

Policy Type

Council

Policy Purpose

The purpose of this policy is for the City to ensure that its collection, use, handling, storage, protection and disclosure of personal information are governed by the privacy principles set out in this policy. These privacy principles are consistent with key provisions of the Australian Privacy Principles (APP) under the Commonwealth's *Privacy Act 1988* (Cth) (the Privacy Act).

Policy Statement

This policy is consistent with a person's right, under section 45 of the *Freedom of Information Act 1992*, to apply to the City for amendment of personal information about the person contained in a document of the City if the information is inaccurate, incomplete, out of date or misleading. Additionally, this policy is consistent with key provisions of the APP to allow stakeholders to know what personal information the City stores about them (subject to some exceptions permitted by law) and permitting stakeholders access to and correction of personal information about them held by the City.

The City will use any personal information collected, whether through electronic or manual means, for the purpose that it was collected, as well as for ongoing research and development of the City's services.

The City collects information for various purposes through various methods, such as:

- personal information of the City's residents / electors /customers, as collected through automated or manual means
- employee's personal information collected through the processes and conditions of employment
- telephone recorded messages advising the user about monitoring the call for the purpose of 'customer service training' including monitoring employees' responses to customer enquiries
- collection or communication of data via third party services such as *Bang the Table, DocuSign, Google Analytics, Kentico, Lucky Orange, Mailchimp, etc.*
- through the use of CCTV surveillance cameras and automated analytics software installed for recording various activities throughout the City
- social media monitoring which may include personal information and what may at first appear as innocuous information, but when combined or correlated with other sources, the information disclosed is personal
- smart mobile devices which may collect location data (for marketing purposes) and hardware identifiers (for installation of City approved apps)

- community surveys involving the collection of personal data
- use of data collected via websites to personalise information presented via the website
- the collection of data through our procurement processes and systems
- information provided by a third-party government agency through the course of collaborative services and information sharing.

The City also provides information to third parties such as:

- organisations or consultants who undertake community engagement and market research on behalf of the City
- intergovernmental government departments
- Western Australian Local Government Association (WALGA) and other Local Government.

(1) All information is data – not all data is information. The terms *Data*, *Information*, *Personal Information* and *Personally Identifiable Information* (PII) are defined and compared below, together with a practical approach to their meanings:

Data	Information	Personal Information	Personally Identifiable Information (PII)
<p>Representations of real world facts, concepts or instructions in a formalised manner suitable for communication, interpretation or processing by human beings or automatic means.</p> <p>Source: AS 5021-2005 (R2016) <i>The language of health concept representation.</i></p>	<p>Data (or facts), that are interpreted, organised and structured in such a way as to be meaningful to the person who receives it.</p> <p>Source: AS 5021-2005 (R2016) <i>The language of health concept representation.</i></p>	<p>Information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <p>(a) whether the information or opinion is true or not; and</p> <p>(b) whether the information or opinion is recorded in a material form or not.</p> <p>Source: Privacy Act section 6(1).</p>	<p>Information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context.</p> <p>Source: Australian Cyber Security Centre, Australian Signals Directorate, Department of Defence.</p>
<p><u>In practice:</u> <i>images, sound recordings, text and numbers captured about someone or</i></p>	<p><u>In practice:</u> <i>data (or facts), about someone or some matter, which have being analysed, and</i></p>	<p><u>In practice:</u> <i>any information relating to a person, directly or indirectly.</i></p>	<p><u>In practice:</u> <i>any information that can be used to distinguish one individual from</i></p>

Data	Information	Personal Information	Personally Identifiable Information (PII)
<i>some matter (sometimes bare and random), which have not been analysed or processed in any manner.</i>	<i>can be communicated to provide understanding, knowledge or insight about someone or some matter and which generate value in some form.</i>		<i>another.</i>

Numerous types of information are explicitly recognised as constituting personal information under the Privacy Act, including but not limited to:

1. *Sensitive information* - includes information or opinion about an individual's racial or ethnic origin, political opinion, religious beliefs, sexual orientation or criminal record, provided the information or opinion or otherwise meets the definition of personal information;
2. Health information, which is also personal information;
3. Some types of credit information;
4. Some types of employee record information (subject to exemptions); and
5. Tax file information.

Although not explicitly recognised as personal information under the Privacy Act, information may be explicitly recognised as personal information under other legislation. For example, under the *Telecommunications (Interception and Access) Act 1979* (Cth), certain telecommunications data (sometimes referred to as 'metadata') is taken to be personal information for the purposes of the Privacy Act).

- (2) Personal information collected by the City will be afforded protection consistent with key provisions of the APP. The 13 APP are:

APP1 - Open and transparent management of personal information

APP2 - Anonymity and pseudonymity

APP3 - Collection of solicited personal information

APP4 – Dealing with unsolicited personal information

APP5 - Notification of the collection of personal information

APP6 – Use or disclosure of personal information

APP7 – Direct marketing

APP8 – Cross-border disclosure of personal information

Title	Privacy Management
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APP9 – Adoption, use or disclosure of government related identifiers

APP10 – Quality of personal information

APP11 – Security of personal information

APP12 – Access to personal information

APP13 – Correction of personal information

Strategic Link:	Communication Strategy and Action Plan 2018-2022
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