

1. Purpose & Scope

- 1.1 The *Information Privacy Act 2009* (IP Act) and its Queensland Privacy Principles (QPPs) set the rules for how Queensland government agencies – including the Charters Towers Regional Council (Council) – handle personal information. These rules include a requirement, under QPP1, that Council has a QPP Privacy Policy.
- 1.2 This QPP Privacy Policy explains how Council will manage personal information including:
- the kinds of personal information that Council collects and holds, how Council will collect and hold that information, and the purposes for which Council collects, holds, uses and discloses personal information; and,
 - how an individual may complain about Council's handling of personal information and how Council will deal with the complaint.

2. Commencement of Policy

- 2.1 This Policy will commence from 17 September 2025.

3. Application Of Procedure

- 3.1 This Policy applies to all people acting for and on behalf of Council, including elected members, employees, consultants, contractors and volunteers and to the personal information that Council collects, stores, manages, uses and discloses in discharging its statutory functions and delivering services to the community.

4. Definitions

Term	Definition
Access	Providing an individual with personal information about themselves that is held by Council. This may include allowing the individual to inspect personal information or to obtain a copy of the personal information.
CCTV	Any system installed by Council to electronically record and display video or audio/video of a public place or Council premises.
Consent	In relation to solicited information, means a voluntary agreement (express or implied) to some act, practice or purpose. The individual must be adequately informed before giving consent and must have the capacity to understand and communicate their consent.
Disclosure	The release of personal information to persons or organisations outside Council (the receiving entity) where the receiving entity does not know the personal information and Council ceases to have control over the personal information in relation to who will know the personal information in the future. It does not include giving individuals' personal information about themselves.
Personal Information	Section 12 of the IP Act: Personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable from the information or opinion – (a) Whether the information or opinion is true or not; and

	(b) Whether the information or opinion is recorded in a material form or not.
Sensitive Information	Schedule 5 (Dictionary) of the IP Act: Sensitive information for an individual, means the following: (a) Information or an opinion about an individual's: i) racial or ethnic origin; or ii) political opinions; or iii) membership of a political association; or iv) religious beliefs or affiliations; or v) philosophical beliefs; or vi) membership of a professional or trade association; or vii) membership of a trade union; or viii) sexual orientation or practices; or ix) criminal record; (b) health information about an individual; or (c) genetic information about an individual that is not otherwise health information; or (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or (e) biometric templates.
Use	The handling of personal information within Council including the inclusion of personal information in a publication, taking personal information into account in the making of a decision, or transferring the information from one part of Council performing particular services to another part of Council performing different services.

5. Policy

5.1 Collecting Personal Information

Council is committed to protecting the privacy of individuals.

Council will collect personal information directly from individuals who access our services and indirectly from third parties as part of carrying out statutory functions and delivering services. The kinds of personal information (including sensitive information) that Council collects and holds are:

Function	Kind of personal information, and how and why we collect that personal information
Customer service requests including for information and assistance	Council collects and holds personal information about individuals who make contact by phone, post, email, online, social media and in person. This information may include names, contact details, credit card and bank account information, and the enquirer's circumstances that led to or are relevant to their enquiry. This may include sensitive personal information, opinions about other people and/or expressions of dissatisfaction.

Complaints management	Council may hold and collect personal information about individuals who make complaints to or against Councillors, Council's services, decisions (or lack of) and actions (or lack of). This may include names, contact details, details on the substance of a complaint, investigation and outcome information. Failure to provide this information may mean that Council is unable to adequately resolve the complaint. As part of conducting reviews or investigations of matters, Council may acquire copies of documents that are relevant to the complaint, which can contain personal information of the individual and related third parties. Council may ask the individual or relevant third parties to provide information in order to resolve the complaint, including their views, opinions and relevant background information.
Audio and visual recordings (CCTV)	Council collects audio and visual recordings and live streaming of Council events at various Council facilities and in the community, which includes the images and/or voices of individuals and that may be used to enable the identification of particular individuals. It also collects images and interactions through body worn cameras. Refer to Council's CCTV Policy for further information.
Human Resources	Council collects and holds personal information about Council staff, contractors, volunteers, Councillors and interns/work experience students relevant to their employment or engagement with Council, including contact details, date of birth, tax file number, qualifications, work history, salary and entitlements, and next of kin and/or emergency contacts, as well as information relating to industrial disputes, conflicts of interest, safety investigations, medical information, disciplinary proceedings, equal opportunity data, emergency contact details, workers compensation claims and the names of individuals who are classified as related parties of Councillors and key management personnel.
Recruitment and engagement of contractors	Council collects and holds personal information about individuals who apply to work at or with Council. This includes names, contact details, application documents, identification, employment experience, qualifications, assessments for suitability, medical information, referees and references. When engaging contractors, Council uses Vendorpanel and also collects and holds information about insurance, subcontractors, commercial in confidence, trade pricing, ABN numbers, details of any statutory notices issued membership of professional or trade associations and other information that may be submitted as part of a tender process. Vendorpanel Privacy Policy
Intergovernmental communications	Council collects personal information during routine communication exchanges with other local and state government departments. Examples include

	consultations on development related matters or land valuations resulting from changes in property ownership and citizenship ceremonies.
Website information	Council's corporate website is hosted in Australia. Council's web measurement tools and internet service providers record only anonymous information about site visitors for statistical purposes including: • server and IP address • name of the top level domain (e.g. .gov, .com, .edu and .au) • type of browser • date and time of access • pages accessed and documents downloaded • previous site visited Council collects personal information through the website where it is provided by individuals who use an online form (e.g. to request a service, register to participate in training or events, lodge a complaint, etc.). Council uses cookies to collect information on website activity (such as number of users, who visits the website, date and time of the visits, number of pages viewed and navigation patterns) for statistical purposes. The information on its own does not identify an individual. Website analytics are captured for the purpose of improving Council's website. Cookies allow computers to identify and interact more effectively and are generated when users log onto or use Council public websites. Users can manage cookies via browser settings giving the user the choice whether to accept or not. Social plug-in tracking cookies may also be used to track both members and non-members of social networks for additional purposes such as behavioural advertising, analytics and market research.
Disaster response and recovery	Council uses the Guardian program (provided by QIT Plus) to keep the public informed and to respond during disasters. Information collected includes name, address, contact details, location, disaster information or requests for service or advice. QIT Plus Privacy Policy
Surveys and community engagement	Council may invite members of the community to undertake community engagement. If an individual agrees to participate in such engagement, Council will collect and hold their personal information using the Council website, Have Your Say Platform and Microsoft Forms. In some limited circumstances, Survey Monkey may also be used. Information collected may include name, email, IP address, opinions expressed and responses to matters raised. Have your Say Privacy Policy Microsoft Forms Privacy Compliance Survey Monkey's Privacy Policy

Mailing list subscriptions	Council's electronic direct mailout is delivered by Mailchimp. A subscriber's name, email address, predicted gender, predicted age, activity, mobile device location (if turned on) may be collected to deliver requested news, updates and alerts. Council also stores business names, addresses, contact details, business type and other business information in MonitorCRMS and Have Your Say to engage and manage economic development investment opportunities. Mailchimps's Global Privacy Statement. MonitorCRMS Privacy Information Have your Say Privacy Policy
Social media platforms	Council uses Facebook, LinkedIn, Instagram and YouTube to communicate with the public about its work and raise awareness of issues affecting the community. When individuals communicate with Council via these social media platforms, Council will collect personal information individuals provide when they communicate with Council. Facebook, LinkedIn, Instagram and YouTube have their own Privacy Policies.
Events, training registrations and Facility bookings	Council collects personal information that individuals provide to Council via VEEZI, Bookeasy Tourism Solutions, Formsit or Council's website when registering and/or attending Council events or Facilities and community meetings or participating in events such as the Christmas Light Competition, Easter Egg Hunt or Business Buzz. This information may include names, contact details, credit card details, bank account, IP address, browser type, device type, vehicle registration number and navigation patterns. Contact details are also collected from individuals undertaking training courses offered or coordinated by Council, for the purposes of awarding a certificate of completion and seeking course evaluation feedback. Council also uses information about course participation to monitor the effectiveness of courses and to inform high-level general reports on training activities. These reports do not include personal information and are published as part of Council's accountability reporting obligations. Veezi, Bookeasy and Formsit have their own privacy policies and security statements.
Library	Council uses the Aurora Library Management System to manage library bookings and customer management. This information may include names, address, date of birth, email and phone numbers. The Archives Department stores historical names and information using File Maker. Aurora Library Management System Privacy Policy File Maker Privacy Policy

Water services	Council invites ratepayers to use MiWater to monitor their water usage. The information collected includes, name, contact details, address details, property location and water usage. MiWater Privacy Policy
Saleyards	Council uses LESaleyard to process cattle sales. Information collected in this program includes name, contact details, brands, business details, cattle purchases and sales and related information including price and weight. LESaleyard Privacy Policy
Analytics, business improvement and reporting	Council may collect information using various analytics tools namely: • Google Analytics • Meta Analytics Council collects this information to communicate with subscribers regarding Council events or services and to improve services and content. Council's analytic measurement tools record only anonymous site visitor information including: • geographical location • browser used • device type • date and time of access • site visited/redirected from.

5.2 Holding and Protecting Personal Information

Council is committed to ensuring the security of personal information collected and retained, protecting it from misuse, interference, loss and unauthorised access, modification or disclosure. Council uses physical and electronic security measures including restricting physical access to its offices, ensuring information can only be accessed by authorised staff, firewalls and databases to keep personal information secure.

Where permitted by the *Public Records Act 2023*, Council will destroy or de-identify unsolicited personal information and destroy personal information that is no longer required for the purpose for which it was originally collected in accordance with Council's obligations under the QPPs. If Council suspects or has reason to believe there has been unauthorised access or disclosure of personal information, all necessary actions required by the Mandatory Notifiable Data Breach Scheme will be undertaken once the Scheme legislatively commences.

5.3 Using and Disclosing Personal Information

When personal information is collected from an individual, Council agrees to advise:

- the purpose for which the information is collected
- that the individual can get access to their personal information
- who the information will be disclosed to (if at all)
- the consequences if all or part of the information is not provided.

Council will use and disclose personal information for the purpose for which the personal information was collected. Council may also use or disclose personal information for secondary or alternative purposes as permitted under the IP Act. This may include where Council is authorised or required under Australian law (including to meet procedural fairness obligations), with the individual's consent, or where

the individual QPP Privacy Policy would reasonably expect Council to use or disclose the information for a secondary purpose where it relates to the primary purpose. This includes disclosure to a court or tribunal. Council retains contact details of individuals (including personal information of individuals with whom it does business) in a Customer Relationship Management (CRM) database.

5.4 Disclosing Personal information Outside Australia

In complying with its obligations under the IP Act, Council will disclose an individual's personal information to someone outside Australia only if:

- the individual agrees to the disclosure
- the disclosure is authorised or required by law
- Council is satisfied on reasonable grounds that the disclosure is necessary to lessen or prevent a serious threat to the life, health, safety or welfare of an individual, or to public health, safety or welfare; or
- two or more of the following apply:
 - Council reasonably believes that the recipient is subject to the law, binding scheme or contract that effectively upholds the principles for the fair handling of personal information that are substantially similar to the QPPs.
 - The disclosure is necessary for the performance of Council's functions in relation to the individual.
 - The disclosure is for the benefit of the individual, but it is not practicable to seek the agreement of the individual, and if it were practicable to seek the agreement of the individual, the individual would be likely to give the agreement.
 - Council has taken reasonable steps to ensure the personal information it discloses will not be held, used or disclosed by the recipient of the information in a way that is inconsistent with the QPPs. When individuals communicate with Council through social media, survey and event management platforms, the providers and its partners may collect and hold personal information overseas.

5.5 Contracted Service Providers

Council will take all reasonable steps to ensure contracted service providers comply with the requirements of the IP Act when they are provided with or collect personal information in order to provide services on behalf of Council.

5.6 Access and Correction of Personal Information

Access and correction rights are contained in the IP Act. An individual has the right to:

- access their personal information held by Council (subject to applicable exemptions); and
- request the correction of inaccurate or incomplete information.

To access or correct personal information, direct all requests in writing to:

Governance Officer
Charters Towers Regional Council
mail@charters Towers.qld.gov.au
PO Box 189
Charters Towers Qld 4820

Access requests and corrections will be actioned in accordance with the timeframes under the IP Act. Correspondence will be treated confidentially.

5.7 Dealing with Council Anonymously or using a Pseudonym

Individuals can deal with Council, report a data breach, or use the enquiry/request forms on the website anonymously or by using a pseudonym. Complaints about Council can be made anonymously or by using a pseudonym but, depending on the nature of the complaint, Council may not be able to action a

complaint and/or provide a response without knowing the complainant's identity (e.g. where the complaint relates to a particular individual's records).

Anonymous or pseudonymous interaction is not possible when lodging a privacy complaint. Council is required to collect information such as an individual's name, contact details and details of the matter so it can deal with the individual and their matter effectively and in accordance with relevant statutory obligations.

5.8 Privacy Complaints

If an individual believes Council has not handled their personal information in accordance with the IP Act, they have the right to lodge a privacy complaint. To make a privacy complaint, individuals must send the complaint to Council in writing and include an address for Council to respond to (e.g. an email address) and details about the matter or issues being complained about. Complaints must be sent within 12 months of becoming aware of the act or practice it is believed constitutes a breach of the IP Act. If submitting a privacy complaint on behalf of someone else, please include an authority from them or other evidence that you have the right to make a privacy complaint on their behalf.

Complaints can be made in the following ways:

- using Council's online form
- email complaints@chartersstowers.qld.gov.au
- write to Charters Towers Regional Council, PO Box 189, Charters Towers Qld 4820
- in person at 12 Mosman Street, Charter Towers Qld 4820.

Council has 45 business days to resolve the privacy complaint to the individual's satisfaction. If this does not occur, the individual can escalate the complaint in accordance with Council's Complaints Management Policy. The complaint will be managed in the same way as complaints about other areas of Council's service delivery and will be dealt with by an officer who was not involved in handling the initial complaint or the activities the subject of the initial privacy complaint. activities the subject of the initial privacy complaint. If an individual is still not satisfied with the outcome of the internal review, the complaint may be escalated to the Office of the Information Commissioner (OIC).

6. Variations

6.1 Council reserves the right to vary, replace or terminate this Policy from time to time.

Associated Documents

- *Local Government Act 2009*
- *Local Government Regulation 2012*
- *Information Privacy Act 2009*
- *Information Privacy Regulation 2009*
- *Right to Information Act 2009*
- *Right to Information Regulation 2009*
- *Public Records Act 2023*
- *Human Rights Act 2019*
- *Information Privacy and Other Legislation Amendment Act 2023*
- S0014 Complaints Management Policy
- STRAT0109 Closed Circuit Television (CCTV) Policy

Document Review			
Date Adopted by Council	17 September 2025	Council Resolution	4592
Date Adopted by ELT	8 September 2025	Next Review Date	August 2027
ECM No.	1247595	Document Contact	Governance Officer