

Western Parkland City Authority

Objective ID: A5216710

Privacy Management Plan and Guidelines

August 2022


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Document control

Document Type(s) (Tick all boxes that apply)	<input type="checkbox"/> Policy <input type="checkbox"/> Procedures <input type="checkbox"/> Guideline <input type="checkbox"/> Fact sheet <input checked="" type="checkbox"/> Plan				
Policy category	Governance and Risk				
Responsible Business Unit	Governance				
Document Owner	Director, Governance, Audit and Risk				
Publication	<input type="checkbox"/> Not for publication <input checked="" type="checkbox"/> Intranet		<input checked="" type="checkbox"/> WPCA website <input type="checkbox"/> Other: (please specify)		
<p>* The <i>Government Information (Public Access) Act 2009 (the GIPA Act)</i> requires that all of the Department's current policy documents be made available on this website (unless there are overriding public interest <u>reasons</u> why that should not be done). WPCA Legal Branch can provide advice.</p>					

Document approval

Version	Objective ID	Name & Position	Signature	Date	Effective Date
1	A3085374	Sam Sangster, CEO	On file	29.07.2019	29.07.2019
2	A5504680	James Hebron, COO		23/08/2022	23/08/2022

Document version control

Version	Objective ID	Status	Date	Prepared By	Comments
1		Final	07.2019	Tom Kwok	New policy
1.1	A5216710	Final (endorsed by ED Governance)	25.10.2021	Jenny Au	To reflect new branding
1.2	A5504680	Final	08/2022	Virginia Tinson	To reflect new branding and streamline the plan

Review date

The Authority will review this Policy every two years or more frequently if required. It may be

reviewed earlier in response to a change in the Australian Government or NSW guidelines.

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1. Introduction

All NSW Government agencies are required to have a privacy management plan under section 33 of the *Privacy and Personal Information Act 1998* (NSW) (**PPIP Act**).

The Western Parkland City Authority (WPCA) has developed its Privacy Management Plan to demonstrate and ensure that our organisation applies correct procedures to manage the personal information of our stakeholders and staff.

The purpose of the Plan is to:

- demonstrate to the people of New South Wales how the WPCA upholds and respects the privacy of its staff and all those who deal with the WPCA;
- explain how we manage personal information in line with the PPIP Act; and
- provide guidance and training for WPCA staff in dealing with personal information. This helps to ensure that we comply with the PPIP Act.

The introduction of this Plan indicates that the WPCA takes the privacy of its staff and the people of NSW seriously and we will protect privacy with the use of this Plan as a reference and guidance tool.

This internal guidelines document aims to ensure that correct procedures are followed in applying and responding to the Plan.

1.1 The role and functions of the WPCA

The WPCA has functions in, or in relation to land in its operational area including (s 13 *WPCA Act 2018* (NSW)):

- preparing master plans for development within precincts;
- carrying out development;
- participating in the planning, funding, prioritisation and co-ordination of public infrastructure that is provided in association with the carrying out of development within precincts;
- co-ordinating, securing and attracting investment;
- developing and implementing schemes for funding, if directed by the Minister;
- promoting, organising, managing, providing and conducting cultural, educational, commercial, transport, tourist and recreational activities and facilities;
- providing consultancy and other services relating to the carrying out of development;
- entering into joint ventures, project delivery agreements and other arrangements with landowners, developers, State and Commonwealth agencies and local councils; and
- liaising and working collaboratively with State and Commonwealth agencies and local councils.

The WPCA collects, holds, uses and discloses personal information for the purpose of carrying out its functions. For instance, the WPCA may handle personal information for the purpose of:

- managing correspondence on behalf of the CEO and Board;
- human resources (**HR**) management;

- recruitment;
- complaints handling; and
- managing applications for Government information (meaning information contained in a record held by an agency) under the *Government Information (Public Access) Act 2009* (GIPA Act).

The WPCA takes the privacy of its staff and the people of NSW seriously and we will protect privacy with the use of this Plan as a reference and guidance tool.

As a NSW public sector agency, the WPCA is regulated by the PPIP Act.

2. Personal Information

2.1 Definition

Personal information is information or an opinion (including information or an opinion forming part of a database and whether or not recorded in a material form) about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion (section 4 of the PPIP Act).

2.2 Exclusions from the definition

Both the PPIP Act and the GIPA Act exclude certain information from the definition of personal information. These exclusions include information which:

- relates to a person who has been dead for more than 30 years; or
- is contained in a publicly available publication; or
- refers to a person's suitability for employment as a public sector official.

Information in a publicly available publication

The definitions exclude information about named or identifiable people which is published in newspapers, books or the Internet, broadcast on radio or television, posted on social media such as Facebook or Twitter, or made known at a public event. Because such information is publicly available, it cannot be protected from use or further disclosure.

Employment-related information

Information referring to suitability for employment as a WPCA member of staff (such as selection reports and references for appointment or promotions, or disciplinary records) is excluded from the definitions and therefore from the provisions of the Acts.

Such information, however, is still treated by the WPCA with the same care as if it were protected by the Acts.

Other employee-related personal information is protected by the Acts.

For example, records or information about work activities such as video or photographs of staff in their workplace, are protected and may only be used in compliance with the Acts' provisions.

Other examples of work-related personal information are staff training records, leave applications

and attendance records. All these are within the scope of the definitions and are protected by the Acts.

2.3 Types of personal information held by the WPCA

Employee records for staff of the WPCA are held by the WPCA. This information includes, but is not limited to:

- records of dates of birth, addresses and contact details;
- payroll, attendance and leave records;
- performance management and evaluation records;
- training records;
- workers compensation records;
- occupational health and safety records; and
- records of gender, ethnicity and disability of employees for equal employment opportunity reporting purposes.

Information on file cannot be accessed without consent of the respective employee. An employee of the WPCA may access their own file under the supervision of People and Culture (P&C) staff.

Apart from the employee the file relates to, P&C staff are the only other members of the WPCA that have authorised access to personnel files.

The records of personal information are stored in soft copy on the SAP database, maintained by GovConnect.

GovConnect is formed by two outsourced vendors managed by the Service Management Office, a division of the Department of Customer Service (DCS). A number of Corporate Services functions are managed by Infosys (Human Resources and Finance) and DCS (Information Technology) on behalf of WPCA.

Therefore, GovConnect holds and is responsible for more detailed personal information about WPCA staff such as payroll and leave records.

The Memorandum of Understanding (DCS) and Customer Outsourcing Agreement (Infosys) with the Department of Enterprise, Investment and Trade (DEIT), also covers WPCA, and note that these providers will have access to information from and about the entities they provide services to in the course of business, and that they are bound to comply with the PPIP Act.

Information collected relating to conflict of interest

All WPCA staff and contractors are required to declare any conflict of interest on appointment and Senior Executives declare their private interests. This information is reviewed annually and updated as necessary.

Digital images

The WPCA holds digital images of all staff members which are used for the production of staff identification cards and other internal uses including publication on the WPCA's intranet.

Contact details

WPCA holds contact details such as contact details for:

- government agency CEOs, members of inter-departmental working groups and similar, members of government boards and advisory committees;
- stakeholders participating in stakeholder consultation forums; and
- people who have made formal access applications under the GIPA Act.

Correspondence records

WPCA holds the following correspondence records:

- contact details of people who have written to or emailed the CEO or WPCA;
- details of the nature of their correspondence, which can include sensitive personal information about matters such as ethnicity, religion or sexuality;
- copies of replies to correspondence; and
- records of to whom, if anyone, their correspondence was referred.

This information is only used for the purpose of communicating a reply to the correspondent either from WPCA or the WPCA Board. Once a matter has been progressed and processed, it is closed and filed accordingly on relevant files stored and secured by GovConnect, as the WPCA’s primary provider of records management services.

3. The Information Protection Principles (IPPs)

3.1 Applying the privacy principles in NSW

The WPCA is guided by sections 8 to 19 of the PPIP Act. These sections provide a set of privacy standards which public sector agencies are expected to follow when dealing with personal information. The IPPs govern the collection, retention, accuracy, use and disclosure of personal information, including rights of access and correction.

12 Information protection principles		
Collection	1	Lawful
	2	Direct
	3	Open
	4	Relevant
Storage	5	Secure
Access	6	Transparent
	7	Accessible
	8	Correct
Use	9	Accurate
	10	Limited
Disclosure	11	Restricted
	12	Safeguarded

3.2 Collecting personal information (sections 8 to 11 of the PPIP Act)

Click on the Sections below to see the relevant sections of the Act.

- [Section 8](#)
- [Section 9](#)
- Section 10
- [Section 11](#)

The WPCA will only collect Personal Information if it is:

- for a lawful purpose that is directly related to one of our functions; and
- reasonably necessary for the WPCA to have the information.

The WPCA will ensure that when Personal Information is collected from an individual, either verbally or in written forms, the individual will be advised accordingly. This advice will include the purpose of the collection; any intended recipients of the information (where applicable); their right to access and correct the information; and the details of any agency or Department that is collecting or holding the information on the WPCA's behalf (if applicable).

The WPCA also advises individuals if the collection is voluntary or if it is lawfully required and informs individuals of any penalties or other possible consequences for not complying with the WPCA's request. When collecting Personal Information from an individual, the WPCA endeavours to ensure that the information is relevant, accurate, up to date and complete for the purposes for which it is being collected

The WPCA will also endeavour to ensure that the collection of the information does not intrude to an unreasonable extent on the personal affairs of the individual, having regard to the purposes for which it is being collected.

Collection tips:

- When designing a form, ask yourself: "do we really need each bit of this information?"
- By limiting the collection of personal information to only what you need, it is much easier to comply with the principles.
- If collecting personal information about someone, collect it from the source to ensure accuracy and gain any permission for disclosure of the information.
- Do not ask for information that is not relevant or very sensitive.
- Individuals providing their personal information to the WPCA have a right to know the full extent of how the information they provide will be used and disclosed, and to choose whether or not they wish to go ahead with providing information on that basis.

3.3 Storing personal information (section 12 of the PPIP Act)

The WPCA takes reasonable security safeguards against the loss, unauthorised access, use, modification and disclosure of personal information by having in place information security and acceptable use policies and security measures such as authorised access. To refer to what WPCA is required to do and what WPCA complies with in storing personal information, click on [section 12](#) of the Act.

Storage tips:

The WPCA must:

- only provide personal information to a contractor or service provider if they really need it to do their job; and
- take reasonable steps to prevent any unauthorised use or disclosure of the personal information by a contractor or service provider, and remember to bind our contractors to the same privacy obligations.

3.4 Accessing personal information (sections 13-14 of the PPIP Act)

Click on the Sections below to see the relevant sections of the Act.

- [Section 13](#)
- [Section 14](#)

Access tips:

- People should generally be able to see easily what information we hold about them.
- The WPCA will let complainants, clients and staff see their own personal information at no cost and through an informal request process.
- The WPCA cannot charge people to lodge their request for access or amendment. The WPCA can, however, charge reasonable fees for copying or inspection, if we tell people what the fees are up-front.

3.5 Using personal information (sections 15-17 of the PPIP Act)

Click on the Sections below to see the relevant sections of the Act.

- [Section 15](#)
- [Section 16](#)
- [Section 17](#)

Use tips:

- The primary purpose for which the WPCA has collected the personal information should have been set out in a privacy notice (Appendix A).
- To use Personal Information for a purpose set out in the privacy notice is usually permissible, but for any other purpose, check with the WPCA's Privacy Coordinator first.

3.6 Disclosing Personal Information (sections 18-19 of the PPIP Act)

Click on the Sections below to see the relevant sections of the Act.

- [Section 18](#)
- [Section 19](#)

Disclosure tips:

- The WPCA can usually disclose information in the way it notified the individual about at the time their personal information was collected.
- However, if the WPCA did not tell the person about the proposed disclosure in a privacy notice (template at Appendix A), the individual's consent is usually required.
- The disclosure of personal information, without prior notice, is also allowable under where the exchange of information is reasonably necessary 'for the purpose of referring inquiries between agencies', or 'to allow agencies to deal with or respond to correspondence from Ministers or Members of Parliament'. (For more information see the [Direction on Information Transfers between Public Sector Agencies](#) (2015)).

3.7 Exemptions

There are a number of exemptions to the IPPs that limit their coverage in a number of ways including:

- information that is contained in a publicly available publication (section 4(3) of the PPIP);
- exchanges of information which are reasonably necessary for the purpose of referring inquiries between agencies;
- disclosure relating to law enforcement and related matters (section 24 of the PPIP Act); and
- where non-compliance is lawfully authorised or required or otherwise lawfully permitted.

4. Code of Practice and PPIP section 41 Directions

Under the PPIP Act, Privacy Codes of Practice can be developed by agencies that provide for the modification of the application of one or more IPPs to particular activities or categories of information.

This is undertaken to take account of particular circumstances relating to legitimate use of personal information by agencies that might otherwise be in contradiction to the IPPs under the PPIP Act.

The Information and Privacy Commission can also prepare Codes of Practice common to a number of agencies. All Codes are approved by the NSW Attorney-General.

In addition, under section 41 of the PPIP Act, the Privacy Commissioner may make a direction to waive or modify the requirement for an agency to comply with an IPP.

4.1 Privacy Code of Practice for the NSW Public Service Commission

The NSW Public Service Commission has developed a [Privacy Code of Practice for the Public Service Commission](#) to allow analysis and reporting about employment characteristics.

The WPCA provides personal information to the NSW Public Service Commission for this purpose. Confidentiality and privacy arrangements underpin the workforce profile.

4.2 Direction on information transfers between Public Sector Agencies

The Privacy Commissioner recognises that there are many transfers of personal information between government agencies in NSW which are both legitimate and necessary.

The direction provides certain exemptions from the requirements of the PPIP Act relating to where exchanges of personal information between agencies are reasonably necessary for the purpose of dealing with:

- responses to correspondence from Ministers or MPs;
- referral of inquiries;
- auditing accounts or performance of a program or programs administered by an agency or agencies;
- law enforcement purposes not covered by the exemptions in the PPIP Act; and
- performance agreements between agencies.

4.3 Direction on the use of information for investigative purposes

The direction provides certain exemptions from the requirements of the PPIP Act to an agency where non-compliance is reasonably necessary for the proper exercise of any of the agency's investigative functions or its conduct of any lawful investigations.

5. Public Registers

Under section 3(1) of the PPIP Act, a Public Register is defined as 'a register of Personal Information' that is required by law to be, or is made, publicly available or open to public inspection (whether or not on payment of a fee).'

The PPIP Act requires that a public sector agency responsible for keeping a Public Register must not disclose any personal information contained in it unless the agency is satisfied that it is to be used for a purpose relating to the purpose of the register.

The WPCA does not currently hold any Public Registers.

6. Other relevant legislation

- *Anti-Discrimination Act 1977*
- *Criminal Records Act 1991*
- *GIPA Act 2009*
- *Ombudsman Act 1974*
- *Public Interest Disclosures Act 1994*
- *State Records Act 1998*
- *Workplace Surveillance Act 2005*

7. Policies affecting processing of personal information

The WPCA Internal Policies and Procedures impacting on the processing of personal information include:

- WPCA Code of Ethics and Conduct;
- WPCA Acceptable Use policy;
- WPCA Cyber Security Policy;
- WPCA Public Interest Disclosures Policy and Procedures;
- WPCA Records Management Framework and associated policies and procedures;
- WPCA Website Privacy Statement and

8. How to access and amend personal information

People have the right to access, amend and update personal information that the WPCA holds about them.

The WPCA must provide access to this information without excessive delay and does not charge any fees to access or amend it.

The WPCA encourages staff wanting to access or amend their own personal information to contact the WPCA Legal.

For members of the public, a request for access to any personal information held by the WPCA should be made in writing to the WPCA Privacy Coordinator (see section 12 for contact details).

Any person can make a formal application to the WPCA Privacy Coordinator and this application should:

- include the person's name and contact details (postal address, telephone number and email address if applicable);
- state whether the person is making the application under the PPIP Act (personal information);
- explain what personal information the person wants to access or amend; and
- explain how the person wants to access or amend it.

The WPCA aims to respond in writing to formal applications within 20 working days and will advise the applicant how long the request is likely to take, particularly if it may take longer than expected.

If an individual believes that the WPCA is taking an unreasonable amount of time to respond to an application, they have the right to seek an Internal Review.

Before seeking an Internal Review, we encourage individuals to first contact the WPCA to request provision of an update or timeframe.

9. Internal Review

9.1 Request for Internal Review

An individual who considers his or her privacy has been breached can make a complaint to the WPCA under section 53 of the PPIP Act and request a formal internal review of the WPCA's conduct in relation to the privacy matter (**Internal Review**).

A breach of an individual's privacy is where a breach of one or more of the IPPs has occurred.

Applications for Internal Review must:

- be in writing addressed to the WPCA;
- include a return address in Australia; and
- be lodged with the WPCA within six months of the time the applicant first became aware of the conduct which is the subject of the application.

The form for applying for a review of conduct under section 53 of the PPIP Act is at Appendix B.

Request for review must be either an alleged:

- breach of the IPPs or any Code of practice applicable to the WPCA; or
- disclosure of personal information from Public Registers held by the WPCA. Applicants who are not satisfied with the findings of the review or the action taken by the WPCA in relation to the Internal Review, have the right to appeal to the NSW Civil and Administration Tribunal (**NCAT**) under s 55 of the PPIP Act.

9.2 Internal Review Process

The Privacy Coordinator is responsible for receiving, allocating and overseeing Internal Reviews in relation to privacy matters.

Within the WPCA, the responsibilities of the Privacy Coordinator are currently held by the Director Legal (Operations).

Internal Reviews will generally be conducted by an Executive Director with no involvement in the matter giving rise to the complaint of breach of privacy. The Executive Director may seek legal or other assistance in conducting the review.

Under section 54(1) of the PPIP Act, the WPCA is required to notify the NSW Privacy Commissioner of the receipt of an application for an Internal Review of conduct and keep the NSW Privacy Commissioner informed of the progress, eventual findings and actions proposed to be taken in response to the internal review. In addition, the Privacy Commissioner is entitled to make submissions to the WPCA in relation to the application for Internal Review (section 54(2) of the PPIP).

Under section 53(6) of the PPIP, an Internal Review must be completed within 60 days of the receipt of the application.

Under section 53(8) of the PPIP Act, as soon as practicable, or in any event within 14 days, after the completion of the internal review the WPCA must notify the applicant in writing of the:

- findings of the review (and the reasons for those findings); and

- action proposed to be taken by the WPCA (and the reasons for taking that action); and
- the right of the person to have those findings, and the WPCA's proposed action, administratively reviewed by NCAT.

When the WPCA receives an Internal Review, the Privacy Coordinator will send:

- an acknowledgment letter to the applicant and advise that if the Internal Review is not completed within 60 days, they have a right to seek a review of the conduct by NCAT; and
- a letter to the NSW Privacy Commissioner with details of the application and a photocopy of the written complaint.

There is an example of a letter of notification to the Privacy Commissioner of receipt of request for an Internal Review at **Appendix D**.

The Director responsible for completing the final determination must consider any relevant material submitted by the applicant or the Privacy Commissioner. Before completing the review, the Director should enquire if the Privacy Commissioner wishes to make a submission.

It is recommended that the Director send a draft copy of the preliminary determination to the Privacy Commissioner for comment.

The WPCA follows the model of the Internal Review process provided by the NSW Information and Privacy Commission (**Appendix C**).

In finalising the determination, the Director will prepare a report containing their finding and recommended action.

The WPCA may:

- take no further action on the matter;
- make a formal apology to the applicant;
- take appropriate remedial action, which may include the payment of monetary compensation to the applicant;
- undertake that the conduct will not occur again; and/or
- implement administrative measures to ensure that the conduct will not occur again.

The reviewing Director will notify the applicant in writing of:

- the findings of the review;
- the reasons for the finding, described in terms of the IPPs;
- any action the WPCA proposes to take;
- the reasons for the proposed action (or no action); and/or
- their entitlement to have the findings and the reasons for the findings reviewed by NCAT.

The Privacy Coordinator provides a single point of contact for individuals seeking further information on how the WPCA complies with the PPIP Act. The Privacy Coordinator will receive all correspondence and enquiries regarding the PPIP Act and Internal Review requests.

The Privacy Coordinator's role also includes monitoring, recording and reporting on the progress of all Internal Review applications received.

9.3 Recording of Internal Reviews

The WPCA records all applications for Internal Review in a secure Objective file and workflow. The workflow tracks the progress of the Internal Review process and the determination of the completed review.

The details recorded in this system will provide the statistical information on Internal Review applications to be included in the WPCA's Annual Report.

10. External Review

An external review process is also available.

10.1 External Review by the Privacy Commissioner

Any individual who considers his or her privacy has been breached can make a complaint to the Privacy Commissioner under section 45 of the PPIP Act without going through the Internal Review process of the WPCA. The complaint must be made within 6 months (or such later time as the Privacy Commissioner may allow) from the time the individual first became aware of the conduct or matter the subject of the complaint.

10.2 External Review by NCAT

If the applicant is not satisfied with the outcome of the WPCA's Internal Review they may apply to NCAT to review the decision. If the WPCA has not completed the Internal Review within 60 days, the applicant can also take the matter to NCAT.

To seek an external review to NCAT, the individual must apply within 28 days from the date of the Internal Review decision.

A person must seek an Internal Review before they have the right to seek an external, administrative review under the *Administrative Decisions Review Act 1997* (section 55(1) of the PPIP Act).

NCAT has the power to make binding decisions on an external review (section 55(2) of the PPIP Act).

For more information including current forms and fees, please contact NCAT:

website: <https://www.ncat.nsw.gov.au/ncat/about-ncat/contact-us.html>
phone: 1300 006 228
visit/post: NSW Civil & Administrative Tribunal
Level 9, John Maddison tower,
86-90 Goulburn Street, Sydney NSW

NCAT cannot give legal advice; however, the NCAT website has general information about the process it follows and legal representation.

11. Promoting the Plan

11.1 Executive & Governance

The WPCA's Board is committed to transparency in relation to compliance with the Acts. The Board reinforces transparency and compliance with the Acts by:

- endorsing this Plan and making it publicly available;
- providing a copy of this Plan to the Audit and Risk Committee;
- reporting on privacy issues in the WPCA's Annual Report in line with the *Annual Reports (Departments) Act 1985* (NSW); and
- identifying privacy issues when implementing new systems

11.2 Staff Awareness

To ensure that WPCA staff are aware of their rights and obligations under the Act, the WPCA currently:

- introduces the Plan during staff induction with training provided as required;
- provides refresher, specialised and on-the-job privacy training;
- as a minimum, highlights the Plan annually during Privacy Awareness Week;
- provides privacy briefing sessions at appropriate management forums; and
- notifies staff of the privacy offence provisions (Part 8 of the PPIP Act contains offences for certain conduct of public sector officials and other persons. Such offences include any relating to corrupt disclosure and use of personal information by public sector officials; and inappropriately offering to supply personal information that has been disclosed unlawfully.)

12. Further Information and Contacts

For further information about this Plan, the personal information the WPCA holds, or if you have any concerns, please contact the Privacy Coordinator of the WPCA

governance@wpca.sydney

For more information on privacy rights and obligations in New South Wales, please contact the NSW Privacy Commissioner at:

NSW Information and Privacy Commission

Level 15, McKell Building, 2-24 Rawson Pl, Haymarket NSW 2000

Telephone: 1800 472 679

Web: <http://www.ipc.nsw.gov.au>

Email: ipcinfo@ipc.nsw.gov.au

13. Appendices

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Appendix C: Internal Review Checklist	Link
Appendix D: Draft letter to the Privacy Commissioner regarding receipt of application for internal review under section 53 of the PPIP Act	Link

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