

PRIVACY AND RESPONSIBLE INFORMATION SHARING POLICY

ASPIRATION	Leadership
RESPONSIBLE DIRECTORATE	CEO Office
RESPONSIBLE BUSINESS UNIT	City Legal
RELEVANT LEGISLATION	<i>Privacy and Responsible Information Sharing Act 2024 (WA)</i>

1. Objective

This policy outlines the City of Armadale's (**City**) approach to managing and handling Personal Information and Sensitive Personal Information in accordance with the *Privacy and Responsible Information Sharing Act 2024 (WA)* (**Act**) including the Information Privacy Principles (**IPPs**).

2. Scope

Personal Information in this policy refers to both Personal and Sensitive Personal Information as defined in the Act.

This policy applies to all Council Members, employees, volunteers, contractors, consultants, service providers, and any other third parties engaged by the City who collect, access, use, disclose, store or otherwise handle Personal Information on behalf of the City.

The policy applies to all Personal Information collected, held or managed by the City in the performance of its statutory, regulatory, and administrative functions and activities, including Personal Information related to customers, stakeholders, employees, agency staff, contractors, volunteers and Elected Members.

3. Policy statement

The City collects, manages and uses Personal Information responsibly, with transparency, in accordance with this policy and the law.

3.1 Collection

The City will only collect the minimum Personal Information reasonably necessary for a purpose directly related to the City's functions and activities. Personal Information will be collected by fair and lawful means and not in an unreasonably intrusive manner.

Personal Information may be collected in a variety of ways, including but not limited to: written or electronic correspondence, email, telephone, written forms, online applications, memberships, subscriptions, complaints, feedback, surveys, workshops, events, recruitment and employment processes (including engagement of volunteers, contractors, Elected Members and other workforce participants), procurement systems, accounts payable/receivable, CCTV, website and social media interactions, or via other government agencies and authorised third parties.

Personal Information may be collected directly from individuals or, where necessary, from third parties and other government agencies, through lawful means that are not unreasonably intrusive and are consistent with the specific purpose for collection.

Where it is not reasonable in the circumstances for an individual to expect their Personal Information to be collected or understand why it is being collected, the City will, at or before the time of collection, or as soon as reasonably practicable afterwards, take appropriate steps to notify individuals of the purpose for collection, whether provision is necessary (i.e. for a City function or required by law) or voluntary and the consequences of not providing it, how the information will be used, stored and protected, who it may be disclosed to, how individuals may access and correct their information and how to make a privacy complaint.

3.2 Use and Disclosure

The City will only use or disclose Personal Information for the primary purpose for which it was collected, or:

- a secondary purpose which would be reasonably expected by the individual to be related to the primary purpose;
- a purpose for which the individual has given consent; or
- a purpose permitted or authorised by law.

The City will:

- create and retain a written record of any secondary purpose or legal authorisation before using or disclosing any Personal Information; and
- limit all use and disclosure to what is reasonably necessary for a permitted purpose, in accordance with the Act and the sensitivity of the information.

Where the City engages contractors, consultants, service providers or other third parties who may collect, access, use, store or disclose Personal Information on behalf of the City, the City will take reasonable steps to ensure those parties are contractually required to handle Personal Information in a manner consistent with this policy and the requirements of the Act.

3.3 Information Quality

The City will take reasonable steps to ensure that Personal Information it collects, uses, or discloses is accurate, complete, up-to-date and relevant to the purpose for which it was collected.

Where the City becomes aware that Personal Information in its possession is inaccurate, incomplete, out-of-date or irrelevant, the City will take reasonable steps to correct, complete or update that information.

Individuals may ask for their information to be corrected. For certain requests related to an individual's Personal Information, a formal request under the *Freedom of Information Act 1992 (WA)* may be required.

3.4 Information Security

The City will take reasonable steps to protect the Personal Information it holds from misuse, loss, unauthorised access, modification or disclosure and unlawful destruction.

The City will take reasonable steps to destroy or permanently de-identify Personal Information when it is no longer required, subject to legal record-keeping and retention requirements, unless otherwise expressly required or authorised by law.

The City will maintain appropriate processes to respond to data breaches lawfully and expediently in accordance with the requirements of the Act, including notifying any applicable regulatory authorities.

3.5 Openness and Transparency

Individuals may request information about the types of Personal Information the City collects and holds, how that information is handled and the purposes for handling that information, and whether any Personal Information is used in automated decision-making processes.

3.6 Access and Correction

Individuals may request access to, or correction of their Personal Information held by the City. Where required or appropriate, such requests may be processed in accordance with the *Freedom of Information Act 1992* (WA).

Access to the City's records by Elected Members will be through the CEO in accordance with the *Local Government Act 1995* (WA) and this policy.

3.7 Unique Identifiers

The City will only assign or collect unique identifiers where necessary for legal compliance or the effective performance of City functions. Access to unique identifiers is restricted to authorised personnel.

The City will only use or disclose unique identifiers issued by other organisations with consent or in accordance with applicable law.

3.8 Anonymity

Where lawful and practicable, individuals may interact with the City anonymously or using a pseudonym. However, the City may be unable to process requests, complaints, submissions or transactions in whole or in part where identification is required by law or necessary to perform City functions.

3.9 Disclosure Outside Australia

The City may disclose Personal Information outside Australia where:

- the City reasonably believes the recipient is subject to comparable privacy protections;
- the City has taken reasonable steps to ensure the information is handled consistently with the IPPs (e.g. contractual safeguards);
- the individual has consented to the disclosure;
- the disclosure is required or authorised by law; or
- the disclosure is necessary to prevent or lessen a serious threat to life, health or safety, or is reasonably necessary for law enforcement or legal proceedings.

3.10 Automated Decision Making

The City may use Personal Information in automated systems that assist decision-making to improve operational efficiency and service delivery. All such processes will be documented and subject to oversight, ensuring:

- transparency of methodology and purpose;
- fairness and mitigation of bias; and
- availability of human intervention mechanisms where outcomes materially affect individuals.

3.11 De-identified Information

The City will take all reasonable steps to ensure any Personal Information that has been permanently de-identified will be protected from misuse and loss, unauthorised re-identification, access, modification or disclosure unless retention is required or authorised by law.

3.12 Privacy Complaints

Individuals may lodge a complaint to the City if they believe their Personal Information has been handled in a manner inconsistent with this policy or the Act. The City will take appropriate steps to investigate and respond to privacy complaints in a reasonable timeframe.

Information about how to lodge a complaint can be found in the Contact section of this policy.

3.13 Responsible Information Sharing

The Act establishes a framework to facilitate information sharing for public benefit between public and external entities as defined by the Act. The City will only share information in a manner consistent with the Responsible Information Sharing Principles (**RSPs**) as set out in Schedule 2 of the Act.

If the City enters into an information sharing agreement with another entity, including another government agency, the City will:

- ensure any sharing of Personal Information is strictly limited to a necessary, lawful and permitted purpose;
- where appropriate, conduct an assessment of the proposed handling of information to ensure consistency with the RSPs; and
- ensure responsible sharing safeguards are in place.

4. Influencing Strategies or Plans

The City's approach to privacy and responsible information sharing is guided by its broader strategic documents, including, but not limited to:

- Record Keeping Plan 2022
- Strategic Community Plan 2026 – 2035

These strategies ensure that Personal Information management aligns with City objectives, statutory obligations, and community expectations.

5. Applicable Legislation

This policy is to be read and applied in conjunction with relevant legislation, including but not limited to:

- *Freedom of Information Act 1992 (WA)*;
- *Local Government Act 1995 (WA)*;
- *Privacy and Responsible Information Sharing Act 2024 (WA)*; and
- *State Records Act 2000 (WA)*.

6. Definitions

Act means the *Privacy and Responsible Information Sharing Act 2024 (WA)*;

City means the City of Armadale;

Collect has the meaning given in the Act;

Consent has the meaning given in the Act;

De-Identify has the meaning given in the Act;

Disclose has the meaning given in the Act;

IPP means an Information Privacy Principle as set out in Schedule 1 of the Act;

Personal Information has the meaning given in the Act and in general terms, refers to any information or opinion (whether true or not and in any form) about an individual (living or dead) whose identity is apparent, or can reasonably be ascertained, from that information or opinion;

Primary Purpose has the meaning given in the Act;

Sensitive Personal Information has the meaning given in the Act, and in general terms, refers to Personal Information related to an individual's racial or ethnic origin, gender identity, sexual orientation or preference, health, political opinions, religious beliefs, membership in a political, professional, trade or union association or criminal record;

Unique Identifier has the meaning given in the Act and in general terms, refers to a number or other identifier (other than the individual's name) assigned by the City to an individual to identify that individual for purposes of the City's operations and functions;

All other terms have the meaning assigned in the relevant legislation unless otherwise defined in this policy.

7. Contact

An individual can contact the City's Privacy Officer to:

- see what Personal Information the City holds
- correct any Personal Information
- make a privacy complaint
- ask questions about how the City handles Personal Information.

Email: privacy@armadale.wa.gov.au

Post: Locked Bag 2, Armadale WA 6992

Telephone: (08) 9394 5000

VERSION CONTROL			
RELEVANT DELEGATIONS			
INITIAL COUNCIL ADOPTION	21/04/2026	REFERENCE	CS4/4/26
LAST REVIEWED	Click or tap to enter a date.	REFERENCE	
NEXT REVIEW DUE	Click or tap to enter a date.		

