amendment of Personal Information

Individuals are entitled to request access to and seek correction of any documents containing their Personal Information. Details in relation to how an individual may seek access to, or correction of their Personal Information are outlined in Stadiums Queensland's Right to Information Policy. Information on how to access personal information can be obtained by contacting Stadiums Queensland's Privacy Officer at RTI-Privacy@stadiums.qld.gov.au.

10 Complaints and Review Procedure

10.1 Privacy Complaints

An individual whose Personal Information is held by Stadiums Queensland may make a privacy complaint about an act done of a practice engaged in by Stadiums Queensland that may be a breach of the QPPs or certain obligations under the Act.

A privacy complaint must be:

- (a) in writing
- (b) state an address to which Stadiums Queensland may respond to the complaint;
- (c) describe the complaint – the act or practice which is the subject of the complaint;
- (d) be made within 12 months after the individual becomes aware of the act or practice which is the subject of the complaint, or a longer period if agreed with Stadiums Queensland.

If the individual has any concerns or issues in putting the complaint in writing, Stadiums Queensland can provide assistance to the individual.

Stadiums Queensland will investigate the privacy complaint and provide a written response notifying the individual who made the complaint, the outcome of the investigation, including any actions Stadiums Queensland will take in response to the complaint.

To make a complaint or for further information in relation to how to make a privacy complaint contact Stadiums Queensland's the Privacy Officer at RTI-Privacy@stadiums.qld.gov.au or phone on 07 3008 6100.

There is no fee or charge for making a privacy complaint.

10.2 Referral of complaints to the Information Commissioner

An individual may make a privacy complaint to the Information Commissioner if the individual:

- (a) has received a response from Stadiums Queensland in relation to a privacy complaint which you do not consider to be adequate; or
- (b) has not, after the period of 45 business days or longer if Stadiums Queensland requested additional time, received a response from Stadiums Queensland to the privacy complaint;

The Information Commissioner will either seek to resolve the privacy complaint by mediation, will refer the privacy complaint to another entity such as the Queensland Ombudsman. If the Information Commissioner cannot resolve the privacy complaint through mediation the Information Commissioner may refer the privacy complaint to the Queensland Civil and Administrative Tribunal (QCAT).

See the Office of the Information Commissioner Queensland (OIC) [website](#) for details about its privacy complaints process.

10.3 Referral of complaints to QCAT

If you are not satisfied with the outcome of the OIC process, you may ask the OIC to refer the matter to QCAT for decision. A complaint that is referred to QCAT will be dealt with by QCAT in accordance with the requirements in Part 4 of Chapter 5 of the Act.

QCAT has published information about its privacy jurisdiction at [Right to information and privacy jurisdictions of QCAT](#).

11 Human rights compatibility

Stadiums Queensland is committed to respecting, protecting, and promoting human rights in accordance with the Human Rights Act 2019 (**HR Act**). Under the HR Act, Stadiums Queensland has obligations to act and make decisions in a way that is compatible with human rights, and to give proper consideration to human rights when making decisions. Human rights are not absolute, and must be balanced against the rights of other individuals and matters of public importance.

Any delegate making a decision under this Policy must give proper consideration to human rights and whether a decision is compatible with human rights, in compliance with the HR Act.

In deciding to make this Policy, Stadiums Queensland has identified the rights of freedom of expression, privacy and reputation, as being relevant. The Policy does not limit human rights as it promotes the recognised human right of privacy and reputation by facilitating Stadium Queensland's lawful handling and security of personal information.

12 Related legislation and policies

In addition to Stadiums Queensland's obligations under the *Information Privacy Act 2009*, Stadiums Queensland's handling of Personal Information will also be supported by other policies and procedures maintained by Stadiums Queensland from time to time. This includes:

- Administrative Delegations;
- Data Breach Policy;
- Information Access and Use Policy (IS33);
- Information Asset Custodianship Policy (IS44);
- Information and Cyber Security Policy (IS18);
- Information Privacy Policy;
- *Major Sports Facilities Act 2001* (Qld)
- *Public Records Act 2023* (Qld);
- Queensland State Archives Standards and Guidelines (as applicable)
- *Right to Information Act 2009* (Qld).
- Right to Information Policy;
- Records Governance Policy; and
- Stadiums Q's Retention and Disposal Schedule (QDAN710).

13 Document management

Policy/Procedure owner	Information Management Coordinator
Document category	Policy
Document number	
Version number	
Effective date	
Last reviewed date	
Last updated date	
Review by date	

14 Revision history

Version	Approved on	Approved by	Amendment category	Changes made

15 For more information

For more information on this document, contact Stadiums Queensland’s Privacy Officer by email at RTI-Privacy@stadiums.qld.gov.au or phone 07 3008 6100.

Appendix 1 Summary of Queensland Privacy Principles

Queensland Privacy Principles (QPPs)

The Act includes 10 QPPs which set rules for how Stadiums Queensland deals with Personal Information. The QPPs are summarised below.

QPP 1 – Open and transparent management of Personal Information -

- Requires Stadiums Queensland to manage Personal Information in an open and transparent way and requires Stadiums Queensland's to include specific matters in its Privacy Policy.

QPP 2 – Anonymity and pseudonymity –

- Requires Stadiums Queensland to allow individuals the option of not identifying themselves unless it is impracticable to do so or is required or authorised by law.

QPP 3 – Collection of solicited Personal Information –

- Provides that Stadiums Queensland:
 - May only collect Personal information that is reasonably necessary for, or directly related to, one or more of their functions or activities;
 - Must collect Personal Information in a lawful and fair manner; and
 - Must collect Personal Information from the individual unless an exception applies, or it is unreasonable or impracticable to do so.
- QPP 3 outlines stricter requirements in relation to the collection of Sensitive Information.

QPP 4 – Dealing with unsolicited Personal Information –

- Requires Stadiums Queensland to assess unsolicited Personal Information to determine whether it could have collected the Personal Information under QPP 3 and/or whether it is a public record. If not, Stadiums Queensland may be required to destroy or de-identify the Personal Information if permitted by law to do so.

QPP 5 – Notification of the collection of Personal Information –

- Requires Stadiums Queensland to take reasonable steps to ensure that individuals are aware of certain matters listed in QPP 5.

QPP 6 – Use or disclosure of Personal Information –

- Provides that Stadiums Queensland may only use or disclose Personal Information for the primary purpose in which it was collected, unless it is permitted to use or disclose the Personal Information for a secondary purpose under the following circumstances:
 - Where the individual has consented to the use or disclosure of their Personal Information for a secondary purpose; or

- Where the individual would reasonably expect Stadiums Queensland to use or disclose their information for the secondary purpose; or
- Where the use or disclosure the Personal Information for a secondary purpose is authorised or required by law; or
- Where a permitted general situation or permitted health situation exists.

QPP 10 – Quality of Personal Information –

- Requires Stadiums Queensland to take reasonable steps to ensure that Personal Information collected, used or disclosed is:
 - Accurate, up to date and complete and relevant to the purpose of the use or disclosure.

QPP 11 – Security of Personal Information –

- Requires Stadiums Queensland to take reasonable steps to protect Personal Information from:
 - Misuse, interference, loss, unauthorised access, modification or disclosure.
- QPP 11 also requires Stadiums Queensland to take reasonable steps to destroy or deidentify personal information that is no longer needed for any purpose, and is not a public record, or otherwise required to be retained under law.

QPP 12 and 13 – Access to and correction of Personal Information –

- Requires Stadiums Queensland to give access to and correct Personal Information held by it on the request of an individual to whom the Personal Information relates or when Stadiums Queensland is satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading.