

Policy Register

Health Records Policy

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Responsible Service Unit	- Information Technology
Authorised by	- Authorised by Director Shared Services.
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This policy is part of a suite of policies adopted by Council or the Executive Management Team (EMT).

New or replacement policies can be created and developed within Service Units but can only be added to Council's Policy Register by Governance Services following the approval of the policy by Council or the EMT.

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PURPOSE

The policy's purpose is to show Manningham Council's compliance with managing health information it holds in accordance with the Health Privacy Principles (HPPs) outlined within the *Health Records Act 2001* (Vic.). This document was created in accordance with HPP 5 (Openness), which requires a clearly and accessible policy showing how we manage health information held by Council.

POLICY STATEMENT

Manningham Council views the responsible handling of health information to be a key cornerstone for good corporate governance. We are committed to full compliance with our obligations with the Health Privacy Principles contained in the *Health Records Act 2001* (Vic.).

SCOPE OF POLICY

The policy applies to all Councillors, Council employees, volunteers and contractors.

This policy applies to all personal information that is also health information held by Manningham Council and includes information that Council has collected:

- About a person through any of Council's services or interactions;
- From the person themselves; and,
- About a person obtained from third-parties.

In broad terms, Council typically holds the following health records:

- Health records for clients accessing a services owned and operated by Council; and,
- Health records of Council employees.

This policy applies to all health information regardless of the format. Unlike the *Privacy and Data Protection Act 2014* (Vic.), the *Health Records Act 2001* (Vic.) covers health information whether it is recorded or not. This means that a verbal conversation detailing identifiable health information that can be overheard by a third-party may be considered a privacy breach.

RESPONSIBILITY

The Council's Privacy Officer is to review and make any necessary amendments to this Policy annually or otherwise in accordance with any significant changes to the legislation.

Everyone (all Manningham Council employees, contractors, and volunteers) is responsible for managing health information in accordance with the Health Privacy Principles (HPPs) and this policy including:

- **Collection** – ensuring only necessary information is collected for the purpose for which it is required.
- **Use and disclosure** – information collected must only be used or disclosed for the purpose for which it was collected or authorised under legislation.
- **Data quality** – ensuring information is accurate, up to date and complete.
- **Data security** - protecting confidential information and the privacy of health information from unauthorised access and release
- **Training** – Completing any Privacy and Health Records Training as required by Council.
- **Privacy breaches** – Reporting any suspected privacy breaches to their Service Unit Manager and Privacy Officer

When ceasing employment, volunteer or elected responsibilities, health information in their custody must be transferred to their supervisor, successor or Information Management.

Line Managers are responsible for:

- Monitoring staff to ensure they understand and comply with this Policy and related information privacy procedures;
- Fostering and supporting a culture that promotes good information privacy practices;
- Assessing and monitoring compliance with this Policy; and,
- Reporting compliance breaches or incidents.

Chief Executive Officer is responsible for:

- Ensuring Council has a formal program for management of health information in accordance with the *Health Records Act 2001* (Vic.) and any guidelines issued by the Office of the Health Complaints Commissioner.

Director of Shared Services is responsible for:

- The development and implementation of Council’s information privacy framework, strategies, policies and procedures.

Executive Management Team is responsible for:

- The review and approval of the Health Records Policy.

Freedom of Information/Privacy Officer is responsible for:

- The development and implementation of information privacy procedures and operations in accordance with this Policy;
- Managing a program of quality assurance, compliance monitoring and performance reporting of all information privacy activities; and
- Investigating any reports of breaches to this Policy.

Manager Procurement is responsible for:

- Ensuring this Policy is adhered to by contractors through clauses within contracts for the records of outsourced service provision.

DEFINITIONS

Term	Definition
Personal Information	<p>Information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in material form or not, about an individual whose identity is apparent, or can be reasonably ascertained, from the information or opinion, but does not include information about an individual who has been dead for more than 30 years.</p> <p>NOTE: A different definition applies to personal information that falls under the <i>Privacy and Data Protection Act 2014</i> (Vic).</p>
Health Information	<p>All identifying personal information about an individual’s:</p> <ul style="list-style-type: none"> • Physical, mental or psychological health (at any time) • Disabilities (at any time);

Term	Definition
	<ul style="list-style-type: none"> • Use and future use of health services; • Wishes regarding specific health services or treatments; • Personal information collected in relation to the provision of health services; • Genetic information; or, • Donation of human tissue.
Health Service	<p>In relation to Council, an activity that is intended to:</p> <ul style="list-style-type: none"> • Assess, maintain or improve an individual's health; • Diagnose an individual's illness, injury or disability; • Treat an individual's illness, injury or disability; or, • Provide disability, palliative or aged care services.
Health Service Provider	An organization that provides a health service within Victoria.
Health Privacy Principles (HPPs)	The eleven (11) principles outlined in Schedule 1 of the <i>Health Records Act 2001</i> that regulate the handling of personal information that is also health information.
HCC	Health Complaints Commissioner. The regulator responsible for oversight and complaint resolution for the handling of health information in Victoria.
Council	Manningham City Council
Contracted Service Providers	An external party that is or was a party to a Council contract and that is or was responsible for provides service to or on behalf of the Council under that contract. The term also includes sub-contractors for the contract.
Privacy Breach	Where personal and health information is subject to misuse, loss or unauthorized access, modification or disclosure.

Term	Definition
Identifier	<p>An identifier (usually a number or alphanumeric code) that is assigned to an individual in relation to health information for the purposes of uniquely identifying that individual.</p> <p>This does not include an identifier that consists only of the individual's name.</p>
Line Manager	<p>A generic term meaning the person to whom an employee directly reports to, who is an employee of MCC and who is of the level of Coordinator or above.</p>

GUIDELINES – The Health Privacy Principles

About Manningham Council

Manningham Council governs the municipality of Manningham by carrying out a variety of activities, functions and services to meet local community needs.

The role of Council under the *Local Government Act 2020* is to provide good governance in its municipal district for the benefit and wellbeing of the municipal community. Section 9 of the *Local Government Act 2020* outlines the overarching governance principles by which Council will demonstrate good governance. These principles include:

- Council decisions are to be made and actions taken in accordance with the relevant law;
- priority is to be given to achieving the best outcomes for the municipal community, including future generations;
- the economic, social and environmental sustainability of the municipal district, including mitigation and planning for climate change risks, is to be promoted;
- the municipal community is to be engaged in strategic planning and strategic decision making;
- innovation and continuous improvement is to be pursued;
- collaboration with other Councils and Governments and statutory bodies is to be sought;
- the ongoing financial viability of the Council is to be ensured;

- regional, state and national plans and policies are to be taken into account in strategic planning and decision making;
- the transparency of Council decisions, actions and information is to be ensured.

In performing its role, a Council may:

- perform any duties or functions or exercise any powers conferred on a Council by or under this Act or any other Act; and
- perform any other functions that the Council determines are necessary to enable the Council to perform its role.

Council provides a number of health services, as well as collect or manage health information as part of its functions and services. These include:

- Aged and Disability Support Services including domestic assistance, respite, food service and social support;
- Maternal and Child Health service;
- Childcare programs;
- Enforcement activities under the Food Act 1984 and Public Health and Wellbeing Act 2008;
- Immunisation services;
- Employee sick leave and entitlements;
- Occupational Health & Safety activities;
- Risk and Assurance activities (e.g. insurance and liability claims);
- Community Venues and functions; and,
- Sporting and recreational facilities (e.g. gyms and pools)

Collection (HPP 1)

Manningham Council will only collect an individual's health information when it is necessary for one or more of its functions or activities and at least one of the following applies:

- The individual has consented;
- It is required, authorised or permitted by or under law;

- Necessary to provide a health service to an individual incapable of giving consent and it is not practicable to obtain consent from their authorised representative (or where no authorised representative exists);
- Where information has been disclosed to Council in accordance with HPP 2.2(a), (f), (i) or (l) or HPP 2.5, which are as follows:
 - Secondary purpose directly related to primary purpose & individual would reasonably expect to be used for that secondary purpose
 - Training and evaluation purposes with de-identified information
 - Under prescribed circumstances
 - To assist in the identification and location of a deceased or missing individual;
- Necessary for public interest research, or compilation or analysis of statistics. If identifiable data is required for this purpose, Council will seek consent unless it is impracticable to do so;
- Necessary to prevent or lessen a serious threat to the life, safety or welfare of any individual or the public;
- On behalf of a law enforcement agency or Council itself, and it is necessary for a law enforcement function; or,
- Necessary for the establishment, exercise or defence of a legal or equitable claim.

How health information is to be collected

Council will collect health information only by lawful and fair means and will not do it in an unreasonably intrusive way.

If it is reasonable and practicable to do so, Council will only collect health information about an individual only from that individual.

At or before the time of collection (or if that is not practicable, as soon as practicable thereafter), Council must take reasonable steps in the circumstances to ensure that the individual is aware of certain information, as outlined in the Collection Notices section below.

Collection Notices

If Council collects an individual's health information from them or from another person, Council will take reasonable steps to ensure (before or at the time) that the individual is made aware of the following:

- who is collecting the information
- how Council may be contacted
- their rights to access the information
- the purpose for which Council has (or will be) collecting the information
- if, and who, Council will be disclosing this information to
- whether it is being collected because a law requires or authorises it
- the main consequences (if any) for them if all or part of the information is not provided.

The only time that Council will not advise someone of the above is when making the individual aware of the matter would pose a serious threat to the life or health of any person may occur, or would involve the disclosure of information that was provided to Council in confidence.

Information given in confidence

If personal information is given in confidence to Council (as a health service provider) about an individual by another person (excluding that individual or another health service provider providing health services to the individual) and it is requested that the information not be communicated to the individual to whom it relates, Council must do the following:

- Confirm with the person that the information they provided is to remain confidential.
- If it is to remain confidential:
 - only record that information if it is relevant to the provision of health service to, or the care of, the individual; and,
 - take reasonable steps to ensure the information is accurate and not misleading.
- Take reasonable steps to record that the information was given in confidence and that it is to remain confidential.

Examples of records containing health information

- Immunisation records
- Medical histories
- Birth notifications

- Disability parking permits
- Public liability insurance claims
- Next of Kin or Emergency contact details
- Appointments to access Council health services
- Complaints regarding food businesses
- Gym membership records

Employee records

Personally identifiable health information about an employee that is included in their personnel record is also considered a health record. This may include sick leave, maternity leave, and work cover claims.

It does not include recreation leave details, contact details or payroll information. Personal information that is not health information are covered by the Privacy and Data Protection Act 2014, as outlined in our Information Privacy Policy.

Employees should make themselves aware of the difference when managing these records as the requirements for health information and personal information are slightly different.

Use and Disclosure (HPP 2)

Manningham Council may use or disclose health information about someone for the primary purposes for which that information was collected.

We will not use or disclose health information about someone for a secondary purpose other than the primary purpose which it was collected unless at least one of the following applies:

- the secondary purpose is directly related to the primary purpose and the individual would reasonably expect Council to use or disclose the information for that secondary purpose; or,
- the individual has consented to the use or disclosure; or,
- the use or disclosure is required, authorised or permitted by or under law; or
- we are providing a health service to an individual and the secondary purpose is reasonably necessary to provide that service and the individual is incapable of giving consent (or it is impracticable to obtain consent from an authorised representative); or,

- we use or disclose health information for the purposes of administering health services or training provided to Council employees and it is not possible to meet that purpose without disclosure of the information, and reasonable steps have been taken to de-identify the information; or,
- the use or disclosure is necessary for public interest research or statistical analysis and it is impracticable to obtain consent and it is not possible for the purpose of that research or analysis to be achieved without disclosure of the health information. In the case of disclosure, Council must reasonably believe that the recipient will not disclose the information and that any publication will not identify the individual whose information it is; or,
- we reasonably believe the use or disclosure of the health information is necessary to lessen or prevent a serious threat to an individual's life, health, safety or welfare, or public health, public safety or public welfare; or,
- We suspect unlawful activity has occurred and the use or disclosure of the health information is a necessary part of the investigation or to report our concerns to the relevant authorities; or,
- We reasonably believe that the use or disclosure is reasonably necessary for a law enforcement function by or on behalf of a law enforcement agency. Any such disclosure requires a written note of that disclosure; or,
- The use or disclosure is necessary for the establishment, exercise or defence of a legal or equitable claim.

Additional considerations for HPP 2

Written note of disclosure – law enforcement or suspected unlawful activity

If a disclosure is made for the purposes of law enforcement, or to investigate or report suspected unlawful activity, Council is required to make a written note of disclosure for that purpose. Typically such notes will be recorded in CRM to track any access requests from law enforcement agencies or regulators.

The note should detail what information was disclosed, to whom and why. It should also note who made the decision to release the information.

Disclosure not mandatory under HPP 2 except for legal obligations

Nothing under HPP 2 requires Council to disclose health information about an individual. Council is always entitled to not disclose health information in the absence of a legal obligation to disclose it.

Disclosure to an immediate family member

Where we are a health service provider, we may disclose an individual's health information to an immediate family member, if we believe that the disclosure is

necessary to provide appropriate health services to care for the individual and the following requirements are met:

- The individual is incapable of giving consent; and,
- Disclosure is not contrary to any expressed wishes by the individual prior to becoming incapable of giving consent; and,
- The immediate family member who requested the information is 18 years of age or over, or if they have sufficient maturity to receive the information.

Missing or deceased individual

In some circumstances, we may disclose health information about an individual where we know or suspect that the individual is deceased, missing or involved in an accident and is therefore incapable of giving consent. This would occur in situation where it is reasonable to identify the individual or to identify and locate an immediate family member so that the police, a coroner or other prescribed organisation can contact them.

However, this cannot occur (in the case of a missing person or a person involved in an accident) where it would be contrary to the wishes of that individual.

Contracted Service Providers

Some of our functions and activities may be outsourced to third-party contractors to perform services on behalf of Council. We may disclose health information we hold to the contractor, where necessary, for them to carry out a specific service or task. They may also collect health information on behalf of Council to carry out certain services or tasks.

An example is where we have contracted the management of Council's leisure facilities, which include gymnasiums and associated health services, to a contracted service provider.

Reasonable steps are taken to ensure that any contracted service provider comply with the HPPs and other relevant legislation in carrying out the functions and activities on behalf of Council.

Other third-parties

We may disclose health information to other third-parties in accordance with the *Health Records Act 2001* or other legislation, including:

- Law Enforcement agencies to assist in a law enforcement investigation;
- Courts and Tribunals in responding to a subpoena;

- State and Commonwealth Government agencies as required under legislation;
- Insurers and legal advisors to assist Council in responding to insurance claims and/or legal proceedings;
- Printer and Mailing Services to assist in mailing out Council correspondence;
- Ombudsman and other regulators to assist in their investigation of a complaint received by them about Council.

Data Quality (HPP 3)

Manningham Council will take all reasonable steps to ensure that the health information it collects, uses, holds or discloses is accurate, complete, up to date and relevant to its functions or activities.

In carrying out these steps, consideration will be given to the purpose for which that information was collected.

This may occur when you request an amendment or update to your health information. We may also seek to periodically update the information as required.

Data Security and Data Retention (HPP 4)

Council will take all reasonable steps to protect the health information it holds from misuse and loss and from unauthorised access, modification or disclosure. This may include safeguards involving:

- Policies and procedures;
- Staff training;
- Physical security and systems; and,
- Information security and systems.

Council maintains its records in accordance with the *Public Records Act 1973* and the relevant Retentions and Disposal Authorities.

In general, Council must take reasonable steps to destroy or permanently de-identify health information if it is no longer needed for the purpose for which it was collected or any other purpose authorised by law. However different considerations apply when Council is acting as a health service provider.

Deletion of health information by a health service provider

Where Council is acting as a health service provider it must not delete health information relating to an individual, even if it is later found to be inaccurate, unless –

- the deletion is permitted, authorised or required by the regulations or any other law; or
- the deletion is not contrary to the regulations or any other law and occurs, and whichever of the following is the later:
 - where the health information was collected while the individual was a child, after the individual attains the age of 25 years; or,
 - more than 7 years after the last occasion on which a service was provided by use.

Where we delete health information in accordance with the above provisions, we are required to make a written note of the following:

- the name of the individual to whom the health information related;
- the period covered by it; and,
- the date on which it was deleted.

Transfer of health information as a health service provider

If we, acting as a health service provider, transfer health information to another individual or organization and we do not continue to hold a record of that information, we must make a written note of the name and address of the individual or organization to whom the information was transferred to.

Openness (HPP 5)

Manningham Council sets out in this statement its expressed policy on the management of health information and the steps that someone can take in order to obtain access to their health information.

This policy details how we manage health information.

If you require further information about our information privacy practices, you can contact Council on (03) 9840 9333 or manningham@manningham.vic.gov.au

Access and Correction (HPP 6)

Formal requests for access to and correction of your health information held by Council is subject to the Freedom of Information Act 1982 ('FOI Act').

Please note that in certain cases of routine access or correction, we may handle them through administrative processes outside the FOI Act. For example, when you need to update or correct your contact details. In many cases these may be resolved with the relevant service area (e.g. Maternal and Child Health, Immunisation, etc.). Please contact Council on (03) 9840 9333 to discuss your requirements.

If you wish to make a formal request under the FOI Act you must:

- do so in writing;
- provide sufficient details about the information you are either seeking to access or to correct; and,
- For access requests, payment of an application fee (through a waiver may be considered on hardship grounds)

Your FOI request can be sent to the following:

Post: Freedom of Information/Privacy Officer
Manningham City Council
PO Box 1
Doncaster VIC 3108

Email: FOI@manningham.vic.gov.au

Requests for access to information

For valid access requests, a decision will be made within 30 days of a valid request being received.

Please note that the timeframe may change under certain circumstances, for example:

- Up to 15 days for mandatory third-party consultations or up to 30 days with your agreements.
- The initial 30 days may reset if payment of access charges deposit is required.

You will be advised of any change to the timeframe and the reasons for it.

If access is refused to some or all of the requested information, you will be advised of the reasons for the refusal, as well as any relevant review rights.

Requests to correct information

For correction requests, Council will take reasonable steps to notify the person of the decision of the request as soon as practicable, or within 30 days of the request being received.

If it is determined that the information is inaccurate, incomplete, misleading or not up to date, Council must take reasonable steps to correct the information but must not delete the information otherwise in accordance with HPP 4.2.

HPP 4.2 states that deletion cannot occur unless:

- It is permitted, authorised or required by law; or,
- Deletion is not contrary to any other law and occurs –
 - When the information was collected while the individual was a child – after the individual attains the age of 25 years; or,
 - In any other case, more than 7 years after the last occasion on which a health service was provided to the individual by Council – whichever is the later.

If Council is not willing to correct the health information and no decision or recommendation is made under any law to correct it and the individual has provided a written statement concerning the requested correction, then Council will take reasonable steps to associate that statement with the information.

If Council accepts the need to correct the health information but it is not possible to remove or correct the incorrect information without either causing misinterpretation, harm to the individuals or cause inappropriate health services to be provided, then Council must place that incorrect information on a record that is not generally available to those providing health services and restrict access to it.

Council will take reasonable steps to ensure only the corrected information is generally available to anyone providing a health service to the individual.

Identifiers (HPP 7)

Council will only assign identifiers to individuals if it is reasonably necessary to enable Council to carry out a function efficiently.

Contracted service providers may adopt, use or disclose an identifier assigned by Council if it is necessary to fulfil its obligations to or its requirements in fulfilling its contracted service to Council.

Anonymity (HPP 8)

Where lawful and practicable, Manningham Council will provide you with the option of remaining anonymous in a transaction with Council.

For example, if you are accessing our website to obtain general information about Council's health services, you do not need to provide personal information in order to view that information.

However, there may be instances where anonymity may limit or hinder Council's ability to provide a service or complete a transaction.

For example, if you wanted to obtain a disabled parking permit, you may need to provide your personal information, along with a completed medical check by a relevant medical practitioner as part of the application process for the permit.

If you choose not to supply all or part of the information that is necessary for the Council to fulfil its functions, Council reserves the right to take no further action on that matter.

Transborder Data Flows (HPP 9)

Council may transfer health information about someone to another person or organisation that is located outside Victoria. This will only occur if:

- We reasonably believe that the recipient is subject to a legal requirement that is substantially similar to the HPPs; or,
- The person who is the subject of the health information consents to the transfer; or,
- The transfer is necessary for the performance of a contract between the individual and Council, or the implementation of pre-contractual measures taken in response to the individual's request; or
- The transfer is necessary for the conclusion of a contract that is the interest of the individual and is between Council and a third-party; or
- All of the following apply:
 - If the transfer is for the benefit of the individual;
 - It is impracticable to obtain consent of the person to that transfer; and,
 - If it were practicable to obtain consent, the person would likely give it; or,
- Council has taken reasonable steps to ensure the information which we have transferred will not be held, used or disclosed by the recipient inconsistently with the HPPs; or,
- The transfer is authorised or required by any other law.

Transfer or closure of the practice of a health service provider (HPP 10)

If a Council health service provider is sold, closed or transferred, and we are no longer providing health services in the new practice or business, or will be closed down, we will provide a public notice in a newspaper that circulates in the locality of the service.

The notice will advise the following:

- That the service has been, or is about to be, sold, transferred or closed down; and,
- How we propose to deal with any health information we hold about people who have used the service, including whether we propose to retain the health information or make it available for transfer to those individuals or their health service provider.

In any case, Council will notify those individuals whose health information is held in an affected health service within 21 days of the newspaper publication to advise them of what will happen to their information.

If a health service provider owned or operated by Council is to be sold or transferred, or amalgamated and the provider will continue to provide health services they can elect to retain the health information. If this occurs they will continue to hold it, in accordance with these HPPs or transfer it for safe storage in Victoria until that health information is destroyed in accordance with HPP 4.

Making information available to another health service provider (HPP 11)

If an individual requests a Council-operated health service provider to make their health information available to another health service provider, or authorises another health service provider to make a requested copy of their health information from Council, Council will, on payment of a prescribed fee, provide a copy or written summary of that health information to that other health service provider.

The fee structure is outlined in Schedule 2 of the *Health Records Regulations 2012*.

Council will endeavour to provide this information as soon as practicable.

HEALTH RECORDS COMPLAINTS

Complaints regarding the quality of a service provided by Council should be directed to the area that provided the service for resolution.

If you wish to lodge a complaint about how we have handled your health information, you can submit a written complaint to:

Post: Freedom of Information/Privacy Officer
Manningham City Council
PO Box 1
Doncaster VIC 3108

Email: privacy@manningham.vic.gov.au

In your complaint, please provide the following:

- Your contact details, so that we can provide you with a response; and,
- Provide a description of the incident, which may include:
 - Details of the incident (e.g. dates, parties involved)
 - What health information was involved; and,
 - Any other relevant details.

Typically the complainant should be the person to whom the health information relates. However, the following are examples where another person may submit a complaint on behalf of another individual:

- Parent or Guardian of a child;
- Person authorised by the individual to make the complaint; or,
- Where an individual is unable to complain by reason of injury, disease, senility, illness, disability, physical impairment or mental disorder.

We will investigate the complaint and provide a written response as soon as practicable, but within 28 days of the complaint being received. If circumstances require a longer period to investigate a complaint, we will discuss this with you.

Alternatively, you can make a complaint to the Health Complaints Commissioner ('HCC'). Please note that the HCC may decline to hear the complaint if you have not made a complaint to Council first. If you are not satisfied with Council's response to your complaint, you may apply to the HCC. Their contact details are:

Post: Health Complaints Commissioner
Level 26
570 Bourke Street
Melbourne VIC 3000

Phone: 1300 582 113

Online: <https://hcc.vic.gov.au/make-complaint>

Further information about the HCC is available at their website:

<https://hcc.vic.gov.au/>

FURTHER INFORMATION

Any enquiries regarding information privacy should be directed to Council's Privacy Officer on (03) 9840 9333 or via email at privacy@manningham.vic.gov.au

RELATED POLICIES

- Councillor Code of Conduct
- Employee Code of Conduct
- Employee Records Policy
- Information Privacy Policy
- Access to Information Policy

RELATED LEGISLATION

- *Charter of Human Rights and Responsibilities Act 2006 (Vic.)*
- *Freedom of Information Act 1982 (Vic.)*
- *Health Complaints Act 2016 (Vic.)*
- *Health Records Regulations 2012 (Vic.)*
- *Local Government Act 1989 (Vic.)*
- *Local Government Act 2020 (Vic.)*
- *Privacy Act 1988 (Cth.)*
- *Privacy and Data Protection Act 2014 (Vic.)*
- *Public Records Act 1973 (Vic.)*

DOCUMENT HISTORY

Policy Title:

Responsible Officer:	David Bellchambers
Resp. Officer Position:	Manager Information Technology
Next Review Date:	March 2024
To be included on website?	Yes

Last Updated	Meeting type? - Council or EMT	Meeting Date	Item N°
March 2021	EMT	11 March 2021	5.1