

Governance x: Information Breach Policy

1. Purpose

The City of Kalamunda is committed to protecting the privacy and security of the information we hold. This Information Breach Policy explains, in clear terms, how the City identifies, responds to, and manages an information breach. It provides our community with transparency, builds trust, and outlines what you can expect from us if your information is involved in a breach.

2. Planning

The Policy relates back to the *Kalamunda Advancing Strategic Community Plan to 2031*

Priority 4: Kalamunda Leads

Objective 4.1 - To provide leadership through transparent governance.

Strategy 4.1.1 - Provide good governance.

3. Policy Statement

This privacy policy tells you how the City responds to an information breach.

An information breach occurs when information is:

- accessed without authorisation
- disclosed without authorisation
- lost, in circumstances where unauthorised access or disclosure is likely

Breaches may be caused by human error, malicious activity, system failures, or physical incidents and may involve digital or paper records.

4. Our commitment to managing breaches

If the City becomes aware of a suspected or actual information breach, we will:

1. Act quickly to contain the breach and prevent further harm
2. Assess what information is involved and how serious the breach may be
3. Mitigate risks to affected individuals (e.g., by recovering information where possible)
4. Communicate with affected individuals when appropriate
5. Implement improvements to prevent future breaches

5. How you will be notified

If your personal information is involved in a breach that could reasonably cause harm, the City of Kalamunda will notify you as soon as practicable. We will explain:

- What happened
- What type of information was affected
- What steps the City of Kalamunda has taken
- What steps you can take to protect yourself
- Who to contact for help

6. When we notify the Information Commissioner

Once the new notifiable information breach scheme commences on 1 January 2027, the City will also notify:

- The Information Commissioner if a breach is likely to result in serious harm
- The Chief Data Officer if the breach involves information shared under an information-sharing agreement

7. How breaches can be reported to the City of Kalamunda

If you suspect an information breach has occurred or you have concerns about how your information has been handled, you can contact:

Privacy Officer – City of Kalamunda
Email: enquiries@kalamunda.wa.gov.au
Phone: (08) 9257 9917
Address: PO Box 42, Kalamunda WA 6926

8. Training, preparedness and continuous improvement

The City maintains systems, policies, and staff training to prevent, detect, and respond to information breaches.

We regularly review our information management and security practices to ensure they remain effective and up to date.

9. Record Keeping

The City keeps secure internal records of suspected and actual information breaches, consistent with recommendations to maintain an Information Breach Register.

This helps us track, understand, and improve our response to breaches.

10. Continuous review of this policy

This policy will be reviewed and updated as required — particularly as new provisions of the PRIS Act come into effect. Agencies are encouraged to update their policies to align with forthcoming obligations. [11 - Infor...ach Policy | PDF]

The most current version of this policy will always be available on the City's website.

- IPP 1 – Collection - We only collect personal information when it is necessary for our functions or activities.
- IPP 2 – Use and Disclosure - We use and disclose personal information only for the purpose we collected it, or for a related purpose you would reasonably expect, unless another law authorises it.
- IPP 3 – Information Quality - We take reasonable steps to ensure the personal information we collect, use or disclose is accurate, complete, and up-to-date.
- IPP 4 – Information Security - We protect the personal information we hold from misuse, loss, unauthorised access, modification, or disclosure.
- IPP 5 – Openness and Transparency - We must maintain a publicly available privacy policy explaining how we handle personal information. This document forms part of that obligation.
- IPP 6 – Access and Correction - From 1 July 2026 you may request access to, and correction of, your personal information. We must assist you to make a request. (You may also use FOI.)
- IPP 7 – Unique Identifiers - We only assign unique identifiers where it is necessary for our functions.
- IPP 8 – Anonymity - Where lawful and practicable, you may interact with us anonymously or using a pseudonym
- IPP 9 – Disclosure Outside Australia - We do not disclose personal information outside Australia.
- IPP 10 – Automated Decision-Making - We do not make significant decisions about individuals using automated systems or AI. If we use such tools in future, we will conduct impact assessments and tell you how decisions are made.
- IPP 11 – De-identified Information - If we hold or share de-identified information, we take steps to prevent it from being re-identified.

11. Sharing information responsibly

We may share information only when permitted by law and with appropriate safeguards. The PRIS Act includes a responsible information sharing framework that allows WA

government (State and Local) to share information (including personal information) for permitted public interest purposes, subject to strict principles, approvals, and accountability. Where we share, we will apply minimisation and security measures and, where required, use a data sharing arrangement or other formal documentation to set conditions on the use and protection of the information.

We do not disclose personal information outside Australia.

12. Direct communications

If you provide your contact details (email address, phone number or postal address), we may use them to send you updates about your request, service notifications or community information you've subscribed to. You can opt out of non-essential communications at any time.

13. Automated decision making and AI

We do not use automated systems (including AI) to make significant decisions about individuals. If this changes in the future, we will conduct impact assessments and let you know how the system works and how you can seek a review—consistent with the PRIS Act.

14. Keeping information secure

We take reasonable steps to protect personal information from misuse, loss and unauthorised access, modification or disclosure. This includes technical controls, access restrictions, training and governance measures across our systems and records.

15. How long we keep information

We retain information only for as long as needed to fulfil the purpose we collected it for and to meet legal, regulatory, and recordkeeping requirements, after which it is securely destroyed or archived.

16. Your rights

From 1 July 2026, you can request access to your personal information we hold and request corrections if it is inaccurate, out-of-date or incomplete. We will respond in line with the PRIS Act's access and correction provisions (Part 2, Division 4 and IPP 6). If you need help making a request, we will assist you.

Note: You can also continue to apply for access to documents under the Freedom of Information Act 1992 (WA), which operates alongside the PRIS Act.

17. Complaints about privacy

Talk to us first. If you are concerned about how we handled your personal information, please contact our Privacy Officer (details below). We will investigate and respond.

If you are not satisfied: from 1 July 2026 you may be able to lodge a complaint with the WA Information Commissioner after you have given us a reasonable opportunity to resolve your concerns.

Serious information breach reporting to the Information Commissioner begins 1 January 2027 under the PRIS Act

18. Collection Notices

When we collect personal information for a specific activity (e.g., form, application, program or event), we will provide a Collection Notice that explains: the purpose, what information is required, whether any law authorises/compels the collection, who we may share it with, consequences of not providing it, and how you can access/correct your information.

19. Third parties and service providers

We may engage providers to help deliver services (for example, survey companies or cloud-hosted tools). These providers must handle your information only for the agreed purpose and must protect it under contractual and legal requirements. Some third-party services used on our website have their own privacy policies—please read those when you use them

20. Contact us

Privacy Officer (Coordinator Data, Information & Systems) – City of Kalamunda
Email: enquiries@kalamunda.wa.gov.au | Phone: (08) 9257 9917
Post: PO Box 42, Kalamunda WA 6926

For FOI requests, contact our Freedom of Information Coordinator using the same details.

21. Changes to this policy

We may update this policy to reflect changes in law or our practices. The latest version will always be available on our website. The PRIS privacy and responsible information-sharing provisions commence 1 July 2026; mandatory notifiable information breach reporting commences 1 January 2027.

22. Definitions

Personal information is information or an opinion about an identified person (or a person who can reasonably be identified).

Sensitive information includes things like health information, racial or ethnic origin, religious beliefs, sexual orientation and similar categories that require extra care.

Status	Draft		
Related Local Law			
Related Council Policies	Governance 20 – Code of Conduct Complaints Management		
Relevant Delegation	CEO		
Related Internal Procedures	Privacy CEO Direction		
Related Budget Schedule	Nil		
Legislation	Privacy and Responsible Information Act 2024 Freedom of Information Act 1992 State Records Act 2000		
Notes and Conditions			
Authority	CEO		
Adopted		Next Review Date:	

Commented [RB1]: This policy is not related as the matter of breaching confidentiality would come under the Rules of Conduct aspect of the Code of Conduct (Division 4) and is not dealt with using this policy.