

Policy

Document ID: 001182

Version: 2.0

Privacy

Date Approved: 01/07/2025

Review Date: 01/07/2028



Purpose

This policy describes how Sunshine Coast Health manages personal information throughout its lifecycle, including collection, use, storage, disclosure, and disposal in accordance with the *Information Privacy Act 2009 (Qld)* and other relevant laws and standards.

Background

The *Information Privacy Act 2009 (Qld)* (IP Act):

- regulates how Queensland government agencies, including Sunshine Coast Health, must manage personal information.
- provides a right for individuals to apply for access and amendment of their personal information.

The health service is required to comply with the Privacy Principles outlined in the IP Act, known as the Queensland Privacy Principles (QPPs)—refer to [Appendix 1](#).

These privacy principles include rules about the collection, use, quality, security, and disclosure of personal information. They also provide conditions under which personal information may be transferred outside of Australia and rules regarding contracted service providers.

The specific obligations of Sunshine Coast Health when collecting and handling your personal information are outlined in the IP Act.

What is personal information?

Personal information is defined by the *Information Privacy Act 2009*. Put simply, it is information that identifies a living person (or could lead to them being identified).

Personal information may be in any form, such as in correspondence, databases, audio recordings, images, alpha-numerical identifiers, or any combinations of these. It can also be spoken or communicated in other mediums, including sign language or social media.

What is sensitive personal information?

Sensitive information is a subset of personal information, and it is important because of the heightened meaning or value to the individual concerned. Refer to [Appendix 2](#) for examples of sensitive information.

Sunshine Coast Health can only collect sensitive information in certain circumstances and must, before it discloses sensitive personal information, take reasonable steps to ensure that the subject of the personal information can no longer and cannot in the future, be identified from the personal information.

What is confidential information?

Confidential information is information about a person who is receiving or has received a public health service. Confidential information includes care and treatment information.

Unlike personal information, which is only about a living person, confidential information can be about a living or deceased person.



Integrity



Compassion



Accountability



Innovation

Sunshine Coast
Health



Queensland
Government

Queensland laws set out requirements for how we handle confidential information.

These laws include:

- Part 7 of the Hospital and Health Boards Act 2011
- *Public Health Act 2005*
- *Mental Health Act 2016*.

To keep things simple, we use the term personal information in this Privacy Policy.

What personal information do we collect?

Sunshine Coast Health collects, holds, uses, and discloses personal information to carry out its functions and activities.

The health service ensures personal information and handling practices are transparent and documented, and that people are given collection notices that comply with the privacy principles.

Large amounts of personal information, some of which is sensitive and health information, are of clients, patients, suppliers, business partners and employees. Refer to [Appendix 2](#) for examples of the types of personal information held by the health service.

Sunshine Coast Health website contains our privacy statement to provide visitors and users of the website with information specific to the site's purpose and how to access your personal information.

How is personal information managed?

Sunshine Coast Health ensures the accuracy of the personal information we hold and keeps it secure through its lifecycle. In addition to the QPPs, we also apply *Information Standard 18* of the *Queensland Government Information Security Classification Framework*.

Our contracted service providers also observe strict personal information management requirements.

Quality of personal information

Before we use your personal information, we may check with you to make sure it is accurate, complete, and up to date. If you think we hold personal information about you that is inaccurate or out of date, please contact us.

Security of personal information

Sunshine Coast Health securely handles and destroys personal information. To do this we have a range of information security practices that align with the Queensland Government information security standard. This includes, for example, only allowing certain staff to access your information, using a login and password.

Protection of personal information from unauthorised access and disclosure is a priority for us. Any concerns about the security of your personal information held by the health service should be reported.

How personal information is managed in Microsoft 365

Sunshine Coast health uses Microsoft platforms to support communication, collaboration, and information management. Microsoft 365 is a set of cloud-based productivity tools and integrated cloud services. Microsoft 365's commonly used featured platforms for collaborative work include (but not limited to):

- Microsoft Teams—a collaboration and video conferencing platform that acts as a central hub for workplace communications via text chat, voice call, video call, calendar, notes, documents, and apps (including, from time to time, recording and capture of video and voice calls). Refer to the [Queensland Health privacy notice: Use of Microsoft for meetings and recordings](#)
- SharePoint—a cloud-based content collaboration and management platform where files can be shared and stored.
- OneDrive—a personal cloud-based storage service. These platforms are integrated and provide Queensland Health with different avenues for sharing, organising and storing information.

Sunshine Coast Health uses these platforms in a manner consistent with our responsibilities and obligations under the *Information Privacy Act 2009 (Qld)*, *Right to Information Act 2009 (Qld)* and *Public Records Act 2023*; and the [Queensland Government Customer and Digital Group Collaboration platform \(Microsoft Teams\) guideline](#).

Collection by Microsoft when using Microsoft 365

Microsoft may collect your personal information as a result of using Microsoft 365 services and applications. [Microsoft's privacy statement](#) explains the personal data Microsoft processes, how Microsoft processes it, and for what purposes.

Contracted service providers and personal information

Sunshine Coast Health uses contracted service providers to provide services and functions to the health service. Some examples include:

- electronic document management
- cloud-based data storage
- community surveys and feedback collation.

To provide these services and functions, service providers may collect and use personal information on our behalf. The health service still controls and is responsible for the information. Sunshine Coast Health ensures that service providers meet our privacy and confidentiality requirements. We do this by entering into a contract or service agreement with them that includes privacy and confidentiality clauses.

Use of Artificial Intelligence (AI)

The health service may use generative artificial intelligence (AI) technologies to support personalised services and improve the way we engage with individuals.

Where AI tools are used to collect or process personal information, we will inform you in advance about the nature of the data being collected and the purpose of its use. You will always have the option to opt out.

This approach ensures transparency, respects your privacy and allows you to make informed decisions about the use of your personal information.

Storage

Sunshine Coast Health stores personal information that we collect in both electronic and analogue formats; that is, we use paper-based and electronic storage systems. The privacy rules apply, irrespective of how we store personal information.

For electronically held and managed personal information, we use Australian/Queensland data centres and back-up systems wherever possible. Where personal information must be stored in an overseas location, we take care to ensure that privacy and security controls are in place (e.g. through strict contractual requirements and avoiding storage locations where privacy rules appear insufficient).

Retention

Sunshine Coast Health will keep your personal information for the minimum period of time as required in a retention and disposal schedule approved by the Queensland State Archivist. The minimum retention period varies between classes of records according to the purpose and use of the records.

Once the minimum retention period has been met, records (including any personal information associated with the records) are securely destroyed using disposal methods appropriate for the type of format and security classification of the records.

The following retention and disposal schedules document the minimum retention periods for records maintained by Sunshine Coast Health:

- [General Retention and Disposal Schedule \(PDF, 1.8MB\)](#)
- [Health Sector \(Corporate Records\) Retention and Disposal Schedule \(PDF, 580KB\)](#)
- [Health Sector \(Clinical Records\) Retention and Disposal Schedule \(PDF, 440KB\)](#)

Social media

Sunshine Coast Health maintains a number of social media accounts for the purpose of providing information about:

- our services
- important health alerts
- health and wellbeing, generally.

Please be aware that personal information given to us or posted on any social media site becomes captured by that social media platform's privacy policy. You may instead choose to [contact us directly](#).

For information regarding our social networking services, email SC-Communications@health.qld.gov.au.

Monitoring of buildings

CCTV cameras

Some Sunshine Coast Health locations are equipped with Closed Circuit Television (CCTV) cameras. These are used to monitor safety and accessibility, as well as to deter (and capture evidence of) unlawful behaviour.

The CCTV cameras in use throughout the health service are all owned by Sunshine Coast Health. The footage from the cameras is generally stored for 30 days before it is destroyed.

If you would like to enquire about the CCTV cameras you can contact the Protective Services Manager.

Secure check-in

Some Sunshine Coast Health buildings have a secure check-in facility for visitors, consultants and contractors attending our premises. This electronic or analogue check-in collects personal information, such as name and mobile phone number. Secure check-in facilities are owned and controlled by Sunshine Coast Health. The health service is responsible for the management of any personal information provided. For more information about the secure check-in facilities, you can contact the Protective Services Manager, who can put you in touch with the relevant Facility Manager.

How does Sunshine Coast Health use and disclose personal information?

What does use and disclosure mean?

In broad terms, use refers to the treatment and handling of personal information within Sunshine Coast Health, particularly when it involves making decisions on the basis of the information.

Disclosure refers to making personal information available to people outside the health service, other than to the individual concerned, and includes the publication of personal information.

Use and disclosure of personal and health information

We may collect personal information directly from you or from someone else, such as your local doctor or a relative in an emergency situation.

We collect personal information when you:

- visit our website (Sunshine Coast Health)
- take part in surveys.
- communicate with us or provide us with feedback.
- visit a health care facility.
- fill in a form (including online and paper forms)
- apply for a job with us
- ask us a question or make a complaint
- request access to, or correction of, your personal information.

When we ask you for your personal information, we will provide you with a notice to explain what personal information we need and why. This is called a 'Privacy Notice'. We may provide you with a written or spoken privacy notice. For example, when you fill out a form that asks for your personal information, it will contain a privacy notice that explains why we need your information.

There may be times when we share your personal information. When we share your information, we do so in accordance with privacy law.

We may share your personal information with:

- your local doctor, or with a healthcare facility—e.g., we release your personal information (including health information) in order to facilitate your treatment.
- your family, spouse, or guardian—e.g., where you have nominated them for the purpose. If you do not wish for us to share your information with a person or organisation, you can ask us not to share it.
- Sunshine Coast Health will not otherwise give your personal information to other government agencies, organisations, or anyone else unless:
- we have your express permission.
- there is a lawful ability or requirement for us to do so.

Why do we collect personal information?

We collect personal information to provide health and wellbeing services and to fulfil our other functions. Specifically, we collect personal information to:

Provide you with health and wellbeing services	We may use your personal information to provide you with our services to improve your health and wellbeing
Ensure you receive appropriate treatment and follow up care	We may use your personal information to provide you with treatment and follow-up care that is appropriate for your needs.
Decide on applications for services or benefits	We may use your personal information to make decisions about your applications for our services or benefits.
Communicate with you and receive your feedback	<p>When you communicate with us via our website (www.sunshinecoast.health.qld.gov.au), your correspondence is treated as a public record. We keep your correspondence for as long as required by the <i>Public Records Act 2023(Qld)</i> and other relevant laws. Your personal information included in the communication will never be shared with others unless you give us permission.</p> <p>Sunshine Coast Health does not reply to all communication received via our website.</p>
Conduct research to improve healthcare practices	We may use personal information for research to help us to improve Queensland healthcare practices. All research must meet ethical requirements and be authorised by our Health Service Chief Executive.
Conduct community wellbeing and other research through online surveys	<p>We may ask you to take part in online surveys that appear on our website. The surveys, for example, may relate to health issues such as smoking.</p> <p>These surveys are voluntary, and you can often remain anonymous. If you would like to participate, you may be asked to agree to certain Terms and Conditions about the use and/or disclosure of your information.</p> <p>We sometimes conduct surveys using online platforms provided by external service providers. These providers may store information outside of Australia.</p>
Make payments to, and generally manage employment of Sunshine Coast Health staff	If you are a Sunshine Coast Health staff member, we will use your personal information to manage your employment and make payments to you.
Process requests to access or correct personal information	Sunshine Coast Health may use your personal information to process your request to access or correct your personal information.
Process requests to access other Sunshine Coast Health information	We may use your information to process requests to access other Sunshine Coast Health information. To find out more you can access our Right to Information page.

<p>Investigate privacy complaints</p>	<p>We may use your personal information to investigate your privacy enquiry or complaint, and to communicate with you about your enquiry or complaint.</p> <p>We set our further information below about how to make a privacy enquiry or complaint with us.</p>
<p>To conduct website analytics</p>	<p>When you visit our website (www.sunshinecoast.health.qld.gov.au), we may make a record of your visit and for statistical purposes only log the following information:</p> <ul style="list-style-type: none"> • server address • top level domain name (e.g. gov) • date and time of your visit to the site. • pages visited and documents downloaded. • previous sites visited. • browser type. <p>No attempt is, or will be, made to identify users or their browsing activities except, in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect activity logs.</p> <p>We use Google Analytics (including display advertising features) on our website to gather anonymous information about visitors to our website. When you visit our web pages, your browser automatically sends anonymous information to Google. Examples of the information include the web address of the page that you're visiting, your IP address and demographic information. Google may also use cookies.</p> <p>We use this data to analyse the pages that are visited, to improve your experience and make sure our website is useful.</p> <p>Read more about:</p> <p>how Google uses data</p> <p>our Website Privacy Statement.</p>

How can I apply to access or amend my personal information?

How to apply for access

Sunshine Coast Health supports your right to apply for access to information held about you.

Information about how you can make an application to apply for access to your personal information is available on our website here [Accessing your medical Records](#) and here [Right to Information](#). This includes information about seeking access 'administratively' (which is generally a simpler and quicker method of seeking access) or making a formal access application under the RTI Act.

Formal access or amendment applications need to be made and processed in accordance with the relevant legislation.

Access under an administrative arrangement does not affect an individual's right to seek access to the documents under the RTI Act. In addition, if the application cannot be processed administratively, it will generally be referred for processing under the RTI Act, whichever is appropriate.

The **Clinical Information Access Unit** can assist with your information access enquiries via email: SCHHS_CIA@health.qld.gov.au or by phoning 07 5202 3011.

Access to employee records

You are entitled to apply for access to your employee records held by Sunshine Coast Health through the administrative access process. The process is the same for both current and former Sunshine Coast Health employees.

Applications for access to your employee records are to be made in writing to:

Sunshine Coast Health Workforce

PO Box 547

Nambour MC Qld 4560

SC-WorkforceAdvisory@health.qld.gov.au

However, in some instances, not all information can be provided through this administrative process and an application under the RTI Act may be required. Contact the Clinical Information Access Unit via email: SCHHS_CIA@health.qld.gov.au before applying to access documents that may be subject to a formal process, and they will be able to guide you as to the best way forward. Additional information is available [here](#).

How to make an amendment application

If there is information in your health record that you believe is incorrect, that is, the information is out-of-date, inaccurate, incomplete, or misleading; you may apply to have the information amended.

Before making a formal amendment application, you should contact the area within the health service you had previous contact with as they may be able to amend your personal information without the need for a formal process. The informal option will apply in many cases—for example, where you wish to update your current contact details.

However, where a formal application to amend personal information under the RTI Act is required, please contact the Clinical Information Access Unit at SCHHS_CIA@health.qld.gov.au.

How to make a privacy complaint

Sunshine Coast Health takes breaches of privacy very seriously. Complaints regarding allegations of breaches of privacy are dealt with in accordance with the health service complaints management process.

If you are receiving, or have received health treatment from us, and consider that we have inappropriately dealt with your personal information, you may lodge a complaint to [Patient Liaison Officer](#) in the first instance.

If you are an employee or have had some other dealing with Sunshine Coast Health and believe that we have not dealt with your personal information in accordance with the privacy principles outlined in the IP Act, (that is the Queensland Privacy Principles), you may lodge an information privacy complaint. You can do so directly to the Principal Privacy Officer via email at SCHHS_PRIVACY@health.qld.gov.au or by using the below contact details.

How to contact us

For privacy related queries please direct your enquiries to:

Principal Privacy Officer

Sunshine Coast Health

Sunshine Coast University Hospital

6 Doherty Street

Birtinya QLD 4575

Ph: 07 5202 1406

E: SCHHS_PRIVACY@health.qld.gov.au

If your query relates to another Hospital and Health Service, you will need to contact them directly.

A list of Privacy and RTI contact officers for other HHS's is available [here](#).

References and further reading

[Sunshine Coast Health Privacy Strategy 2024-2028](#)

Primary legislation, policy, standards, or other authority

[Queensland Health, Privacy Policy, 27 September 2023](#)

[Queensland Health Employment Framework](#)

National Safety and Quality Health Service (NSQHS) Standards 2nd ed

- Clinical Governance

Forms and other related or supporting documents.

Consultation

Key stakeholders who contributed to and/ or reviewed this version include:

Executive Director, Legal and Governance

Director, Communications and Engagement

Chief Digital Officer

Director, Workforce Advisory

Director, Digital Health and Clinical Information Systems

Director, Internal Audit

Manager, Risk

Manager, Clinical Informatics Operations

Manager, ICT Strategy and Architecture

Lead Health Information Manager

Principal Advisor Ethics and Integrity

Senior Coordinator, Clinical Information Access

Community Health Information Manager

Compliance

Existing Sunshine Coast Health Audit: Clinical Information Systems – Privacy, Confidentiality and Access Management & Privacy Maturity Assessment

Department or Sunshine Coast Health Quality program: N/A

Reporting mechanism: N/A

Key indicators and/ or outcomes: N/A

Document approval

Version	Prepared by	Endorsed by	Authorised by	Review due
2.0	Principal Privacy Officer	Governance Improvement Committee	Executive Director, Legal and Governance	01/07/2028
Approved by: Sunshine Coast Health Board 01/07/2025				
Supersedes: 001182.01				
Keywords: Privacy, patient, information, client, confidentiality, breach, complaint, disclosure, consumer, personal, collection, data, sensitive				

Appendix 1 Queensland privacy principles – quick guide

QPP No.	Description
QPP1 – Open and transparent management of personal information	Requires Sunshine Coast Health to manage personal information in an open and transparent way. Requires a clear, up-to-date, and accessible QPP privacy policy, and practices and procedures to ensure QPP compliance.
QPP 2 — Anonymity and pseudonymity	Requires Sunshine Coast Health to allow individuals the option of not identifying themselves (i.e. to deal with the health service in an anonymously or pseudonymously) unless it is: <ul style="list-style-type: none"> • required or authorised under law, or • impracticable.
QPP 3 – Collection of solicited personal information	Provides that the health service: <ul style="list-style-type: none"> • can only collect personal information that is reasonably necessary for, or directly related to, one of our functions or activities • must collect it lawfully and fairly, and • must collect it from the individual unless an exemption applies (including consent, lawful authority/requirement, and law enforcement), or it is unreasonable or impracticable to do so. <p>Higer standards apply to the collection of sensitive information.</p> <p>Personal information is only collected if Sunshine Coast Health solicits it, i.e., they ask someone for it or otherwise takes active steps to acquire it. Unsolicited personal information sent to the health service is not collected and must be assessed under QPP 4</p>
QPP 4 — Dealing with unsolicited personal information	Requires Sunshine Coast Health to assess unsolicited personal information to determine whether they could have collected it under QPP 3 and/or whether it is a public record. If not, the health service may be required to destroy or de-identify unsolicited personal information, subject to public record laws. Otherwise, QPPs 5 to 13 apply.
QPP 5 — Notification of the collection of personal information	Requires Sunshine Coast Health to take reasonable steps to make sure individuals are aware of the matters listed in QPP 5 when collecting personal information. This includes our contact details, the fact and circumstances of the collection, and the consequences if the information is not collected. <p>This applies when personal information is collected from an individual or from a third party.</p> <p>The health service does not need to provide a formal QPP 5 notice. The QPP 5 matters can be communicated in other ways, for example, informally or verbally.</p>
QPP 6 — Use or disclosure of personal information	Sunshine Coast Health can only use or disclose personal information for the reason it was collected, unless QPP 6 allows it to be used or disclosed for a secondary purpose. These include: <ul style="list-style-type: none"> • instances where the individual has consented to the use or disclosure of the information • QPP 6 specific secondary purposes, including where: <ul style="list-style-type: none"> o the individual would reasonably expect the health service to use or disclose the information for the secondary purpose (subject to limitations) o where it is required or authorised by law or reasonably necessary for law enforcement activities • permitted general situations such as lessening or preventing a serious threat or locating a missing person (set out in schedule 4, part 1 of the IP Act), and permitted health situations (set out in schedule 4, part 2 of the IP Act).
QPP 10 — Quality of personal information	Requires Sunshine Coast Health to take reasonable steps to ensure the personal information: <ul style="list-style-type: none"> • it collects, use, or disclose is accurate, up to date, complete, and • for use or disclosure, is relevant to the purpose of the use or disclosure.

QPP No.	Description
<p>QPP 11 — Security of personal information</p>	<p>Requires Sunshine Coast Health to take reasonable steps to protect the personal information it holds from</p> <ul style="list-style-type: none"> • misuse, interference, or loss, and • unauthorised access, modification, or disclosure. <p>Requires the health service 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 or court or tribunal order.</p>
<p>QPP 12, QPP 13 — Access to/correction of personal information</p>	<p>Requires agencies to give access to and correct personal information they hold, subject to limitations.</p>

Appendix 2 - Personal information

Sunshine Coast Health holds personal information of patients, consumers, clients, suppliers, business partners and employees, such as:

- name
- contact details
- date of birth
- signature
- photographs
- unique physical characteristics (e.g. tattoos, birthmarks)
- fingerprint or other 'biometrics'
- driver's licence number
- financial/bank details
- educational history
- unique identifying number
- medical/health/diagnostic information
- cultural background, relationship details and family circumstances
- details of office bearers in funded organisations (i.e. names)
- disability funding and service provision
- complaints and investigations
- personal information recorded by way of camera surveillance systems (CCTV)
- occupation and employment history
- criminal history
- recruitment information

Personal information includes *sensitive information* and *health information*. The types of sensitive personal information which Sunshine Coast Health holds include personal information about any of the following:

- race or ethnic origin
- political opinions
- membership of a political association
- religious beliefs or associations
- philosophical beliefs
- membership of a professional or trade association
- membership of a trade union
- sexual preferences or practices
- criminal records.

Sensitive health information about a person which may be held by Sunshine Coast Health includes the following types of personal information:

- Details about a person's health at any time (e.g. that a person is 'off work sick today')
- A disability of a person at any time (e.g. short-term disability following a stroke)
- A person's express wishes about future health services to be provided to them (e.g. a 'do not resuscitate' request)
- A health service that has been, is being, or will be provided to a person (e.g. patient treatment plan)
- Personal information collected about a person for the purpose of, or while providing a health service (e.g. diagnostic tests)
- Personal information collected in connection with the donation, or intended donation, by the person of their body parts, organs, or body substances (e.g. blood or urine samples).