



Privacy Management Policy

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GOULBURN MULWAREE COUNCIL PRIVACY MANAGEMENT POLICY

POLICY OBJECTIVE

This policy details how Goulburn Mulwaree Council deals with the personal information and health information it collects to ensure that it complies with the *Privacy and Personal Information Protection Act 1998* (PPIP Act) and the *Health Records and Information Privacy Act 2002* (HRIP Act).

Section 33 of the PPIP Act requires agencies to have a privacy management plan that sets out Council's commitment to respecting the privacy rights of clients, employees and members of the public. It also explains Council's practices and procedures in handling personal information under the PPIP Act and health information under the HRIP Act.

LEGISLATIVE PROVISIONS

Privacy and Personal Information Protection Act 1998

Health Records and Information Privacy Act 2002

Government Information (Public Access) Act 2009

Public Interest Disclosures Act 2022

Privacy Code of Practice for Local Government

POLICY STATEMENT

What is 'Personal Information'?

Personal information is defined in section 4 of the PPIP Act and is essentially any information or opinions about a person where that person's identity is apparent or can be reasonably ascertained. Personal information can include a person's name, address, family life, sexual preferences, financial information, ethnic or racial origin, political opinions, religious or philosophical beliefs, trade union membership and photos.

There are some kinds of information that are not personal information for example, information about someone who has been dead for 30 years or information about someone that is contained in a publicly available publication.

What is 'Health Information'?

Health information includes personal information that is information or opinions about the physical or mental health or a disability of an individual. Health information can include information such as a medical report, a blood test or an X-ray, or even information about a person's medical appointment.

Council is committed to being open, accessible and to complying with its obligations under the *Government Information (Public Access) Act 2009* (GIPA Act), while protecting an individual's right to privacy under the PPIP Act and the HRIP Act.

How Council Manages Personal and Health Information

General information held by Council

The principles in the PPIP Act and the HRIP Act apply to personal and health information held in Council records, information acquired by Councillors and staff in the course of carrying out their duties and information held by contractors or agents in the course of undertaking a commitment on Council's behalf.

Council holds personal information concerning Councillors such as:

- Personal contact information
- Complaints and associated matters
- Pecuniary interest returns
- Entitlements to fees, expenses and facilities.

Council holds personal information concerning its employees such as:

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- Recruitment material
- Leave and payroll data
- Personal contact information
- Performance management plans
- Disciplinary matters
- Pecuniary interest returns
- Wage and salary entitlements
- Training records and professional qualifications

Council holds personal information concerning its customers, ratepayers, residents and program participants such as:

- Names, addresses & contact details
- Land holdings
- Rates records
- Car registration numbers and insurance
- Bank account details
- Closed Circuit TV (CCTV) footage

Council holds personal information concerning its clients and participants of community programs such as:

- USI Numbers
- Licence/Photo ID
- Medicare numbers
- Pension cards
- Companion cards

Council holds health information relating to the health status of:

- Clients of the Goulburn Aquatic and Leisure Centre, Community Centre, Goulburn Regional Art Gallery and Goulburn Mulwaree Library where relevant to the provision of services
- Employees, where relevant to their employment.

Other information held by Council

Complaints made to Council

Any personal or health information contained in complaints and requests for action will not be disclosed however, the nature of the complaint may be released, except under the following circumstances:

- Where the complaint is made under the provisions of the *Public Interest Disclosure Act 2022 (PID Act)*
- Where the personal safety of the complainant may be at risk by the disclosure
- Where the complaint refers to corruption or maladministration currently under investigation.

Submissions on proposed developments

All public submissions (including petitions) on proposed developments will be considered in each Assessment Report prepared by Council. Advice is given, upon notification of development, that where disclosed, names and addresses and identifying information of people making submissions will be published in any Assessment Report presented to Council unless a specific request for confidentiality has been made. It should also be noted that submissions made via third party platforms, such as the NSW Planning Portal, will be subject to the terms, conditions and privacy policies that are applicable to those platforms. This may result in information being published by Council regardless of any confidentiality request. Requirement to publish these identifying details (where provided) should apply to any/all submissions, applications, requests etc. made to Council on any matter, unless confidentiality requirements otherwise apply.

Submissions are kept on file and can be accessed by other members of the public under the *Environmental Planning and Assessment Act 1979*, *Local Government Act 1993* (LG Act) and the *Roads Act 1993*.

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Items Tabled at a Meeting of Council

Items tabled at a meeting of Council will be made available in accordance with Part 19 of Council's Code of Meeting Practice.

Petitions

It is the responsibility of the petition organiser to ensure:

- the appropriate authorities are obtained from people signing the petition;
- potential signatories on the petition understand where the information may be made available or published.

Names or Signatories on the petition will not be notified of Council's actions in regard to any Development Application progress or decision. Where it is unclear who has lodged the petition, the first name on the petition will be used as the submission author for further communication.

Closed Circuit Television (CCTV) Recordings

CCTV recordings will be retained for a maximum of 30 days, and be overwritten, unless it is required in relation to the investigation of crime, for court proceedings, or to meet other legal obligations.

Access to and use of CCTV recorded material will be facilitated by Council and will only take place:

- in compliance with the needs of the Police in connection with their law enforcement functions; or
- if necessary for the purposes of legal proceedings; or
- other lawful requirement

For further information refer to Council's CCTV Code of Practice.

Webstreaming of Council Meetings

Council live streams ordinary meetings of Council and places the recording of the meetings on its web page. This allows members of the public who are not able to attend meetings to observe Council debate. Notices are placed in the Council Chambers advising the meeting is being recorded and that images and voice recordings of individuals attending the meeting may be captured and shall be published to the internet. These recordings will be retained for a maximum of 7 years and are available to view from Council's web page.

How Council collects personal information

Council decides what level of personal or health information is appropriate to be collected for each matter, with the understanding that the detail we collect must contain enough information to allow staff to provide assistance or process an application but should not contain unnecessary personal information. Council abides by the information protection principles in collecting personal information that is directly related to Council's functions and activities as described below:

Council collects personal information from the person concerned unless:

- The person has authorised collection from someone else;
- When information relates to a person who is under the age of 16 years, it is being provided by a parent or guardian of the person;
- It is provided to Council in accordance with legislative requirements;
- It is collected as required by another Act. For example, information provided to Council by the NSW Land Registry Service about transfers of property and associated matters is provided in accordance with provisions of the LG Act;
- It is collected in connection with proceedings before a court or tribunal;
- It is unreasonable or impracticable to collect health information directly from the person;
- It relates to Council's conduct of any investigation of a regulatory or law enforcement matter or a matter that could be referred to the Ombudsman or another investigative agency.

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Requirements when collecting personal and health information

If Council collects personal or health information, it will take reasonable steps in accordance with privacy principles, to ensure that before the information is collected or as soon as possible after collection, the person to whom the information relates is made aware of the following:

- The fact that the information is being collected;
- The purposes for which the information is being collected;
- The intended recipients of the information;
- Whether the supply of the information by the person is required by law or is voluntary and what may occur if the information (or any part of it) is not provided;
- The existence of any right of access to, and correction of, the information;
- The name and address of Council as the collector of the information.

Council will ensure that relevant forms and applications include a statement that addresses these matters. Council will also publish a brochure to inform members of the public about information handling practices. It will sometimes be impracticable to specifically refer to these matters in counter transactions, interviews or telephone conversations.

Council will ensure that any collection of personal or health information by use of security video cameras or other devices will be accompanied by appropriate signage as required by law.

Council is not required to give notice of collection in the following circumstances:

- Where the person consents to dispensing with the requirement;
- Where collection is reasonably necessary to confer an award, prize or benefit or similar form of personal recognition on the person to whom the information relates;
- Where collection is necessary in Council's conduct of any investigation of a regulatory or law enforcement matter or a matter that could be referred to the Ombudsman or another investigative agency;
- Where the information is collected in connection with proceedings before a court or tribunal;
- Where compliance would prejudice the interests of the person to whom the information relates.

Council will in normal circumstances rely on the person providing the information at the time of collection regarding accuracy and completeness, although in special circumstances some verification processes may be necessary.

How Council stores personal and health information

Council will store information in accordance with the principles in the PPIP Act and the HRIP Act and ensure:

- Information is kept for no longer than is necessary for the purposes for which the information may lawfully be used;
- Information is disposed of securely and in accordance with any requirements for the retention and disposal of personal information;
- Information is protected, by taking security safeguards against loss, unauthorised access, use, modification or disclosure, and against all other misuse;
- If necessary, for the information to be given to a person in connection with the provision of a service to Council, everything reasonably within the power of the Council is done to prevent unauthorised use or disclosure of the information.

Personal and health information will be held in an appropriately secure manner including restricted access to electronic and hard copies.

Council will include in its documents concerning employment and in any contractual arrangements, terms that ensure that staff and contractors and agents are aware of their obligations regarding the handling of any personal or health information obtained in the course of their employment or engagement.

How to access personal and health information held by Council

Privacy Principles state that people have the right to know what personal and health information Council holds about them and the right to access their information. They also have the right to amend their own personal or health information for example contact details.

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Council must provide access without excessive delay or expense. Council does not charge any fees to access or amend personal or health information.

Council requires that each application for access to personal information be made in writing. Applications will be dealt with as soon as practicable and usually within 21 working days.

No requests for personal information will be dealt with over the telephone.

Staff members seeking access to records held about them have rights of access to their personnel file.

Council will clearly explain the reasons if it decides not to give access to or amend personal or health information.

Amending personal or health information

Council will, at the request of the individual to whom personal or health information relates, make appropriate amendments (whether by way of corrections, deletions or additions) to ensure that the personal information is accurate, relevant, up-to-date, complete and not misleading.

Requests for changes to personal and health information are required to be in writing with appropriate supporting documentation.

If personal or health information is amended in accordance with this section, the individual to whom the information relates is entitled, if it is reasonably practicable, to have recipients of that information notified of the amendments made by Council.

Non-compliance of this Principle is permitted if compliance is reasonably likely to detrimentally affect or prevent the proper exercise of Council's conduct of any lawful investigation.

How Council uses and discloses personal information

Council will not use or disclose personal information for a purpose other than that for which it was collected unless:

- The individual to whom the information relates has consented, or
- Is directly related to the purpose for which the information was collected, or
- It is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual to whom the information relates, or of another person, or
- Council is satisfied that the personal information is reasonably necessary for the exercise of Council's lawful and proper function/s and
- It is to confer upon a particular person, an award, prize, benefit or similar form of personal recognition, or
- It is reasonably likely to detrimentally affect or prevent the proper exercise of Council's conduct of any lawful investigation, or
- Another law requires Council to disclose the information. The GIPA Act for example requires Council to make documents available for public inspection. Some documents must be made available while others are subject to disclosure unless on balance this would be contrary to the public interest.

Some information collected by Council may be used for a variety of purposes. For example, the names and addresses of individual owners of property kept as part of Council's rates records may be used to notify adjoining owners of proposed developments, to identify companion animal ownership, evaluate road openings and obstructions, evaluate tree preservation orders, investigate parking controls, evaluate land dedications and laneway status.

Staff investigating these issues and using personal information for these purposes will not notify individuals for approval to perform these functions.

Council may also disclose information to:

- Law enforcement authorities where required or permitted to do so or where there are reasonable grounds to believe an offence may have been committed;
- Public sector agencies or public utilities.

Council will not disclose information to any person or body that is in a jurisdiction outside New South Wales unless:

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- A relevant privacy law that applies to the personal information concerned is in force in that jurisdiction, or
- The disclosure is permitted under a Privacy Code of Practice for Local Government (a Code determined by the Privacy Commissioner and published in the Government Gazette.)

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Health Information Privacy Principles

Health information held by Council must only be used or disclosed in accordance with the Health Privacy Principles contained in HRIP Act.

There are special requirements regarding giving of notice when health information is collected from a third party. Council will comply with the Statutory Guidelines approved by the Minister for Health regarding the giving of notice in these circumstances.

Health information is given a higher level of protection regarding use and disclosure than other personal information. Council will comply with the use and disclosure limitations set out in the HRIP Act.

Any use of health information for training or research will be in accordance with the Statutory Guidelines issued by the Minister for Health.

There are four additional specific Health Privacy Principles contained in HRIP Act:

Identifiers

Council will only assign identifiers to individuals if the assignment of identifiers is reasonably necessary to enable the Council to carry out any of its functions efficiently.

Anonymity

Wherever it is lawful and practicable, individuals must be given the opportunity to not identify themselves when entering into transactions with or receiving any health services from Council. While Council does not currently provide a health service as described under the HRIP, where My Aged Care and National Disability Insurance Scheme clients provide health information to program coordinators at the Community Centre such information will be maintained in accordance with Health Information Privacy Principles.

Transborder data flows and data flow to Commonwealth agencies

Council must not transfer health information about an individual to any person or body who is in a jurisdiction outside NSW or to a Commonwealth agency except for circumstances described under Health Privacy Principle 14. Council will only transfer personal information out of New South Wales if the requirements of Health Privacy Principle 14 are met.

Linkage of health records

Council will only include health information in a system to link health records across more than one organisation if the individual to whom the health information relates expressly consents to the link.

Health record means an ongoing record of health care for an individual.

Health records linkage system means a computerised system that is designed to link health records for an individual held by different organisations for the purpose of facilitating access to health records, and includes a system or class of systems prescribed by the regulations as being a health records linkage system, but does not include a system or class of systems prescribed by the regulations as not being a health records linkage system.

Public Registers

Council is required by law to maintain several public registers and to make them available for public inspection. Some of these registers contain personal information as defined in the Acts. Council is required to ensure that any access to personal information in a register is consistent with the purpose for which the register exists.

Some registers have been created to serve several purposes. Where Parliament has stipulated that the register is to be available for public inspection, one purpose is to provide access to any member of the public with a legitimate interest in inspecting the register. Registers containing personal information will not be published on the Internet. Enquiries about public registers can be made by contacting Council's Governance Unit.

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Council will not disclose any personal information kept in a public register unless it is satisfied it is to be used for a reason relating to the purpose of the register or the Act under which the register is kept.

Specific rules governing disclosure of personal information on Registers:

1. Council will not disclose personal information kept in a Public Register unless the information is to be used for a function relating to the purpose of the Register or an Act under which the Register is kept.
2. Any person may inspect a publicly available copy of a public register and copy a single entry or a page of a register.
3. No Statutory Declaration is required to inspect and copy a single entry or page of a public register where the register does not contain personal information.
4. Where a copy of the whole or a substantial part of a public register is requested, the applicant is required to complete a statutory declaration describing the intended use of any information obtained from the inspection. A copy will then only be provided if the information is to be used for a purpose relating to the purpose of the Register or an Act under which the Register is kept.

Suppression of personal information in a public register

An application for suppression in relation to a public register will be dealt with under section 58 of the PPIP Act rather than section 739 of the LG Act.

A person about whom personal information is contained (or proposed to be contained) in a public register, may request Council under section 58 of the PPIP Act to have the information removed from, or not placed on the register as publicly available and not disclosed to the public.

If Council is satisfied that the safety or well-being of any person would be affected by not suppressing the personal information as requested, Council will suppress the information in accordance with the request unless Council is of the opinion that the public interest in maintaining public access to the information outweighs any individual interest in suppressing the information, in accordance with section 58(2) of the PPIP Act.

Any information that is removed from, or not placed on, that aspect of a public register to be made public may be kept on the register for other purposes. That is, the information may still be used for Council functions, but it cannot be disclosed to other parties.

When in doubt, Council will err in favour of suppression.

An application for suppression should be made in writing addressed to the General Manager and must outline the reason for the request. Council may require supporting documentation where appropriate.

How to make a Complaint

Under section 53 of the PIPP Act a person (the applicant) who is aggrieved by the conduct of Council in relation to personal and health information is entitled to make a complaint.

Council is committed to ensuring that no complainants are disadvantaged. Council will provide assistance where possible to any person with a special need and wanting to make complaint under this policy.

Procedure for internal review

Complaints must be made within 6 months of the complainant being first aware of the issue. Complaints should be made in writing and addressed to:

The Privacy Officer
Goulburn Mulwaree Council
Email: council@goulburn.nsw.gov.au
Mail: Locked Bag 22, GOULBURN NSW 2580

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When a complaint is received by the Privacy Officer (being the Business Manager Governance), the process is as follows:

- Step 1: The Privacy Officer notifies the Privacy Commissioner that a complaint has been received.
- Step 2: The Privacy Officer can appoint a Reviewing Officer to handle the complaint or will act as the Reviewing Officer.
- Step 3: The Reviewing Officer investigates the complaint and reports the determination back to the Privacy Officer.
- Step 4: The Privacy Officer notifies the Complainant and the Privacy Commissioner of the determination.

The review must be completed within 60 days of the lodgement of the complaint. The complaint will be investigated following the recommended checklist published by the Information and Privacy Commission NSW.

The complainant will be notified in writing within 14 days of the determination.

The Privacy Commissioner can make a submission on Council's findings and Council is to consider any relevant material submitted by the Privacy Commissioner in relation to the review.

Council may conclude that no breach of the privacy principles has occurred, that any breach was justified by a relevant exemption that applies to Council's handling of the information, or that a breach has occurred without justification. Any finding of a breach may result in a formal apology, appropriate remedial action, an undertaking that the conduct will not occur again, or the implementation of administrative changes.

Should a complainant not be satisfied, he or she may lodge an appeal to the NSW Civil and Administrative Tribunal, which will hear the matter and may impose its own decision. It may also impose substantial damages for a breach of an information protection principle.

Informal privacy complaints

A person may request to have an issue resolved informally. Informal privacy complaints are those that a person raises in passing when talking to Council Officers handling a matter in which they have an interest and where they indicate that they want the complaint to remain informal. Staff respond to informal complaints as follows:

- confirm that the person making the complaint would like it to remain informal;
- address the concerns that are raised, and seek to resolve them where possible with the assistance of Council's Privacy Officer;
- note the concern and how it was resolved in a file note within Council's record management system;
- raise the issue with the staff concerned immediately so that progress of the complaint can be monitored.

The outcome of an informal complaint about privacy may be to alter systems or procedures, or to provide specific training or instruction to the staff member involved. Governance staff are to ensure necessary changes are made or training provided to relevant staff.

Any apparent privacy breaches of procedure recognised within Council will be treated as an informal privacy complaint.

The Role of the Privacy Commissioner

The Information and Privacy Commission is the office of the NSW Privacy Commissioner. Its function is to protect the privacy of the citizens of NSW. The office receives, investigates and conciliates complaints. It also monitors internal reviews and answers enquiries.

In addition to monitoring internal reviews the Commissioner may, at the request of the agency concerned:

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- undertake the internal review on behalf of the agency, and
- make a report to the agency in relation to the application.

The Privacy Commissioner is entitled to charge an appropriate fee for that service.

Contact details for the Commission are included at end of this policy.

Offences in the PPIP Act and HRIP Act

Parts 8 of the PPIP Act and the HRIP Act contain offences for certain conduct of public sector officials and other persons. For example, there are offences relating to:

- corrupt disclosure and use of personal and health information by public sector officials
- inappropriately offering to supply personal or health information that has been disclosed unlawfully.

There is considerable risk that a failure to appropriately address breaches of privacy may result in fines to Council under the Acts and in the image and reputation of Council diminishing within the community.

Code of Conduct

Council's Code of Conduct outlines expectations in relation to access, use and security of information available to Councillors and Staff. The Code also includes information on reporting breaches, complaint handling and outlines sanctions to be taken under the Code of Conduct.

Council officials are introduced to the Code of Conduct and the principles of privacy in their induction training and additional training is provided to staff to assist with compliance of the Code of Conduct and the Acts.

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The Role of the Privacy Officer

The role of the Privacy Officer has been delegated by Council to the General Manager who has sub-delegated it to the Business Manager Governance.

The role carries primary responsibility for the following:

- a. Assigning, monitoring and reporting internal review matters.
- b. Liaising with all staff to ensure their needs are met in relation to the PPIP Act & HRIP Act.
- c. Assisting with training and induction.
- d. Assisting other Managers and staff in developing processes and procedures to enable staff, Councillors, contractors and consultants to meet their obligations under the Act.
- e. Conducting a review of physical security, security of paper records and IT safeguards and access arrangements.
- f. Acting as a point of contact for enquiries regarding the Act within the organisation.
- g. Reviewing the Privacy Management Policy.

In order to ensure compliance with Acts, the Privacy Officer will review relevant proposed contracts and agreements with consultants and other contractors, rates notices, application forms and other written requests by which personal information is collected by Council, to ensure that Council is in compliance with the Acts.

The Privacy Officer shall take other reasonable steps to ensure that Council is complying with the Acts.

The Privacy Officer will also provide opinions within Council as to:

- a. Whether the personal information is collected for a lawful purpose;
- b. If that lawful purpose is directly related to a function of Council; and
- c. Whether or not the collection of that personal information is reasonably necessary for the specified purpose.

Any further concerns of a legal nature will be referred to Council's solicitor.

Dissemination of the Privacy Management Policy

This Policy will be made available by the Privacy Officer to all members of Council and Council staff and members of the public by the following means:

- Report to Council
- Publication on Council's Web page

Training and information

Council's Governance Unit will be responsible for ensuring that Councillors, staff, consultants and contractors and members of Council committees receive appropriate training and information regarding the Acts and this policy. Basic information will be provided on induction and task specific training will be provided to positions identified as being able to access personal information.

When staff are unsure about any privacy issue they should direct enquiries to Council's Privacy Officer (Business Manager Governance) for advice.

Procedure for access to Council documents

Guidelines regarding public access to documents under the GIPA Act, PPIP Act and the HRIP Act will continue to be developed and updated by Council's Privacy Officer (Business Manager Governance) in consultation with Council staff. Ongoing training will be provided to frontline staff.

Review of procedures for the release of Council held information will be carried out on an annual basis in accordance with the requirements of the GIPA Act.

For More Information

Goulburn Mulwaree Council

Privacy Officer

Email: council@goulburn.nsw.gov.au

Phone: (02) 4823 4444

Postal: Locked Bag 22, GOULBURN NSW 2580

Information and Privacy Commission

Email: ipcinfo@ipc.nsw.gov.au

Phone: 1800 472 679

Postal: GPO Box 7011, Sydney NSW 2001

NSW Civil and Administrative Tribunal (NCAT)

Phone: 1300 006 228

Version	Council Meeting Date	Resolution	Adoption Date	Effective From
1	19 November 2013	13/488	17 January 2014	17 January 2014
2	16 September 2014	14/369	23 January 2014	23 January 2014
3	6 December 2016	16/547	6 December 2016	13 January 2017
4	3 May 2022	2022/147	3 May 2022	31 May 2022
5	19 August 2025	2025/192	19 August 2025	18 September 2025
All policies can be reviewed or revoked by resolution of Council at any time.				

DIRECTORATE: Executive Services

BUSINESS UNIT: Governance