APP Privacy Policy

1. Introduction

Queensland Independent Schools Block Grant Authority Limited (**QIS BGA**) collects, uses and stores information for the purposes of managing applications for capital assistance, in accordance with Commonwealth and Queensland Government legislation and guidelines. Following the assessment of these applications, recommendations are made by the QIS BGA Board of Directors to the relevant Ministers for Education. Administration of successful applications includes QIS BGA reporting on grant payments to schools and confirmation of the appropriate use of the capital funding by schools. These processes may include information about individuals working at or with eligible independent schools (**Participant Schools**), including their business contacts, professional consultants and staff.

QIS BGA's collection, storage, use and disclosure of personal information is governed by the Australian Privacy Principles (**APP**) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**).

2. Purpose

QIS BGA has policies and procedures in place to ensure that the collection, storage, use and disclosure of personal information is done in a safe, secure and confidential manner to ensure the rights of individuals involved with participating independent schools are protected.

3. Definitions

(a) **APP-** means Australian Privacy Principles which are contained in Schedule 1 to the Privacy Act.

(b) **A data breach-** means when **personal information** that QIS BGA holds is subject to unauthorised access or disclosure or is lost.

(c) **Participant School-** means an independent school which participates in the grant of government funding with QIS BGA, under the prescribed funding agreement

(d) **Personal information-** defined in section 6 of the Privacy Act as "information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not."

(e) **Privacy Act-** means the *Privacy Act 1988* (Cth) and associated regulations.

4. Relevant Documentation and Legislation

(a) *Privacy Act 1988* (Cth)

(b) *Capital Grants Program (CGP) for non-government schools, Program Guidelines*

5. Scope

(1) This policy applies to information which may be collected in the course of the work involved in administering capital grants programs for the Commonwealth and Queensland Governments. QIS BGA will only collect and use information that is necessary for the following services:

- receiving, assessing and managing applications for capital funding made by Participant Schools;

- making recommendations to the relevant Minister regarding those applications; and

- managing the distribution and application of the capital funding (**our services**);

or as required by law.

(2) QIS BGA will take reasonable steps to ensure that the information which it holds is secure, accurate, complete and up-to-date.

(3) QIS BGA will give an individual access to all personal information it stores about the individual in a timely manner, unless an exception applies under the Privacy Act.

(4) In the event of information security being compromised, i.e., a data breach (**Data Breach**), the QIS BGA Internal Privacy Policy and the Data Breach Response Plan will be consulted and executed.

6. Procedure

6.1 KINDS OF INFORMATION COLLECTED

(1) QIS BGA collects personal information about individuals working at or with Participant Schools which have applied for capital assistance (including individuals providing relevant services to Participant Schools, such as architectural services for a capital funded project), business contacts, job applicants and also visitors to the website who request to be contacted for the purposes of providing business services.

(2) QIS BGA will collect and hold details of individuals which are necessary for it to provide its services, which include, but are not limited to:

(a) Full name;

(b) Address;

(c) Contact number;

(d) Email address;

(e) Date of birth; and

(f) Work and home addresses and work and employment history (for job applicants, directors and members of our committees).

(3) The handling of personal information which is collected, used, held and disclosed by QIS BGA as an employer which is directly related to a current or former employment relationship is exempt from the requirements under the Privacy Act.

(4)   The following activities undertaken as part of the delivery of QIS BGA's services involve the handling of personal information:

    (a)   receiving and assessing applications for the grant of capital funding;

    (b)   receiving documentation required as part of the distribution of capital funding throughout an approved capital project;

    (c)   managing employee records; and

    (d)   running our website but only in relation to receiving and responding to enquiries made via our website.

6.2   COLLECTION AND STORAGE FOF PERSONAL INFORMATION

(1)   QIS BGA will collect personal information of individuals working at or with Participant Schools which have applied for capital funding, business contacts and job applicants and visitors to our website who request to be contacted by one of the following means:

    (a)   By requesting information on an application form and other written forms including via QIS BGA's website;

    (b)   By an individual providing personal information by way of a resume; and

    (c)   By an individual updating their records with QIS BGA.

(2)   QIS BGA will usually only collect personal information from individuals directly. However, QIS BGA may collect personal information from a third party, such as a Participant School applying for capital funding, where the third party is required to provide contact details as part of the application process e.g. details of architect or other consultant.

(3)   QIS BGA will store the personal information of individuals in the following manner:

    (a)   All relevant personal information will be entered into and held on QIS BGA's electronic database and electronic records maintained on QIS BGA's secure server. The database is only accessible by authorised QIS BGA staff. The server is maintained in Australia.

    (b)   Personal information contained in written forms and hard copy documents will be kept in safe and secure storage.

6.3   PURPOSE OF COLLECTION, HOLDING, USE AND DISCLOSURE OF PERSONAL INFORMATION

(1)   QIS BGA will only collect personal information when it is reasonably necessary for one of QIS BGA's functions or activities related to the provision of our services such as employment, marketing or feedback and reporting to government.

(2)   QIS BGA will not use or disclose personal information for any other purpose unless:

    (a)   consent has been given by the individual; or

    (b)   the individual would reasonably expect QIS BGA to disclose the information for another purpose which is directly related/related to QIS BGA's primary purpose of providing our services; or

    (c)   QIS BGA is required or authorised by law.

6.4 RETENTION AND DISPOSAL OF PERSONAL INFORMATION

(1) QIS BGA is required by statute to retain records regarding its activities for at least 7 years. These records may include personal information collected and used by QIS BGA as part of its activities. QIS BGA's records are kept safely and securely in both paper and electronic form. QIS BGA permanently destroys all unused records generally after 7 years. If the QIS BGA is required to retain any document for longer than this, any personal information contained in the record will be deidentified.

(2) If in the unlikely event that an eligible data breach within the meaning of the Privacy Act occurs to any personal information held by QIS BGA, then QIS BGA will take the required steps to:

(a) assess the nature of the breach;

(b) mitigate the risk of damage arising from the breach; and if required

(c) notify the individuals to whom the personal information relates who are at risk from the breach and notify the Australian Information Commissioner;

as required under the Privacy Act.

6.5 ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

(1) An individual may request, in writing, access to their personal information held by QIS BGA, for information or correction purposes, by contacting the following:

(a) Name: Mr Michael Harding

(b) QIS BGA role: General Manager

(c) Telephone Number: (07) 3839 2142

(d) Postal Address: 96 Warren Street, Spring Hill, Qld 4000

(e) E-mail address: mharding@bga.qld.edu.au

There is no fee involved in making such a request.

6.6 COMPLAINT POLICY AND AMENDMENTS

(1) A complaint can be made, in writing, regarding how QIS BGA has dealt with an individual's personal information by contacting the following:

(a) Name: Mr Michael Harding

(b) QIS BGA role: General Manager

(c) Telephone Number: (07) 3839 2142

(d) Postal Address: 96 Warren Street, Spring Hill, Qld 4000

(e) E-mail address: mharding@bga.qld.edu.au

There is no fee involved in making such a request.

(2) QIS BGA takes any complaint regarding the privacy of personal information seriously and will work with the individual to resolve the complaint. QIS BGA will consider and respond to a written complaint within a reasonable time (usually 30 days).

(3)   If a complaint still remains unresolved, an individual may take their complaint to the Office of the Australian Information Commissioner. The contact details for the Office of the Australian Information Commissioner can be found via its website located at www.oiac.gov.au and are also listed below:

Office of the Australian Information Commissioner

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Facsimile: +61 2 9284 9666

Post:

Sydney Office:	Canberra Office:
GPO Box 5218	GPO Box 2999
SYDNEY NSW 2001	CANBERRA ACT 2601

(4)   QIS BGA may change this privacy policy from time to time. When changes are made, an updated version of this policy will be available on the QIS BGA website.