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| Responsible Department: | Office of the CEO |
| Responsible Business Unit: | Governance |
| Date of Review: | 15 April 2026 |
| Council Resolution: | 110426 |

1. OBJECTIVE

The objective of this Policy is to ensure the Shire of Chittering manages information responsibly, lawfully and securely, across its lifecycle, and responds appropriately to any information or data breaches.

This Policy supports compliance with Part 5A of the *Children and Community Services Act 2004 (WA)* and other applicable legislation governing information management and disclosure.

This Policy supports:

- protection of personal and sensitive information,
- compliance with privacy and information-sharing legislation, including PRIS, and
- community confidence in the Shire's governance and information management practices.

This Policy operates alongside the Shire's Privacy and Responsible Information Sharing (PRIS) Governance & Compliance Framework, Recordkeeping Plan, and information security controls.

2. SCOPE

This Policy applies to:

- All Shire employees,
- Contractors, consultants and volunteers,
- Elected Members;
- Any person or organisation handling information on behalf of the Shire.

It applies to all forms of information, including:

- personal information,
- sensitive personal information,
- confidential or restricted information, and
- information held in physical or electronic form.

3. DEFINITIONS

Authorised Officer means an employee who has delegated authority to make decisions on behalf of the Shire in accordance with legislation, policy and internal delegations.

Information means any information created, received, stored or managed by the Shire in the course of its functions, including personal, sensitive, confidential, restricted and operational information, in physical or electronic form.

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Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Sensitive Information means personal information that is particularly sensitive in nature, including information relating to a person's health, safety, wellbeing, personal circumstances or other matters that could cause harm if misused or inappropriately disclosed.

Information Sharing means the disclosure or exchange of information by the Shire to another person, organisation or agency, whether verbally, in writing or electronically.

Record means information created or received by the Shire in the course of its business that is required to be kept as evidence of a transaction or decision, in accordance with the *State Records Act 2000* (WA).

PRIS means Privacy and Responsible Information Sharing provisions under Part 5A of the *Children and Community Services Act 2004* (WA) that permit information sharing in defined circumstances to promote the wellbeing or safety of individuals or the community.

Wellbeing or Safety Purpose means a lawful purpose relating to the protection, prevention or mitigation of harm to an individual or the broader community, including physical, emotional, environmental or community safety considerations.

Information Breach means an incident involving unauthorised access to, disclosure of, or loss of information held by the Shire, whether accidental or intentional.

Data Breach means a subset of an information breach involving personal or sensitive information that may result in harm to an individual or the community.

Unauthorised Access means access to information by a person or system that does not have approval or a legitimate business need.

Security Controls means physical, technical and administrative measures implemented to protect information from misuse, loss, unauthorised access or disclosure.

Incident Response means the actions taken by the Shire to identify, contain, assess, notify and review an information or data breach.

4. POLICY STATEMENT

The Shire of Chittering is committed to:

- Collecting, using, storing and disclosing information in a lawful and responsible manner;
- Protecting information from misuse, loss or unauthorised access;
- Ensuring any information sharing, including sharing undertaken under PRIS, is supported by appropriate handling, security and breach response controls; and
- Responding promptly and transparently to information breaches.

Information must be handled in a manner that is:

- Lawful – authorised under legislation or policy
- Purpose-driven – used only for legitimate Shire functions
- Proportionate – limited to what is necessary

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- Secure – protected from unauthorised access or disclosure
- Accountable – documented and capable of review

The Shire will only collect, use or disclose information where:

- it is necessary to perform a lawful function,
- it is authorised or required by law (including PRIS),
- consent has been provided where required, or
- it is necessary to prevent serious harm to a person or the community.
- Information sharing under PRIS must also comply with the PRIS principles of:
 - necessity,
 - proportionality,
 - responsibility, and
 - accountability.

The Shire will take reasonable steps to protect information by:

- maintaining appropriate physical and electronic security controls,
- restricting access to authorised personnel,
- ensuring staff awareness and training,
- complying with recordkeeping and retention requirements, and
- managing third-party and system security risks.

An information breach may include:

- unauthorised access to information,
- unauthorised disclosure of information, or
- loss of information (including loss of devices or records).

All suspected or actual information breaches must be reported immediately in accordance with Shire procedures.

The Shire will manage information breaches through the following steps:

1. Identification – promptly identify and report the breach
2. Containment – take immediate action to limit further impact
3. Assessment – assess the scope, cause and potential harm
4. Notification – notify affected individuals and relevant authorities where required by law
5. Review – identify lessons learned and implement improvements

Where required by applicable legislation or government guidance, information or data breaches may be reported to the relevant oversight body, including the Office of the Information Commissioner or other authorised authority.

All information handling and breach responses must be:

- documented at the time of identification and assessment,
- recorded in the Shire's records management system, and
- retained in accordance with the Recordkeeping Plan and the *State Records Act 2000* (WA).

SHIRE POLICY 1.16

Information Handling and Data Breach

This Policy governs how information is handled, protected and responded to in the event of a breach. It does not authorise information sharing decisions under the Privacy and Responsible Information Sharing (PRIS) provisions, which are governed separately under the PRIS Policy.

Serious or systemic breaches must be escalated to the Chief Executive Officer and managed in accordance with legislative requirements, risk management processes and any applicable external reporting obligations.

5. ROLES AND RESPONSIBILITIES

Chief Executive Officer is responsible for overall accountability for information governance and compliance.

PRIS Champion (Deputy CEO) is responsible for providing executive oversight of PRIS-related information sharing and compliance.

PRIS Point of Contact (Records Officer) is responsible for providing advice on lawful information handling, PRIS application and recordkeeping.

Managers are responsible for ensuring staff comply with this Policy and report breaches promptly.

All Employees and Contractors are responsible for complying with this Policy and related procedures and reporting any suspected or actual information breach immediately.

6. COMPLIANCE

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| Legislation | <i>Children and Community Services Act 2004 (WA) – Part 5A (PRIS)</i> <i>Freedom of Information Act 1992 (WA)</i> <i>Local Government Act 1995 (WA)</i> <i>State Records Act 2000 (WA)</i> |
| Industry | |
| Organisational Documents | PRIS Governance & Compliance Framework Privacy and Responsible Information Sharing (PRIS) Policy Recordkeeping Plan |
| Strategic Alignment | |

7. ADMINISTRATION

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| Review Cycle | Every 3 years | Next Review Due | February 2029 |
| Policy Owner | Governance | | |
| Version | Decision Ref | Date | Change |
| 1.0 | 110426 | 15/04/2026 | Initial adoption |