

Information Handling and Privacy Policy

Responsible Division	Corporate Services and the Office of the CEO
Responsible Business Unit	Digital Solutions and Services Governance and Strategy
Responsible Officer(s)	Manager Digital Solutions and Services Manager Governance and Strategy
Affected Business Units	All City Business Units
ECM Document Set ID	3275118

Purpose

1. This policy sets out how the City of Bayswater manages the collection, storage and use of personal information to ensure that privacy risks are appropriately managed.

Scope

2. This policy applies to all Elected Members, all employees, contractors and volunteers undertaking duties on behalf of the City.
3. This policy applies to all personal information handled by the City, including information relating to customers and stakeholders of the City, employees, contractors, volunteers, Elected Members and Committee Members.

Definitions

4. For the purpose of this policy —

"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:

- (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; and
- (vii) information that relates to one or more features specific to the physical, physiological, genetic, mental, behavioral, economic, cultural, or social identity of an individual.

"Business purposes" means for purposes associated with the day-to-day business of the City of Bayswater.

Policy Statement

Collection of personal information

- 5. The City's Risk Management Framework identifies and controls information management risks, including legislative requirements for information management.
- 6. The City will take all reasonable steps to safeguard personal information from unauthorised access or misuse.
- 7. Personal information will only be collected for purposes that relate to the City carrying out its functions of a local government and can include public consultation through the City's "Engage Bayswater" portal.
- 8. The City collects personal information through the performance of our services and functions;
 - a) as required by law;
 - b) through correspondence, communication and service requests; and
 - c) through online data and metadata collection.
- 9. The City also collects personal information using website tools to collect and view website traffic information including:
 - browser and device used;
 - dates and times of visit; and
 - pages and documents viewed.

These form part of the City's cookies and website analytics from third parties and these sites have their own privacy policies. The City also uses cookies and session tools to improve user experience when accessing the City's websites.

Sharing of personal information

- 10. The City will establish controls to ensure that personal information is only used for business purposes.
- 11. Personal information collected by the City will not be disclosed to a third party (other than the individual concerned) unless:
 - a) The disclosure is a public interest disclosure, or it is information which the public has a right to access under relevant legislation;

- b) The disclosure is required or authorised by or under any other law;
 - c) The individual concerned has consented to the disclosure;
 - d) The disclosure is necessary to prevent or lessen a serious and imminent threat to the individual concerned or another person; and
 - e) The information is being utilised by a third party engaged on behalf of the City to undertake business purposes.
12. The City will use processes to de-identify information by redacting out personal or confidential information as part of the Freedom of Information process as well as disposal.
13. The City's website contains links to third party websites. Where these links are accessed by City stakeholders, via the City's website, the City is not able to control what information may be collected by the third-party website.
14. The City is committed to safeguarding personal information against misuse, loss, unauthorised access or disclosure. Personal information is stored in on-premises and cloud-based systems. Where cloud services are used, they are hosted in Australia and must comply with Australian privacy laws and contractual security requirements.
15. Any documents held by the City that contain personal information will be handled in a secure, responsible, and compliant manner. This includes the collection, storage, retention, and destruction of records.
16. The City of Bayswater will implement multiple controls to protect personal information from unauthorised access, misuse, loss, modification, and disclosure by implementing robust security controls where practical, including:
- Encryption
 - Access Controls
 - Multi-Factor Authentication
 - Security Awareness Training
 - Network Security
 - Domain Security
 - Email Security
 - Firewalls and Intrusion Detection Systems
 - Audit logs

Data breaches and compliance

17. The City will conduct regular security assessments to detect and prevent data misuse or loss. If a data breach occurs, the City will investigate the extent of the incident and ensure appropriate containment and mitigation measures are applied.
18. Affected individuals and regulatory bodies will be notified as required (e.g., the Australian Cyber Security Centre (ACSC), Australian Cybercrime Online Reporting Network (ACORN), WA Office of

Digital Government, Office of the Australian Information Commissioner, Police, particularly if theft or other crime is suspected).

19. Monitoring and Compliance Security systems will be actively monitored to detect cyber threats.
20. The City will review and update its cyber security practices in line with industry standards and legal requirements and regular training will be provided to employees to improve cybersecurity awareness and compliance.
21. Regular annual compliance activities such as “orchestrated phishing” is conducted to provide real life learning to City stakeholders to increase cyber security awareness.

Automated decision making

22. The City implements a range of automated decision-making processes that benefit both the organisation and “customer experience”. Examples of these that are used in key and core business include:
 - Recruitment;
 - Employee onboarding and training;
 - Payment and payroll processes;
 - Online lodgement and assessment of applications and:
 - Scheduling and booking of annual maintenance requests.

Requests for personal information

23. Under the Freedom of Information process there are rights to access personal information. Access to someone’s own information can be made by contacting the City’s records management email at mail@bayswater.wa.gov.au. This request will then be considered by the designated City’s Privacy Officer in accordance with both the *Privacy and Responsible Sharing Act 2024* and the *Freedom of Information Act 1992*.

Complaints

24. Complaints in relation to breaches of the *Privacy and Responsible Information Sharing Act 2024 Legislation* and this Policy can be lodged with the City by email at governance@bayswater.wa.gov.au.

Related Legislation

- *Privacy and Responsible Information Sharing Act 2024*
- *Local Government Act 1995*
- *Freedom of Information Act 1992*
- *Public Interest Disclosure Act 2003*

Related Documentation

Risk Management Framework

Record Keeping Plan

Document details

Relevant delegations	Nil		
Risk evaluation	Low		
Strategic link	Goal L4: Communicate in a clear and transparent way. Provide the community with useful information about Council's policies, services and events and advise the community of engagement outcomes.		
Council adoption	27 May 2025	Resolution	10.5.1.7
Next review due	27 May 2029		