

Policy

Privacy Management



Policy Type

Council

Policy Purpose

The City of Cockburn (the City) values the privacy of its customers and stakeholders and is committed to protecting the personal information it collects, stores, uses and discloses as required by the [Privacy and Responsible Information Sharing Act 2024](#) (PRIS Act).

This policy applies to all City workers and Elected Members and outlines what personal information the City collects, how it is used and how it is kept safe. For the purposes of this policy, the term workers include employees, contractors, on-hired temporary labour services (agency staff), volunteers and third party service providers who handle personal or sensitive information on behalf of the City.

Policy Statement

Any personal information collected will be used for the purpose for which it was collected, the general provision of local government functions and services, as otherwise authorised by law, and for supporting the ongoing research and development of the City's functions and services.

(1) Terms and definitions

Terminology used in this document is defined as follows:

- **Data:** images, sound recordings, text and numbers captured about someone or some matter (sometimes bare and random), which have not been analysed or processed in any manner.
- **Information:** data (or facts), about someone or some matter, which have been analysed, and can be communicated to provide understanding, knowledge or insight about someone or some matter and which generate value in some form.

Source: [AS 5021-2005 The language of health concept representation](#).

- **Information Sharing Agreement:** agreement or mechanism between entities to share information under the PRIS Act.
- **'Personal information'** and **'Sensitive personal information'** are defined and compared below:

Personal Information	Sensitive personal information
Source: <i>Privacy and Responsible Information Sharing Act 2024</i> , section 4 .	
<p>(a) 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 be reasonably be ascertained from the information or opinion, and</p> <p>(b) Includes of the following kinds to which paragraph (a) above applies -</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's behaviour, including predictions in relation to an individual's behaviour generated from aggregated information (vii) information that relates to 1 or more features specific to the physical, physiological, genetic, mental, behavioural, economic, cultural, or social identity of an individual. 	<p>(a) Information that relates to an individual's -</p> <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; <p>or</p> <ul style="list-style-type: none"> (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) above can be reasonably be inferred.

(2) Collection of information

The City collects personal information through various methods, such as:

- Personal information of the City's residents / electors / customers collected to carry out the City's functions and to provide services.
- Workers' personal information collected through the processes and conditions of employment.
- Recordings of telephone conversations for the purpose of customer service training including monitoring employees' responses to customer enquiries.
- Collection of data via third party services, software providers and cloud-service providers.
- CCTV surveillance cameras and automated analytics software installed for recording and monitoring various activities throughout the City to improve safety.

- Social media monitoring which may include personal information from users that interact with the City through these channels.
- 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.
- Data collected via the City's websites to personalise information presented via the website.
- Collection of data through the City's procurement processes and systems.
- Information provided by other government agencies that work with the City to deliver services or programs.

(3) Disclosure and sharing of information - permitted disclosure

Information may be disclosed:

- With the individual's consent.
- Where required or authorised by law.
- Where necessary to prevent a serious threat to life, health, or safety.
- Under a formal Information Sharing Agreement.

The City may disclose personal information to third parties such as:

- Organisations or consultants who undertake community engagement and market research on behalf of the City.
- Contractors that deliver goods, works and services on behalf of the City.
- Other local governments, and state and federal government agencies that help the City to deliver its services or under an Information Sharing Agreement.
- Western Australian Local Government Association (WALGA).

(4) Secure storage of personal information

The City:

- Has a duty to protect the personal information that it holds from misuse or loss and from unauthorised access, modification or disclosure.
- Manages its data and information within a number of business systems, with the TechnologyOne suite being the City's Enterprise Resource Planning (ERP) system; a cloud-based application with servers based within Australia.
- Stores and retains the data and information it holds in compliance with the requirements of the State Records Act 2000.
- Has implemented controls to protect the information that it holds including multi-factor authentication, access controls, firewalls, endpoint detection and response (EDR), encryption of data at rest and in transit, regular security patching and vulnerability management, a managed Security Information and Event Management (SIEM) service, and ongoing cybersecurity awareness training for staff.

(5) Access and correction

The City will take reasonable steps to ensure the accuracy of personal information prior to use, having regard for the purpose it was collected, its proposed use, its relevance, whether it is up-to-date, complete, and not misleading.

You may request access to your personal information held by the City if you are not satisfied with the accuracy of that personal information.

(6) Complaints and breaches

You may make a complaint to the City about an alleged interference with your personal information.

(7) How to request access to your personal information or make a complaint

To request access to, or request correction of personal information held by the City about you, or to make a make a complaint about an alleged interference with your personal information, you need to make a written submission to:

Chief Executive Officer
City of Cockburn
PO Box 1215
Bibra Lake DC WA 6965
Or by emailing customer@cockburn.wa.gov.au

Requests for access to or correction of personal information, and any complaints about that information will be responded to in line with the City's Customer Service Charter.

(8) Contacting the Information Commissioner

You may also make a complaint to the Information Commissioner and Privacy Deputy Commissioner, who are equipped to consider and resolve privacy complaints, if you believe there has been an interference with the privacy of your personal information held by the City.

To make a complaint to the Information Commissioner and Privacy Deputy Commissioner, you may contact the Office of the Information Commissioner on:

(08) 6551 7888 or 1800 621 244 (WA country callers)

(9) Related documents

Internal

- Code of Conduct
- Elected Members Record Keeping Guidelines
- Employees Record Keeping Guidelines
- Information Governance Framework
- Privacy Management Framework
- Record Keeping Plan
- Records Management Policy

External

- *Freedom of Information Act 1992*
- *Privacy and Responsible Information Sharing Act 2024*
- *State Records Act 2000*

Policy Information

Strategic Link:	Strategic Community Plan – Key Objective ‘Listening and Leading’
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