

Assessment of Privacy Management Policy (Policy No: 4.1.31)

Impact of Policy Repeal: The National Privacy Principles (NPPs) outlined in the current Privacy Management Policy are outdated and have been replaced by the Australian Privacy Principles (APPs). The repeal of this policy and its replacement with a proposed Administrative Standard will ensure alignment with the current legal framework as detailed below.

No.	Current Clause	Impact of Policy revocation
	Policy Statement	The current policy statement infers a legislative requirement to have a policy governing how the City manages information. However, there is no specific legislative requirement for a Council Policy. Compliance with the <i>Privacy Act 1988</i> and the Australian Privacy Principles (APPs) can be achieved through a proposed Administrative Standard, which will ensure that personal information is managed in accordance with current legal standards. This approach provides flexibility to incorporate the impending legislative change in a timely manner while continuing to provide essential guidance and prepare for privacy law reform.
Clause 1:	National Privacy Principle 1 - Collection	A proposed Administrative Standard will align with APP 3, ensuring personal information is collected only when necessary and by lawful means.
Clause 2:	National Privacy Principle 2 - Use And Disclosure	A proposed Administrative Standard will align with APP 6, ensuring personal information is used and disclosed only for the primary purpose or a related secondary purpose with consent.
Clause 3:	National Privacy Principle 3: Data Quality	A proposed Administrative Standard will align with APP 10, maintaining the quality of personal information.

No.	Current Clause	Impact of Policy revocation
Clause 4:	National Privacy Principle 4: Data Security	A proposed Administrative Standard will align with APP 11, ensuring evolving data security measures are in place.
Clause 5:	National Privacy Principle 5: Openness	A proposed Administrative Standard will align with APP 1, ensuring transparency in personal information management.
Clause 6:	National Privacy Principle 6: Access and Correction	A proposed Administrative Standard will align with APP 12 and APP 13, ensuring individuals can access and correct their personal information.
Clause 7:	Review of Certain Conduct (Internal Review Process)	Administrative procedures will continue to provide an internal review process, ensuring grievances related to privacy are addressed in accordance with the APPs.
Clause 8:	National Privacy Principle 7: Identifiers	A proposed Administrative Standard and supporting procedures will align with APP 9, ensuring the use of identifiers is compliant with current standards.
Clause 9:	National Privacy Principle 8: Anonymity	A proposed Administrative Standard will align with APP 2, providing options for anonymity.
Clause 10:	National Privacy Principle 9: Transborder Data Flow	A proposed Administrative Standard will align with APP 8, ensuring compliance responsible information sharing requirements.

No.	Current Clause	Impact of Policy revocation
Clause 11:	National Privacy Principle 10: Sensitive Information	A proposed Administrative Standard and supporting procedures will align with APP 3 and APP 6, ensuring sensitive information is handled appropriately.
Clause 12:	Code of Conduct	The City's Code of Conduct will continue to incorporate these obligations, ensuring continued compliance.