IPP 7 – Alteration of records

IPP 7
A record-keeper must take reasonable steps to ensure that the record is accurate, relevant, up to date, complete and not misleading.
The record-keeper can, on request, attach a statement from the individual correcting, deleting or adding to the record.

---

1. Will reasonable steps be taken to make sure that records are accurate, relevant, current, complete and not misleading?

   Yes.

   Post data from the PSTC registration form is emailed through to the PSTC course administrator. This email record is maintained electronically and re-keyed into the Vocational Educational Training (VET) database, transmitted in an encrypted format. Users submitting information are required to confirm that the information put forward in the form is complete and accurate.

2. Will provision be made for attaching corrections?

   Yes.

   Users are able to download the PSTC registration form off the Department's website as a PDF version and re-submit it to the Department with the amendments made. Notice on the page for re-submission is provided as follows:

   - For follow-up enquiries, or if you are having problems completing the online form, please telephone the Assistant Director, Training and Development on 02 6141 3699 or email PSTC.TrainingCentre@ag.gov.au
   - Fax the completed PDF form to 02 6273 2083 or post to:

     Assistant Director, Training and Development

     Protective Security Training Centre

     Attorney-General's Department

     3-5 National Circuit

     BARTON ACT 2600

IPP 8 – Record-keeper's obligation to check accuracy etc of personal information before use

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IPP 8
Record-keepers must take reasonable steps to ensure information is accurate, current and complete before using it.

---

1. Will processes be put in place to ensure accuracy, currency and completeness before information is used?

   Yes.

   Users submitting personally identifiable information to the PSTC are required to click on a box stating that the information is accurate and complete. The PSTC places reliance on the information represented by the individual that it is accurate, current and complete.

IPP 9 – Personal information to be used only for relevant purposes

---

IPP 9
A record-keeper must only use information for a relevant purpose.

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1. Will relevance be tested before use?

   Yes.

   The information collected is for the relevant purpose of the completion of AVETMISS information.

IPP 10 – Limits on use of personal information

IPP 10
A record-keeper can generally only use the information for another purpose in special circumstances, including with consent and for health and safety or law enforcement reasons.

Generally:

- Use is what happens to the personal information inside the agency (it includes putting the information in a publication).
- Disclosure is releasing personal information from the record-keeper's control.
- Consent means express consent or implied consent [21].

---

1. Will the individual be asked to consent to the proposed use of personal information about them for other purpose(s)?

   Yes. Notices relating to consents are on the website as follows:

   > Cancellation Policy: If you are unable to attend, we would welcome a substitute participant. An invoice may be issued three weeks prior to the course commencement date and you will be liable for the course fees. So as to not incur the course fees, a written cancellation must therefore be received by the PSTC at least three weeks prior to the course commencement date. In the case of non-attendance due to illness, participants may reschedule to a later program at no charge but only if a medical certificate is provided to the Director of the PSTC. If the PSTC cancels a course, participants will be offered a rescheduled course or a full refund. The PSTC reserves the right to cancel, postpone or reschedule a course.
   >
   > Identifying Personal Information: We collect your personal information for the purposes of course administration, statistical analysis and evaluation of our programs. Some course administration details may be disclosed to your employer for administration and statistical/monitoring purposes if they make a written request to the PSTC. Your information will not be used for any other purpose except as required or authorised by or under law. Your information may be used to inform you about other Protective Security Training Centre courses or sponsored events.
   >
   > Confidentiality Policy: All information provided during assessment in either electronic or hardcopy format is official government information under the provisions of the Crimes Act 1914 (sections 70 and 79) and is issued on a need-to-know basis. It will be stored, transmitted and disposed of in accordance with the Protective Security Policy Framework (PSPF) Information Security Management Guidelines.

   Users completing the PSTC registration form are provided with an additional check box to advise the PSTC whether they wish to have their personal information not used for marketing purposes.

2. Will a record be kept of whether the consent was express or implied?

Yes.

Post data from the PSTC registration form, including the users' response to requests for consent, is emailed to the PSTC course administrator. This email record is maintained electronically and re-keyed into the VET database. The post data does not reside on the web server.

3. Will there be guidance/process in place to help the record-keeper determine what necessary to prevent or lessen a serious and imminent threat to the life or health means, before using this exemption?

   Not applicable - As the information is not stored on the web server this is outside the scope of this PIA.

4. Will there be guidance/process to help the record-keeper determine whether a proposed other purpose is required or authorised by or under law, before invoking this exemption?

   Not applicable - As the information is not stored on the web server this is outside the scope of this PIA.

5. Will there be guidance/processes in place to help the record-keeper determine what is reasonably necessary for enforcement of a criminal law, pecuniary penalty or protection of the public revenue, before invoking this exemption?

   Not applicable - As the information is not stored on the web server this is outside the scope of this PIA.

6. Will there be guidance/process in place to assist the record-keeper determine what directly related purposes are?

   Not applicable - As the information is not stored on the web server this is outside the scope of this PIA.

7. Will there be processes in place to allow the record-keeper to record that a use under IPP 10(d) has occurred?

   Not applicable - As the information is not stored on the web server this is outside the scope of this PIA.

IPP 11 – Disclosure

IPP 11
A record-keeper can generally only disclose information in special circumstances, such as with the individual\'s consent or for health and safety or law enforcement reasons.

---

1. Will processes be put in place to:
   - make individuals aware of the usual disclosures?
   - help the record-keeper determine if the individual was reasonably likely to have been aware of the disclosures?

   Yes. Notices relating to consents are on the website as follows:

   > Cancellation Policy: If you are unable to attend, we would welcome a substitute participant. An invoice may be issued three weeks prior to the course commencement date and you will be liable for the course fees. So as to not incur the course fees, a written cancellation must therefore be received by the PSTC at least three weeks prior to the course commencement date. In the case of non-attendance due to illness, participants may reschedule to a later program at no charge but only if a medical certificate is provided to the Director of the PSTC. If the PSTC cancels a course,

participants will be offered a rescheduled course or a full refund. The PSTC reserves the right to cancel, postpone or reschedule a course.

Identifying Personal Information: We collect your personal information for the purposes of course administration, statistical analysis and evaluation of our programs. Some course administration details may be disclosed to your employer for administration and statistical/monitoring purposes if they make a written request to the PSTC. Your information will not be used for any other purpose except as required or authorised by or under law. Your information may be used to inform you about other Protective Security Training Centre courses or sponsored events.

Confidentiality Policy: All information provided during assessment in either electronic or hardcopy format is official government information under the provisions of the Crimes Act 1914 (sections 70 and 79) and is issued on a need-to-know basis. It will be stored, transmitted and disposed of in accordance with the Protective Security Policy Framework (PSPF) Information Security Management Guidelines.

Users completing the PSTC registration form are provided with an additional check box to advise the PSTC of whether they wish to not have their personal information used for marketing purposes.

2. Will the individual have consented to the disclosure(s)?

   Yes.

   Post data from the PSTC registration form, including the users' response to requests for consent, is emailed through to the PSTC course administrator. This email record is maintained electronically and re-keyed into the VET database. The post data does not reside on the web server.

3. Will a record be kept of whether the consent was express or implied?

   Yes.

   Post data from the PSTC registration form, including the user's response to is emailed to the PSTC course administrator. This email record is maintained electronically and re-keyed into the VET database.

4. Will there be guidance/process in place to help the record-keeper determine what necessary to prevent or lessen a serious and imminent threat to the life or health of a person means, before invoking this exemption?

   Not applicable - As the information is not stored on the web server this is outside the scope of this Privacy Impact Assessment.

5. Will there be guidance/process in place to help the record-keeper determine whether a proposed disclosure is required or authorised by or under law?

   Not applicable - As the information is not stored on the web server this is outside the scope of this Privacy Impact Assessment.

6. Will there be guidance/process in place to help the record-keeper determine what is reasonably necessary for enforcement of a criminal law, pecuniary penalty or protection of the public revenue?

   Not applicable - As the information is not stored on the web server this is outside the scope of this Privacy Impact Assessment.

7. Will there be processes in place to allow the disclosure under IPP 11(e) to be recorded?

   Not applicable - As the information is not stored on the web server this is outside the scope of this Privacy Impact Assessment.

8. Will there be processes in place to ensure that the person, body or agency the information has been disclosed to will only use or disclose the information for the purposes it was disclosed?

Note: Responses to some of the IPP 4 questions will be relevant here.

Not applicable - As the information is not stored on the web server this is outside the scope of this Privacy Impact Assessment.

Appendix C Scope statement

The Consultant has undertaken a Privacy Impact Assessment of the Department's Website Redevelopment Project environment described in the figure below. The scope of this Privacy Impact Assessment is indicated by the areas shaded yellow in the diagram below.

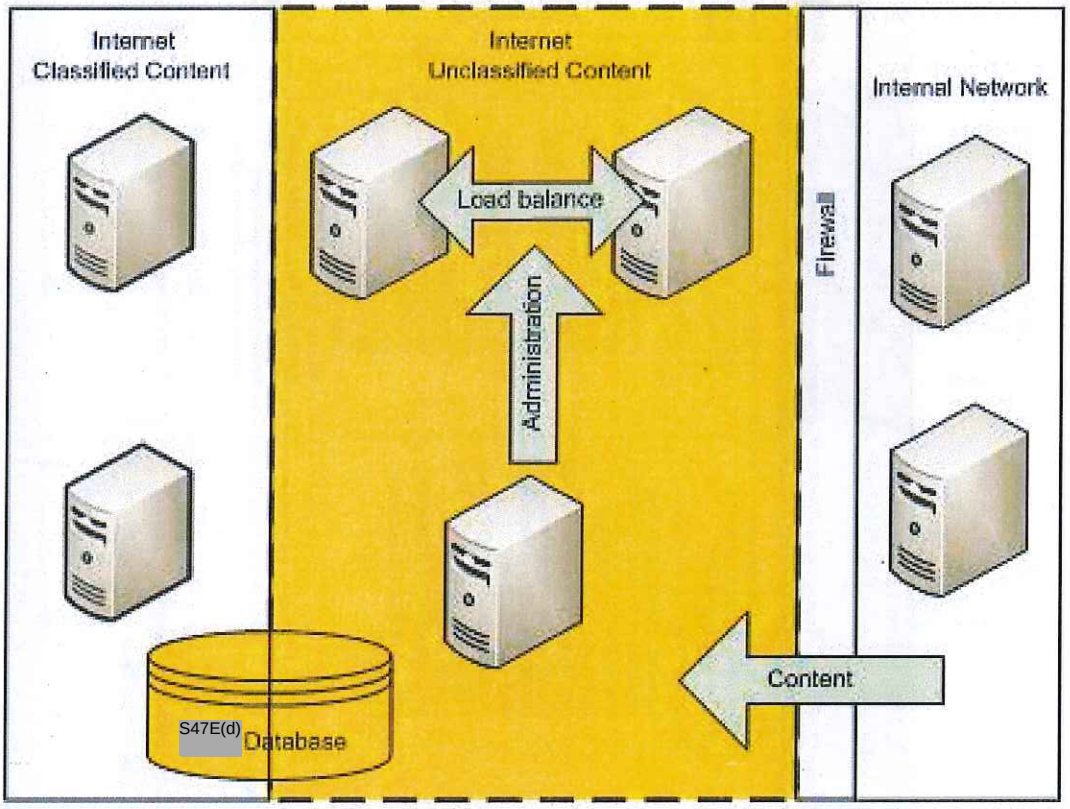
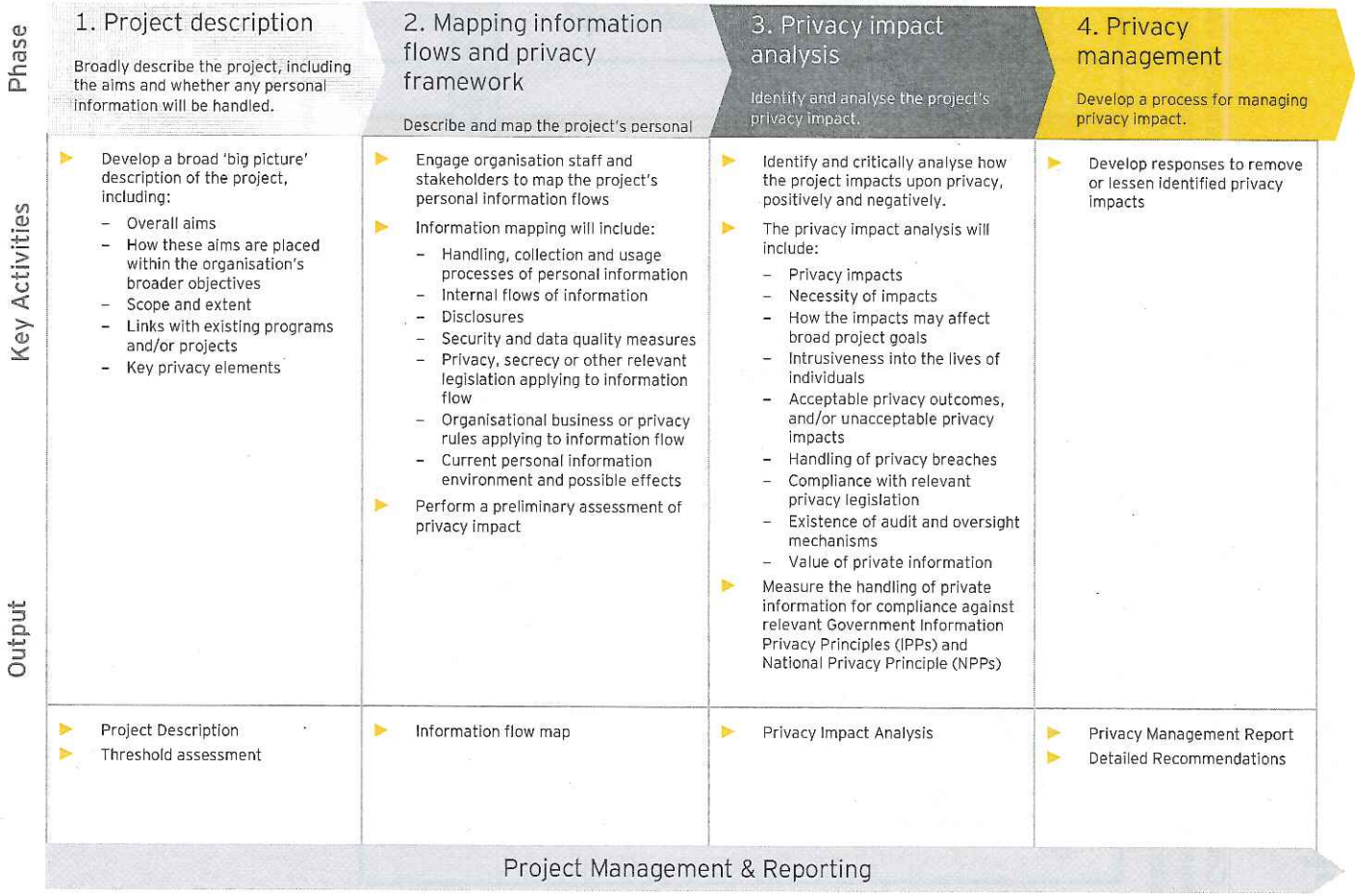


Figure 2 - the Department's Website Redevelopment Project Environment

Appendix D PIA approach

The following table outlines the approach taken to delivering this Privacy Impact Assessment.

This approach aligns to the guidance issued by the Office of the Privacy Commisioner.



Appendix E Attorney-General's Department risk ratings

The following section outlines the priority ratings and risk ratings system applied in this internal audit. Findings have been characterised as:

- An opportunity to strengthen the control environment; and
- An opportunity to reduce costs and/or process inefficiencies.

The Attorney General's Department Risk Rating System has been applied to the findings noted within this internal audit. The criteria provide a classification for the appropriate response to the level of risk present. The definitions for Consequence and Likelihood are provided below.

This risk rating tool was endorsed by the Secretary of the Attorney-General's Department in January 2011.

DEPARTMENTAL Consequence descriptor		PROJECT Consequence descriptor	
Insignificant	The event would have minimal impact on noncore business activities. It is unlikely to have impact on image or attract media/public/political concern.	**Insignificant**	The event would have insignificant impact on noncore project outputs, timeframes or budgets. Project Manager's expectations not met.
Negligible	The event would have some impact on business areas in terms of delays, systems and quality. There may be limited public/political concern.	**Negligible**	The event would have significant impact on noncore project outputs, timeframes or budgets. Branch Manager's expectations not met.
Moderate	The event would cause reduced performance such that targets are not met. There would be a possibility of limited damage to AGD's reputation and the event being subject to public/political concern.	**Moderate**	The event would have insignificant impact on core project outputs, timeframes or budgets. Division Manager's expectations not met.
Extensive	The event would cause failure to achieve a Departmental objective. It would be likely to attract significant/extended media coverage, national news interest, independent external enquiry and significant public/political concern and questioning.	**Extensive**	The event would have significant impact on core project outputs, timeframes or budgets. Division Manager and client expectations not met.
Significant	The event would cause significant impact on the social or economic well-being of the nation, or affect Australia's ability to conduct national defence and ensure national security.	**Significant**	The event would cause failure of the project. Secretary's expectations not met.

Likelihood Level	Likelihood descriptor
Remote	The event may only occur under exceptional circumstances. The probability of its occurrence is estimated at less than 5 per cent.
Rare	The event seldom occurs under similar circumstances. The probability of its occurrence estimated at 5 to 15 per cent.
Unlikely	The event occasionally occurs under similar circumstances. The probability of its occurrence is estimated at 15 to 40 per cent.
Possible	The event sometimes occurs under similar circumstances. The probability of its occurrence is estimated at 40 to 60 per cent.
Likely	The event often occurs under similar circumstances. The probability of its occurrence is estimated at 60 to 80 per cent.
Almost Certain	The event frequently occurs under similar circumstances. The probability of its occurrence is estimated at more than 80 per cent.

		Risk Rating					
Consequence	Significant	Medium	High	High	Very High	Very High	Very High
	Extensive	Low	Medium	Medium	High	High	High
	Moderate	Very Low	Low	Medium	Medium	Medium	Medium
	Negligible	Very Low	Very Low	Low	Low	Low	Low
	Insignificant	Very Low	Very Low	Very Low	Very Low	Very Low	Low
		Remote	Rare	Unlikely	Possible	Likely	Almost Certain
		Likelihood					

Appendix F Information flows

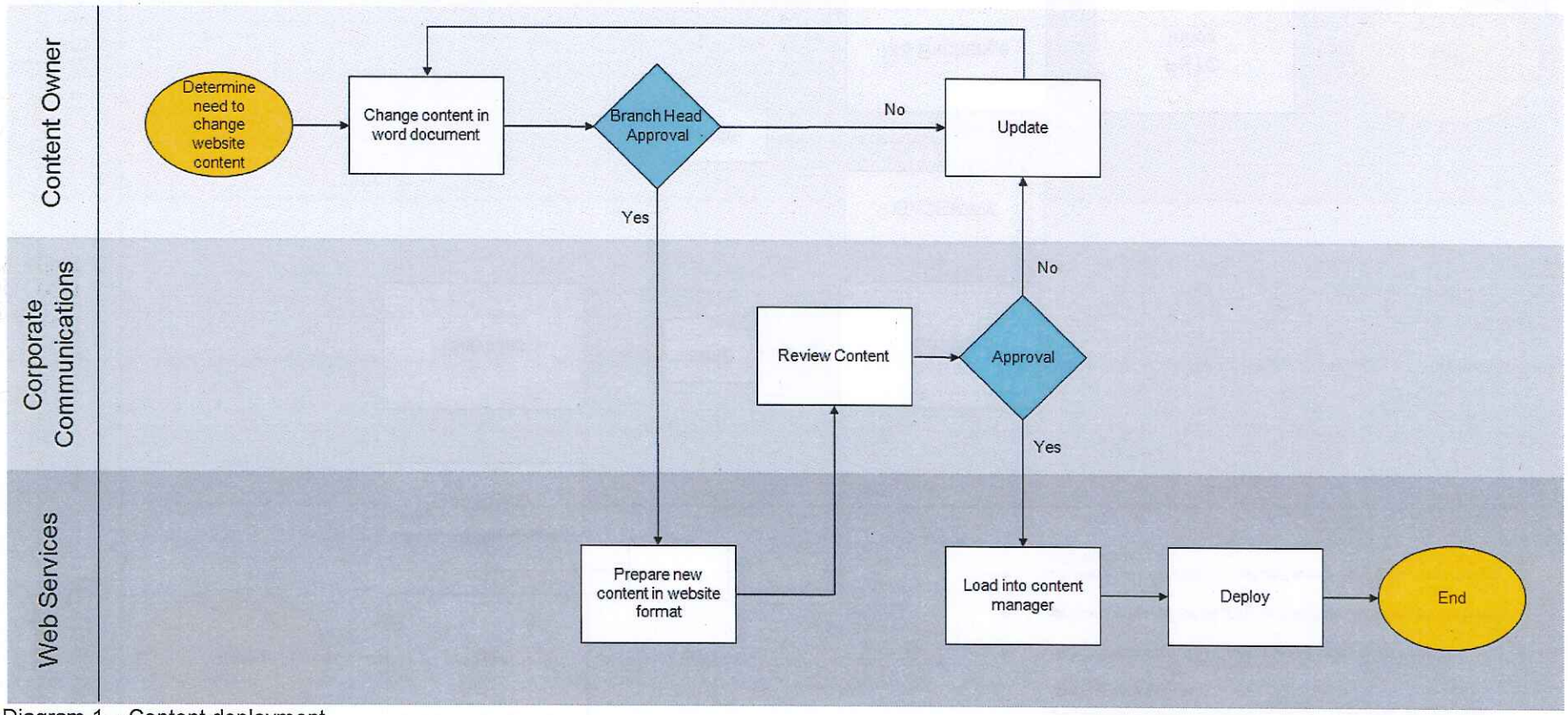


Diagram 1 – Content deployment

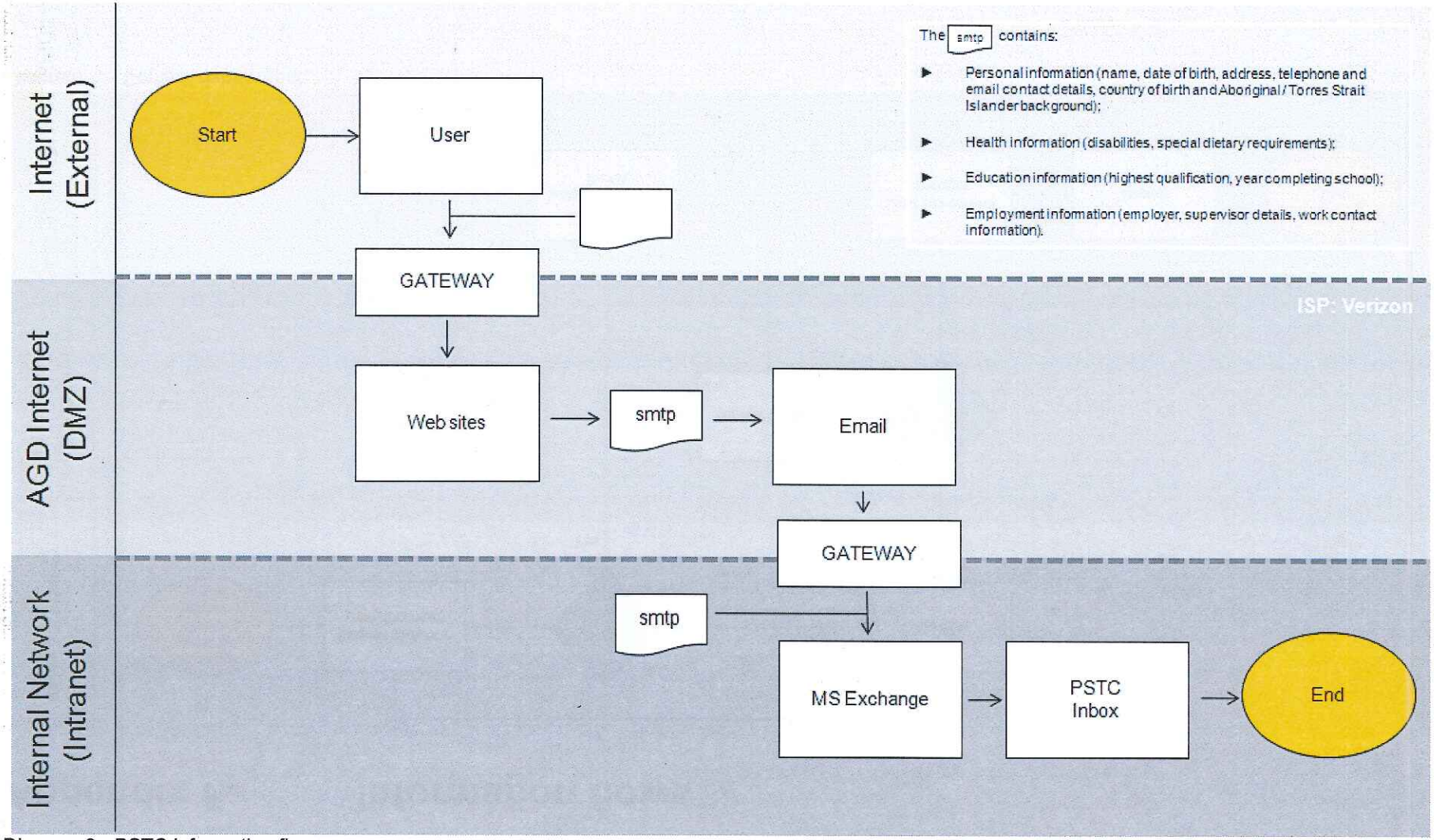


Diagram 2 - PSTC information flow

Appendix G Personnel contacted in this PIA

We would like to extend our appreciation to the following individuals who participated in, and provided information, during this Privacy Impact Assessment.

Name	Position	Date
s22(1)	Web Projects Manager Attorney-General's Department	11/12/12 12/12/12 13/12/12 14/12/12 17/12/12 19/12/12 20/12/12 21/12/12
s22(1)	SharePoint Developer Attorney-General's Department	11/12/12 12/12/12 13/12/12 14/12/12 17/12/12 19/12/12
s22(1)	SharePoint Team Member Attorney-General's Department	11/12/12
s22(1)	IT Security Advisor Attorney-General's Department	13/12/12
s22(1)	Service Delivery Section Attorney-General's Department	13/12/12
s22(1)	Service Delivery Section Attorney-General's Department	13/12/12
s22(1)	Director, Freedom of Information Section Attorney-General's Department	13/12/12
s22(1)	Course Coordinator Protective Security Training Centre (PSTC)	14/12/12 19/12/12
s22(1)	Network Architect Attorney-General's Department	14/12/12

Appendix H Reference sources for the PIA

Documents and/or Other Reference Sources
► Attorney-General's Department AG Threat Risk Assessment – Website Redevelopment
► Attorney-General's Department Server Services
► Attorney-General's Department SharePoint Server Farm
► Attorney-General's Department Website Project Management Plan
► Attorney-General's Department website (www.ag.gov.au)
► Privacy Impact Assessment Guide
► Privacy Act 1988 Act No. 119 of 1988 as amended
► Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS) Data element definitions: Edition 2.1
► Google Analytics Privacy and Data Sharing Statement
► Google Analytics Terms of Service
► Google Privacy Policy

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