

July 2026

Privacy Policy

Information Privacy Act 2009 and Right to Information Act 2009



QUEENSLAND
Family & Child
Commission



Privacy Policy

1. Objective and Scope

The *Information Privacy Act 2009* (Qld) (IP Act) and its Queensland Privacy Principles (QPPs) set the rules for how Queensland government agencies – including the Queensland Family and Child Commission (Commission) – handle personal information.

These rules include a requirement under QPP 1 that every agency must have a QPP privacy policy.

Our Privacy Policy explains how we manage personal information, including:

1. the kinds of personal information we collect and hold, how we collect and hold that personal information, and the purposes for which we collect, hold, use and disclose personal information, and
2. how you may complain about our handling of your personal information, and how we will deal with the complaint.

This Policy applies to the protection of all personal information held by the Commission. This includes electronic and hard copy information stored by the Commission and/or entrusted to us by stakeholders, partners or external third parties, such as the personal information we collect, store, manage, use and disclose in discharging our statutory functions. These functions are set out in the IP Act and *Right to Information Act 2009* (RTI Act), the *Child Safe Organisations Act 2024* (CSO Act) and the *Family and Child Commission Act 2014* (FCC Act).

This policy applies to all Commission staff, contractors or consultants, or any external parties deployed or engaged by the Commission.

This policy encompasses all forms of collection, accessing, storing and using personal information by the Commission. As such, the policy applies to on-site and off-site (remote) Commission work arrangements (e.g. home-based, mobile, regional, and interstate).

2. Legislative and regulatory requirements

[Information Privacy Act 2009](#)

[Right to Information Act 2009](#)

[Public Records Act 2023](#)

3. Principles

The principles of this policy include:

- Protecting the confidentiality, integrity and accessibility of personal information held by the Commission.
- Complying with applicable Queensland Government information privacy legislation and principles.
- Implementing appropriate security controls and obtain ongoing assurance of their effectiveness in ensuring that personal information is securely collected and stored.
- Maintaining accountability and governance through regular monitoring and reporting.
- Reporting information security incidents involving personal information promptly in accordance with government requirements.
- Ensuring that personal information security aligns with relevant legislation, policy and risk management frameworks.
- Promoting the shared responsibility for the protection of personal information across all Commission staff and third-party partners.

4. Policy

Collection of personal information

The definition of 'personal information' is set out in the 'Definitions' in section 7.

The Commission collects personal information required to exercise our statutory functions and meet our legal obligations. We may collect this personal information in writing or by recording information provided verbally.

We collect personal information directly from individuals who access our services and indirectly from third parties as part of carrying out our functions. These functions include:

- Conducting its regulatory functions, for example:
 - o conducting reviews of child deaths as provided in reports from the Department of Families, Seniors, Disability Services and Child Safety
 - o conducting an audit or review or assessing an organisation's compliance with the *Child Safe Organisations Act 2024* (CSO Act)
 - o conducting an investigation of a report made through the Reportable Conduct Scheme under the CSO Act.
- Responding to enquiries from the public and government agencies.
- Dealing with applications under the RTI Act.
- Dealing with privacy complaints made under the IP Act.

We also collect personal information to carry out our business functions, e.g. human resources management and recruitment processes.

The kind of personal information we collect from individuals directly includes names, contact details, details of individuals' interactions with child-related organisations, the justice system, and details about their concerns or complaints with an organisation or government agency or a decision or action taken by an organisation or government agency, and reasonable accommodations required by individuals (i.e. assistance requirements). This information may be collected, for example, when someone:

- applies for information held by the Commission under the RTI Act
- submits a report to the Commission under the Reportable Conduct Scheme
- contacts the Commission to request information or assistance, or
- notifies the Commission about any incident involving the protection of children.

Due to the nature of the Commission's statutory functions, we may indirectly collect any kind of personal information which can be recorded in another agency's document, for example, when it conducts an audit, carries out an investigation, reviews a privacy complaint, or assesses a data breach.

The Commission may also collect personal information such as individuals' names and contact details to organise meetings with the Principal Commissioner, Commission staff, or when offering training and other engagement activities, including via our website and learning management system.

4.1 Sensitive information

We may also collect sensitive information. The definition of 'sensitive information' is set out in the 'Definitions' in section 7.

In the ordinary course of our business operations, we will only collect sensitive information directly from the individual it is about, or with their consent, or otherwise consistently with our obligations under the IP Act. The kinds of personal information (including sensitive information) we collect, and hold, are set out in the table below.

Commission function	Type of personal information collected and the reason for collection
Child death investigations and child death prevention	The Child Death Review Board Secretariat collects personal and sensitive information of deceased children who are known to the child safety system in the 12 months prior to their death. The personal and sensitive information collected about the children who are the subject of agency reports includes (but is not limited to) name, date of birth, date of death, racial or ethnic origin, genetic information, residential address, details of their family members (including parents, grandparents, siblings, and other extended family members), Queensland Police Service records, health records, and education records. The Child Death Prevention team has collected personal and sensitive information of deceased children in Queensland since 2004. The personal and sensitive information collected about the children includes (but is not limited to) name, date of birth, date of death, racial or ethnic origin, residential address, details of their family members (including parents, grandparents, siblings, and other extended family members), details of other persons involved in the death incident, coronial records, Queensland Police Service records, health records, and education records. The information is stored in the Queensland Child Death Register, which is a cloud-based database and stored in secure files within the Commission's records management system.
Regulatory investigations, audits and reviews (CSO)	The Commission obtains documents and information from child-related organisations and government agencies who may be the subject of an audit, review or investigation relevant to the matters or issues under examination. These documents and/or information may include personal information which relates to the functions of the organisation or government agency being audited, their staff, and the personal information of persons who have had contact with and provided their personal information to the organisation and/or government agency.
Human Resources	The Commission collects and holds personal information about our staff and relevant to their employment at the Commission, including their contact details, date of birth, tax file number, qualifications, work history, required reasonable accommodations, entitlements, and next of kin and/or emergency contacts. Payroll and leave are managed for the Commission by the Corporate Administration Agency and Aurion as part of a service level agreement.

Commission function	Type of personal information collected and the reason for collection
Recruitment and contractors	The Commission collects and holds personal information about people who apply to work at the Commission. This includes names, contact details, application documentation, identification information, assessments for suitability, referees and references.
Complaints about the Commission	The Commission collects and holds personal information about people who make complaints to the Commission about our services, including their names, contact details, interactions with the Commission, expressions of dissatisfaction, investigation into the complaint and the outcome of the complaint.
Information collected through the Commission's website	The Commission's public website www.qfcc.qld.gov.au is hosted in Australia and the Commission does not generally collect personal information about site visitors. The Commission's web measurement tools and Internet Service Providers record only anonymous information about site visitors for statistical purposes including: • 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. The Commission collects personal information through our website where it is provided by individuals who subscribe to our electronic mailing lists or use an online form (e.g. to register to participate in events, apply for grants, or lodge a privacy complaint).
Youth Summit	Third party event providers collect speakers' name and email for the purpose of booking accommodation and flights. Commission-held personal information is stored in secure files within the Commission's records management system and other secure network files.
Event registration	Eventbrite collects individuals' name and email address to send event registrations and reminders.
Social media platforms	The Commission uses Meta, Instagram, and LinkedIn to communicate with the public about our work and to raise awareness of issues relating to the protection of children. Where individuals communicate with the Commission via social media platforms, we may collect any personal information you provide when you communicate with us.
Google Analytics	The Commission uses Google Analytics to analyse website use which is raw data and does not contain personal information
SalesForce	Commission-held data from the Reportable Conduct Scheme is stored in SalesForce at Australian locations.

It is a legislative requirement for Queensland Government agencies to receive assurance regarding the privacy policies of all partners, stakeholders and contractors with whom the Commission is engaged and with whom we have entered contracts for the provision of goods and/or services. All contracted parties must provide the Commission with evidence of appropriate privacy policies and procedures.

4.2 Use and disclosure of personal information

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

1. exercising our powers or performing our statutory functions and duties, such as dealing with the review of child death cases, engaging with child-related organisations, or responding to enquiries
2. managing associated business processes, such as recruitment and human resources administration as part of our daily operations.

We may also use or disclose personal information for secondary or alternative purposes as permitted under the IP Act. This may include where we are authorised or required under Australian law, with your consent, or where you would reasonably expect us to use or disclose for a related – or in the case of sensitive information, directly related – secondary purpose.

4.3 Access and correction of personal information

Access and correction rights are contained in the RTI Act. The Commission is subject to access and correction obligations under the RTI Act.

Commission staff may apply to access or correct their own personal information.

Members of the public may apply to access and correct their personal information held by the Commission.

4.4 Disclosure of personal information outside Australia

In the normal course of our business operations, we would disclose personal information overseas only when necessary to address a complaint or application within our statutory functions and obligations, for instance, where a complainant or applicant is overseas.

However, when you communicate with us via a social media platform such as LinkedIn, the social media provider and its partners may collect and hold your personal information overseas. We also use 'cloud hosted' Microsoft Forms to conduct voluntary surveys from time to time, which may involve the collection and disclosure of participants' personal information overseas.

Where we disclose personal information overseas, this will usually occur either with agreement, where we are authorised or required by law, or otherwise consistently with our obligations under the IP Act.

4.5 Dealing with the Commission anonymously or using a pseudonym

People may deal with the Commission's enquiries service, report a data breach, or use the enquiry forms on our website anonymously or by using a pseudonym.

Concerns raised about the Commission, its actions or inaction, or its staff can be made anonymously or by using a pseudonym but, depending on nature of the concern, we may not be able to act and/or provide a response without a person's identity.

Anonymous or pseudonymous interaction is not possible for other Commission functions, such as notifying of a breach of the CSO Act by a child-related organisation under the Reportable Conduct Scheme. We are required to collect information such as your name, contact details and details of your matter so we can deal with you and your matter effectively and in accordance with our statutory duties.

4.5 Security of personal information

The Commission holds personal information securely and takes all reasonable steps to protect it from misuse, interference, loss, unauthorised access, modification or disclosure. The Commission 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* (Qld), the Commission will destroy or deidentify unsolicited personal information or personal information no longer required for any of its functions in accordance with our obligations under the QPPs if it is lawful and reasonable to do so.

4.6 Privacy complaints about the Commission

If you believe that the Commission has not handled your personal information in accordance with the IP Act, you can make a privacy complaint. You can only make a privacy complaint on behalf of another person if they have authorised you to do so, they are a minor/child and you are their parent or guardian, they lack capacity, and you are their guardian or have other legal authority to act for them.

To make a privacy complaint about the Commission, you must send your complaint to the Commission in writing and include:

- an address for us to respond to you (e.g. an email address).
- details about the matter or issues you are complaining about (e.g. what did the Commission do or not do with your personal information that you believe breached the QPPs and the IP Act).

You must send your complaint to us within 12 months of becoming aware of the act or practice you think constitutes a breach by the Commission of the IP Act. If you are making a privacy complaint for someone else, please include an authority from them or other evidence.

Contact address for privacy complaints:

Email: governance@qfcc.qld.gov.au

Post: Queensland Family and Child Commission
PO Box 15217
Brisbane City East Qld 4002

4.7 Timeframe for dealing with a privacy complaint

The response period for a privacy complaint is 45 business days, if the Commission requests for a longer period under section 164A(2) of the IP Act, we will consult with you on an agreed timeline, on any further specified period, until you refuse the request, you further escalate the complaint to the Commission, or the further specified period ends.

If you do not consider the Commission's response to be adequate or if the Commission does not respond within the response period, you can escalate your complaint. Your complaint will be managed in the same way as other complaints are managed and will be dealt with by officers who was not involved in handling the initial complaint or the activities the subject of the initial complaint. Our *Customer Concerns Management Policy* is available on our website for information about our processes and principles for handling concerns raised with us.

5. Considerations

5.1. Consideration of Human and Child Rights

This Policy upholds a person's:

- right to privacy and reputation
- right to equality before the law and non-discrimination
- right to recognition and equality before the law (procedural fairness)

- right to take part in public life (indirectly through the policy via engaging with reviews and providing submissions and evidence)
- right to protection of families and children

5.2. Consideration of the Child Safe Standards and Universal Principle

This Policy supports the Commission's commitment to safeguarding children and young people by embedding child-safe considerations into information security practices, systems and organisational culture.

The following matters have been taken into consideration in developing this policy:

1. Protection of children's personal and sensitive information
2. Risk-based approach to child safety and information security
3. Safe access to information and systems
4. Accountability, governance and oversight
5. Incident response and harm minimisation
6. Staff awareness and shared responsibility
7. Child-centred and culturally safe practices
8. Supporting participation and trust
9. Continuous improvement of child-safe capability.

This policy supports the Child Safe Standards and Universal Principle by ensuring that the Commission protects children's personal and sensitive information, promote strong governance and accountability, support safe participation, and reduce risks that could cause harm to children. Through risk-based controls, staff awareness, and effective incident management, the Commission strengthens its capacity and culture to operate as a child-safe organisation.

5.3. Consideration of Reframing the Relationship commitments

This policy supports the Queensland Government's Reframing the Relationship commitments by embedding respect, accountability and shared responsibility for Aboriginal and Torres Strait Islander peoples into information security practices, governance and organisational culture.

This policy supports Reframing the Relationship commitments by ensuring that information security practices respect Aboriginal and Torres Strait Islander peoples, protect culturally sensitive information, support transparency and shared decision-making, and strengthen trust. Through strong governance, culturally capable practices and continuous improvement, the Commission reinforces its commitment to respectful partnerships and accountable public sector leadership.

5.4. Consideration of risk management

This policy supports the Commission's risk management framework by identifying, managing and mitigating information security risks that may impact the achievement of organisational objectives, service delivery, compliance obligations and stakeholder trust.

This policy serves as a key control for mitigating information security risks identified in the Commission's Strategic and Operational Risk Registers by establishing clear requirements, responsibilities and governance arrangements for protecting information.

5.5. Consideration of privacy

This policy supports the Commission's obligations to manage personal information in a lawful, fair and responsible manner, and to protect the privacy of individuals whose information is collected, stored, used or disclosed by the Commission.

This policy supports effective privacy management by embedding information security controls that protect personal information, promote lawful and responsible information handling, and support transparency, accountability and public trust.

6. Supporting documents

Authority	Name
Framework or policy	Right to Information Policy
	Information Security Policy
Procedures	Privacy Management Plan
Forms, templates and other supporting documents	

7. Definitions

Term	Definition
Personal information	Personal information means 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, and • whether the information or opinion is recorded in a material form or not. (Section 12 of the IP Act)
Sensitive information	Sensitive information for an individual, means the following: • information or an opinion, that is also personal information, about the individual's: - o racial or ethnic origin, or - o political opinions, or - o membership of a political association, or - o religious beliefs or affiliations, or - o philosophical beliefs, or - o membership of a professional or trade association, or - o membership of a trade union, or - o sexual orientation or practices, or - o criminal record • health information about the individual, or • genetic information about the individual that is not otherwise health information, or • biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or • biometric templates. (Schedule 5 (Dictionary) of the IP Act).

8. Document control

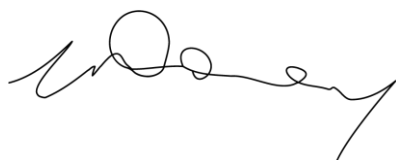
Document type	Policy	
Responsible Officer	Chief Operating Officer	
Content Manager references	PDF version:	D26/13690
	Word version:	D26/12272
	Record of approval:	TF26/1044
Information security classification	Official	
Document review	This policy is to be reviewed annually, following changes to Right to Information and Information Privacy legislation, or as required, in accordance with the Commission's <i>Policy Framework</i> .	

8.1 Version control

Version	Date	Description of revisions	Author
1.0	July 2026	First approved version	Principal Advisor, Governance and Risk

9. Approval

This policy is subject to the approval by the Chief Operating Officer as the accountable officer.



Libby Doney
A/ Chief Operating Officer
Queensland Family and Child Commission

5 August 2026