

Podsquad

Privacy Impact Assessment Report

1 October 2025

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Document information

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Endorsement and approval

Project manager:

I **recommend** the project proceeds as proposed in this document.

Name:	Joanna Munro		
Position:	Director – Prevention Systems		
Signature		Date:	3 October 2025

The following officer/s have **endorsed** this document:

Name:	Jennifer Kenny		
Position:	Director – Business and Governance		
Signature		Date:	7/10/2025

Project Executive/Steering Committee/senior management:

I **agree** to the project proceeding as proposed in this document.


Name:	Robyn Littlewood		
Position:	Chief Executive Officer		
Signature		Date:	21/10/2025
Comments:			

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1 Introduction

1.1 Purpose

This Privacy Impact Assessment (PIA) Report:

- identifies possible impacts on the privacy of individuals' personal information; and
- recommends options for mitigating or minimising any negative impacts.

1.2 Applicable legislation

This PIA analyses the privacy impacts of collecting, storing, using and disclosing personal information for the purposes of Podsquad against the privacy principles set out in the *Information Privacy Act 2009* (Qld) (IP Act).

1.3 Project description

The project aims to strengthen, enhance and promote Podsquad – a free, play-based wellbeing program that supports children and families as they build healthy habits together. The Podsquad app provides a universally available program targeting child obesity and chronic disease prevention.

The *Making Healthy Happen Strategy 2023–2032* and *Action Plan 2024-2026* delivers a comprehensive plan to address obesity and ease the burden on the state's health system. Podsquad delivers against the *Action Plan 2024-2026* under:

- Ambition 2: Empower people to stay healthy
 - Priority 4: Empower children, young people, families and adults to support healthy behaviours
 - Action 4.4, Strengthen, enhance and promote Podsquad, a play-based wellbeing program to support children and families build healthy eating, physical activity and sleep habits together.

Podsquad also contributes to priorities under Ambition 3: Enable access to prevention, early intervention and supportive healthcare.

Podsquad benefits the community by providing families with a trusted source of health information, delivered in a way that is engaging for children and practical for parents. Foundational research and co-design activities determined the features and priorities of Queensland families, and family input has guided decision making at every step in Podsquad's development. Podsquad also benefits Queensland's health professionals by providing an evidence-informed, universally available referral and waitlist option for families in their care. A broad range of health professionals have been consulted throughout the development of the program.

1.4 Scope of the PIA

The PIA covers the Podsquad app for Apple and Android devices as at the time of reporting (Apple version 1.5.0; Android version 1.5.0).

1.5 Review

The PIA will be reviewed every 12 months or if significant changes are made to the program, particularly with regards to the capture, storage, or use of personal information.

2 Personal information flows

This section explains how personal information will flow through the agency's systems and processes as a result of the output or deliverable to be produced by the project. It describes:

- what personal information will be collected and how it will be used and disclosed
- who will have access to it; and
- how it will be stored and protected.

Business process/activity	Components of personal information	Collection	Storage	Use	Disclosure
A parent/carer creates an account on the app	<ul style="list-style-type: none"> • Parent/carer's first name • Parent/carer's email address • Parent/carer's postcode • Child's first name • Child's date of birth • Child's Indigenous status (optional) • Parent/carer responses to an onboarding questionnaire about their child, comprising 11 questions or statements regarding current diet, physical activity and sleep behaviours, which informs the recommended goals for the child (optional) • Parent/carer responses to a one-and/or three-month check-in questionnaire based on the onboarding 	Collected from parents/carers through the app, which is managed by The Khemists Pty Ltd (The Khemists) on behalf of HWQld.	Stored on Amazon Web Services (AWS), AP-Southeast- 2 Region, Sydney, Australia. The technology solution, including all transfer of information, is managed by The Khemists on behalf of HWQld. Information remains stored unless the user deletes their account or if their account is inactive for <1 year, at which time the system automatically de-identifies their account and data is kept for research and evaluation purposes only.	<p>Used by The Khemists on behalf of HWQld to:</p> <ul style="list-style-type: none"> • Create a secure family account • Deliver a personalised experience in the app, which is central to the app's intention to support family-based behaviour change in alignment with the family's goals • Deliver a personalised experience through email updates (core component of the program's design) • Deliver push notifications (only if the parent/carer 'opts in' for this feature) to remind you of game progress and current quest completion. <p>De-identified information is used by HWQld for reporting, program evaluation, and quality improvement.</p>	<p>Not disclosed.</p> <p>HWQld will not share the users' name or contact details with anyone without their consent. Unless otherwise stated in these conditions of use, no attempt will be made to identify users or users' activities.</p>

	<p>questionnaire (optional)</p> <ul style="list-style-type: none"> • Child's self-reported progress on goals (optional). 				
<p>A parent/carer provides feedback through the feedback form on the app</p>	<ul style="list-style-type: none"> • Parent/carer's email address • Parent/carer's mobile phone number (optional) • Feedback message (free text) 	<p>Collected from parents/carers through the app, which is managed by The Khemists on behalf of HWQId.</p>	<p>Information collected by the mobile app is sent via an encrypted connection to the API/backend where it is stored. The information is then sent via email using the secure AWS servers to HWQId at the address podsqquad@hw.qld.gov.au. HWQId emails are stored in accordance with HWQLD POL-014.</p>	<p>Used by HWQId to:</p> <ul style="list-style-type: none"> • Receive feedback • Provide a response to the parent/carer if requested. 	<p>Not disclosed.</p> <p>HWQId will not share the users' name or contact details with anyone without their consent. Unless otherwise stated in these conditions of use, no attempt will be made to identify users or users' activities.</p>
<p>A parent/carer sends an email to podsqquad@hw.qld.gov.au</p>	<ul style="list-style-type: none"> • Parent/carer's email address • Email message (free text) 	<p>Received from parents/carers to HWQId as an email.</p>	<p>HWQId emails are stored in accordance with HWQLD POL-014.</p>	<p>Used by HWQId to:</p> <ul style="list-style-type: none"> • Receive feedback • Provide a response to the parent/carer if requested. 	<p>Not disclosed.</p> <p>HWQId will not use users' personal information to compile a mailing list or for marketing purposes. HWQId will not disclose these details to third parties without users' consent.</p>

Access to the information

The Khemists is a bound service provider and must comply with the Privacy Principles of the *Information Privacy Act 2009* as per Clause 15 of the Comprehensive Contract Conditions – ICT Products and Services.

The Khemists' staff manage the Podsquad database and technology stack (see Figure 1) on behalf of HWQId. Access to information is with a 'need-to-know' requirement. Limited members of the development team at The Khemists will have access to the database files; these staff have the requisite permissions and safeguards (e.g. two-factor authentication) in place. Vendor confidentiality agreements are also in place. Unencrypted database files, which are required for the functioning of the program, are protected with multiple layers of security.

HWQId will request from The Khemists a copy of the program's source code and de-identified data files with each significant app release milestone or quarterly at a minimum. Limited members of HWQId will have access to this information for the purpose of keeping a secure record on Content Manager and for program monitoring and evaluation purposes via PowerBI.

Information storage and protection

The data will be stored within a secure, password protected and encrypted database on a server with Amazon Web Services (AWS), AP-Southeast- 2 Region, Sydney, Australia. Data will also be encrypted as it is sent from the individual's device to the API/database, and backup files will also be encrypted.

A secure record of program source code will be kept at HWQId on Content Manager. Access will be limited through access control groups with a 'need-to-know' requirement, with groups audited on a monthly basis. A secure record of de-identified data will be stored at HWQId on SharePoint, and PowerBI will be used to interpret de-identified data for program monitoring and evaluation purposes.

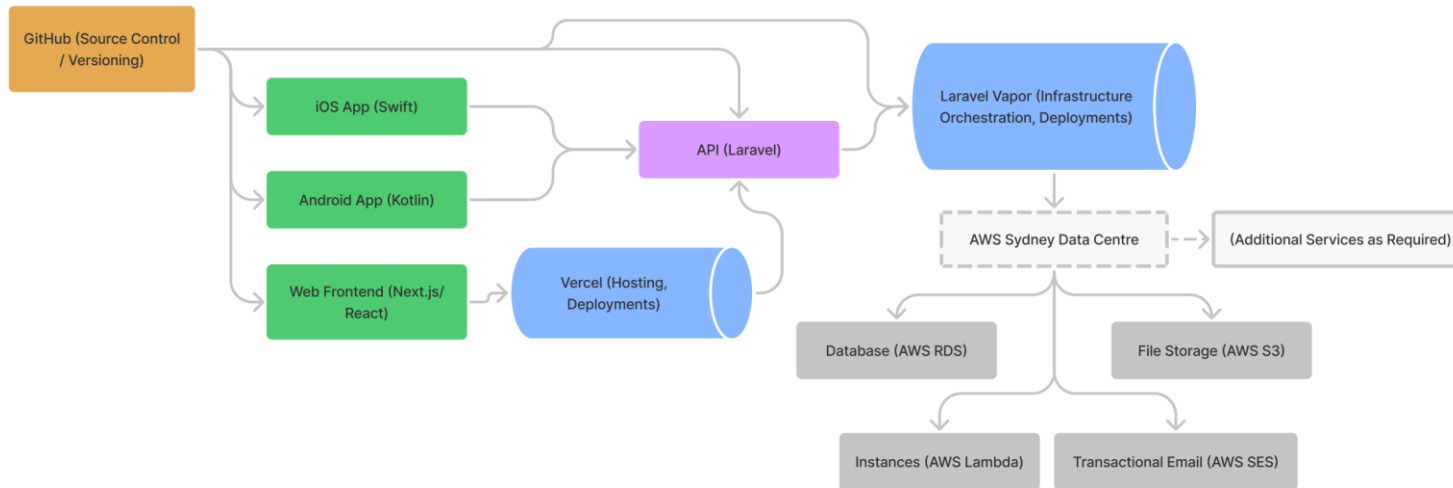


Figure 1. Podsquad technology stack diagram

3 Risk analysis

3.1 Privacy risks

Privacy principles	Proposed information handling practices	Identified risks
<p>Collection (IPPs 1 to 3)</p> <ul style="list-style-type: none"> • Collect only that personal information necessary for or required to fulfil a purpose that is directly related to a function or activity of your agency. • Obtain it lawfully and fairly and in a way that is not unreasonably intrusive into an individual's personal affairs. • Inform the individual of what you are going to do with their information, of any applicable law and of any third parties the information will be given to. • Take reasonable steps to ensure the information is complete and up to date. 	<p>The app collects personal information needed to deliver a personalised experience for users, which is central to the app's effectiveness as a health behaviour change program as per the research evidence base for such programs. For Podsquad, personalisation currently occurs through the creation of individual profiles for each family member (uses the individual's first name, responses to onboarding questions, and goals). Through these profiles, the Podsquad program can also send emails and mobile notifications (optional) which encourage participation and support behaviour change.</p> <p>During the development phase, it was identified that Podsquad could further enhance the personalisation experience. Although this is not delivered in the current version, the app has been set up to enable this functionality through:</p> <ul style="list-style-type: none"> • Collecting date of birth to potentially personalise the experience based on age • Collecting postcodes to potentially provide regionally relevant information to families. <p>Podsquad collects information regarding whether a child identifies as an Aboriginal and/or Torres Strait Islander person. This is classified as sensitive information. It is optional to answer this question.</p> <p>In addition to using personal information for personalisation of the app experience, de-identified information may also be used for reporting, program evaluation and quality improvement. For example, asking whether a child identifies as an Aboriginal and/or Torres Strait Islander person will help HWQId understand if the app is achieving its intention to reach this priority population.</p> <p>Personal information is obtained directly through the user and not through any indirect way (e.g. through accessing data stored on their mobile device). Parent/carers are responsible for setting up the account and choosing whether to add their child. As the app is designed to be used primarily by</p>	<p>None identified</p>

	<p>children 5-12 years, and their families, parents/carers consent on the child's behalf.</p> <p>While the best user experience is delivered when users input their correct data, users can choose to input any data during the account registration process (e.g. pseudonyms, incorrect birth dates, incorrect postcodes). Hence, there is an option to be unidentifiable. Users are not required to verify their identity.</p> <p>Users could choose to incorrectly answer the questions in the onboarding questionnaire. The only consequence would be that the recommended goals may not be relevant to the user. However, the user can choose to swap the recommended goals, so they can still receive the benefits of the app regardless of how they respond to the questionnaire.</p> <p>Users can also delete their account, which deletes their data from the Podsquad database.</p> <p>Podsquad's privacy statement is hosted on the HWQld website and is available to all users through the Apple and Google app stores, automated program emails, program web pages, and within the app's settings at any time, including prior to downloading the app and creating an account. The privacy statement clearly describes:</p> <ul style="list-style-type: none"> • The identity and contact details of the collecting agency, The Khemists • The fact that the individual is able to gain access to the information • The purposes for which the information is collected. <p>It is unlikely that users will be concerned by the way in which their personal information will be collected or used. It is apparent through using the app that information collected is used for personalisation.</p>	
<p>Storage and security (IPP 4)</p> <ul style="list-style-type: none"> • Make sure personal information is protected by appropriate security safeguards to prevent it being lost, accessed improperly, misused, modified or disclosed. • If giving the information to a third party, take reasonable steps to 	<p>Operational controls:</p> <ul style="list-style-type: none"> • Limiting access to HWQld's Content Manager, SharePoint and PowerBI platforms, through access control groups with a 'need-to-know' requirement, with groups audited on a monthly basis. • Managing the data in accordance with organisational policies regarding information privacy (HWQLD POL-012) and records management (HWQLD POL-014). • Ensuring mandatory training, including Code of Conduct training, is completed for any HWQld staff member working on the program. 	<p>None identified</p>

<p>prevent its unauthorised use or disclosure.</p>	<ul style="list-style-type: none"> • The Khemists is responsible for managing the program, including data, in accordance with the contracted agreement, and as per their organisational policies and procedures. The Khemists' relevant policies include the Access Control Policy, Acceptable Use Policy, Privacy Policy, Incident Response Policy and Plan, Data Breach Response Plan, Disaster Recovery Plan and Business Continuity Plan. • The Khemists is responsible for ensuring staff working on the program have completed mandatory training, including security awareness training. <p>Technical controls:</p> <ul style="list-style-type: none"> • Data will be stored within a secure, password protected and encrypted database on a server with Amazon Web Services (AWS), AP-Southeast- 2 Region, Sydney, Australia • Data will also be encrypted as it is sent from the individual's device to the API/database, and backup files will also be encrypted. • Other security measures in place include API authentication keys and user-scoped permissions. • Accounts that have been inactive for more than one year are automatically de-identified and the de-identified data is kept for research and evaluation purposes only. • The database system has an access logging feature to enable detection and investigation of unauthorised access or misuse. <p>API penetration testing was most recently completed by an external service provider in November 2024. Four low-level risks were identified and have been addressed.</p> <p>Podsquad has a testing environment that uses dummy data.</p>	
<p>Openness, access and amendment (IPPs 5 to 7)</p> <ul style="list-style-type: none"> • Inform the public about what types of personal information you hold and how it is used and how to request access to or amendment of documents 	<p>There are no Podsquad documents containing personal information.</p> <p>Users can make an application for access to their personal information from the Podsquad app database as per HWQLD POL-012 Information Privacy.</p> <p>Data can be obtained from The Khemists as per the contract between the agencies.</p> <p>Currently, registered email account, postcode and users' date of birth cannot be changed once an account is set up. However, the parent/carer</p>	<p>None identified</p>

<p>containing their personal information.</p>	<p>who registered the account can delete the account, removing all personal information from the program's database.</p> <p>Accounts that have been inactive for more than one year are automatically de-identified and the de-identified data is kept for research and evaluation purposes only.</p> <p>Users may choose to provide inaccurate or incomplete information in their family profile, which could lead to incorrectly informed decisions by the program team, and in turn may have a negative impact on program evaluation and quality improvement. To minimise this risk, co-design, research, and evaluation activities will be routinely conducted to avoid overreliance on information gathered through the program.</p>	
<p>Use and disclosure (IPPs 8 to 11)</p> <ul style="list-style-type: none"> • Use information only for the purpose for which it was collected unless one of the exemptions in the IP Act permits it. • Take reasonable steps to make sure the information is accurate, complete and up to date before you use it. • Only use the parts of the personal information that are necessary to fulfil the purpose. • Do not disclose personal information to anyone other than the individual who is the subject of it, unless one of the exemptions in the IP Act permits it. 	<p>Personal information will not be disclosed to any outside agency.</p> <p>Personal information is not used for any secondary purposes.</p> <p>If a request is made to use or disclose personal information for a secondary purpose, the request will be considered in alignment with the IP Act. The project's Executive Sponsor, Senior Responsible Officer, and Business and Governance team will be consulted with regards to the request to ensure compliance.</p> <p>Users are responsible for inputting accurate information into the app. Doing so will provide the best possible user experience and supports the users' intention to improve their family's health and wellbeing by using the app.</p> <p>HWQId will not check the accuracy of personal information given by any user. Accurate information, while beneficial, is not mandatory to use the program.</p> <p>Personal information is unlikely to change over time.</p> <p>Names, responses to the onboarding questionnaire, and goals can be changed at any time. Currently, registered email account, postcode and users' date of birth cannot be changed directly in the app once an account is set up. However, the parent/carer who registered the account can either:</p> <ul style="list-style-type: none"> • Use the feedback form in the app, or the podsqquad@hw.qld.gov.au email address, to request a change to their account details; or • delete their account and create a new account. 	<p>None identified</p>

<p>Transfer of personal information outside Australia (section 33)</p> <p>Do not transfer personal information outside Australia unless:</p> <ul style="list-style-type: none"> • the individual agrees to the transfer • there is legal authority for the transfer • it is necessary to prevent or lessen a serious threat to life, health, safety or welfare; or • at least two of the criteria in section 33(d) of the IP Act are satisfied. 	<p>Personal information will not be transferred outside Australia. All data collection and storage systems are physically located in Australia and data is not routed outside Australia at any stage of the data transfer process, unless the user is using Podsquad on their device while outside Australia.</p>	<p>None identified</p>
<p>Use of contracted service providers (chapter 2, part 4)</p> <ul style="list-style-type: none"> • Take all reasonable steps to bind a contracted service provider to compliance with the privacy principles. 	<p>HWQId contracted the services of an external service provider, The Khemists, to develop and maintain Podsquad on its behalf. A comprehensive ICT contract was established between the parties, which addresses privacy requirements including the use of sub-contractors and mandatory reporting of breaches.</p>	<p>None identified</p>

3.2 Risk ratings

None identified

4 Previous actions to address identified privacy risks

#	Date risk was identified	Identified privacy risk	Existing controls that contribute to managing the identified risk	Recommended actions	Resolution date and description	Status
1	September 2023	Individuals are not aware of how their personal information will be used, or to whom it will be routinely disclosed, which can lead to a lack of trust.	Program-specific privacy statement is currently available through the app stores and program website.	Update the privacy statement to more comprehensively address aspects covered in the PIA.	Recommended action was completed in 2024 and is embedded in program management processes.	Resolved
2	September 2023	Collection notices are not consistently provided, for example, across all communication channels.	Privacy statement is available through the app stores and program website.	Link to privacy statement from relevant communications channels e.g. automated emails, within the app's settings, and the webpage for clinicians on the HWQId website.	Recommended action was completed in 2024 and is embedded in program management processes.	Resolved
3	September 2023	Incomplete, inaccurate or outdated information leads to incorrectly informed decisions, which in turn may have a negative impact on program evaluation and quality improvement.	Users are asked for minimal personal information, and where possible in the user journey, the program provides context regarding why this data is being requested. This supports the likelihood of accurate information being provided.	Continue to conduct additional co-design, research and evaluation activities, so not to be overly reliant on information gathered through the program for evaluation and quality improvement purposes.	Recommended action has been embedded in program management processes since project initiation in 2021.	Resolved
4	September 2023	The system does not log who has accessed a file, making it difficult to detect or investigate unauthorised access or misuse.	GrowthOps' operational and technical controls limit and govern access to data.	Conduct penetration testing at least annually, or when significant changes are implemented.	Recommended action was last completed in 2024. Action is embedded in program management processes.	Resolved

	September 2023			Explore auditing and logging capabilities/mechanisms with GrowthOps.	Recommended action was completed in 2024.	Resolved
5	September 2023	Personal and confidential information is kept for longer than required under approved retention and disposal schedule/s.	Users can delete their profile, removing all personal information from the database.	Implement a system to de-identify user information and retain for research and reporting purposes, after a one-year period of inactivity.	Recommended action was completed in 2024.	Resolved

5 Stakeholder consultation

The following stakeholders were consulted in undertaking this PIA:

Stakeholder	Internal/External	Scope of consultation	Method	Results
HWQld Business and Governance team	Internal	Input and review on all aspects of the PIA	Email	Reviewed updated document to ensure clarity and completeness of information.
HWQld Research and Impact	Internal	Input and review on data aspects of the PIA	Email	Reviewed accuracy of information following introduction of PowerBI as a tool to assist with data analysis for the Podsquad program.
The Khemists	External	Sought technical information for responses	Email	Reviewed updated PIA document to ensure accuracy and completeness of information.

6 PIA outcomes

6.1 Agreed recommended actions

#	Actions to be taken	Responsibility for action	Date for completion
1	Review and update Privacy Impact Assessment at least annually, or in alignment with major app updates.	Program Lead	1 October 2026

6.2 Contact point for future enquiries

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Business unit:	Prevention Systems		
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