

Privacy Impact Assessment and Report

GRC Solutions – Salt Compliance E-Learning

1. Conduct a Threshold Assessment

Did the privacy threshold assessment result in a PIA being deemed necessary? Comment and attach privacy threshold assessment results:

- Privacy Threshold Assessment completed on 24/6/2019
- 4/17 questions resulted in 'Yes' indicating a PIA is required
 - 1. Will the project involve collecting personal information or a new way of collecting personal information?
 - 5. Will the project involve Disclosing personal information to another agency, a contractor, the private sector or to the public?
 - 13. Will the project involve a change in the way personal information is stored or secured?
 - 16. Will the project involve using de-identified information that could be matched with another dataset and enable individuals to be identified

2. Plan the PIA

After completing the threshold assessment, planning of the PIA can commence. When planning the PIA, the below points should be considered:

- What aspects of the project will be assessed
 - Collection – How is the data being collected?
 - The data will be entered by the user at their own discretion under the instruction of Agrifutures staff ✓
 - Storage – Where is the data being stored? Is the location secure?
 - The data is being stored by GRC Solutions on their infrastructure, which is based in Australia, meaning they have to comply with Australia's Data Privacy laws. ✓
 - Access – Who has access to the information? Are there suitable controls restricting access to additional users?
 - The information can only be accessed by Agrifutures moderating staff, the Agrifutures user and GRC Solutions support staff. ✓
 - Disclosure – In what form is the data being published? Is this method of disclosure suitable for personal information?
 - The data being entered into the GRC Solutions system is not being disclosed to the knowledge of Agrifutures ✓
- Where the PIA will fit in the overall project plan and timeframes
 - The PIA will be completed pre signing the contract to initiate the project. ✓
- Who will conduct the PIA and what resourcing is available
 - Gerard McTaggart will complete the PIA with the review being performed by Privacy Officer Louise Heaslip. The scope of the project and PIA means these resources are suitable ✓
- The extent and timing of stakeholder consultations; and
 - the information required to complete the PIA has already been received so there is no need for further stakeholder consultations

3. Describe the project

Comment below:

The project being undertaken by the Agrifutures Corporate team involves the adoption of a new e-learning platform for all staff within the business. This project allows a central platform for testing to be assigned to each of the staff members, in addition to the hosting of all of Agrifutures policies. ✓

This platform allows Agrifutures to perform staffwide policy compliance monitoring from a central, cloud based platform.

The main privacy risk arising from this project is that there is a small amount of personal information required to be uploaded to the platform, which is not personal on its own, but is personal when pieced together with other information found on the Agrifutures website. ✓

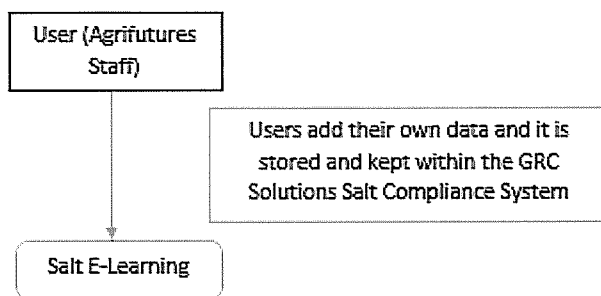
4. Identify and consult with stakeholders

Detail stakeholder consultations below:

The information required to be collected as part of this PIA has either already been detailed during the initial conversations of the project with the GRC Solutions project manager Mary Hague. The rest of the information required can be found on the GRC Solutions website under their Privacy Policy

5. Map the personal information flow

Comment below:



Customer information Collected

- Full name
- Work Email Address

How will it be stored

- GRC Solutions systems

What will the personal information be user for

- Used by Agrifutures moderating staff to assign relevant learning and policy modules

Whether the personal information will be routinely disclosed

- The information will not be routinely disclosed

How individuals will be able to access and amend their personal information.

- The individuals will not be able to amend their personal information while they are a still an employee of Agrifutures Australia ✓

6. Identify the privacy impacts

Comment below:

Risk 1: The main risk involved is that the data is being held by an external party (GRC Solutions) over which Agrifutures does not have visibility over.

7. Identify options to address the privacy risks

Comment below:

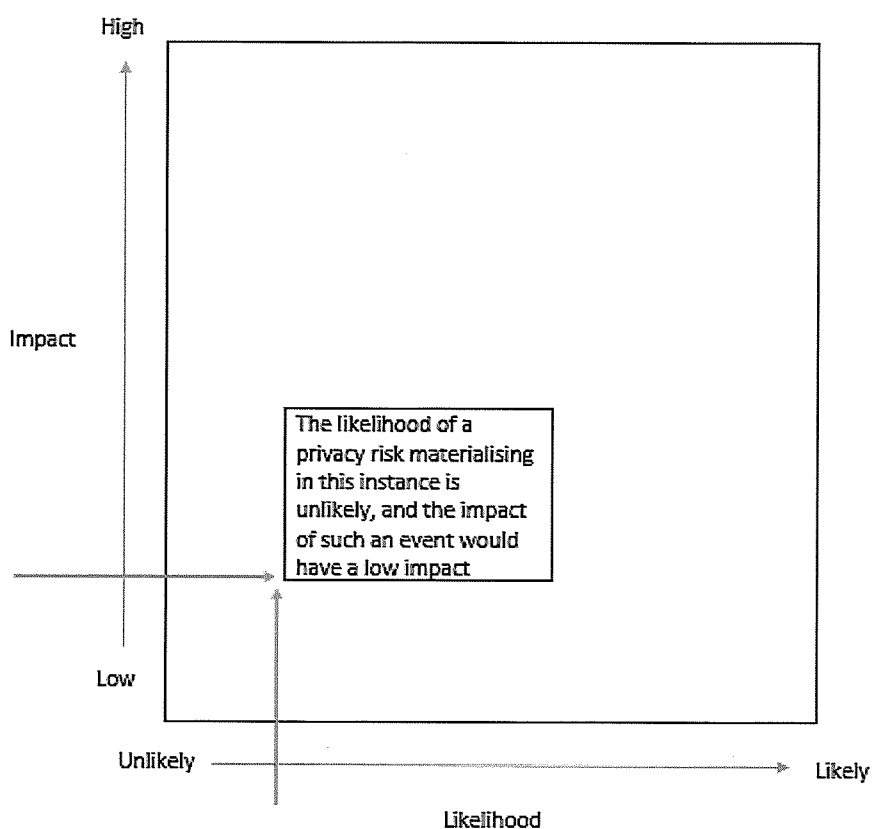
Risk 1: (Action 1) – GRC Solutions Privacy Policy states the following:

1.8 Data protection/ information security

We will take appropriate measures to keep your information confidential and secure in accordance with our internal procedures covering the storage, access and disclosure of information.

Dealing with Risk

Please see the Risk Matrix below



8. Respond and review

This PIA will be reviewed in the future to assess the Privacy Impact and Recommendations.

Additionally this will also be revisited if there is major changes to the project, requiring additional privacy recommendations.

Document Information


Date PIA completed:	24/6/2019
Status:	Waiting for Review

Prepared by:	Gerard McTaggart
Position:	Systems Coordinator
Email:	Gerard.mctaggart@agrifutures.com.au

Endorsement and approval

Project manager:

I recommend the project proceeds as proposed in this document.

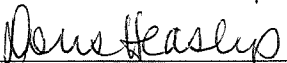
Name:	NICOLE LEGGISH		
Position:	MANAGER CORPORATE		
Signature		Date:	26/6/19

The following officer/s have endorsed this document:

Name:			
Position:			
Signature		Date:	

Project Executive/privacy officer/senior management:

I agree to the project proceeding as proposed in this document.

Name:	Louise Heaslip		
Position:	General Manager Corporate		
Signature		Date:	25.6.19