



Sydney Opera House

# Privacy Management Policy and Plan

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# Overview

## 1.1 Policy statement

The Sydney Opera House is operated and maintained for the Government of New South Wales by the Sydney Opera House Trust (the **Opera House**), which is constituted as a body corporate under the *Sydney Opera House Trust Act 1961*.

The Opera House's objectives and functions are to: administer, care for, control, manage and maintain the Sydney Opera House building and site; manage and administer the site as an arts centre and meeting place; promote artistic taste and achievement in all branches of the performing arts; foster scientific research into and encourage the development of new forms of entertainment and presentations.

In connection with the carrying out of its functions, the Opera House collects personal and health information. The Opera House is committed to protecting the privacy of individuals by ensuring that the collection, storage, use and disclosure of personal and health information is undertaken in accordance with the requirements of the *Privacy and Personal Information Protection Act 1998 (PIIP Act)* and the *Health Records and Information Privacy Act 2002 (HRIP Act)* and with reference to this Plan. The Opera House complies with its obligations under these Acts in relation to personal and health information that is collected about its employees (including contractors), partners, performers, customers and members of the general public as set out in section 3 of this Plan.

## 1.2 Purpose

The purpose of this Privacy Management Plan is to:

- provide staff with the knowledge to manage personal and health information in accordance with the law;
- demonstrate to members of the public how the Opera House meets its obligations under the PPIP Act and the HRIP Act; and
- meet the requirement for the Opera House to have such a Plan under section 33 of the PPIP Act.

## 1.3 Responsibilities

### Managers and Supervisors

Managers and supervisors are responsible for ensuring that their staff are aware of their privacy responsibilities under the PPIP and HRIP Acts and comply with this Plan.

### Staff

All employees and contractors of the Opera House are required to comply with the PPIP and HRIP Acts and this Plan.

It is an offence for any person employed or engaged by the Opera House (including former employees or contractors) to intentionally use or disclose any personal information about another person, to which the employee or contractor has or had access in the exercise of his or her official functions (other than in connection with the lawful exercise of his or her functions). Personal or health information should not be inputted or disclosed to public generative AI tools or platforms.

### Privacy Officer for the Opera House

The Opera House has appointed a Privacy Officer who handles all matters related to privacy, including the handling of personal and health information.

The role of the Privacy Officer is to:

- ensure this Plan remains up to date (including monitoring and continuously improving this Plan);
- make a copy of this Plan available to all current and new employees and contractors;
- train and educate staff (with the assistance of members of the Learning and Development team) in aspects of the PPIP and HRIP Acts;
- provide advice to staff and the Executive on privacy and the application of the PPIP and HRIP Acts;
- provide a first point of contact for members of the public for all matters related to privacy and the handling of personal and health information within the Opera House;

- participate in the development of new initiatives within the Opera House that have a potential privacy impact;
- conduct internal reviews into possible breaches of the PPIP and HRIP Acts; and
- liaise with the NSW Information and Privacy Commission and other government agencies.

The Privacy Officer can be contacted on the details below:

**Post:** Privacy Officer  
 Sydney Opera House  
 Bennelong Point  
 SYDNEY NSW 2000

**Phone:** 02 9250 7872

**Email:** [privacy@sydneyoperahouse.com](mailto:privacy@sydneyoperahouse.com)

#### 1.4 Review

The Plan will be reviewed and updated every 3 years at a minimum, or from time to time in response to legislative amendments and improvements in technology.

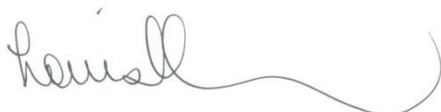
#### 1.5 Approval

This Privacy Management Plan has been approved by the Chief Executive Officer of the Opera House.

#### 1.6 Version control

Version	Approved by	Approval date	Effective date	Sections modified
1.0	Chief Executive Officer	19/10/2016	16/10/2016	New policy
1.1	Chief Executive Officer	15/05/2024	15/05/2024	Updates to refer to the appropriate use of public generative AI platforms.

**APPROVED**



Chief Executive Officer

Date: 15/05/2024

## 2 Personal and health information held by the Opera House

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### 2.1 What is personal information?

Personal information is information or an opinion about an individual whose identity is apparent or could reasonably be ascertained from the information or opinion. Common examples of personal information include:

- a person's name;
- bank account details;
- fingerprints; or
- a photograph or video.

It can also include information or an opinion that is recorded (for example on paper or contained in a database) and also information or an opinion that is not recorded (for example verbal conversations). A person's identity may be apparent where neither their name nor a photograph is involved, but the information about the person is such that it could not be referring to anyone else.

There are 13 exclusions to the definition of personal information under the PPIP Act, including:

- information about an individual who has been dead for more than 30 years;
- information about an individual that is contained in a publicly available publication; and
- information or an opinion about an individual's suitability for appointment or employment as a public sector official.

Common examples of information falling within the exclusions include the recruitment records, referee reports and performance appraisals of prospective, current, and past Sydney Opera House employees, as well as information provided in the White Pages, a newspaper or a court judgment available on the internet.

For more information on these exclusions refer to sections 4(3) and 4A of the PPIP Act or contact the Privacy Officer.

### 2.2 What is health information?

Health information means:

- personal information that is also information or an opinion about:
  - a person's physical or mental health or disability;
  - a health service provided, or to be provided, to a person;
  - a person's express wishes about the future provision of health services to themselves;
- other personal information collected to provide, or in providing, a health service;
- other personal information about an individual collected in connection with the donation, or intended donation, of an individual's body parts, organs or body substances; or
- other personal information that is genetic information arising from a health service provided to a person in a form that is or could be predictive of the health of that person or a genetic relative of that person.

There are 15 exclusions to the definition of health information under the HRIP Act, which include the exclusions listed above at section 2.1 of this Plan. An example of information excluded by the HRIP Act is the results of a pre-employment medical check to assess a person's suitability for a job as a [public sector official](#).

For more information on these exclusions, refer to section 5(3) of the HRIP Act or contact the Privacy Officer.

### 2.3 Main kinds of personal and health information held by the Opera House

The Opera House holds a range of personal and health information in a number of locations and in a range of formats. Some examples of the main kinds of personal and health information held by the Opera House about our employees (and contractors) include:

- personal information contained in or related to personnel records, including emergency contact details, date of birth, financial information (including bank account information and tax file numbers), educational qualifications, ethnic background, timesheets, grade and salary range;
- health information contained in or related to personnel records, including medical certificates, fitness for duty assessments, injury management information (such as workplace injuries incident reports, workers compensation claims and payments and return to work plans);
- personal and health information, including complainant details, audio recordings, images and CCTV footage held for the purposes of conducting workplace investigations (which must be conducted in accordance with the *Workplace Surveillance Act 2005*); or
- personal and health information related to audit and risk work, including audit evidence collected during the performance of approved audit programs, fraud and corrupt conduct complaints and conflict of interest disclosures.

Some examples of the main kinds of personal and health information held by the Opera House about our partners, performers, customers and members of the general public include:

- personal and health information related to the purchase of tickets that is collected so that we can deliver tickets to customers, contact customers in the event of performance postponement or cancellation, or when other important information must be provided to customers including, but not limited to, difficulties relating to purchases. This information could include name and personal contact details (including telephone number, postal and email address), financial information (including credit card information), date of birth and Roads and Maritime permit and concession numbers;
- personal information that may be collected when customers join *Sydney Opera House Insiders*, subscribe to our mailing lists, enter competitions, participate in promotional activities, provide feedback or make a donation to the Opera House through any channel;
- photographs and CCTV footage recorded while customers are within the Opera House precinct;
- opinions arising from general enquiries, consultation, feedback and complaints; or
- health information as a result of having provided First Aid on the Opera House premises.

## 3 How the Opera House manages personal and health information

### 3.1 Introduction

The objectives of the PPIP and HRIP Acts are to protect individuals' privacy, to allow them a degree of control over information held about them by public sector agencies and to provide a mechanism for complaints. These objectives are achieved primarily through compliance with 'privacy principles', which establish standards for using personal information in the NSW public sector and regulate the collection, storage, use and disclosure of personal and health information by agencies.

For the purposes of this Plan, the most relevant obligations and how the Opera House complies with these obligations have been condensed into one set of plain language principles below. These principles should not be treated as a substitute for the principles set out in the PPIP and HRIP Acts as they do not cover the full range or complexity of the principles. Staff should always seek guidance from the Privacy Officer in relation to the application of these principles.

### 3.2 Condensed Information Protection Principles and Health Privacy Principles

The references in brackets are to the Information Protection Principles (IPP) in the PPIP Act and the Health Privacy Principles (HPP) in the HRIP Act.

COLLECTION	
Limiting the collection of personal and health information	<p>We will only collect personal and health information if:</p> <ul style="list-style-type: none"> <li>▪ it is for a lawful purpose that is directly related to one of our functions; and</li> <li>▪ it is reasonably necessary for us to have the information.</li> </ul> <p>By limiting our collection of personal and health information to only what we</p>

<i>(s. 8 PPIP Act and HPP 1)</i>	<p>reasonably need, it is much easier to comply with our other privacy obligations. When requesting personal or health information on behalf of the Opera House, staff should only ask for information that is reasonably necessary to the task at hand. We will especially avoid collecting sensitive personal information if we do not need it. See the Definitions in Section 9 of this Plan for an explanation of what constitutes sensitive personal information.</p>
<p>Collecting personal and health information – the source, method and content <i>(ss. 9 &amp; 11 PPIP Act and HPP 2 &amp; 3)</i></p>	<p>We will collect personal or health information directly from the person unless they have authorised otherwise or, in the case of health information, it would be unreasonable or impractical to obtain the information directly from the individual.</p> <p>When collecting information from an individual, we will:</p> <ul style="list-style-type: none"> <li>▪ not collect excessive personal or health information;</li> <li>▪ not collect personal or health information that would unreasonably intrude in that individual's personal affairs; and</li> <li>▪ ensure that personal and health information collected is relevant, accurate, up-to-date and complete.</li> </ul>
<p>Notification on collection <i>(s. 10 PPIP Act and HPP 4)</i></p>	<p>When collecting personal or health information from an individual (or from someone else about that individual), we will take reasonable steps to tell the person:</p> <ul style="list-style-type: none"> <li>▪ that the Opera House is collecting and holding the information, and provide our contact details;</li> <li>▪ the fact that the information is being collected;</li> <li>▪ what it will be used for;</li> <li>▪ what other parties (if any) routinely receive this type of information from us;</li> <li>▪ whether the collection is required by law (and if so, which law) or is voluntary;</li> <li>▪ what the consequences will be for the person if they do not provide the information; and</li> <li>▪ that they have a right to access and/or correct their personal and health information held by us.</li> </ul> <p>Notification is usually provided to individuals through a 'privacy notice' at the initial time of collection or as soon as we can afterwards. Privacy notices can be in writing or verbal. A copy of our Customer Privacy Statement, which serves as our notice, is available on our website at this <a href="#">link</a>. This document is also publicly available on our website.</p>
<b>STORAGE</b>	
<p>Retention and security <i>(s. 12 PPIP Act and HPP 5)</i></p>	<p>We will put in place reasonable security safeguards to protect personal and health information from loss, unauthorised access, use, modification or disclosure, and against all other misuse. We will ensure personal and health information is stored securely, not kept longer than necessary for lawful purposes and disposed of appropriately.</p> <p>Where it is necessary for personal or health information to be transferred to a third party in connection with the provision of a service to us, we will do everything reasonably within our power to prevent unauthorised use and disclosure of that information.</p> <p>Information security is fundamental to information privacy. Our information technology systems are designed to ensure that only authorised users can access them. Access controls are also employed to only give access to information required for the user's particular role and functions. Logs and audit trails will act as a deterrent against any misuse, and enable security breaches or data quality problems to be investigated.</p> <p>We follow best practice in records management for both electronic and paper</p>

	records and apply retention periods and disposal schedules in accordance with the <i>State Records Act 1998</i> . When no longer required, we destroy personal and health information in a secure manner as appropriate.
Transparency (s. 13 PPIP Act and HPP 6)	<p>We will enable anyone to know, on request to the Opera House Privacy Officer:</p> <ul style="list-style-type: none"> <li>▪ whether we hold their personal or health information;</li> <li>▪ the nature of the personal or health information;</li> <li>▪ the main purposes for which we use their personal or health information; and</li> <li>▪ their entitlement to access their personal or health information.</li> </ul> <p>The publication of this Plan promotes accountability and increases the transparency of our information handling practices. This Plan will be accessible on our website and available to download and print. For more information on our privacy practices, staff and members of the public can contact the Opera House Privacy Officer.</p>
Access and alteration (ss. 14 & 15 PPIP Act and HPP 7 & 8)	<p>We will allow people to access their personal and health information without excessive delay or expense.</p> <p>We will allow, and encourage, people to update or amend their personal and health information, to ensure it is accurate, relevant, up-to-date, complete and not misleading.</p> <p>We will only refuse access or a request to amend personal or health information where authorised by law, and we will provide written reasons, if requested.</p> <p>Further information about how to access and amend personal and health information held by the Opera House is provided in section 4.1.</p>
<b>USE</b>	
Accuracy (s. 16 PPIP Act and HPP 9)	<p>Before using personal or health information, we will take reasonable steps to ensure that the information is relevant, accurate, up-to-date, complete, and not misleading.</p> <p>We ensure that information is recorded in a consistent format and attempt to confirm the accuracy of information collected from a third party or a public source where practicable. We will not use personal or health information that we know is based on misleading or erroneous information.</p> <p>We will ensure, as far as possible, that Opera House IT users:</p> <ul style="list-style-type: none"> <li>▪ use public generative AI tools responsibly and ethically.</li> <li>▪ where generative AI-driven decisions are made, able to explain and justify their actions and decisions. Humans must remain the final decision-maker.</li> <li>▪ fact check and verify all outputs before using them for any official purpose.</li> <li>▪ do not use generative AI outputs that are unethical, irresponsible, biased, inaccurate or discriminative.</li> <li>▪ decisions for SOH – humans must remain the final decision-maker.</li> <li>▪ will not use outputs that infringe on copyright or violate intellectual property rights.</li> </ul>
Purpose of use (s. 17 PPIP Act and HPP 10)	<p>We may use personal and health information for:</p> <ul style="list-style-type: none"> <li>▪ the primary purpose for which it was collected;</li> <li>▪ a directly related secondary purpose (where in the case of health information, the individual would reasonably expect us to use the information for that purpose);</li> <li>▪ another purpose permitted by law, such as where it is reasonably necessary to prevent or lessen a serious and imminent threat to life or health; or</li> </ul>



	<ul style="list-style-type: none"> <li>▪ another purpose for which the person has consented.</li> </ul>
<b>DISCLOSURE</b>	
<p>Disclosure (ss. 18 &amp; 19 PPIP Act and HPPs 11 &amp; 14)</p>	<p>We may disclose personal information if:</p> <ul style="list-style-type: none"> <li>▪ the disclosure is directly related to the purpose for which the information was collected, and we have no reason to believe that the individual concerned would object to the disclosure,</li> <li>▪ the individual has been made aware in accordance with a privacy notice under section 10 of the PPIP Act that information of the kind in question is usually disclosed to the intended recipient, or</li> <li>▪ we reasonably believe that the disclosure is necessary to prevent or lessen a serious and imminent threat to life or health.</li> </ul> <p>Higher protections are afforded to certain sensitive personal information, as defined in Section 9 of this Plan. We can generally only disclose sensitive personal information when the person has consented to the disclosure or when it is necessary to prevent a serious and imminent threat to life or health.</p> <p>We may disclose health information if:</p> <ul style="list-style-type: none"> <li>▪ the person has consented to the disclosure;</li> <li>▪ the disclosure is directly related to the purpose for which it was collected and the individual would reasonably expect us to disclose the information for that purpose; or</li> <li>▪ the disclosure is permitted by law, such as where it is reasonably necessary to prevent or lessen a serious and imminent threat to life, health or safety.</li> </ul> <p>We will not transfer personal or health information outside of NSW or to a Commonwealth agency except in limited circumstances permitted by law.</p> <p>When using public generative AI tools, the Opera House will:</p> <ul style="list-style-type: none"> <li>• Not disclose or input any personal or health information to public generative AI tools.</li> <li>• Comply with all applicable legislative requirements and laws including the <i>Personal Information Protection Act 1998</i> and <i>Health Records and Information Privacy Act 2002</i>.</li> </ul>

### 3.3 Exemptions from compliance with IPPs and HPPs

The PPIP Act and HRIP Act provide that we do not need to comply with some or all of the IPPs or HPPs if certain circumstances apply. Some examples of exemptions most relevant to our functions and operations include:

- where the receipt of health information is unsolicited;
- where another law authorises or requires us not to comply with the principles;
- where another law permits non-compliance with certain principles.
- where disclosure of information is reasonably necessary for the protection of public revenue, or in order to investigate an offence where there are reasonable grounds to believe that an offence may have been committed; and
- when we exchange personal information with other public sector agencies for certain purposes such as responding to correspondence from a Minister or the Premier.

## 4 How to access and amend personal and health information

### 4.1 Request to access and amend

You may request access to and/or alteration of your personal or health information by email or post. All requests should be sent to:

**Post:** Privacy Officer  
Sydney Opera House  
Bennelong Point  
SYDNEY NSW 2000

**Email:** [privacy@sydneyoperahouse.com](mailto:privacy@sydneyoperahouse.com)

Your request should:

- include your name and contact details (postal address, telephone number and email address if applicable);
- state whether you are making the application under the PPIP Act (personal information) or the HRIP Act (health information);
- explain what personal or health information you want to access or amend; and
- explain how you want to access or amend it.

If staff want to access and/or amend their personnel file, a request may be made to Human Resources. Staff may inspect their files under supervision after obtaining approval from their Director.

## 5 Privacy complaints and internal reviews

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A person who wishes to make a complaint in relation to privacy may do any of the following:

- make an informal complaint by contacting the Opera House Privacy Officer;
- make a complaint with the Privacy Commissioner; or
- make a formal complaint with the Opera House by applying for an internal review.

### 5.1 How to make an informal complaint

We encourage people to try to resolve privacy concerns with us informally by simply contacting the Opera House Privacy Officer to discuss the issue, before lodging an application for internal review.

### 5.2 How to make a complaint with the Privacy Commissioner

You may make a privacy complaint directly to the Privacy Commissioner if you believe that the Opera House has breached an Information Protection Principle (**IPP**) in the PPIP Act or a Health Privacy Principle (**HPP**) in the HRIP Act.

For more information on how the Privacy Commissioner handles privacy complaints received from members of the public, please refer to the Information & Privacy Commission's [Protocol for Handling Privacy Complaints](#). Complaints directed to the Privacy Commissioner can only result in conciliated outcomes, whereas internal reviews (which are explained below) can lead to a binding determination by the NSW Civil and Administrative Tribunal (the **Tribunal**).

The Privacy Commissioner can be contacted as follows:

**Office:** Information & Privacy Commission Level 11, 1 Castlereagh Street Sydney NSW 2000  
**Post:** GPO Box 7011 Sydney NSW 2001  
**Phone:** 1800 472 679  
**Fax:** 02 8114 3756  
**Email:** [ipcinfo@ipc.nsw.gov.au](mailto:ipcinfo@ipc.nsw.gov.au)

### 5.3 How to apply for an internal review by the Opera House

A person who is aggrieved by the conduct of the Opera House in relation to personal or health information is entitled to an internal review of that conduct by the Opera House. An internal review is the process by which we manage formal, written privacy complaints.

An application for internal review must:

- be in writing;
- be addressed to the Opera House and sent by email or post;
- specify an address in Australia to which the applicant is to be notified after the completion of the review; and

- be lodged with the Opera House within **six months** from the time the applicant first became aware of the conduct that they want reviewed.

The Opera House may, on a case by case basis, accept applications for internal review where the six month time limit has been exceeded. Reasons for lateness should be clearly set out in the written application.

An application for internal review can be made on behalf of someone else. Where the applicant is not literate in English (for example, because it is not their first language), and where there is no other organisation making the application on their behalf, staff should help the person to write their application. Staff should use a professional interpreter, if necessary. Applications in languages other than English will be accepted and translated, and all acknowledgments and correspondence to the applicant will be translated.

Applications for internal review or any written complaint about privacy received by staff should be forwarded to the Opera House Privacy Officer.

#### 5.4 Internal review process

When we receive an internal review application the Opera House Privacy Officer will:

- send an acknowledgment letter to the applicant within five working days and advise that if the internal review is not completed within **60 days** they have a right to seek a review of the conduct by the Tribunal; and
- as soon as practicable, send a letter to the Privacy Commissioner with details of the application. The Opera House will keep the Privacy Commissioner informed of the progress of the internal review.

Internal review follows the process set out in the Information & Privacy Commission's *Internal Review Checklist* which is attached at **Appendix A**.

If the complaint is about an alleged breach of the IPPs, HPPs, privacy code of practice or health privacy code of practice, the internal review will be conducted by the Opera House Privacy Officer or by another person who:

- was not involved in the conduct which is the subject of the complaint;
- is an employee or an officer of the Opera House; and
- is qualified to deal with the subject matter of the complaint.

When the internal review is completed, as soon as reasonably practicable and within **14 calendar days** the Opera House Privacy Officer will notify the applicant in writing of:

- the findings of the review;
- the reasons for those findings;
- the action the Opera House proposes to take;
- the reasons for the proposed action (or no action); and
- the applicant's entitlement to have the findings and the proposed action reviewed by the Tribunal.

We will also send a copy of that letter to the Privacy Commissioner.

#### 5.5 External review by the NSW Civil and Administrative Tribunal

Individuals can seek an external review if they are not satisfied with the outcome of an internal review we have conducted or with the Opera House's action in relation to the individual's application for internal review. Individuals can also seek an external review if they do not receive an outcome of the review within **60 days**.

To seek an external review, a person must apply to the Tribunal. Generally a person must seek an internal review before they have a right to seek an external review.

The Tribunal has the power to make binding decisions, and may make orders requiring us to (among other things):

- refrain from any conduct or action which breaches an IPP, HPP, privacy code of practice or health privacy code of practice;

- perform in compliance with an IPP, HPP, privacy code of practice or health privacy code of practice;
- correct information disclosed by the Opera House; or
- take steps to remedy loss or damage.

The Tribunal may also make an order requiring us to pay damages of up to \$40,000 if the applicant has suffered financial loss, or psychological or physical harm because of the conduct of the Opera House.

For more information about seeking an external review including current forms and fees, please contact the Tribunal:

**Office:** NSW Civil and Administrative Tribunal (NCAT)  
Level 10, John Maddison Tower 86-90 Goulburn Street  
SYDNEY NSW 2000  
**Phone:** 1300 006 228 or 02 9377 5859 (TTY)  
**Website:** [www.ncat.nsw.gov.au](http://www.ncat.nsw.gov.au)

## 6 Strategies for implementing this Plan

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Policies and procedures, including this Plan, are communicated to staff in a range of ways, including through the Opera House intranet, printed copies and training. All new staff are required to complete an online module on the Code of Conduct and an induction course before starting with the Opera House. The Code of Conduct specifically refers to the importance of protecting privacy and complying with the PPIP Act and the HRIP Act.

All policies and procedures are sourced, numbered, dated and owned by a specific management position, and are systematically reviewed and updated when necessary.

Any new policy or procedure, or any policy that is changed or updated, is developed and reviewed in consultation with relevant business areas and receives the endorsement of senior management, including the General Counsel and Chief Executive Officer.

The Opera House advises members of the public about its privacy obligations and the public's privacy rights through the publication of this Plan on the Opera House website and by providing/making available the Opera House's *Customer Privacy Statement*.

## 7 Privacy and other legislation relating to personal and health information

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### 7.1 Links to relevant Privacy legislation

- [Privacy and Personal Information Protection Act 1998](#);
- [Health Records and Information Privacy Act 2002](#);
- [Privacy and Personal Information Protection Regulation 2014](#);
- [Health Records and Information Privacy Regulation 2012](#).

### 7.2 Other legislation

Other legislation that may also affect the application of the privacy principles to the Opera House includes, but is not limited to, the following:

- *Government Information (Public Access) Act 2009*;
- *State Records Act 1998*;
- *Workplace Surveillance Act 2005*;
- *Surveillance Devices Act 2007*;
- *Ombudsman Act 1974*; and
- *Public Interest Disclosures Act 1994*.

Copies of this legislation can be found on the [NSW Legislation](#) website.

## **8 Related Opera House policies**

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*Closed Circuit Television Policy*

*Code of Conduct*

*Information Systems and Security Policy*

*Records Management Policy*

## 9 Definitions

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**Collection** refers to the way in which the Opera House acquires or gathers personal or health information. Collection can be by any means, including a written or online form, a verbal conversation, a voice recording or taking a picture or image.

**Disclosure** means when the Opera House makes known to an individual or body, personal or health information that the individual or body did not previously know.

**Generative artificial intelligence (AI)** is a subset of AI that generates novel content such as text, images, audio and code in response to prompts. Generative AI technologies use large language models (LLMs) that specialise in the generation of human-like text.

Health information is a subset of personal information. Health information relates to the physical or mental health or disability of an individual or information provided or generated in the delivery of a health service. See section 6 of the HRIP Act for the full definition.

**Holding personal and health information:** information is held by the Opera House if it is in possession or control of the information, including when the information is in the possession or control of a person employed or engaged by the Opera House in the course of such employment or engagement. This means that the Opera House will be considered to hold personal or health information if it is processed by a contractor or service provider on behalf of the Opera House and will remain responsible for how the Opera House contractors or service providers handle such information in accordance with the privacy principles.

**Information & Privacy Commission** is an independent NSW Government agency with responsibilities to promote privacy rights for the people of NSW. The Commission is headed by the Information Commissioner and the Privacy Commissioner. See [www.ipc.nsw.gov.au](http://www.ipc.nsw.gov.au) for more details.

**Personal information** is information or an opinion that identifies or could reasonably identify an individual. See section 4 of the PPIP Act for the full definition.

**Privacy principles** refer to the Information Protection Principles set out in Division 1 of Part 2 of the PPIP Act and the Health Privacy Principles set out in Schedule 1 of the HRIP Act. The privacy principles set out the baseline standards for all NSW public sector agencies when handling personal or health information.

**Public sector official** is generally a person who is employed by or acts for or on behalf of a public sector agency, or employed in the Government Service. See section 3(1) of the PPIP Act and section 4(1) of the HRIP Act for the full definition.

**Sensitive personal information** refers to personal information about an individual's race, ethnicity, religion, sexual activities, political or philosophical beliefs or membership of a trade union.

**Staff** means all permanent and temporary staff, staff seconded from another organisation, contractors and consultants.

**Unsolicited information** refers to personal or health information that the Opera House finds itself receiving without having asked for it.

# **Appendix A – IPC Internal Review Checklist**

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Please refer to [this link](#) for the IPC Privacy internal review for agencies.