

Our Ref: F160590
Your Ref:
Enquiries: [REDACTED]

28 October 2019

Public Sector Reform Unit, Department of the Premier and Cabinet
LOCKED BAG 3001
WEST PERTH WA 6872

Dear Sir/Madam,

Submission on Privacy and Responsible Information Sharing for the Western Australian Public Sector

The Shire of Manjimup Council at its Ordinary Meeting held 24 October 2019 considered the content of the Privacy and Responsible Data Sharing discussion paper released by the Department of Premier and Cabinet. Council is appreciative of the opportunity to provide comment on the proposal.

As a result of its consideration of the proposal documents, and as recorded in its Minutes, Council has determined to:

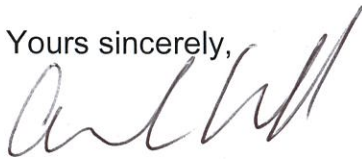
1. Support the proposed new data legislation subject to:

- i. The development of a data security system by third party users that protects the personal details of individuals from misappropriation by unauthorised third parties;**
- ii. The appointment of a Privacy Commissioner and Chief Data Officer to oversee the control and facilitate the use of public sector data;**
- iii. The use of the “Five Safes” as proposed in the discussion paper as the basis for the criteria for the inter-agency sharing of personal information;**
- iv. The setting of common standards and definitions for inter-agency data sharing;**
- v. Resolution of privacy or information-sharing disputes between agencies and individuals through a Privacy Commissioner;**
- vi. The imposition of penalties by the Privacy Commissioner for any breach of the proposed new legislation;**
- vii. The development of model policies and guidelines for local government to aid in the consistent imposition of the new legislation;**
- viii. The cost of training of local government Officers to administer and interpret the new legislation being borne by the State Government;**

- ix. **The cost of any modification or addition to local government resources to facilitate the uptake of the new legislation being borne by the State Government;**
 - x. **Data being used for purposes related to the well-being, welfare or protection of an individual, reducing the threat to life, health or safety;**
 - xi. **Data being shared for research and development with clear and direct public benefits;**
 - xii. **Data being used to support evidence-based policy making; and**
 - xiii. **Data being used to support the effective delivery of government services or operations.**
2. **Does not support the proposed new data legislation in the event that it is to be used:**
- i. **By non-government third parties for the purposes of direct marketing, or the profiling of individuals for commercial or insurance purposes.**

The Shire wishes the Department well in the development of the new legislation. Should you wish to discuss the content of this submission, please do not hesitate to contact me on [REDACTED] if should you have any queries.

Yours sincerely,



**Andrew Campbell
CHIEF EXECUTIVE OFFICER
SHIRE OF MANJIMUP**