



Privacy Management Plan

Version 8 - 19 August 2022

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Privacy Management Plan

Introduction

Purpose

This Privacy Management Plan (the Plan) explains how Lake Macquarie City Council (Council) complies with, and manages¹, personal and health information (personal information) in accordance with;

The *Privacy and Personal Information Protection Act 1998* (PIIP Act), the *Health Records and Information Privacy Act 2002* (HRIP Act), the *Government Information (Public Access) Act 2009* (GIPA Act), the *Privacy Act 1988* and the Privacy Code of Practice for Local Government (privacy obligations).

Scope

The privacy obligations and this Privacy Management Plan apply, wherever practicable, to:

- Councillors
- Council employees
- consultants and contractors of Council
- Council-owned businesses
- Council committees
- volunteers.

Council will take reasonable steps to ensure that all such parties are made aware that they must comply with the privacy obligations, any other applicable Privacy Code of Practice and this Plan.

Policy statement

Collecting personal information is an essential component for Council to be able to carry out its business activities, therefore we manage¹ this information in accordance with our privacy obligations.

This Plan is prepared based on the 12 Information Protection Principles (IPPs) and 15 Health Privacy Principles (HPPs) in the PIIP Act and the HRIP Act respectively.

Principles

Lake Macquarie City Council (Council) is committed to ensuring the protection of personal information of our customers, volunteers, employees, contractors, Councillors and Council committees. We do this by:

- informing individuals how Council will manage¹ their personal information
- informing individuals of their rights, and review processes available, under privacy legislation
- maintaining a culture of privacy awareness and supporting staff to understand their responsibilities regarding privacy
- developing, implementing and educating staff on policies and procedures which promote and enable compliance with Council's legal obligations regarding privacy
- considering relevant information and privacy protection principles in relation to Council systems, policy, processes, activities and projects.

Objectives

This Plan will:

- a) Ensure our processes and systems enable us to manage¹ personal and health information in accordance with our privacy obligations.

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- b) Educate Council staff about how to handle personal information to ensure compliance to our privacy obligations.

What is personal information?

Personal information under Section 4 of the PPIP Act is defined as 'information or an opinion about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion'. This information can be on a database and does not necessarily have to be recorded in a material form.

What is health information?

Health information under Section 6 of the HRIP Act is defined as 'personal information that is information or an opinion about the physical, mental health or disability of a person, express wishes about the future provision of health services, a health service provided or to be provided, or any other personal information collected to provide or in providing a health service'.

What is not personal or health information?

Personal information does not include information about an individual that is contained in a publicly available publication. Personal information, once it is contained in a publicly available publication, ceases to be covered by the PPIP Act.

Where Council is requested to provide access or make a disclosure and that information has already been published, then Council will rely on the provisions of the relevant Act that authorises Council to release that information and not the PPIP Act (for example, Section 8 of the GIPA Act).

Council considers the following to be examples of publicly available publications:

- an advertisement containing personal information in a local, city or national newspaper
- personal information on the internet
- books or magazines that are printed and distributed broadly to the public
- personal information that may be a part of a public display on view to the public.

Personal information held by Council

Council holds personal information concerning its customers, ratepayers and residents, such as:

- rates records
- DA applications and submissions
- Family Day Care records
- various types of health information.

Council holds personal information concerning employees, such as:

- recruitment material
- leave and payroll data
- personal contact information
- performance management information
- CCTV footage
- complaints and disciplinary matters
- pecuniary interest returns
- wage and salary entitlements
- health information, for example medical certificates, workers compensation claims and vaccination status.

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Council holds personal information concerning Councillors, such as:

- personal contact information
- complaints and disciplinary matters
- pecuniary interest returns
- entitlements to fees, expenses and facilities.

Unsolicited information

Where an individual, a group or committee, not established by Council, gives Council unsolicited personal or health information, then that information will still be treated in accordance with this Plan, the Codes, the HRIP Act and the PPIP Act for the purposes of IPPs 5-12 and HPPs 5-15 which relate to storage, access, use and disclosure of information.

Note that for the purposes of the HRIP Act and the PPIP Act, Council is not considered to have “collected” health or personal information if the receipt of the information by Council is unsolicited.

Public registers

Council is required by law to maintain a number of public registers and to make them available for public inspection.

Some of these registers contain personal information as defined in the PPIP Act, the HRIP Act and the GIPA Act. Section 57 of the PPIP Act requires Council to ensure that access to personal information in a register is consistent with the purpose for which the register exists.

In line with this requirement, Council has developed specific rules governing disclosure of personal information held in registers:

- Council will not disclose personal information in a public register unless the information is to be used for a purpose relating to the purpose of the Register, or an Act under which the Register is kept.
- The Privacy Code of Practice allows disclosure of single items or one page in a Register without explanation. However, such a disclosure can only occur when the person seeking the information attends Council in person.
- Council requires that any person who applies for more than one record or page from a public register, does so by completing a Statutory Declaration. Any such declaration must describe the intended use of the information requested and be witnessed by a Justice of the Peace.

The list of Council registers below specifies the main purpose of each of those registers.

Council's public register list

The GIPA Act and *Government Information (Public Access) Act Regulation 2018* (GIPA Regulation) lists information available to the public free of charge within a public register. The following is a list of Council's public registers:

- *Public Land Register* – (Section 53, Local Government Act, 1993). The purpose of this register is to identify all land vested in Council, or under its control.
- *Records of Approvals* – (Section 113, Local Government Act, 1993). The primary purpose is to identify all approvals granted under the LGA.
- *Pecuniary Interests* – (Schedule 1, GIPA Regulation, 2018). The purpose of this register is to determine whether a Councillor, a member of a council committee or a designated officer, has a

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pecuniary interest in any matter with which the Council is likely to be concerned. There is a corresponding public accountability purpose.

- *Rates and Charges Records* - (Section 602, Local Government Act, 1993). The purpose of this register is to record the value of a parcel of land and record rate liability in respect of that land and the owner or lessee of each parcel of land.

The information that is held on the Rates and Charges record is:

- property address
- rate liability
- property valuation
- owner name/s

Owner contact mailing information is not considered part of the Rates and Charges record. Owner contact mailing information will only be provided to adjoining property owners.

- *Development Consent Approvals* – (Section 100, Environmental Planning and Assessment Act, 1979). The purpose of this register is to identify applications for development consent and other approvals, confirm determinations on appeal, and identify applications for complying development certificates.
- *Building Certificates* – (Section 149G, Environmental Planning and Assessment Act, 1979). The purpose of this register is to identify all building certificates. Register information is available for inspection free of charge. However, copies of certificates are only available with owner's consent and the payment of the prescribed fee.
- *Public register of licences held* – (Section 308, Protection of the Environment Operations Act, 1997). The purpose of this register is to identify all licences granted under the Act.
- *Record of Impounding* – (Section 30 and 31, Impounding Act, 1993). The purpose of this register is to record any impounding action by Council.

Secondary purpose of all public registers

Due to the general emphasis on local government processes and information being transparent and accountable, it is considered that a secondary purpose for councils holding public registers is the provision of access to the public. Therefore, disclosure of specific records from public registers would normally be considered allowable under Section 57 of the PPIP Act.

However, requests for access, copying or the sale of the whole or a substantial part of a public register held by Council will not necessarily fit within this purpose. Council should be guided by the Privacy Code of Practice for Local Government in this respect. Where Council officers have doubt as to the intended use of the information, an applicant may be requested to provide a statutory declaration so that Council may satisfy itself as to the intended use of the information.

Application for access to one's own records on a public register

A person wishing to have access to a public register to confirm their own details needs only to prove their identity to Council before having access to their own personal information.

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Other registers

Council may have other registers that are not considered public registers. The Information Protection Principles, the PPIP Act, all applicable codes, and this Privacy Management plan apply to those databases or registers.

Information Protection Principles (IPPs)

Part 2, Division 1 of the PPIP Act contains 12 Information Protection Principles with which we must comply and an overview of the principles as they apply to Council is included below.

Principle 1 – Collection of personal information for lawful purposes

Council is committed to collecting personal information only by lawful means. Council will collect and deliver personal information to and from Government Departments, such as the Department of Planning and Environment and Office of Local Government, involved in the normal functions of Council's operation.

Council will continue the practice of dealing with the NSW Department of Community Services for enquiries on personnel and recruitment matters, such as for pre-employment screening of people working with children (*Commission for Children & Young Peoples Act 1998*).

Council will use any personal information for a variety of purposes within its departments, as on most occasions the information was collected for one main purpose; it may be used for a variety of other purposes. For example, the names and addresses of individual property owners are used to notify adjoining owners of proposed development, identify companion animal ownership, evaluate road openings and obstructions, evaluate tree preservation orders, investigate parking controls, evaluate land dedications and laneway status as well as being the basis of the Rating and Valuation Register.

Principle 2 – Collection of personal information directly from the individual

Council will collect personal information directly from the individual concerned unless:

- the individual has authorised collection from someone else
- the information has been provided by a parent or guardian of a person under the age of 16, or incapacitated by disability or age.

Personal information is collected by Council on individuals for a specific interaction/purpose. Council will not assume that permission has been given to use information that has been previously provided, as it may have been collected for another purpose.

Principle 3 – Requirements when collecting personal information

When Council collects personal information about an individual, that person will be notified of:

- the fact that the information is being collected
- the purposes for which the information is collected
- the intended recipients of the information
- whether the supply of the information is required by law or is voluntary, and any consequences for the individual if the information (or any part of it) is not provided
- the existence of any right of access to, and correction of the information
- Council's name and address, and where the information will be stored.

Council has added a Privacy Protection Notice to forms where Council solicits personal information from the public. Internal forms are not affected. There are also exemptions to this principle as outlined in Part 2 Division 3 of the PPIP Act.

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Principle 4 – Other requirements relating to collection of personal information

Council will take reasonable steps to ensure that:

- information collected is relevant to that purpose, is not excessive and is accurate, up to date, and complete
- the collection of the information does not intrude unreasonably on the personal affairs of the individual concerned.

There are exemptions to this principle as outlined in Part 2 Division 3 of the PPIP Act.

Principle 5 – Retention and security of personal information

Council will ensure that:

- information is used for a lawful purpose and is kept for no longer than is necessary
- the information will be disposed of securely
- the information is protected against loss, unauthorised access, use, modification or disclosure and against all other misuse (as are reasonable in the circumstances)
- relevant security measures are in place for example password protection, user defined restricted access, lockable storage of hard copy files, cyber security and data breach protections
- if it is necessary to release the information to a person in connection with the provision of a service to Council, everything reasonable is done to prevent unauthorised use or disclosure of the information.

The removal and destruction of records is performed in accordance with the State Archives and Records Authority of NSW General Retention and Disposal Authorities and Council's Records Management Policy.

Principle 6 – Information about personal information held by agencies

Council will take all reasonable steps to enable a person to determine whether Council holds personal information about them. If Council holds any information about a person, they may request Council advise them the nature of that information, the main purposes for which it is held, and that person's entitlement to access.

Principle 6 is subject to the GIPA Act provisions.

Principle 7 – Access to personal information held by agencies

At the request of an individual, Council will provide, without excessive delay and expense, details of the personal information it holds that relate to that individual.

Current employees are to enquire with the People, Culture and Risk department to access their employee records. Past employees are required to submit a formal information access application through Council's Access to Information team.

Council may also share information with other agencies in accordance with legislative requirements, memorandums of understanding or referral arrangements. This can include agencies such as the NSW Ombudsman, Office of Local Government and NSW Police for enquiries and property related matters. If you have any questions about whether Council holds your information, what the information is held for or how you can access the information, please refer to Council's [Access to Information](#) page.

The PPIP Act and the HRIP Act give people the right to access and amend their own information. Members of the public wishing to access or amend personal and health information Council holds about

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them need to contact Council's [Customer Service Centre](#). Council does not charge a fee to access and amend personal and health information.

Principle 8 – Alteration of personal information

Any person who is concerned with the inaccuracy or unacceptable use of their personal information kept by Council may request, in writing, that amendments be made to that information. Changes to information will require supporting documentation and evidence for the reason of the request.

Council has an obligation to take such steps to amend personal information where necessary. If Council decides that it will not amend the information, it may add the additional information, enabling it to be read with the existing information and notify the individual concerned. The individual to whom the information relates is entitled to have the recipients notified of the amendments made by Council. Council's Privacy Officer will approve required changes where applicable.

Principle 9 – Accuracy of information

Council will take reasonable steps to ensure the accuracy of personal information prior to use, having regard to the purpose for which it was collected, its proposed use, its relevance, whether it is up to date, complete and not misleading, in accordance with Council's Code of Conduct, approved policies and recorded procedures.

Principle 10 – Limits on use of personal information

Council will not use personal information for a purpose other than for which it was collected unless:

- the individual to whom the information relates has consented to use the information for that other purpose
- the other purpose for which the information is used is directly related to the purpose for which it was collected
- the use of the information for that other purpose is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual to whom that information relates, or of another person.

Officers using relevant personal information will not notify individuals for approval to perform usual office functions.

Officers will discuss personnel and recruiting records with solicitors and administrative staff when necessary without prior approval of individuals. These processes relate to the normal operational functions of Council and officers will use any personal information collected for multiple purposes if required for the business of Council.

Compliance with Information Protection Principle 10 is also subject to certain exemptions under the Act. If one of those exemptions apply, Council need not comply. Section 23(4) of the PPIP Act permits Council not to comply with Information Protection Principle 10 where the use of the information for another purpose is reasonably necessary for law enforcement purposes or for the protection of the public revenue. Law enforcement purposes means a breach of the criminal law and criminal law enforcement. This section does not remove the rights of an accused person.

Principle 11 – Limitations on disclosure of personal information

Council will not disclose personal information unless:

- the disclosure is directly related to the purpose for which it was collected and there is no reason to believe the individual concerned would object
- the individual has been made aware that this kind of information is usually released

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- disclosure is necessary to prevent or lessen a serious or imminent threat to the life of the individual concerned, or another person
- for the reasons outlined in Part 2 Division 3 of PPIP Act.

The GIPA Act overrides the restrictions on disclosure of personal information under Section 18 and 19 of the PPIP Act to the extent that it lawfully authorises, requires, necessarily implies, or reasonably contemplates that councils need not comply with these sections. Council must make records available for inspection and/or copy, and may be available subject to the public interest test.

Principle 12 – Special restrictions on disclosure of personal information

Council will not disclose personal information that:

- relates to an individual's ethnicity/racial origin, political opinions, religion or philosophical beliefs, trade union membership, or sexual activities unless the disclosure is necessary to prevent a serious or imminent threat to the life or health of the individual concerned or another person
- relates to any enquiry from anyone outside NSW unless:
 - a relevant privacy law applies to personal information in force in that jurisdiction; or
 - the disclosure is permitted under a privacy code of practice (a law determined by the Privacy Commissioner and published in the *Government Gazette*).

There are exemptions to this principle as outlined in Part 2 Division 3 of the PPIP Act.

The Health Privacy Principles (HPPs)

Under the provisions of the *Health Records and Information Privacy Act 2002* (HRIP Act) Council has a legal obligation in how it must collect, hold, use and disclose individuals' health information.

The following is a list of examples of the types of health information and circumstances in which Council may collect health information:

- seniors' bus outings where information may be collected on special medical needs
- information on carers and families for the purposes of children's services
- volunteer programs where volunteers are asked to disclose health conditions which assist Council to provide support in the event of an incident or which may preclude them from some types of volunteer work
- information in relation to the need for assisted waste services
- information relating to employee health for example pre-employment medical declarations, medical certificates, workers' compensation and vaccination status.

In the same way as the Information Privacy Principles that have been outlined above, the provisions of the HRIP Act allow for Health Privacy Principles. The meaning, intent and application of these principles are required when handling health information.

The Health Information Principles and the Information Privacy Principles are very similar with some principles overlapping in areas. For more information on the Health Privacy Principles, refer to the Information and Privacy Commission (www.ipc.nsw.gov.au).

Principle 1 – Collection of health information for lawful purposes

Council will only collect health information for a lawful purpose that is directly related to Council's activities and is necessary for that purpose.

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Principle 2 – The collection of health information is relevant to Council’s operations

Council will ensure that the health information is relevant, accurate, up to date and not excessive and that the collection is not unnecessarily intrusive into the personal affairs of the individual.

Principle 3 – Collection of health information directly from the individual

Council will only collect health information directly from a person concerned, unless it is unreasonable or not practical to do so.

Principle 4 – Requirements when collecting personal information

Council will tell the person why their health information is being collected, what will be done with it, who else might see it and what the consequences are if the person decides not to provide it. Council will also tell the person how they can see and correct their health information.

Principle 5 – Retention and security of health information

Council will store health information securely and protect it from unauthorised access, use or disclosure. Health information will not be kept for any longer than is necessary and will be disposed of appropriately.

Principle 6 – Information about health information held by agencies

Council will provide details about what health information Council is holding about an individual and information about why Council is storing that information and what rights of access the individual has.

Principle 7 – Access to health information held by agencies

Council will allow a person to access their health information without unreasonable delay or expense.

Principle 8 – Alteration of health information

Council will allow a person to update, correct or amend their personal information where necessary.

Principle 9 – Accuracy of health information

Council will ensure that individuals’ health information is relevant and accurate before using it.

Principle 10 – Limits on use of health information

Council will only use individuals’ health information for the purpose for which it was collected or for a directly related purpose that the person to whom the information relates would expect. Otherwise, Council will obtain the person’s consent.

Principle 11 – Limits on disclosure

Council will only disclose health information under the following circumstances:

- with the consent of the individual to whom the information relates
- for the purpose for which the health information was collected or a directly related purpose that the individual to whom it relates would expect
- if an exemption applies within Health Privacy Principle 11 (for example law enforcement or serious threat to health or welfare) as outlined under Schedule 1, 10 (1) (i) of the HRIP Act.

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Principle 12 – Not identified

Council will only attribute an identification number to health information if it is reasonably necessary for Council to carry out its functions effectively.

Principle 13 – Anonymous

Council will provide health services anonymously where it is lawful and practical.

Principle 14 – Transfer of health information to Commonwealth agencies

Council will only transfer personal information out of NSW if the requirements of Health Privacy Principle 14 are met.

Principle 15 – Authorised

Council will only include health information in a system to link health records across more than one organisation if the individual to whom the health information relates expressly consents to the link.

Supplementary information

Suppression of personal information

A person may request Council to not publish their personal information if they consider that the safety or wellbeing of a person would be affected by the information being placed on the public register or released by Council.

Council will suppress the information in accordance with the request unless Council is of the opinion that the public interest in maintaining public access to the information outweighs any individual interest in suppressing the information. When in doubt, Council will favour suppression.

This is in accordance with Section 58(2) of the PPIP Act and Section 739 of the Local Government Act 1993 (LGA).

Any information that is suppressed from the public register may still be kept for other purposes. The information may still be used for Council functions and disclosure will be managed in accordance with the GIPA Act.

An application for suppression must be made in writing and outline the reasons for the request. Council may require supporting documentation where appropriate.

Privacy complaint process

Council encourages the informal resolution of privacy issues before undertaking the review process, issues can be raised informally with Council and complaints will be managed under Councils Feedback Management Policy, further details can be found on our website www.lakemac.com.au.

Internal review

Individuals have the right to request an internal review under Part 5 of the PPIP Act. A complaint about Council's handling of personal information (conduct) is managed via an internal review, which is an internal investigation by Council's Privacy Officer.

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Conduct can mean an action, a decision, or even inaction by Council. Examples of the conduct complained about could be:

- a decision to refuse a person access to their personal or health information
- the action of disclosing a person's personal or health information to another person
- the failure to protect a person's personal or health information from being inappropriately accessed by someone else.

The person (applicant) who has a concern about Council's conduct is entitled to apply for an internal review. The application for review must be in writing and addressed attention to The Privacy Officer through the following channels:

- online at www.lakemac.com.au/Services/Report-an-issue
- email at council@lakemac.nsw.gov.au
- Post:

The Privacy Officer
Lake Macquarie City Council
Box 1906
Hunter Regional Mail Centre NSW 2310

On receipt of the internal review request, Council will forward a copy to the NSW Privacy Commissioner. Council will inform the NSW Privacy Commissioner of progress and the outcome of the review. Council will assess whether or not it has complied with the privacy principles and then advise the applicant of its findings and what it will do as a result.

The NSW Privacy Commissioner is entitled to make submissions in relation to internal reviews and Council is required to consider any relevant material submitted by the NSW Privacy Commissioner. The Council must provide the NSW Privacy Commissioner with a draft of Council's internal review report to enable the NSW Privacy Commissioner to make a submission.

The aggrieved individual must lodge an application within six months from the time the applicant first became aware of the conduct (the subject of the application). Council may exercise its discretion to accept an application which may be received after the end of the 6-month period.

Council will keep the contents of the review confidential in accordance with Council's Code of Conduct. The Internal Review, as far as practicable, will be conducted by the Privacy Officer, or an appropriately qualified employee of the Council, who does not have a conflict of interest (Reviewing Officer).

Council will complete the review as soon as reasonably practicable within 60 days from receipt of the application for review.

Following completion of the review, Council will do one or more of the following:

- take no further action on the matter
- make a formal apology to the applicant
- take appropriate remedial action
- provide undertakings that the conduct will not occur again
- implement administrative measures to ensure that the conduct will not occur again.

Council will notify the applicant in writing as soon as practicable at the completion of the review. This will include:

- the outcome and reasoning behind the decision
- any proposed actions to be taken

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- the right of the applicant to have the outcome reviewed by the Administrative and Equal Opportunity Division of NSW Civil and Administrative Tribunal (www.ncat.nsw.gov.au or 1300 006 228)

The Privacy Commissioner's role

The Privacy Commissioner has an oversight role in how agencies handle privacy complaints and is entitled to make submissions to the City regarding internal reviews. If the City receives an internal review application, it will:

- notify the Privacy Commissioner of the application as soon as practicable after receiving the application
- keep the Privacy Commissioner informed of the progress of the internal review
- inform the Privacy Commissioner of the findings of the review and the action proposed to be taken by the City in relation to the matter.

An individual can also make a complaint directly to the Privacy Commissioner about an alleged breach of their privacy.

Misuse of personal or health information

Section 664 of the Local Government Act 1993 makes it an offence for anyone to disclose information except in accordance with that section. Whether or not a particular disclosure is made with lawful excuse is a matter that requires legal opinion from case to case.

Training and education

All new employees and Councillors will receive training on our privacy obligations at induction. This training is also supplemented by a regular curriculum of additional awareness training.

Members of the public are educated about our privacy obligations and rights through notification or messaging when customers call us on our main telephone number, collection notices on all forms that require collection of personal information and a dedicated privacy information page on our website lakemac.com.au/privacy-statement

Public access to the Privacy Management Plan

This Plan is available on Council's website at www.lakemac.com.au/Privacy-Statement or by contacting our Customer Service Centre on the details below. Other Council policies can be accessed at www.lakemac.com.au/Our-Council/Council-policies .

Contact details

You may obtain further information by contacting:

Privacy Officer
Lake Macquarie City Council
Box 1906
Hunter Region Mail Centre NSW 2310
02 4921 0333
council@lakemac.nsw.gov.au

Privacy Commissioner
GPO Box 7011
Sydney NSW 2001
1800 472 679
ipcinfo@ipc.nsw.gov.au

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Review and Evaluation

Section 33 of PPIP Act requires all public sector agencies to prepare, implement, and periodically review a Privacy Management Plan. This Plan will be reviewed every two years.

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Controlled Document Information

Authorisation Details

Folder No:	F2005/02170	TRIM Record No:	D10637319
Audience:	External – The document applies to all staff, councillors and customers.		
Department:	Customer Experience	Officer:	Coordinator Customer Service Centre – Troy Hamilton
Key focus area(s):	Shared Decision Making		
Review Timeframe: Max < 4 years	2 years	Next Scheduled Review Date:	19 August 2024
Authorisation:	Authorised by Director Organisational Services - 19 August 2022		
Authorisation – Council Adoption Date:	N/A as authorised by Director Organisational Services - 19 August 2022		

Related Document Information, Standards & References

Related Legislation:	<i>The PPIP Act 1998 Health Records and Information Privacy Act 2002 Government Information (Public Access) Act 2009 State Records Act, 1998 Privacy Act 1988</i>	<i>Requirement of Act Plan must address requirements of Act Requirement of Act</i>
Related Policies:	<i>Code of Conduct Records Management Policy</i>	
Related Procedures, Guidelines, Forms, WHS Modules/PCD's, Risk Assessments, Work Method Statements:	<i>Archiving and disposal of records procedure</i>	
Standards, COP's & Other References	<i>- Information and Privacy Commission's checklist for privacy management plans, guide to making privacy management plans - Dept of Local Government Model Privacy Management Plan</i>	

Definitions

Term / Abbreviation	Definition
GIPA Act	Government Information (Public Access) Act 2009
PPIP Act	Privacy and Personal Information Protection Act 1998
HRIP Act	Health records and Information Privacy Act 2002
Manages ¹	Unless otherwise specified, manage includes, without limitation, Council collection, storing, keeping, retaining, accessing, securing, using, amending, disclosing or disposing of personal or health information.

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Consultation (update for each version created)

Key Departments, Teams, Positions, Meetings:	Legal Department, Head of Customer Experience, Records Services Coordinator, Access to Information Officers, Internal Ombudsman, Internal Auditor, Information and Privacy Commission
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Version History

Version No	Date Changed	Modified By	Details and Comments
0	09/05/2005	G Brown	Inclusion of reference to Health Records and Information Privacy Act
1	7/10/2005	G Brown	Conversion to new template.
2	30/11/2007	L Fitton	Changes in legislation, titles, headings
3	29/04/2009	R.Skelton	Conversion to new template, improved format and corrected out of date information.
4	27/07/2010	R Skelton	Included GIPA (Act) and corrected out of date information
5	2/02/2011	R. Skelton	Included changes to applying for suppression of personal information and body of document reviewed for improved grammatical presentation.
6	25/09/2014	T. Hamilton	Updated template, updated content and improved format. Updated contact information for Privacy Commissioner NSW. Changes of note are, the inclusion of a definition of what is not personal or health information, examples of personal information held by Council and the inclusion of the detailed list of the health privacy principles
7	9/4/2019	T. Hamilton	Minor grammatical changes, updated content and improved format
8	May 2022	T. Hamilton	Updated template and modified content to include more detailed information on the Privacy Complaint Process, the role of the Privacy Commissioner and how we educate members of the public on our privacy obligations.