



Privacy Management PLAN

Policy Version 1.0

Category: Statutory

Adopted: November 2025



Introduction

This Privacy Management Plan outlines how Winton Shire Council ensures ongoing compliance with the *Information Privacy Act 2009* (Qld) and the *Information Privacy and Other Legislation Amendment Act 2023* (IPOLA). This plan compliments the Winton Shire Council Privacy Policy and related documents including the Data Breach Response Plan and Complaints Management Policy.

Definitions

| Term | Definition |
|---|---|
| Council | Winton Shire Council |
| Chief Executive Officer (CEO) | The highest-ranking executive in an organisation, responsible for making major decisions, managing overall operations, and setting the company's strategic direction. |
| Governance Officer | Oversees compliance with laws, regulations and internal policies. Ensures transparency, accountability and ethical conduct across council operations. |
| Employees | Individuals employed by Winton Shire Council under a formal employment agreement, including full-time, part-time, casual, and temporary staff. For the purposes of this policy, "employees" may also refer to contractors, volunteers, and elected representatives when they are acting in an official capacity on behalf of Council and handling personal information. |
| Personal Information | Information or an opinion about an individual whose identity is apparent or can reasonably be ascertained. |
| Eligible Data Breach | A breach likely to result in serious harm to one or more individuals. |
| Queensland Privacy Principles (QPPs) | A set of 13 principles under the Information Privacy Act 2009 (Qld) governing personal information handling by public sector agencies. |
| IPOLA | Information Privacy and Other Legislation Amendment Act 2023, which updates privacy laws and introduces mandatory breach notification. |
| Mandatory Data Breach Notification (MDBN) | Legal requirement to notify affected individuals and the Information Commissioner of an eligible data breach. |
| Information Commissioner | The statutory officer overseeing privacy and right to information laws in Queensland. |
| Pseudonymity and Anonymity | The right of individuals to interact with Council without identifying themselves, where lawful and practicable. |
| Right to Information Act 2009 | Legislation that governs access to personal information held by Queensland public sector agencies. |

Governance Framework

The Governance Officer supports the CEO in overseeing privacy compliance. The Governance Officer is responsible for:

- Maintaining privacy policies and procedures
- Coordinating training and information updates to be shared with employees



- Monitoring Council's adherence to the Queensland Privacy Principles

All Council employees, contractors, volunteers and elected representatives are required to follow privacy protocols and report concerns promptly.

Privacy Protocols

To ensure compliance with the Information Privacy Act 2009 and Council's internal policies, all staff and representatives must adhere to the following privacy protocols:

- **Data Handling:** Only collect and access personal information necessary for your role. Use secure systems and avoid storing data in personal devices or emails.
- **Confidentiality:** Do not disclose personal information unless authorised. Refer to the Privacy Policy for guidance.
- **Reporting:** Immediately report suspected data breaches or privacy concerns using the Data Breach Report Form.
- **Training:** Complete mandatory privacy training and refreshers as scheduled.
- **Third-Party Compliance:** Ensure contractors and service providers comply with Council's privacy clauses.
- **Records Management:** Follow the Document Management Policy for secure storage and disposal of personal information.

Privacy Risk Assessment

The Governance Officer will conduct periodic assessments to identify high-risk personal information holdings. Risk mitigation strategies will be implemented, and privacy audits will be scheduled annually or following significant changes to legislation.

Council will identify personal information holdings and assess associated risks using a privacy risk matrix. Mitigation strategies will be documented and reviewed regularly. High-risk areas will be prioritized for audits. The Prepare-for-IPOLA workbook will be used to assess readiness and identify areas for improvement.

Information Lifecycle Management

Council collects personal information only when necessary for its functions. Information is stored securely using physical, electronic, and procedural safeguards. Retention and disposal practices comply with the *Public Records Act 2023*. All Council employees are responsible for ensuring personal information is collected, stored, used and disposed of in accordance with the *Public Records Act 2023* and IPOLA.

Council manages personal information across its full lifecycle, from collection to disposal, ensuring compliance with IPOLA and the QPPs and other Government legislation.

Types of Personal Information Collected

Council collects personal information that may include:

- Identity and contact details – name, address, phone number, email, date of birth.
- Property and rates information – ownership records, valuation data, payment history.
- Service usage – waste collection, water usage, library memberships, community services.
- Employment and HR records – job applications, contracts, performance reviews, leave records.
- Health and wellbeing data – disability support, aged care services, immunisation records.
- Financial information – bank details, invoices, grant applications.
- Photographs and video – event photography.



- CCTV footage - is stored securely on Council-managed systems with access restricted to authorised personnel. Retention and disposal of CCTV footage is managed in accordance with the Records Management Policy. Any access, use, or disclosure of CCTV footage must comply with Council's privacy protocols and relevant legislation.
- Complaints and feedback – written submissions, online forms, call logs.
- Emergency contact and next-of-kin details.
- Sensitive information – cultural background, medical conditions, criminal history (where relevant and lawful).

Departmental Responsibilities

Personal information is handled by various departments, including:

- Governance and Administration – complaints, privacy enquiries, policy oversight.
- Finance and Rates – billing, payments, property ownership.
- Human Resources – staff records, recruitment, training.
- Community Services – aged care, disability support, childcare, youth programs.
- Infrastructure and Planning – development and building applications, property data.
- Customer Service – general enquiries, service requests.
- Libraries and Cultural Services – memberships, event registrations.
- Regulatory Services – animal registration, permits, inspections.
- Emergency Management – disaster response coordination, vulnerable persons registry.

Lifecycle Stages

- Collection – via forms, online portals, phone calls, emails, in-person interactions.
- Storage – in secure physical files, Magiq document management system, RelianSys and other approved platforms.
- Access and Use – restricted to authorised personnel for legitimate purposes.
- Disclosure – only with consent or as authorised by law.
- Retention – based on legal and operational requirements.
- Disposal – securely destroyed or de-identified when no longer required.

Controls and Safeguards

- Role-based access controls
- Encryption and secure login protocols
- Physical security for hard copy records
- Staff training and awareness
- Regular audits and compliance checks

Training and Awareness

- All employees will be required to complete privacy induction and refresher training.
- The Prepare-for-IPOLA workbook will be used to assess areas that require improving.
- Privacy awareness training and updates will be provided regularly to reinforce compliance or updates with relevant legislation.

Data Breach Management

Under the IPOLA guidelines, Council maintains a Data Breach Response Plan. Staff must report suspected breaches immediately. The Governance Officer will coordinate breach assessments, notifications to the Office of the Information Commissioner (OIC), and post-breach reviews.



Access and Amendment Procedures

Individuals may request access to or correction of their personal information. From 1 July 2025, requests will be processed under the *Right to Information Act 2009*. Requests must be submitted in writing and will be assessed in accordance with legislative requirements.

Amendment requests should include details of the information to be corrected and supporting evidence. Council will acknowledge requests and make a decision in a timely manner. If the amendment is refused, individuals will be notified with reasons and may request that a statement be attached to the record. Unresolved matters may be escalated to the Office of the Information Commissioner.

Contact Details for Privacy Enquiries

To enquire about personal privacy details/management or make a complaint:

- **Phone:** (07) 4657 2666
- **Address:** PO Box 288, Winton, Qld, 4735
- **Email:** complaints@winton.qld.gov.au
- **Online:** Via the contact tab on council website <https://www.winton.qld.gov.au>
- **In Person:** The Main Council Office, 75 Vindex Street

Escalation – If unresolved, contact the Office of the Information Commissioner Queensland

- **Email:** complaints@oic.qld.gov.au
- **Post:** PO Box 10143, Adelaide Street, Brisbane, Qld, 4001

Third-Party Management

Council will include privacy clauses in contracts with third-party service providers and conduct due diligence to ensure compliance. Cross-border data transfers will be subject to strict controls and legal review.

Related Council Documentation

- Privacy Policy WSC-GOV-POL-015
- Data Breach Response Plan WSC-GOV-PLN-002
- Data Breach Report Form WSC-GOV-FRM-011
- Document Management Policy WSC-ADM-POL-008
- Prepare for IPOLA workbook
- Complaints Management Policy
- Information Technology Policy and Procedure

Legislation, Recognised Authorities and Other Sources

- *Information Privacy Act 2009*
- *Information Privacy Regulation 2009*
- *Information Privacy and Other Legislation Amendment Act 2023*
- *Local Government Act 2009*
- *Local Government Regulation 2012*
- *Public Records Act 2019*
- *Right to Information Act 2009*
- *Right to Information Regulation 2009*

Monitoring and Review of Plan

Council will monitor privacy compliance through internal reviews, feedback from complaints, and regular reviews. This Privacy Management Plan will be reviewed every two years or following legislative changes.



Record of Amendments and Adoptions

| Date | Version | Reason | Date Adopted & Resolution Number |
|---------------|----------------|------------------------|---|
| November 2025 | 1 | Changes to legislation | 20 November 2025; 13.7 2025/169 |