

Privacy Council Policy

Responsible directorate: Office of the CEO

Objective: To ensure personal information is handled and protected in accordance with the *Privacy and Responsible Information Sharing Act 2024*.

1. Application:

This Policy applies to all Elected Members and employees of the City, as well as business partners, contractors, suppliers, consultants, outsourced service providers and third parties, who are responsible for handling personal information held and managed by the City.

2. Definitions:

As defined in the *Privacy and Responsible Information Sharing Act 2024* (the Act):

“**handle**”, in relation to information, means to collect, hold, manage, use or disclose the information.

“**personal information**”

- a. means information or an opinion, whether true or not, and whether recorded in a material form or not, that relates to an individual, whether living or dead, whose identity is apparent or can reasonably be ascertained from the information or opinion; and
- b. includes information of the following kinds to which paragraph a. applies —
 - i. a name, date of birth or address
 - ii. a unique identifier, online identifier or pseudonym
 - iii. contact information
 - iv. information that relates to an individual's location
 - v. technical or behavioural information in relation to an individual's activities, preferences or identity

- vi. inferred information that relates to an individual, including predictions in relation to an individual's behaviour or preferences and profiles generated from aggregated information
- vii. information that relates to one or more features specific to the physical, physiological, genetic, mental, behavioural, economic, cultural or social identity of an individual.

“sensitive personal information” means personal information —

- a. that relates to an individual's —
 - i. racial or ethnic origin; or
 - ii. gender identity, in a case where the individual's gender identity does not correspond with their designated sex at birth; or
 - iii. sexual orientation or practices; or
 - iv. political opinions; or
 - v. membership of a political association; or
 - vi. religious beliefs or affiliations; or
 - vii. philosophical beliefs; or
 - viii. membership of a professional or trade association; or
 - ix. membership of a trade union; or
 - x. criminal record;or
- b. that is health information; or
- c. that is genetic or genomic information (other than health information); or
- d. that is biometric information; or
- e. from which information of a kind referred to in any of paragraph's a. to d. can reasonably be inferred.

3. Statement:

The City is committed to upholding the right to privacy of all individuals who have dealings with the City and will take reasonable steps to ensure that personal information is protected in accordance with the Act.

The City collects, holds, manages, uses and discloses personal information to enable it to exercise powers and perform functions under a range of legislative and policy requirements and to carry out certain business functions.

The City is committed to ensuring that effective privacy management remains central to all its operations while delivering a wide and diverse range of services to its community, including residents, ratepayers, businesses and visitors. Maintaining privacy is the responsibility of everyone and is an integral part of organisational culture which is reflected in various policies and related documentation, systems and processes used.

4. Details:

The City handles a broad range of information about individuals including, but not limited to, customers, ratepayers, residents, volunteers, employees and prospective employees, and Elected Members. A significant part of that information is personal information.

The City is bound by the Act when handling personal information during its operations as a local government, and adheres to the requirements of the following Information Privacy Principles (IPPs) as described in Schedule 1 of the Act:

- Collection (IPP 1)
- Use and disclosure (IPP 2)
- Information quality (IPP 3)
- Information security (IPP 4)
- Openness and transparency (IPP 5)
- Access and correction (IPP 6)
- Unique identifiers (IPP 7)
- Anonymity (IPP 8)
- Disclosures outside of Australia (IPP 9)
- Automated decision-making (IPP 10)
- De-identified information (IPP 11).

A Guide to how the City handles personal information outlines in further detail how the City meets its obligations to protect the privacy of personal information.

Creation date:	August 2025 (CJ243-08/25)
Formerly:	NA
Amendments:	NA
Last reviewed:	NA
Related documentation:	<ul style="list-style-type: none">• Freedom of Information Act 1992• Guide to how the City handles personal information• Information Breach Council Policy• Local Government Act 1995• Local Government (Administration) Regulations 1996• Privacy and Responsible Information Sharing Act 2024• Records Management Council Policy• State Records Act 2000• Statement of Business Ethics
File reference:	111876