

Governance 25: Privacy and Responsible Information Sharing Policy

1. Purpose

The City of Kalamunda is committed to protecting your privacy. This policy outlines how we collect, use, disclose and protect your personal information in accordance with the Privacy and Responsible Information Sharing Act 2024.

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 we collect and use personal information. The City of Kalamunda values the privacy of its customers and stakeholders, and views the protection of an individual's privacy as a vital part of its responsibility to the community. This privacy policy outlines that:

- We collect the minimum personal information needed to deliver City services and meet our legal obligations
- We use your information only for the purpose we collected it, or as the law allows
- We keep your information secure and only share it when lawful and responsible, in a safe and secure manner
- You can access and correct your information from 1 July 2026 under the PRIS Act (you can also use FOI)
- We do not disclose personal information outside Australia.
- For website use, we use cookies/analytics and may use third-party services—each has its own privacy policy.
- If something goes wrong, we will manage it and—where required—notify the WA Information Commissioner and affected people for serious breaches from 1 Jan 2027.

4. What we collect

We collect personal information when it is necessary for our functions and services (for example, rates and property administration, animal registration, customer service requests, programs and events, facility memberships, consultative processes, and compliance activities). We also collect information you give us directly (forms, emails, phone calls, online requests, event registrations and feedback).

Examples include: your name, contact details, property details, service requests, application information, and (where relevant to a program or required by law) date of birth or limited health information. Some collections are authorised or required under specific laws such as the Local Government Act 1995, Dog Act 1976 and Cat Act 2011.

5. How we collect information online

City websites and cookies. We use cookies and analytics tools (e.g., Google Analytics) to improve our sites and services. These tools may capture device IP addresses, pages visited, and referring sites. You can opt out of some analytics via your browser settings or the Google Analytics opt-out add-on.

Third-party services. Certain online services we use are hosted by trusted providers and have their own privacy policies. When you choose to use those services, your information is handled according to those providers' policies.

Social media. We use social media to inform and engage the community. Interactions with us on those platforms are also subject to the platform's privacy terms. For recordkeeping, we capture social media posts and messages using Brolly into our records system in line with the State Records Act 2000 (WA).

6. Why we collect and how we use your information

We use your information to deliver services, respond to requests, administer programs, maintain community assets, collect rates and fees, meet legal obligations, and undertake service planning, evaluation and research. We only use or disclose information for the primary purpose it was collected, or for a related purpose you would reasonably expect, or as otherwise authorised by law—consistent with the PRIS Act's Information Privacy Principles

7. Our lawful basis for collection and use

Under the PRIS Act, we must collect only what is necessary for our functions, ensure information is accurate and up-to-date, keep it secure, and be open and transparent about our handling practices (IPP 1–5). We also provide you with ways to access and correct your information (IPP 6).

Where specific laws require or authorise us to collect and use information (for example, Local Government Act 1995, Dog Act 1976, Cat Act 2011), we will state this in the Collection Notice associated with the activity or form.

8. Information Privacy Principles (IPPs)

Under the Privacy and Responsible Information Sharing Act 2024, the City must comply with 11 Information Privacy Principles. These principles guide how we collect, use, store, secure, and share personal information.

- 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.

9. 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.

10. 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.

11. 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.

12. 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.

13. 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.

14. 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.

15. 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

16. 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.

17. 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

18. 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.

19. 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.

20. 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	Final
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	<i>Privacy and Responsible Information Act 2024</i> <i>Freedom of Information Act 1992</i> <i>State Records Act 2000</i>		
Notes and Conditions			
Authority	OCM 26 May 2026		
Adopted	26/05/2026	Next Review Date:	26/05/2028