



Privacy Policy

Policy Type: Council Policy Policy Owner: Chief Information Officer	Policy No. CP-128 Last Review Date: 15 April 2024
--------------------------------------------------------------------------------------	--------------------------------------------------------------------

Policy Objectives

This Policy outlines the City of Melville's obligations for and commitments to the responsible management of personal information held about its staff, residents and organisations with whom it interacts.

Policy Scope

This policy applies to all City employees, Elected Members, contractors, and volunteers.

This policy covers all personal information held by the City or any contractors providing services on behalf of the City and includes information we have collected:

- about any individual through any of the City's public interfaces;
- from any individual, including information collected from third parties; and
- about any individual regardless of format. This includes information collected on forms, in person, in correspondence, over the telephone, via our website and social media platforms

Definitions / Abbreviations Used In This Policy

Information Privacy Principles (IPP): means the Information Privacy Principles as defined in the Privacy & Responsible Information Sharing (PRIS) Act.

Personal information: means information or an opinion that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained from the information or opinion.

Privacy and Responsible Information Sharing (PRIS): Privacy and Responsible Information Sharing legislation which regulates the use and management of personal information.

Privacy breach: an act or practice that contravenes one or more of the Information Privacy Principles.

Privacy Impact Assessment: a systematic assessment of a project that identifies potential privacy impacts and recommendations to manage, minimise or eliminate them.

Sensitive information: means information or an opinion about an individual's racial or ethnic origin, political opinions, religious beliefs, professional memberships, sexual preferences or criminal record.



Policy Statement

The City of Melville will implement practical measures and take all reasonable steps to ensure that the use and disclosure of personal and sensitive information is consistent with Privacy and Responsible Information Sharing (PRIS) laws and community expectations.

The City is committed to the 11 Information Privacy Principles (IPP) which cover all aspects of collection, use, disclosure, management, security and retention of personal and sensitive information. In summary, the City will:

- allow people to interact with the City anonymously, where that is lawful and practicable.
- only collect personal information that is necessary for the City's functions.
- provide notice about how the information will be used, stored and disclosed.
- collect information directly from the individual where possible.
- use and disclose 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.
- take steps to make sure that personal information is accurate, complete and up to date.
- take steps to protect personal information from misuse and loss and from unauthorised access, modification or disclosure, and.
- provide processes for people to see access to, or the correction of, their personal information.

A privacy impact assessment will be undertaken as part of decision making for new initiatives, processes, information systems and technology and steps will be taken to mitigate privacy risks as far as lawful and practicable.

Privacy Breaches and Risks

All identified privacy breaches must be immediately reported to the City's Privacy Officer or, in the case of Elected Members, to the Chief Executive Officer, who will assess the report and make decisions in relation to:

- the steps required to prevent the impact of a breach worsening.
- whether notification to the affected people is appropriate.
- whether notification to the relevant privacy regulator is required; and
- the steps to be taken to prevent similar future breaches or mitigate the identified privacy risk.

Privacy Complaints

All privacy complaints will be investigated, and the complainant provided with information about the investigation and outcome. If a complainant is not satisfied with the City's response, they are entitled to refer their complaint to the Privacy Commissioner.

Obligation

All City employees, Elected Members, contractors, and volunteers must, in performing the duties of their employment, appointment or engagement by the City:

- a. respect the privacy of the personal information that they collect, use or disclose; and
- b. complies with the requirements of all applicable personal data protection laws, this policy and its related procedures.



Non-compliance with this Policy

Non-compliance with this policy has the potential to:

- cause harm to people impacted by a privacy breach.
- cause reputational damage to the City.
- hinder the City's day-to-day operations if information systems are compromised.
- generate complaints to the Privacy Commissioner.
- constitute a breach of the provisions relating to confidential information.
- incur financial penalties for the City and/or individual Elected Members and employees; and

Non-compliance with this policy may also result in disciplinary action.

References that may be applicable to this Policy

Legislative Requirements: Privacy and Responsible Information Sharing Act 2024

Procedures, Process Maps, Work Instructions:

Other Plans, Frameworks, Documents Applicable to Policy: City of Melville Recordkeeping Plan
Information Privacy Principles

Delegated Authority No:

ORIGIN/AUTHORITY

Ordinary Council Meeting

15 April 2025

Item No.

C25/258

Reviews

Insert name of Council Meeting

Insert date of meeting

Insert Item No.