

Council Policy

Council Policy Name: Privacy Policy

Responsible Directorate: Corporate Strategy and Performance

Version: Adopted

1. PURPOSE

- 1.1. This Policy explains what Personal Information the City of Busselton (the City) collects, and how it uses, stores, and shares Personal Information. Aligning with the Privacy and Responsible Information Sharing (PRIS) Act 2024, it supports transparency, accountability, and public trust in our information handling practices.

2. SCOPE

- 2.1. This Policy applies to all Personal Information collected and held by the City in the course of its business operations.

3. DEFINITIONS

Term	Meaning
Complaint Management Officer	Customer Information Coordinator and Manager Systems and Information
De-identified Information	Information stripped of Personal Information so that individuals cannot be reasonably identified. Once de-identified, it is no longer considered Personal Information under privacy legislation.
OIC	Office of the Information Commissioner (WA)
Personal Information	<p>Personal Information 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 includes information of the following kinds:</p> <ul style="list-style-type: none"> (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; information that relates to 1 or more features specific to the physical, physiological, genetic, mental, behavioural, economic, cultural or social identity of an individual.
Privacy Officer	Manager Systems and Information (privacy@busselton.wa.gov.au)

Sensitive Personal Information	<p>Sensitive Personal Information means Personal Information -</p> <ul style="list-style-type: none"> (a) that relates to an individual's - <ul style="list-style-type: none"> (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;
Unique Identifiers	<p>Unique identifier means a number or other identifier assigned by an entity to an individual to uniquely identify that individual for the purposes of the operations of the entity; but does not include an identifier that consists only of the individual's name.</p>

4. STRATEGIC CONTEXT

Strategic Theme	Objective
OPPORTUNITY	16: Provide effective governance and organisational leadership

5. POLICY STATEMENT

- 5.1. The City collects, retains and discloses Personal Information to provide its services to the community and support legal obligations. Personal Information is used to:
 - a. deliver services and administer programs;
 - b. respond to enquiries and manage complaints; and
 - c. fulfil legal obligations and reporting requirements.

- 5.2. The City takes reasonable steps to ensure that the Personal Information it collects is relevant, required for business purposes, accurate, and not excessive. Individuals may request access to, or correction of, their Personal Information.

- 5.3. Where Personal Information is collected a collection notice will inform the individual of the purpose of collection. The types of Personal Information most relevant to the City's business (including in relation to employment related information) include:
 - a. names, dates of birth and addresses;
 - b. other contact information
 - c. unique identifiers, online identifiers or pseudonyms;
 - d. contact information;
 - e. information that relates to an individual's location (e.g. through vehicle GPS on City fleet)

- 5.4. Personal Information may be collected by:

- a. hard copy forms;
 - b. online forms and portals;
 - c. telephone and in-person interactions;
 - d. email and written correspondence;
 - e. CCTV use in public places; and
 - f. third party service providers where they share Personal Information.
- 5.5. The City will only use or disclose Personal Information for the primary purpose for which it was collected, or for a City business related secondary purpose, or as required or permitted by law. Consent will be sought for any other use or disclosure of Personal Information including to:
- a. contracted service providers;
 - b. other government agencies;
 - c. law enforcement bodies; and
 - d. entities authorised under legislation.
- 5.6. Personal Information is stored in designated electronic and hardcopy systems in accordance with internal information security practices which include physical access control and system access permissions based on role requirements. This may include the use of Unique Identifiers.
- 5.7. Personal Information is retained, de-identified and disposed of in accordance with the:
- a. City's Recordkeeping Plan;
 - b. General Retention and Disposal Authority for Local Government (GRDA); and
 - c. State Records Act 2000.
- 5.8. If Personal Information is to be stored and/or used by a contracted third party, contractual obligations will require compliance with this policy.
- 5.9. Where Personal Information is stored or accessed outside Australia, the City ensures appropriate safeguards are in place through its procurement and contractual arrangements.
- 5.10. Suspected or actual information breaches involving Personal Information are managed in accordance with the City's Information Breach Policy.
- 5.11. Individuals may lodge a complaint with the City's Complaint Management Officer regarding the handling of their Personal Information. Complaints will be managed in accordance with the City's Complaint Management Policy. Where a complainant is dissatisfied with the outcome, they may escalate it to the OIC.
- 5.12. Appropriate privacy and information handling awareness training will be provided to relevant employees and contractors.

6. RELATED DOCUMENTATION / LEGISLATION

- 6.1. Privacy and Responsible Information Sharing Act (PRIS) 2024
- 6.2. State Records Act 2000
- 6.3. Freedom of Information Act 1992
- 6.4. Local Government Act 1995
- 6.5. Information Breach Policy

7. REVIEW DETAILS

Review Frequency		3-yearly		
Council Adoption	DATE	27 May 2026	Resolution #	C2605/150
Previous Adoption	DATE		Resolution #	