

Privacy Council Policy Guide

Guide to how the City handles
your personal information



Guide to how the City handles your personal information

At the City of Joondalup, we take your privacy seriously. We're committed to handling your personal information responsibly and in line with the *Privacy and Responsible Information Sharing Act 2024*.

This Guide gives you a quick overview of how we manage personal information – whether you're a resident, community member, supplier/contractor or stakeholder.

We update this Guide from time to time, so feel free to check our privacy page at joondalup.wa.gov.au/privacy

Who are we?

We're the City of Joondalup (ABN 64 245 472 416), your local government which delivers a wide range of economic, human, recreational and property services, as well as developing and maintaining essential community infrastructure. Our work is guided by the *Local Government Act 1995* plus a number of other significant legislation. We also develop and administer local laws to ensure our responsibilities are met efficiently.

Our diverse range of services and facilities assist our residents, community members and visitors, as well as supporting local businesses. To provide these services and fulfill our obligations, we sometimes need to collect, use, store and share personal information.

What is the purpose of our Guide? ^{IPP5}

As we value your privacy and are committed to protecting it, this Guide is designed to provide a transparent overview of how we handle your personal information.

We adhere to the *Privacy and Responsible Information Sharing Act 2024*, which includes a set of rules called Information Privacy Principles (IPPs). In addition to this, we also carry out other responsibilities that may involve handling personal information under different laws and regulations.

What is covered in our Guide?

Our Guide follows the IPPs and outlines how we handle your personal information. Here's what it includes:

- How we collect and store your personal information.
- How we use and share it.
- How you can access and update your information.
- How we keep your information safe and secure.
- How to make a privacy complaint if you need to.

If you would like further information on the IPPs, feel free to check our privacy page at joondalup.wa.gov.au/privacy

Who does this Guide apply to?

This Guide applies to anyone whose personal information we collect – whether you're a resident, visitor, supplier/contractor or someone interacting with us in any other way.

Collecting your personal information ^{IPP1}

What is personal information?

Personal information is anything that can identify you – whether it's true or not, and whether it's written down or not. Under the *Privacy and Responsible Information Sharing Act 2024*, this includes things such as your name, age, gender, address, contact details and more sensitive data and information such as:

- bank and credit card details
- tax file number
- passport or driver's licence number
- health and medical information
- employment details
- sexual orientation, ethnicity, religious or philosophical beliefs
- political opinions or memberships
- trade or professional associations
- biometric data or criminal record.

How do we collect personal information?

We typically collect personal information directly from you. This might happen when you:

- Make an enquiry or complaint, give feedback or a compliment, or fill out a form (online or on paper).
- Speak with one of our staff in person, over the phone or via email.
- Interact with us on our website or social media.
- Make a payment.

Sometimes, we'll also use Collection Notices – these are short explanations that tell you more about how we use your information in specific situations. It's a good idea to read them carefully, as they may include requests for your consent to use or share your personal information in certain ways. You will find these at the point of collection, either on our online or paper forms.

What kind of personal information do we collect?

We only collect what's necessary and lawful to help us carry out our services. This may include:

- **Basic details** such as your name, gender and date of birth.
- **Contact information** such as your address, phone number and email.
- **Business details** such as ABN, business address, and contact numbers.
- **Government-issued IDs** such as your driver's licence, Medicare number, passport or tax file number.
- **Financial information** such as bank account or credit card details.
- **Health-related information** including exercise or medical data.

Do we collect information from others?

Yes, sometimes we receive your personal information from someone else who's authorised to share it with us on your behalf.

How we use your personal information ^{IPP2}

Why do we use your information?

We use your personal information to help us deliver services and carry out our responsibilities as a local government. Generally, we'll only use your information for the reason we collected it – or for a closely related purpose that you'd reasonably expect. If we ever need to use it for something unrelated, we'll ask for your consent first.

Here are some of the ways we might use your information:

- Sending out rates notices
- Providing planning and building advice, permits and certificates
- Carrying out compliance inspections and law enforcement duties
- Managing library and leisure centre memberships
- Paying contractors and service providers
- Supporting community safety through CCTV
- Conducting customer satisfaction surveys
- Keeping you informed about events, services and community consultations
- Organising waste collection and recycling services
- Recording your feedback, including complaints and compliments

- Handling public liability insurance claims
- Managing employment contracts and obligations
- Meeting our legal obligations

If you're applying for a job with us, we'll use your information to assess your application and may keep it on file for future opportunities – unless you tell us not to.

If you're a current or former employee, we'll use your personal information in line with employment laws and for purposes related to your role with the City.

Sharing your personal information ^{IPP2; IPP9}

Why do we share your information?

We may need to share your personal information to help deliver services or when required or permitted by law. For example, we might share it with trusted service providers who help us carry out tasks such as:

- Collecting domestic waste, garden organics and recycling.
- Processing card payments online or at parking meters.

Sometimes, we may need to share your personal information with third-party service providers located outside of Australia, and we only do this when it's necessary to deliver our services, such as:

- When we use cloud services to process or store information.
- When our website hosting is managed by an overseas provider.

We will always take steps to ensure your information is handled securely and in line with privacy laws.

You'll often find more details about how we share your information at the point of collection – in our Collection Notices. If you would like further information on Collection Notices, feel free to check our privacy page at joondalup.wa.gov.au/privacy

Who might we share your information with?

We may disclose your personal information to third parties when it's necessary for service delivery or to meet legal obligations. This could include:

- **mailing and printers services** (e.g. to send out correspondence)
- **regulators and ombudsman** (e.g. during complaint investigations)
- **debt collection agencies** (e.g. to recover unpaid fees or fines)
- **law enforcement agencies** (e.g. to assist with investigations)

- **courts and tribunals** (e.g. in response to a subpoena)
- **insurers and legal advisors** (e.g. for claims or legal matters)
- **other third parties** when necessary to prevent serious threats to health, safety or welfare.

Sharing for research and statistics

We may also share information with other government agencies for research or statistical analysis that benefits the public. Any information or data released won't identify individuals.

Closed-Circuit Television (CCTV)

We use CCTV in public areas such as libraries, leisure centres, footpaths, roads and car parks. Footage may be shared:

- with authorised agencies to support investigations or prosecutions
- to help manage events, emergencies, traffic and public safety.

Publicly available information

During Council meetings, your name and suburb may appear in published agendas and minutes, as well as live streamed and/or audio recordings if you participate in Public Question Time or Public Statement Time.

Under the *Local Government Act 1995*, we're also required to make certain records publicly available, which may include personal information. These include:

- Council agendas and minutes
- registers of interests, gifts, fees and professional development
- tender and complaint registers.

What information do we not disclose?

Under the *Local Government Act 1995*, we're restricted from disclosing certain records that may contain confidential information, including:

- a matter affecting an employee or employees
- the personal affairs of any person
- a contract entered into, or which may be entered into
- legal advice or other information over which the City holds legal professional privilege
- to ensure compliance with a requirement that is imposed under written law, and that prohibits or restricts the making of public information
- information contained in a tender for a contract that if disclosed, would reveal:
 - a tendered price

- a tendered methodology for calculating a price
- any technology, manufacturing, industrial or trade process
- a matter that if disclosed, could be reasonably expected to:
 - have an adverse effect on a tenderer's business interests
 - impair the effectiveness of any lawful method or procedure for preventing, detecting, investigating or dealing with any contravention or possible contravention of the law
 - endanger the security (including cyber security) of the local government's property or operations
- a matter that must be dealt with on a confidential basis as advised by:
 - a committee of a House of Parliament or a joint committee of both Houses
 - the Local Government Inspector or a person authorised by the Local Government Inspector
 - the Departmental CEO or a person authorised by the Departmental CEO.

How we keep your information safe ^{IPP3, IPP4}

We do our best to make sure your personal information is accurate, complete and up to date – especially when it's needed to deliver our services.

We also work hard to protect your information from unauthorised access, misuse, loss or interference. When your data is transmitted online, we take extra care to keep it secure.

Before launching new programs or initiatives, we assess how they might affect your privacy by completing a Privacy Impact Assessment, which helps us:

- identify any potential privacy risks
- ensure we're complying with privacy laws
- put strategies in place to reduce risks before we begin.

Here's how we protect your personal information:

- Restricted access to systems, databases and registers using passwords and multi-factor authenticators.
- Network monitoring and security protections.
- Secure physical areas with swipe card access.
- Clear policies and procedures to guide how we handle information.
- Staff training to ensure everyone understands their privacy responsibilities.
- Regular audits to check compliance.

What happens if there's a breach?

If we discover that your personal information has been used or shared inappropriately – and we can't fix it immediately – we'll contact you. We'll work with you to reduce any potential harm and let you know what steps you can take to protect yourself.

If your personal information is compromised, we follow a strict process under our Information Breach Response Plan, which includes:

- identifying and containing the breach
- assessing the impact
- notifying affected individuals
- reviewing what happened to prevent it in future.

Unique identifiers ^{IPP7}

We only assign unique identifiers – such as ID numbers – when it's absolutely necessary to help us carry out our services efficiently.

We won't use identifiers assigned to you by other organisations (such as your driver's licence, Medicare number, passport number or tax file number) unless:

- it's reasonably necessary for us to do our job
- you've given us permission
- we're required to by law.

Anonymity ^{IPP8}

We'll always try to respect your privacy, but in most cases, we'll need to identify you to provide services or support. That means using your personal information in fair and lawful ways that help us do our job properly.

Automated decision-making ^{IPP10}

We don't use automated systems to make significant decisions about you based on your personal information.

If that ever changes, and we use your personal data or information, we'll let you know and ask for your permission – just as required under the *Privacy and Responsible Information Sharing Act 2024*.

When we no longer need your information ^{IPP11}

We don't keep your personal information forever. Once it's no longer needed for our services or legal obligations, we either destroy it securely or permanently de-identify it – in line with the *State Records Act 2000*.

Accessing and updating your personal information ^{IPP6}

You can request access to the personal information we hold about you in accordance with the *Freedom of Information Act 1992*, and if the City holds records

about your personal affairs, which you believe are incomplete, incorrect, out of date or misleading, you can apply for them to be amended.

Applications should be made in writing and submitted to the Freedom of Information Coordinator – we'll respond as soon as we can, and always within 45 days of receiving your request.

More information on how to do this can be found on the [City's website](#).

You can also correct or update your personal information by simply contacting our Customer Care Centre:

- in person at our Administration Centre, 90 Boas Avenue, Joondalup
- via email, info@joondalup.wa.gov.au
- via phone, (08) 9400 4000.

Contact us or make a privacy complaint

If you believe your personal information hasn't been handled properly, you're welcome to get in touch. We review each complaint carefully and work through it on a case-by-case basis until it's resolved.

The first step is to lodge an application in writing and submit to the Privacy and Compliance Officer – we'll respond as soon as we can, and always within 45 days of receiving your request.

More information on how to do this can be found on our privacy page at joondalup.wa.gov.au/privacy

You can also contact the Privacy and Compliance Officer:

- in person at our Administration Centre, 90 Boas Avenue, Joondalup
- via email, privacy@joondalup.wa.gov.au
- via phone, (08) 9400 4000.

Legend for Information Privacy Principles

- IPP1: Collection
- IPP2: Use and disclosure
- IPP3: Information quality
- IPP4: Information security
- IPP5: Openness and transparency
- IPP6: Access and correction
- IPP7: Unique identifiers
- IPP8: Anonymity
- IPP9: Disclosures outside Australia
- IPP10: Automated decision-making
- IPP11: De-identified information



T: 08 9400 4000

Boas Avenue Joondalup WA 6027

PO Box 21 Joondalup WA 6919

joondalup.wa.gov.au

This document is available in alternative formats upon request.