

Information privacy

Version: 1.0 | Version effective: 05/06/2025

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Audience

Public

Function area

Corporate

Purpose

This policy outlines how the Office of the Queensland Integrity Commissioner (OQIC) manages personal information in accordance with the *Information Privacy Act 2009* and its Queensland Privacy Principles (QPPs).

Policy statement

The OQIC is committed to handling personal information in accordance with the QPPs to ensure the fair collection and handling of personal information. This policy outlines:

- the kinds of personal information collected and held by the OQIC, how the information is collected and held, and the purposes for which the information is collected, held, used and disclosed
- how individuals can apply to access and correct their personal information held by the OQIC
- how a complaint can be made about the OQIC's handling of personal information and how the complaint is dealt with.

Personal information is defined in the Information Privacy Act as information or an opinion about an identified individual or an individual who is reasonably identifiable from the information or opinion whether the information or opinion is true or not or is recorded in a material form or not.

Key terms used in this policy are explained in the definitions section towards the end.

Principles

The QPPs guide the management of personal information collected and held by the OQIC in the following ways.

Principle	What this means for OQIC
Open and transparent management of personal information	Personal information is managed in an open and transparent way. This policy will clearly outline the OQIC's current information privacy, which will be publicly available on the OQIC website.
Anonymity and pseudonymity	Individuals have the option not to identify themselves when engaging with the OQIC unless it is impracticable to do so or if their identity is required or authorised under law.
Collection of solicited personal information	The OQIC only collects personal information which is reasonably necessary or directly related to its functions or activities. The OQIC will collect the information lawfully and fairly from the individual to which it relates (unless an exemption applies).
Dealing with unsolicited personal information	Any unsolicited personal information received by the OQIC will be assessed and managed appropriately with regard to the <i>Public Records Act 2023</i> .

Principle	What this means for OQIC
Notification of the collection of personal information	Reasonable steps are taken by the OQIC to ensure individuals are aware personal information is being collected, even if the information is being collected from a third party.
Use or disclosure of personal information	Personal information is only used or disclosed for the primary purpose for which it was collected, unless circumstances permit it to be used or disclosed for a secondary purpose.
Quality of personal information	The OQIC takes reasonable steps to ensure the personal information collected, used or disclosed is accurate, up to date and complete. Any personal information used or disclosed must be relevant to the purpose.
Security of personal information	Reasonable steps are taken by the OQIC to protect personal information it holds, including destroying or deidentifying personal information no longer needed and which is not a public record or required by law.
Access to and correction of personal information	Individuals can request access and corrections to personal information held by the OQIC where appropriate.

Requirements

1. Collection of personal information

The OQIC collects personal information required to exercise its statutory functions and meet legal obligations. This information may be collected in writing or as a record of information provided verbally.

The OQIC collects personal information directly from individuals who access services and indirectly from third parties as part of carrying out the functions of the Integrity Commissioner under the *Integrity Act 2009* (Integrity Act). These functions include:

- giving written advice to a designated person, former designated person or former ministerial advisor on ethics or integrity issues
- meeting and giving written or oral advice to members of the Legislative Assembly on interests issues
- keeping the lobbying register and maintaining registration of lobbyists
- providing education and training to government representatives, opposition representatives and registered lobbyists about requirements for lobbying activity
- raising public awareness on ethics or integrity issues relevant to other functions.

Personal information is also collected by the OQIC in carrying out business functions such as human resource management and recruitment processes.

The kind of personal information collected by OQIC is outlined in section 3.

In addition, OQIC may also collect personal information indirectly while dealing with a complaint, or undertaking an audit, review or investigation in accordance with its statutory powers.

2. Sensitive information

The OQIC also collects personal information which is defined as sensitive information in the *Information Privacy Act 2009* (refer to the definitions section).

The OQIC will only collect sensitive information directly from the individual it is about with their consent or otherwise consistently with its obligations under the [Integrity Act](#).

Due to the nature of the OQIC's statutory functions, sensitive personal information disclosed for the purpose of providing ethics and integrity advice or regulation of lobbying is collected. Such information is collected and managed in accordance with the confidentiality clauses under the [Integrity Act](#), including the secrecy provisions.

3. Kinds of personal information collected and held

The OQIC collects and holds the following kinds of personal information (including sensitive information):

OQIC activity	Kind of personal information	How and why the information is collected
Ethics and integrity advice	The OQIC collects and holds personal information (including sensitive information) from individuals who request advice on ethics or integrity issues from the Integrity Commissioner. Under the Integrity Act , individuals must disclose all information relevant to the issues.	Information is collected through an individual's interaction with the OQIC including emails, meeting invitations and written information provided to OQIC. The information enables the Integrity Commissioner to provide complete advice. Information provided for this purpose is protected by secrecy provisions in the Integrity Act where the information provided must not be used or disclosed for any other purpose unless authorised by legislation.
Lobbying registration	The OQIC collects and holds personal information (including sensitive information) to register individuals as lobbyists and companies as registered entities. The information collected and held may include names, contact details, criminal history, political positions held and previous activity relating to lobbying.	Information is typically collected and held via the Queensland Lobbying Register. The information enables the Integrity Commissioner to for their functions including the regulation of lobbying. Limited information is made publicly available as defined in the Integrity Act . The Queensland Lobbying Register is an OQIC system built on a Microsoft platform. Data in the Queensland Lobbying Register is secured in line with Microsoft's privacy policy .
Lobbying compliance audits and reviews	The OQIC collects and holds personal information (including sensitive information) which relates to the OQIC function of regulating lobbying activity. This may include details of activity undertaken by	Information may be collected from other government agencies in the form of a non-compliance report. The information assists identifying potential lobbying non-

QQIC activity	Kind of personal information	How and why the information is collected
	individuals or entities being reviewed and, in some cases, the personal information of individuals who engaged with the individual or company being reviewed.	compliance which needs to be investigated. The QQIC may request additional personal information from individuals or entities who are being reviewed and will collect and hold this information for the purpose of investigating the potential non-compliance activity.
Training	The QQIC collects details about individuals who undertake training courses including for registered lobbyists who are required under the <u>Integrity Act</u> to complete mandatory training.	Information is collected when an individual registers to attend the training. The information assists to organise training and promotes compliance by stakeholders with their obligations under the <i>Integrity Act 2009</i> and other Acts in Queensland. The QQIC also uses information about course participation to monitor the effectiveness of training courses and to inform higher-level general reports on training activities. These reports do not include personal information and are published as part of the QQIC's accountability reporting obligations.
Information and assistance	The QQIC collects and holds personal information about people who seek its information and assistance. This information includes names, contact details, and the enquirer's circumstances which led to or are relevant to their enquiry (this can include sensitive personal information), opinions about other people and expressions of dissatisfaction. The QQIC may also collect and hold information about reasonable adjustments required by an enquirer.	Information is collected when an individual engages with QQIC, generally by phone, post or email. The information enables the QQIC to respond with information and assistance.
Human resources	The QQIC collects and holds personal information about its	Information is collected through recruitment, onboarding and

OQIC activity	Kind of personal information	How and why the information is collected
	staff. This information includes contact details, date of birth, tax file number, qualifications, work history, required reasonable adjustments, entitlements, and next of kin and/or emergency contacts.	activities relating to employment at the OQIC. The information enables the OQIC to comply with legal obligations and manage employment relationships.
Complaints about the OQIC	The OQIC collects and holds personal information of individuals who make complaints about it. The personal information includes names, contact details, interactions with the OQIC, expressions of dissatisfaction, investigation into the complaint and the outcome of the complaint.	Information is collected and held when an individual contacts the OQIC with a complaint matter, generally through phone, post or email. The information enables the OQIC to take the necessary action and appropriately respond to the complaints.
Recruitment and contractors	The OQIC collects and holds personal information about contractors and individuals involved in OQIC recruitment processes. The personal information collected and held includes names, contact details, application documentation, identification information, assessments for suitability, referees and references.	Information is collected and held when an individual applies to work at the OQIC through a recruitment process. The information assists the OQIC in determining the suitability of applicants for working at the OQIC.
Information collected through OQIC's website	<p>The OQIC's web measurement tools and Internet Service Provider records only anonymous information about site visitors for statistical purposes including:</p> <ul style="list-style-type: none"> • server and IP address • the name of the top-level domain (for example, .gov, .com, .edu, .au) • type of browser used • date and time the site was accessed • pages accessed and documents downloaded • the previous site visited. 	<p>The OQIC's public website www.integrity.qld.gov.au is hosted in Australia. The OQIC does not generally collect personal information about site visitors.</p> <p>Information is collected through the OQIC website where it is provided by individuals who subscribe to electronic subscription lists or use an online form (e.g. to register to participate in training or events or lodge a complaint).</p>

QQIC activity	Kind of personal information	How and why the information is collected
Surveys	The QQIC collects personal details provided by individuals participating in surveys.	Information is collected and held via Microsoft forms which the QQIC use for voluntary surveys at the conclusion of a process for the purpose of gauging satisfaction with its services. View Microsoft's privacy policy .
Subscription list service	The QQIC collects personal information such as email address and name from an individual when they subscribe to the subscription service.	Information is collected and stored through a Vision 6 account which the QQIC uses for its email subscription service to deliver news, updates and alerts to subscribers. View Vision 6's privacy policy .
Event registration	The QQIC collects information, including personal information such as contact information, provided by an individual when they register to attend an QQIC event.	Information is collected and held when an individual registers to attend an QQIC event. The information can be used for other purposes such as updates about the event or other upcoming events, or updating contact details.
Social media platforms	The QQIC collects any personal information provided by individuals who communicate with the QQIC on its social media platforms.	The QQIC uses LinkedIn to communicate with the public about its work and to raise awareness of ethics and integrity. View LinkedIn's privacy policy .
Google Analytics	Information gathered using the Google Analytics includes: <ul style="list-style-type: none"> the number of visitors to the QQIC's website how visitors arrive at the QQIC's website, for example, did they type the address in directly, follow a link from another webpage, or arrive via a search engine the number of times each page is viewed and for how long 	The QQIC uses Google Analytics to gather statistics about how its website is accessed. Google Analytics uses cookies to gather information for the purpose of providing statistical reporting on website usage. The information generated by a cookie is transmitted to and stored by Google on servers located outside Australia. No personally identifying information is recorded or provided to Google. Individuals logged in to the QQIC's website

OQIC activity	Kind of personal information	How and why the information is collected
	<ul style="list-style-type: none"> time and date of visit geographical location of the visitor information about what browser was used to view the OQIC's website and the operating system of the computer information about whether the browser supports Java and Flash; and the speed of the user's internet connection. 	<p>do not have information about their user account linked to data recorded by Google Analytics or provided to Google.</p> <p>View Google's privacy policy.</p>
Analytics, business improvement and reporting	<p>The OQIC may collect information using various analytic tools and survey platforms including:</p> <ul style="list-style-type: none"> Google Analytics Vision 6 <p>It will not ordinarily be personal information because it does not generally identify anyone or relate to a specific individual.</p>	<p>This information is collected to communicate with subscribers regarding OQIC's events, services or content and to improve services and content.</p> <p>To the extent information collected by these tools is personal information, it will be de-identified to be used for analytics, business improvement and reporting purposes.</p>
Other information	<p>The OQIC may be contacted by an individual on a matter outside the jurisdiction of OQIC, where the individual discloses personal (including sensitive information).</p>	<p>Where the information is received in error, OQIC will notify the individual and delete the information so it is not stored.</p> <p>Information sent to the OQIC for an out of jurisdiction matter will be collected and stored in accordance with the Public Records Act 2023. The information may be disclosed if required by legislation.</p>

4. Use and disclosure of personal information

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

- exercising powers or performing statutory functions and duties under the [Integrity Act](#)
- managing associated business processes, such as recruitment and human resources administration.

The OQIC may also use or disclose personal information for secondary or alternative purposes as permitted under the [Integrity Act](#) or the [Information Privacy Act 2009](#). This

may include where authorised or required under Australian law (including to meet procedural fairness obligations), with the individual's consent, or where the individual would reasonably expect the OQIC to use or disclose the personal information for a related – or in the case of sensitive information, directly related – secondary purpose.

This may include disclosure to a court, tribunal or external reviewer.

There are specific limitations on the use and disclosure of information provided for the purpose of seeking ethics and integrity advice outlined in the [Integrity Act](#).

5. Access and correction of personal information

Individuals who engage with the OQIC can request administrative access to review and correct their personal information collected and held by the OQIC. Requests must be made in writing to the Integrity Commissioner for consideration and must be made by the individual directly unless they have authorised someone else to act on their behalf.

Registered lobbyists and entities have access to review and correct their personal information via the Queensland Lobbying Register.

Complaints about refused administrative access are dealt with under the OQIC Complaints management framework.

Personal and sensitive information about a third party is not available for administrative access.

6. Disclosure out of Australia

The OQIC generally only discloses personal information overseas only when necessary to address a complaint or application related to its statutory functions and obligations.

Individuals who communicate with the OQIC through a social media platform such as LinkedIn, may have their personal information collected and held overseas by the social media provider and its partners.

Where the OQIC discloses personal information overseas it will usually occur with agreement, where the OQIC is authorised or required by law, or otherwise consistently with the obligations under the [Integrity Act](#).

7. Dealing with the OQIC anonymously or using a pseudonym

People can deal with the OQIC's main enquiry phone line or email, report suspected lobbying non-compliance or use the enquiry forms on our website anonymously or by using a pseudonym.

Complaints about the OQIC can be made anonymously or by using a pseudonym. However, the inability of the OQIC to identify an individual may limit the action which can be taken including any response that would ordinarily be provided.

Anonymous or pseudonymous interaction is not possible for other OQIC functions, such as requesting ethics or integrity advice or applying for lobbying registration. The OQIC is required to collect personal information such as names, contact details and details of the matter so that it can appropriately deal with the individual and their matter.

8. Security of personal information

The OQIC holds personal information securely and takes reasonable steps to protect it from misuse, interference, loss, unauthorised access, modification or disclosure. The OQIC complies with relevant Queensland government Information Standards and security protocols to protect personal information and ensure it can be accessed by authorised staff members only.

Where permitted by the [Public Records Act 2023](#), the OQIC will destroy or de-identify unsolicited personal information or personal information no longer required for any of its

functions in accordance with its obligations under the QPPs if it is lawful and reasonable to do so.

9. Privacy complaints

If an individual believes the OQIC has not handled their personal information in accordance with the *Information Privacy Act 2009*, they can make a privacy complaint.

A privacy complaint may only be made on behalf of another person if they are authorised by the individual to do so or, in the case of a minor or someone who lacks capacity, their parent, guardian or legal authority.

A privacy complaint about the OQIC must be sent to the OQIC in writing and include:

- an address for a response (e.g. an email address)
- details about the matter or issues being complained about.

A privacy complaint must be made within 12 months after the individual becomes aware of the act or practice the subject of the complaint.

If the privacy complaint is made on someone's behalf, an authority from them or other evidence (e.g. a birth certificate showing the parent of a minor/child) must be provided.

Contact address for privacy complaints

Email: integrity.commissioner@integrity.qld.gov.au

Post: Office of the Queensland Integrity Commissioner

PO Box 15290, City East Brisbane Qld 4002

Timeframe for handling a privacy complaint

The OQIC has 45 business days to resolve a privacy complaint or such additional time if requested by the OQIC and agreed by the complainant.

If this does not occur, or if the individual is not satisfied with the OQIC's response, the complaint can be escalated to the Office of the Information Commissioner following the [procedure outlined on its website](#).

10. Information privacy practices, procedures and systems

The OQIC uses several practices, procedures and systems to identify risk, protect information and respond to breaches:

OQIC practice procedure or system	Information privacy management application
Personal information register	All personal information holdings (a group or repository of personal information collected and held by the OQIC) are documented to provide effective oversight to manage use, disclosure, security and risk of the information.
Privacy risk register	The OQIC records identified privacy risks to ensure appropriate controls are implemented to reduce or remove the potential impact of a data breach.
Data Breach Policy	The OQIC's Data Breach Policy outlines the roles, responsibilities and requirements when a data breach or an eligible data breach occurs.

Data Breach Register	The OQIC records all instances and actions relating to data breaches in the register as required under section 72 of the <i>Information Privacy Act 2009</i> .
Data breach notification	A notification to inform affected individuals of a data breach including all relevant information for the individual as required in the <i>Information Privacy Act 2009</i> .
OQIC complaints management framework	Privacy complaints are handled in line with the OQIC complaints management framework and this policy.
Privacy impact assessment	The OQIC undertakes a privacy impact assessment as part of its project management framework to ensure any new systems and processes from a project are consistent with the QPPs.
Collection notices	The OQIC includes collection notices on all activities involving collection of personal and sensitive information where practical and relevant to the collection method used.
Staff training	The OQIC staff undertake annual training on information privacy and the QPPs.

Definitions

Term	Definition
Personal information	<p>Personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable from the information or opinion—</p> <p>(a) whether the information or opinion is true or not; and</p> <p>(b) whether the information or opinion is recorded in a material form or not.</p> <p>(Section 12 of the <i>Information Privacy Act 2009</i>)</p>
Sensitive information	<p>Sensitive information for an individual, means:</p> <p>(a) information or an opinion about an individual's:</p> <ul style="list-style-type: none"> • (i) racial or ethnic origin; or • (ii) political opinions; or • (iii) membership of a political association; or • (iv) religious beliefs or affiliations; or • (v) philosophical beliefs; or • (vi) membership of a professional or trade association; or • (vii) membership of a trade union; or • (viii) sexual orientation or practices; or • (ix) criminal record; <p>(b) health information about an individual; or</p>

Term	Definition
	<p>(c) genetic information about an individual that is not otherwise health information; or</p> <p>(d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or</p> <p>(e) biometric templates.</p> <ul style="list-style-type: none"> • (Schedule 5 (Dictionary) of the <i>Information Privacy Act 2009</i>)

Legislation

- [Information Privacy Act 2009](#)
- [Integrity Act 2009](#)
- [Public Records Act 2003](#)

Delegations/Authorisations

- Nil

Policies and procedures in this group

- OQIC complaints management framework
- OQIC Data Breach policy

Supporting information for this policy

- [Personal information register](#)
- [Privacy risk register](#)
- [Privacy Impact Assessment report template](#)

Other resources

- [Basic guide to the QPPs – Office of the Information Commissioner](#)
- [IPOLA Guideline: Undertaking a Privacy Impact Assessment – Office of the Information Commissioner](#)
- [Privacy Impact Assessment risk considerations – Office of the Information Commissioner](#)

Key data

Item	Note/relevant information	As at [date]
Document owner	Manager, Corporate Services	05/06/2025
TRIM reference	QIC/25/5255	05/06/2025
Review period	2 years	05/06/2027
Keywords	Privacy, personal information, sensitive information, privacy principles, QPPs, complaints	

Document history

Date	Version number	Author	Description of changes
28/04/2025	1.0	Cyrilla Eastwood	Initial draft
12/05/2025	1.0	Monique Brown	Peer review
29/05/2025	1.0	Cyrilla Eastwood	Incorporate ELT/IC changes
5/06/2025	1.0	Paxton Booth	Reviewed changes – approved to publish

Approval

Role	Name	Position	Date
Approver	Linda Waugh	Integrity Commissioner	28/05/2025