PAW 2022: Protecting privacy, building trust

Steps you can take to protect personal information and build trust

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Update your polices and notices

Privacy Policy

- You must have an up-to-date Privacy Policy which clearly outlines how personal information is being collected and handled by your agency or organisation
- Ensure that your Privacy Policy is drafted in plain language and can be easily understood
- Ensure your Privacy Policy is up to date and available on your website
- Regularly review and update your Privacy Policy to reflect changes in internal practices or systems

Collection Notices

- You must notify individuals when you are collecting their information of certain things
- Ensure that collection notices are specific and available on your website
- Regularly review and update collection notices to reflect changes in internal practices or systems
- Give client's options about the handling of their personal information, including whether they can remain anonymous, have a pseudonym or 'opt-out' of further communications

Promote privacy by design

Privacy by design

- Design programs and services to eliminate, minimise or manage privacy risks

Privacy Impact Assessments

- Undertake a PIA for complex or high privacy risk projects
- Adopt a 'privacy by design' approach ensuring privacy compliance from start to finish
- Publish PIA's on your PIA Register and make it available on your website

Data minimisation

- Consider whether the information you are collecting is a 'nice to know' or a 'need to know' – you should only collect personal information which is reasonably necessary for, or directly related to, your functions or activities

Review practices and promote a strong privacy culture

Privacy Management Plan

- Keep your PMP up-to-date, ensure that it clearly identifies your privacy goals and the steps being taken to meet privacy obligations
- Ensure that you measure and document performance against the PMP regularly

Internal policies and procedures

- Develop policies and procedures for staff to promote privacy awareness and ensure Privacy Act compliance
- Appoint a privacy champion and privacy officer and promote their roles within your agency or organisation
- Develop a data and privacy breach response plan
- Establish procedures to allow individuals to promptly and easily access and correct their personal information
- Establish procedures for receiving and responding to privacy enquiries and complaints.
- Consider whether your policies and procedures can be made available on your website

Staff training

- Keep staff informed of the changes to your privacy obligations
- Ensure annual privacy training and consider ad hoc training on cyber security risks like phishing attacks, ransomware attacks and data spills

Secure personal information

Review information handling practices

- Take steps to ensure your information handling practices remain secure and appropriate in the current cyber security / threat environment
- Take steps to ensure third-party providers engaged or third party platforms used are secure
- Monitor and address new security risks and threats
- Review information holdings and identify personal information which may be deidentified or destroyed

Plan for a breach

- Develop, review and test your data breach response plan

Know when (and where) to get help

Use resources available

- Keep up-to-date with compliance issues, guidance materials and decisions made by the OAIC at Privacy - Home (oaic.gov.au)

Get specialist advice – call the lawyers!

- Sparke Helmore's team of specialised privacy lawyers can help you ensure compliance with the Privacy Act – from updating your Privacy Policy, PMP and collection notices, undertakings PIAs, providing training and specialist resourcing during peak periods
- We work in partnership with your team to protect privacy and ensure you can build a strong privacy foundation

PRIVACY
THE FOUNDATION OF TRUST

PRIVACY
AWARENESS WEEK

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