

City of Greater Geraldton Council Policy

4.4 PRIVACY POLICY

STRATEGIC THEME

Leading

OBJECTIVES

The objective of this policy is to ensure personal information obtained by the City of Greater Geraldton is handled and protected in accordance with the *Privacy and Responsible Information Sharing Act 2024*.

POLICY STATEMENT

This Policy applies to Council Members, City employees, all business partners and contracted service providers, volunteers and other third parties who are responsible for handling personal information held and managed by the City of Greater Geraldton.

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 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 PRIS Act.

The City will implement practical measures and take reasonable steps to ensure that the use and disclosure of personal and sensitive information is consistent with the PRIS Act. 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.

POLICY DETAILS

This Policy outlines the obligations for and commitments to the responsible management of personal information.

1. The City is governed by the eleven Information Privacy Principles (IPPs) in the *Privacy and Responsible Sharing Information Act 2024* (WA) (the PRIS Act). The IPPs regulate how personal and sensitive information is handled by the City.
2. This Policy covers all personal information as defined in the PRIS 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 paragraphs (a) to (d) can reasonably be inferred.

3. Collection

The City collects personal information in a range of ways to deliver services, meet its legislative obligations, and support operational needs, including:

- (a) personal information of the City's residents / electors / customers collected to carry out the City's functions and to provide services.
- (b) employees' personal information collected through the processes and conditions of employment
- (c) recordings of telephone conversations for the purpose of customer service training including monitoring employees' responses to customer enquiries.
- (d) collection of data via third party services, software providers and cloud service providers.
- (e) CCTV surveillance cameras and automated analytics software installed for recording and monitoring various activities throughout the City to improve safety.
- (f) social media monitoring may include personal information from users that interact with the City through these channels.
- (g) smart mobile devices which may collect location data (for marketing purposes) and hardware identifiers (for installation of City approved apps).
- (h) community surveys involving the collection of personal data.
- (i) data collected via the City's websites to personalize information presented via the website.
- (j) collection of data through the City's procurement processes and systems.
- (k) information provided by other government agencies that work with the City to deliver services or programs.

4. Obligation

The City handles a broad range of information about individuals including, but not limited to, customers, ratepayers, residents, volunteers, employees and prospective employees, and Council 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 IPPs as described in the PRIS Act.

5. Use and Disclosure of Personal Information

The City will disclose or use personal information only for the primary purpose it was collected, a secondary related and expected purpose, as authorised by law or with the individual's consent.

6. Accessing or Correcting your Personal Information

You have the right to request access to the personal information the City holds about you. Unless an exception applies, the City must provide access to your personal information within 45 days.

You also have the right to request the correction of the personal information we hold about you. We will take reasonable steps to make appropriate corrections to personal information so that it is accurate, complete and up-to-date. Unless an exception applies, we must correct the personal information we hold about you within 45 days.

7. Privacy Officer

If you have any enquiry about the way we handle your personal information or seek to exercise your privacy rights in relation to the personal information we hold about you, you may contact our Privacy Officer. Our Privacy Officer is:

Paul Radalj

Director Corporate Services

Telephone: 08 9956 660

Email: pris@cgg.wa.gov.au

Mail: PO Box 101, Geraldton, WA 6531

KEY TERM DEFINITIONS

City is City of Greater Geraldton

PRIS is the *Privacy and Responsible Information Sharing Act 2024*

ROLES AND RESPONSIBILITIES

Director Corporate Services is responsible for the implementation of this Policy and is the designated Privacy Officer.

WORKPLACE INFORMATION

Privacy and Responsible Information Sharing Act 2024

Freedom of Information Act 1992

Local Government Act 1995

State Records Act 2000

City of Greater Geraldton Local Laws

Privacy Management Plan

Privacy Management Guideline

City of Greater Geraldton Employee Code of Conduct

Code of Conduct for Council Members, Committee Members and Candidates

Freedom of Information Statement
Information Security Management System
Privacy Statement

DRAFT

POLICY ADMINISTRATION

Directorate		Officer	Review Cycle	Next Due
Corporate Services		Manager Corporate Compliance and Manager ICT Services	Biennial	2028
Version	Decision Reference	Synopsis		
1.	CSXX TBC	New Policy		