



Information Privacy Policy



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1. Purpose

1.1 Overview

The purpose of this policy is to outline Logan City Council's approach to the fair, efficient, and transparent collection, handling, and management of personal and confidential information. This policy outlines

- the kinds of personal information we collect and hold
- how we collect and hold that personal information
- the purposes for which we collect, hold, use and disclose personal information
- how you may access your personal information that we hold and seek correction of the information
- how you may complain about our handling of your personal information, and how we will deal with the complaint
- whether we will disclose your information to entities outside of Australia and
- the countries in which the recipients are likely to be located if it is practicable to state those countries.

This policy applies to Logan City Council employees, contractors, and elected officials who are required to adhere to the principles and obligations contained in this policy when collecting, using, or disclosing personal information.

1.2 Legislative Context

This policy is governed by the following legislative framework:

- *Information Privacy Act 2009* (Qld)
- *Right to Information Act 2009* (Qld)
- *Local Government Act 2009* (Qld).

This policy is required under the Information Privacy Act.

2. Principles

Council applies a consistent approach to information privacy that is guided by the following principles:

2.1 Queensland Privacy Principles

Council is committed to upholding the Queensland Privacy Principles (QPP's) contained in Schedule 3 of the Information Privacy Act. This ensures that personal information is managed lawfully, fairly, and transparently across all Council activities.

2.2 Protecting Privacy and Facilitating Responsible Access

Council safeguards the privacy and confidentiality of individuals by implementing robust security measures and limiting the collection, use, and disclosure of personal information to what is necessary for Council's functions. Council takes a balanced approach to the facilitation of access to information for individuals and the community, balancing openness with the need to protect sensitive data.

2.3 Responding to Privacy Concerns

Council is dedicated to maintaining public trust by responding quickly and thoroughly to privacy complaints, data breaches, and requests for correction or access. Continuous improvement is driven by feedback, legislative changes, and best practice standards.

3. Our Approach to Information Privacy

3.1 Kinds of Personal Information We Collect and Hold

Council collects and holds personal information required to exercise our statutory functions and meet our legal obligations. The personal information we collect and hold may include names, contact details, interactions with Council, complaint details, and reasonable accommodations required by individuals. Council may also collect and hold sensitive information, such as information about an

individual's racial or ethnic origin, religious beliefs, criminal records, health records, and biometric information, only with consent and as is reasonably necessary for, or directly related to, Councils functions or activities or as required or permitted by law.

3.2 How We Collect and Hold Personal Information

Council may collect personal information through various channels including written applications, online forms, in person interactions, and correspondence. At or as soon as practicable after collection, Council will take all reasonable steps to provide a collection notice to the individual who is having their personal information collected, in accordance with QPP 5 of the Information Privacy Act. We may collect this information in writing, electronically, verbally, or indirectly from third parties with the individual's consent, where required or authorised by law, or where it is unreasonable or impracticable to collect the information from the individual. When collecting personal information, Council will:

- Whenever it is lawful and practical to do so, provide individuals the option of not identifying themselves
- Not collect any sensitive information without the relevant individual's consent, in accordance with QPP 3.3 of the Information Privacy Act.

Information may be collected through service requests, complaints, audits, reviews, investigations, recruitment, and community engagement. Council will protect all collected personal information, including any sensitive information, against misuse, interference, loss, unauthorised access, modification or disclosure.

3.3 Purposes for which we Collect, Hold, Use and Disclose Personal Information

Council collects, holds, uses and discloses personal information that is necessary for its functions and activities in providing services to the community. Council will use and disclose personal information

only for the purpose for which it was collected, unless an exception outlined under QPP 6 of the Information Privacy Act applies. Personal information may be used or disclosed for secondary purposes as permitted under the Information Privacy Act, such as where authorised or required by law, with the individual's consent, or where reasonably expected for a related purpose. When collecting, using and disclosing personal information, Council will take reasonable steps to ensure the quality, accuracy, and completeness of the information. If Council receives unsolicited personal information, it will be handled in accordance with QPP 4 of the Information Privacy Act.

3.4 How you can access and correct your personal information

Individuals may apply to access or correct their personal information held by Council, subject to the provisions of the *Right to Information Act 2009* (RTI Act). Requests must be made in writing to Council through Council's administrative access process and include sufficient detail. Council will respond within the statutory timeframes set and will permit access unless authorised or required to refuse by law. Council will proactively correct personal information that is inaccurate, out of date, incomplete, irrelevant, or misleading, as required by QPP 13.

3.5 Disclosure Outside Australia

Council will only disclose personal information overseas when necessary to address a complaint or application, or as required by law. Where Council uses third-party platforms, personal information may be collected or held overseas by those providers. Council ensures that overseas disclosures are consistent with obligations under the Information Privacy Act.

3.6 Anonymity and Pseudonymity

Council provides individuals with the option to interact with Council anonymously or by using a pseudonym for certain services, such as general enquiries or reporting issues. However, where Council is required or authorised by law to deal with individuals who have identified themselves, or where it is impracticable for Council to deal with

individuals who have not identified themselves or who have used a pseudonym, Council will collect identifying information to manage the matter effectively.

3.7 How you may complain about our handling of your personal information

If you believe Council has not handled your personal information in accordance with the Information Privacy Act or this policy, you can make a privacy complaint. Complaints must be in writing, include an address for response, and details of the matter. Council will provide assistance to individuals to put complaints in writing. Complaints must be made within 12 months of becoming aware of the act or practice or a longer period as agreed by Council. Council will provide a decision outlining if the complaint has been substantiated within 45 business days, or a further specified period if the individual who submitted the complaint agrees to an extension of this time. If dissatisfied with Council's management or response, the individual is able to escalate their complaint to the Office of the Information Commissioner.

3.8 Security

Council takes reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, modification, or disclosure, consistent with QPP 11. These steps include implementing physical, technical, and administrative safeguards aligned with Queensland Government Information Standards and security protocols. Council will destroy or de-identify personal information that is no longer required, where lawful and reasonable. Unsolicited personal information may be used or retained only in circumstances permitted under QPP 4, such as where it is necessary for Council's functions or activities and collection would have been lawful if solicited.

3.9 Data Breach Response

Council responds to data breaches in line with the Information Privacy Act, ensuring containment, assessment, notification, and review. Council's Integrity and Information Program leads breach

management, and all staff must report suspected breaches promptly. Council maintains a Data Breach Register and reviews breaches to prevent recurrence.

3.10 Administrative Access to Information

Council supports proactive access to information, allowing individuals to obtain certain types of information without formal application under the RTI Act. Access may be provided for personal information, open data, and information published on Council's website, subject to verification and legal restrictions. Requests are managed in accordance with the Administrative Access to Information Procedure.

4. Reporting

Council reports on privacy compliance, complaints, and data breaches in accordance with statutory requirements and internal procedures.

5. Definitions

Personal information: Information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or not, and whether recorded in material form or not (Section 12 of the Information Privacy Act).

Sensitive information: Information or an opinion, that is also personal information, about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information, biometric information or biometric templates (Schedule 5 of the Information Privacy Act).

6. Document Control

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1.0	860146-1	13315298	188/2019	Creation.	04/12/2019
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