



Privacy and Responsible Information Sharing Policy

30 June 2026 - Attachment 9.4

Policy Statement

The Shire of Denmark is committed to protecting individuals' privacy while enabling the responsible use and sharing of information to deliver services, meet legal obligations, and support community outcomes.

This Policy sets out, at a strategic level, how the Shire collects, uses, stores and shares personal and other information in a lawful, transparent and responsible manner, consistent with the Privacy and Responsible Information Sharing (PRIS) framework.

Policy Scope

This Policy applies to:

- all Shire employees, contractors and councillors;
- all personal information and government information held by, or on behalf of, the Shire;
- information collected through physical, digital and online channels, including third-party platforms used by the Shire.

Definitions

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.

Policy

The Shire manages personal information in accordance with the following principles:

- **Lawfulness and fairness** – Information is collected, used and shared only where authorised, required, or reasonably necessary for the Shire's functions.
- **Transparency** – Individuals are informed about how their personal information is handled.
- **Purpose limitation** – Information is used only for its intended purpose, or a related purpose that a person would reasonably expect.
- **Data minimisation** – Only information that is necessary for a given purpose is collected and retained and personal information is de-identified when no longer required.
- **Security and protection** – Information is protected against loss, misuse and unauthorised access.
- **Responsible sharing** – Information is shared only where there is a clear public benefit, lawful authority, and appropriate safeguards.

Collection of Information

The Shire collects personal information to carry out its functions and deliver services, including but not limited to:

- property, ratepayer and customer administration;
- community services, leisure, library and facility operations;
- planning, regulatory and compliance functions;
- employment and volunteer management;
- community engagement and consultation.

Information may be collected:

- directly from individuals or by a third party on an individual's behalf;
- through online forms, portals, surveys and payment systems;
- via Shire websites and digital platforms;
- through third-party service providers acting on behalf of the Shire;
- where authorised or required by law, from other public sector agencies.

Collection notices are required to explain why personal information is collected and how it will be used.

Use of Information

The Shire uses information to:

- deliver services and fulfil statutory responsibilities;
- respond to enquiries, requests and complaints;
- communicate with residents, ratepayers and stakeholders;
- manage Shire facilities, programs and assets;
- support planning, reporting, research and continuous improvement.

Information is not used for unlawful, unfair, or unrelated purposes.

Responsible Sharing of Information

The Shire may share information with other public sector agencies, service providers or partners:

- to enable service delivery, public safety, compliance or regulatory activities; or
- where required or authorised by legislation, court order or lawful direction.

Information sharing decisions are made carefully and proportionately, having regard to:

- the public interest in sharing or not sharing the information;
- privacy, security and confidentiality risks;
- whether the objective can be achieved using less or de-identified personal information.

Information is not shared for personal, political or commercial advantage.

Digital Services, Online Tools and Social Media

The Shire uses a range of digital platforms and online services to communicate with the community, deliver services and collect feedback. This may include:

- websites, content management systems and analytics tools;
- online booking, payment and registration platforms;
- community engagement and survey tools;
- email distribution and messaging services;
- social media platforms.

Where third-party platforms are used, personal information is handled in accordance with this Policy and relevant contractual arrangements. External platforms may also be subject to their own privacy policies.

Information Storage and Security

The Shire takes reasonable steps to protect information through:

- secure systems and access controls;
- role-based permissions;
- physical and digital safeguards;
- information classification and risk management practices;
- retention and disposal in accordance with approved authorities.

Information assets are documented and managed in line with the Shire's Information Asset Register and Record Keeping Plan and obligations.

Access, Correction and Complaints

Individuals may:

- request access to their personal information held by the Shire;
- request correction of inaccurate personal information;
- raise concerns or complaints about how their information has been handled.

Requests and complaints are managed in accordance with applicable legislation, including the Freedom of Information Act 1992, and the Shire's internal procedures.

Governance and Accountability

The Shire maintains governance arrangements to support:

- compliance with privacy and information sharing obligations;
- staff awareness and capability;
- assessment and management of information risks;

- continuous improvement of information handling practices.

Breaches or suspected breaches of privacy or information security are managed promptly and appropriately.

Review

This Policy is reviewed regularly to ensure it remains current, effective and aligned with legislative, technological and organisational changes.

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