

3.2.8 PRIVACY POLICY

Policy Objective

This policy explains how the Shire of Kent manages personal information. It sets out clear rules to make sure data is handled legally, ethically and respectfully. It follows privacy laws and supports good public service while protecting people's privacy.

Policy Scope

This Policy applies to everyone who works with or for the Shire of Kent, including elected members, employees, contractors and service providers, volunteers and external partners. It covers anyone who handles personal information on behalf of the Shire of Kent.

Implementation

The following outlines how the Shire of Kent puts its privacy commitment into practice. These statements reflect the Shire's approach to managing personal information responsibly, in line with legal obligations and community expectations.

Roles and Responsibilities

All Employees, Contractors, Volunteers and Elected Members

- Must understand the Shire's privacy and confidentiality rules and how they apply to their work.
- Must report any data breaches or privacy risks as soon as they are identified.

Data Breach Response Team

- Activated according to the Shire of Kent's Data Breach Response Policy.
- Responsible for containing the breach, fixing the issue and restoring services.

Information Collection

The Shire of Kent collects personal information from staff, residents, customers and other stakeholders to deliver services and carry out its functions.

Types of information collected can include:

- Name
- Address
- Date of birth
- Phone number
- Email address
- Next of kin
- Gender
- Signature
- Drivers licence
- Bank account details
- Health information
- Police clearance
- Tax file number

- Vehicle registrations

This information can be collected through:

- Paper forms
- Online forms
- Recorded meetings
- Email
- CCTV
- Phone calls

This information is only used for the reason it is collected for. If another agency is involved, such as the State Government, you will be informed.

Automatically Collected Information

When you interact with the Shire of Kent through social media or through the Shire's various WhatsApp groups, website forms or Microsoft Forms forms, your information may also be used to help improve communication. These platforms have their own privacy policies.

The Shire of Kent's website may use cookies and collect anonymous data such as browser type, IP addresses and pages visited. This helps us to understand website traffic and improve services. Clickstream data (your path through the website) may also be recorded for statistical purposes. No attempt is made to identify users unless the data is required for investigation or security purposes.

Cookies used by the Shire of Kent's website are session-based and deleted when you close your browser. You can block cookies in your browser settings.

Links to external websites are provided for convenience. The Shire is not responsible for the privacy policies of these third parties.

Use and Disclosure of Personal Information

The Shire of Kent only uses personal information for the purpose it is collected for or for related purposes you would reasonably expect. This includes:

- Managing rates and local government records
- Providing information about Shire services
- Delivering appropriate services and facilities
- Managing permits, billing, animal ownership, building and development applications.

Unique identifies created by the Shire of Kent are only used within internal systems and are not shared externally. Information is stored securely in accordance with the *State Records Act 2000*.

Sharing

The Shire does not share personal information outside Australia unless required by law. Information may be shared if:

- Required under the *Freedom of Information Act 1992*
- Required under the *Local Government Act 1995*
- Ordered by a court or required or authorised by a written law
- Needed to complete the purpose for which it was collected
- Needed to recover money owed to the Shire of Kent
- You have given consent

Public Registers

The Shire of Kent only shares information from public registers for purposes related to the register.

Anonymity

You can remain anonymous when dealing with the Shire of Kent unless the law requires your identity. Remaining anonymous in dealing with the Shire of Kent however may mean the Shire cannot proceed or deal with the matter if personal information is requested.

Access and Complaints

You can ask to update or access your personal information. In most cases, this can be handled informally. If needed, you can make a formal request under the *Freedom of Information Act 1992*.

To request access or updates, please contact the Shire of Kent at admin@kent.wa.gov.au.

You will need to provide a form of identification to prove your identity.

To make a complaint, you can contact the Shire of Kent at admin@kent.wa.gov.au.

State Government Frameworks

Privacy and Responsible Information Sharing (PRIS)

The PRIS framework includes 11 Information Privacy Principles that guide how organisations in Western Australia must handle personal information. A summary of the 11 IPPs are:

- Collection of personal information – must be lawful, fair and necessary for the organisation's work.
- Source of personal information – should be collected directly from the person unless it is not practical.
- Use and disclosure – information must only be used or shared for the reason it was collected, unless an exception applies.
- Data quality – reasonable steps must be taken to keep information accurate, complete and current.
- Data security – information must be protected from misuse, loss and unauthorised access.
- Access to personal information – people have the right to see their personal information, with some exceptions.

- Correction of Personal Information – people can ask for correction to make sure their personal information is accurate
- Identifiers – limits apply to using government-issued identifiers (like Medicare numbers)
- Anonymity and pseudonymity – people should be able to stay anonymous or use a pseudonym where possible and legal.
- Cross-border disclosure – information must not be sent outside WA unless proper protections are in place.

Definitions

Personal Information means any detail or opinion, true or not, written down or not, that relates to a person who can be identified, either directly or indirectly. This includes both living and deceased individuals. Examples of personal information include:

- A person's name, date of birth or address.
- A unique identifier, online username or pseudonym.
- Contact details like phone number or email.
- Location data showing where someone is or has been.
- Technical or behavioural data about someone's activities, preferences or identity.
- Inferred information, such as predictions about someone's behaviour or preferences, or profiles created from combined data.
- Details about a person's physical, mental, genetic, economic, cultural or social identity.

Health and biological data includes the following:

- Health information
- Genetic or genomic data (not related to health)
- Biometric data (like fingerprints or facial recognition)

Inferred sensitive information means any other information that could reasonably reveal one of the above categories.

Cookies means files stored on a user's device to help websites remember the user's visits and activity.

Unique identifiers means numbers or codes used to identify and track people or things, such as

- Tax file numbers, driver's licence number, passport number
- IP address or MAC address
- Employee ID or customer ID
- Barcodes, QR codes, vehicle identification numbers.
- Medicare number, health record number.

Automated decision-making means when systems make decisions using data and rules without human input, often used to improve services.

De-identification / obfuscation means removing or replacing personal details with codes so data can be used without revealing identifies.

Document Control

Policy Number	3.2.8
Policy Version	1
Creation Date	17/06/2026
Last Review Date	N/A
Next Review Due	2029
Legislation:	<i>Local Government Act 1995</i> <i>Privacy and Responsible Sharing Act 2025</i>
Related Documents:	Nil