Privacy Policy – Prisoners' Legal Service Inc.

Last updated: 13/10/2026

Prisoners' Legal Service Inc. (ABN 15 677 129 750) (**PLS**, **we**, **us** and **our**) respects your privacy and is committed to protecting it. We comply with the Australian Privacy Principles and the *Privacy Act 1988* (Cth) (**Privacy Act**), which govern the way we collect, use, keep secure and disclose Personal Information or Personal Data.

The Privacy Act defines "Personal Information" to mean any information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent or can be reasonably ascertained, from the information or an opinion.

If you have any concerns or complaints about the manner in which your Personal Information and Personal Data has been collected, used or disclosed by us, please contact us via the information set out in **Section 9** and will resolve your concern or answer your question.

We recommend that you keep this information for future reference.

Please note our website may contain links or references to other websites to which this privacy policy does not apply. You should review the privacy policy of each of those websites and assess whether those policies are acceptable to you before using those websites.

1. The kinds of Personal Information collected, used and disclosed by PLS

We will only use or disclose your Personal Information for the primary purposes for which it was collected or as consented to by you.

At or around the time we collect Personal Information from you, we will endeavour to provide you with a notice which details how we will use and disclose that specific information.

We set out some common collection, use and disclosure instances in the table below.

Purpose	Type of Information	Uses	Disclosures
Online, written and telephone enquiries	• **Contact information:** Such as your name, email address, postal and residential addresses, phone numbers, country of residence; • **Additional information:** other additional information you provide as part of your enquiry.	The types of uses we will make of Personal Information collected for this type of purpose include: • responding to your enquiry and recording your enquiry in our internal database; • analysis and evaluation of PLS services; • legal research, advocacy and law reform purposes; • if your enquiry leads to us providing legal assistance, the Uses listed in the "*Provision of legal services*" row.	The types of disclosures we will make of Personal Information collected for the type of purposes listed include, without limitation, to: • third party service providers (including IT service providers and consultants) who assist PLS in providing our services; • law firms, barristers, legal centres or community organisations who assist PLS in providing our services or performing our legal research, advocacy and law reform activities; • if your enquiry leads to you receiving legal services, the parties listed in the Disclosures column for "*Provision of legal services*"; • As required or authorised by law.
Provision of legal services	• **Contact information:** Such as your name, e-mail address, current postal and residential address (including correctional centre), phone numbers, country of residence; • **Identifying information:** Such as your prison identification number, prison identification card, photo, date of birth, passport and residency details, drivers' licence or 18+ card details, Medicare card details, Centrelink Health Care Concession card details, ImmiCard details; • **Eligibility factors:** Such as whether you identify as Aboriginal and/or Torres Strait Islander, whether you have a mental health condition or disability, whether English is your first language, whether you need an interpreter, your literacy and level of education, details of your legal matter; • **Medical or health information:** Which you can voluntarily provide to us or obtained from third parties if required in provision of legal advice and our services to you. This can include health issues or disabilities; • **Racial or ethnic background, political or religious beliefs:** If required in the provision of legal advice or our services to you, for example identification as either Aboriginal or Torres Strait Islander; • **Domestic violence information:** for example, whether there is a relevant domestic violence order in place; • Information on your criminal history; • Other information that can be relevant to your legal matter, including parole records, prison records , Integrated Offender Management System (IOMS) details; • Other information you provide to us during the course of providing assistance.	The types of uses we will make of Personal Information collected for this type of purpose include: • **Eligibility assessment:** to assess and provide advice regarding your eligibility to receive assistance from PLS; • **Identity verification**: the verification of your identity in order to provide assistance; • **Services**: if you are eligible, the provision of our services to you including: - Using your Personal Information and Personal Data in order for us to provide legal assistance directly or by referral to other services; - To provide customer service functions, including handling customer enquiries and complaints; • **Research, advocacy and law reform activities:** to use your Personal Information and Personal Data for research, advocacy and law reform purposes; • **Publication:** to use your de-identified information in case studies, our annual report and law reform submissions; • **Analysis and evaluation:** to use your Personal Information and Personal Data to analyse and evaluate PLS services.	The types of disclosures we will make of Personal Information and collected for the type of purposes listed include, without limitation, to: • third party service providers (including IT service providers and consultants) who assist PLS in providing our services; • law firms, barristers, legal centres or community organisations (such as Legal Aid Queensland) who assist PLS in providing our services or performing our legal research, advocacy and law reform activities; • Government entities who provide funding for PLS are permitted access to PLS's internal database for the purposes of monitoring PLS's performance; • Other Community Legal Centre's in Queensland are able to audit our records from time to time for the purpose of ensuring compliance with the National Accreditation Scheme for Community Legal Centres. • As required or authorised by law.

Purpose	Type of Information	Uses	Disclosures
Human resources	• **Contact information**: Such name, e-mail address, current postal and residential address, phone numbers, country of residence, next of kin contact details; • **Employee record information**; • **Identifying information**: Such as your photo, passport and residency details, date of birth; • **CV, resume or application related information**: Such as the details provided in your resume or CV, your eligibility to work in Australia, your education, previous employment details, professional memberships (including, without limitation, any frequent flyer memberships), trade qualifications, history of driving or other offences; • **Tax, superannuation and payroll information**: Such as your Tax File Number and ATO Declaration, Superannuation details and financial institution details; • **Background check information**: Information obtained from you or third parties to perform background checks; • **Medical or health information** which you voluntarily provide to us or such other information which can be related to an incident which has occurred during the course of your employment; • **Performance related information**: Including information and metrics collected by PLS's systems in the course of the employee or contractor's engagement with PLS; • **Information collected from referees** • **Photo and video footage:** Such as professional photos, or attendance at events; • **Security information**: Such as CCTV footage and photographs taken on our premises.	• **Background checks:** Utilising the information collected for the purpose of assessing candidate suitability for role, including by obtaining: - Verification of your identity and age; - Publicly available information including Facebook, X (formerly Twitter), Instagram, YouTube; - Confirmation of eligibility to work in Australia; - Confirmation of education and qualifications; - Confirmation of previous employment; - Consideration regarding medical leave; • **Administration and performance monitoring use:** Utilising the information collected for the purpose of; - Dealings related to the employer/employee relationship, volunteer relationship or the contractor/principal relationship (as the case may be); - Use of such information whether or not the employment, volunteer or contractor relationship is prospective, current or past; - Use of such information to monitor systems, performance and time usage and internet usage; The use of your Personal Information collected in the administration and management of PLS.	We are permitted to disclose your Personal Information to: • Your Superannuation company; • Government agencies, including but not limited to The Australian Taxation Office, Centrelink and Child Support Agency; • Relevant Workers' Compensation organisation (e.g. WorkCover etc); • Third party referees provided by you in connection with an application made to PLS; • Service providers (including IT service providers and payroll providers), if any; • Recruitment agents used in connection with your application with us; • Third parties in connection with obtaining any background checks, pre-employment screening; • Financial institutions for payroll purposes; • As required or authorised by law.
Donations and fundraising	• **Contact information:** Such as your name, Company's name, address, email address, phone numbers, fax number; • **Payment information:** Billing and account details, payment card details; • Any other information you elect to provide as a part of your donation.	The types of uses we will make of Personal Information collected for this type of purpose include: • processing your donation; • to communicate with you regarding future donations and fundraising opportunities.	The types of disclosures we will make of Personal Information collected for the type of purposes listed include, without limitation, to: • Third parties connected with the payment process including ecommerce, payment gateway providers and financial institutions; • Service providers (including IT service providers and consultants) who assist PLS in providing our services; • **As required or authorised by law.**

2. How PLS collects and holds Personal Information

2.1 Collection generally

As much as possible or unless provided otherwise in this Privacy Policy or a notification, we will collect your Personal Information directly from you. However, we note that in many instances, relatives and acquaintances provide PLS with your Personal Information on your behalf. In those instances, we will endeavour to confirm the Personal Information provided on your behalf, with you, to ensure that it is up to date, accurate and complete.

When you engage in certain activities, such as filling out a survey or sending us feedback, we can ask you to provide certain information. It is completely optional for you to engage in these activities.

Depending upon the reason for requiring the information, some of the information we ask you to provide can be identified as mandatory or voluntary. If you do not provide the mandatory information or any other information we require in order for us to provide our services to you, we may be unable to provide our services to you in an effective manner, or at all.

2.2 Other collection types

We can collect Personal Information about you from other sources and third parties. Some examples of these alternative collection events are:

(a) when we collect Personal Information about you from third parties, for example from family members or relatives who contact us on your behalf, Queensland Corrective Services, the Parole Board Queensland, the Commonwealth Parole Board, other community legal centres, support workers, court staff and judges;

(b) when we collect Personal Information about you from publicly available sources including but not limited to, court judgments, directorship and bankruptcy searches, Australia Post, White Pages directory, and social media platforms (such as Facebook, X (formerly known as Twitter), Google, Instagram etc).

2.3 Notification of collection

If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and why, unless special circumstances apply, including as described in this **Section** 2.3(a) to 2.3(e) below. Generally speaking, we will not tell you when we collect Personal Information about you in the following circumstances:

(a) where you have provided your written authorisation for us to collect your information from someone else (e.g. a support worker);

(b) where information is collected from any personal referee you have listed on any application form (including any employment application) with PLS;

(c) where information is collected from a recruiter engaged by PLS to assist with finding potential new volunteers or employees;

(d) where information is collected from publicly available sources including but not limited to, *Freedom of Information Act 1982* (Cth) searches, court judgments,

directorship and bankruptcy searches, social media platforms (such as Facebook, Twitter, Google, Instagram etc); or

(e) as otherwise required or authorised by law.

2.4 **Unsolicited Personal Information**

In the event we collect Personal Information from you, or a third party, in circumstances where we have not requested or solicited that information (known as unsolicited information), and it is determined by PLS (in its absolute discretion) that the Personal Information is not required, we will destroy the information or ensure that the information is de-identified.

In the event that the unsolicited Personal Information collected is in relation to potential future employment with PLS, such as your CV, resume or candidacy related information, and it is determined by PLS (in its absolute discretion) that it may consider you for potential future employment, PLS can keep the Personal Information on its human resource records.

2.5 **How we hold your Personal Information**

Once we collect your Personal Information, we will either hold it securely and store it on infrastructure owned or controlled by us or with a third party service provider who have taken reasonable steps to ensure they comply with the Privacy Act. We provide some more general information on our security measures in **Section 7** (**Data security and quality**).

2.6 **Cookies and IP addresses**

If you use our website, we are permitted to utilise 'cookies' which enable us to monitor traffic patterns, trends and to serve you more efficiently if you revisit our website. In most cases, a cookie does not identify you personally but can identify your internet service provider or computer.

We can gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

However, in some cases, cookies can enable us to aggregate certain information with other Personal Information we collect and hold about you. PLS extends the same privacy protection to your Personal Information, whether gathered via cookies or from other sources, as detailed in this Privacy Policy.

You can set your browser to notify you when you receive a cookie, and this will provide you with an opportunity to either accept or reject it in each instance. However, difficulties can arise when accessing certain areas of our website, and the enhanced browsing experience that cookies provide will not be available.

3. Uses and disclosures of Personal Information

3.1 **Use and disclose details**

We provide a detailed list at **Section 1** of some common uses and disclosures we make regarding the Personal Information we collect.

3.2 **Other uses and disclosures**

We are permitted to use or disclose your Personal Information and in doing so we are not required to seek your additional consent:

(a) when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your Personal Information to be used or disclosed for such a purpose;

(b) if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;

(c) if we have reason to suspect that unlawful activity has been, or is being, engaged in; or

(d) if it is required or authorised by law.

3.3 Use and disclosure procedures

In the event we propose to use or disclose such Personal Information other than for reasons set out in the above table at **Section 1** or as otherwise outlined in this Privacy Policy, we will first notify you or seek your consent prior to such disclosure or use.

Your Personal Information is disclosed to these organisations or parties only in relation to the services we provide to you or for a purpose permitted by this Privacy Policy.

We take such steps as are reasonable to ensure that these organisations or parties are aware of the provisions of this Privacy Policy in relation to your Personal Information.

3.4 Communications opt-out

If you have received communications from us and you no longer wish to receive those sorts of communications, you should contact us via the details set out in **Section 9** of this document and we will ensure the relevant communication ceases. Any other use or disclosure we make of your Personal Information will only be as required or authorised by law or as permitted by this Privacy Policy or otherwise with your consent.

4. Sensitive information

4.1 Sensitive information generally

Sensitive information is a subset of Personal Information. It means information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

4.2 Collection and use of sensitive information

In general, we attempt to limit the collection of sensitive information we can collect from you, but this is not always possible. We are permitted to collect sensitive information from you in order to carry out the services provided to you. However, we do not collect sensitive information from you without your consent.

The type of sensitive information we can collect about you is dependent on the services provided to you by PLS and will be limited to the purpose(s) for which it is collected. We set out some types of sensitive information we can collect about you in the "*Online and telephone enquiries, Provision of legal services and Human resources*" section of the table at **Section 1** above.

4.3 Consent

We are permitted to collect other types of sensitive information where you have consented and agree to the collection of such information. Generally speaking, we will obtain this type of consent from you at (or around) the point in time in which we collect the information.

5. Anonymity and pseudo-anonymity

Due to the nature of the services PLS provides to you, it is impractical (and in some cases, impossible) for us to deal with you on an anonymous basis or through use of a pseudonym.

6. Cross Border Disclosure

6.1 Cross border disclosures

Any Personal Information collected and held by PLS can be disclosed to, and held at, a destination outside Australia, including but not limited to the United States, where we utilise third party service providers to assist PLS with providing our goods and services to you. Personal Information can also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies.

As we use service providers and platforms which can be accessed from various countries via an Internet connection, it is not always practicable to know where your information is held. If your information is stored in this way, disclosures can occur in countries other than those listed above.

In addition, we can utilise overseas IT services (including software, platforms and infrastructure), such as data storage facilities or other IT infrastructure. In such cases, we can own or control such overseas infrastructure or have entered into contractual arrangements with third party service providers to assist PLS with providing our services to you.

6.2 Provision of informed consent

By submitting your Personal Information to PLS, you expressly agree and consent to the disclosure, transfer, storage or processing of your Personal Information outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to Personal Information. However, we will take steps to ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

The Privacy Act requires us to take such steps as are reasonable in the circumstances to ensure that any recipients of your Personal Information outside of Australia do not breach the privacy principles contained within the Privacy Act. By providing your consent, under the Privacy Act, we are not required to take such steps as may be reasonable in the circumstances. However, despite this, we acknowledge the importance of protecting Personal Information and have taken reasonable steps to

ensure that your information is used by third parties securely and in accordance with the terms of this Privacy Policy.

6.3 If you do not consent

If you do not agree to the disclosure of your Personal Information outside Australia by PLS, you should (after being informed of the cross border disclosure) tell PLS that you do not consent. To do this, please contact us via the details set out in **Section 9** of this document.

7. Data security and quality

7.1 PLS's security generally

We have taken steps to help secure and protect your Personal Information from unauthorised access, use, disclosure, alteration, or destruction. You will appreciate, however, that we cannot guarantee the security of all transmissions or Personal Information, especially where the Internet is involved.

Notwithstanding the above, we will take reasonable steps to:

(a) ensure that the Personal Information we collect, use or disclose is accurate, complete and up to date;

(b) protect your Personal Information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and

(c) destroy or permanently de-identify Personal Information if it is no longer needed for its purpose of collection.

7.2 Accuracy

The accuracy of Personal Information depends largely on the information you provide to us, so we recommend that you:

(a) let us know if there are any errors in your Personal Information; and

(b) keep us up-to-date with changes to your Personal Information (such as your name or address).

We provide information about how you can access and correct your information in **Section 8.**

8. Access to and correction of your Personal Information

You are entitled to have access to any Personal Information relating to you which we hold, except in some exceptional circumstances provided by law (including the Privacy Act). You are also entitled to edit and correct such information if the information is inaccurate, out of date, incomplete, irrelevant or misleading.

If you would like access to or correct any records of Personal Information we have about you, you are able to access and update that information (subject to the above) by contacting us via the details set out in **Section 9** of this document.

9. Resolving Privacy Complaints

9.1 Complaints generally

We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.

9.2 Contacting PLS regarding complaints

If you have any concerns or complaints about the manner in which we have collected, used or disclosed and stored your Personal Information, please contact us:

Telephone: (07) 3846 5074

Email: pls@plsqld.com

Address: GPO Box 257 BRISBANE QLD 4001 AUSTRALIA

9.3 Steps we take to resolve a complaint

In order to resolve a complaint, we:

(a) will liaise with you to identify and define the nature and cause of the complaint;

(b) can request that you provide the details of the complaint in writing;

(c) will keep you informed of the likely time within which we will respond to your complaint; and

(d) will inform you of the legislative basis (if any) of our decision in resolving such complaint.

10. Consent, modifications and updates

10.1 Interaction of this Policy with contracts

This Privacy Policy is a compliance document prescribed by law rather than a legal contract between two or more persons. However, certain contracts can incorporate all, or part, of this Privacy Policy into the terms of that contract. In such instances, PLS can incorporate the terms of this policy such that:

(a) certain sections or paragraphs in this policy are incorporated into that contract, but in such a way that they do not give rise to contractual obligations onto PLS, but do create contractual obligations on the other party to the contract; and

(b) the consents provided in this policy become contractual terms provided by the other party to the contract.

10.2 Acknowledgement

By using our website or engaging with a service from PLS, where you have been provided with a copy of our Privacy Policy or had a copy of our Privacy Policy reasonably available to you, you are acknowledging and agreeing:

(a) to provide the consents given by you in this Privacy Policy; and

(b) that you have been informed of all of the matters in this Privacy Policy.

10.3 **Modifications and updates**

We reserve the right to modify our Privacy Policy as our business needs require. We will take reasonable steps to notify you of such changes (whether by direct communication or by posting a notice on our website). If you do not agree to our continued use of your Personal Information and Personal Data due to the changes in our Privacy Policy, please cease providing us with your Personal Information and Personal Data and contact us via the details set out in **Section 9** of this document.

Frequency of approving this policy

Frequency	Person Responsible	Approval
Every three years	Director	Management Committee

DOCUMENTATION

Documents related to this policy

Related policies	• Access to relevant documents • Information technology • Record management • Use of artificial Intelligence • Access to confidential information • Client Records • Personnel and employment record • Privacy Notice