

## Privacy Impact Assessment and Report

### *PRO-016542 - Community Trust Quantitative Research 2022-2025*

A Privacy Impact Assessment (PIA) process involves the following steps:

1. Conduct a threshold assessment
2. Plan the PIA
3. Describe the project
4. Identify and consult with stakeholders
5. Map the personal information flow
6. Identify the privacy risks
7. Identify options to address the privacy risks
8. Respond and review

#### 1. Threshold Assessment

A threshold assessment was conducted, indicating a PIA was necessary as this project involves:

- Collecting new personal data and storing personal data
- Personal data is being collected for the purpose of analysis and aggregation of data into a tool
- Data systems outside of the approved AgriFutures systems are being utilised for the purpose of data / server control
- Data systems are being used to host personal data offshore

The following personal information will be collected during the course of the Community Trust Quantitative Research 2022-2025 project in order to meet project objectives and create positive impact for rural industries and associated communities.

- Gender
- Age
- Geographical positioning
- Employment status
- Highest level of education
- Ethnicity
- Dietary restrictions
- Existing personal affiliations with agriculture

For the purpose of the dashboard, the above demographic questions are asked, but information is presented as aggregated responses, so we cannot pull any individual information from the dataset. An example of this is age – we report on age ranges rather than individual age as nominated by the participant.

#### 2. PIA Plan

The PIA will be undertaken by the Senior Manager, Collaboration, Georgina Toose, with support from the Senior Manager, Corporate, Information Systems and Business Improvements, Nicole Legovich, and the Manager, Governance and Compliance, Jess Grant.

The PIA was conducted after a threshold assessment identified the need for the PIA to ensure the PIA, risk management and implementation of findings could be implemented prior to approval of external stakeholders accessing the interactive dashboards containing the data collected.

The Senior Manager, Collaboration, Georgina Toose, and the Senior Manager, Corporate, Information Systems and Business Improvements, Nicole Legovich, have discussed the gathering and storing of personal information being collected as part of the survey, which is as follows:

**Name of system:** *Qualtrics*

- What it is being used for: Data collection
- What data is being stored in it: All survey responses Raw data deidentified and demographic data linked to a participant ID.
- Where it is being hosted: Amazon AWS (Au server)
- Who has access to it: Voconiq Project Manager, Voconiq Survey Designer, Voconiq Data Analyst.
- What data do they have access to (i.e. full data set, de-identified etc) : Full deidentified data set, demographic information via PID.

**Name of system:** *ShinyApps*

- What it is being used for: Analysis and aggregation of data into a tool (VQ dash)
- What data is being stored in it: Deidentified full dataset
- Where it is being hosted: Amazon AWS
- *Who has access to it:*
  - Backend – Voconiq Data Scientist and Chief Data Scientist
  - Frontend – those who have the password (distributed by AgriFutures Australia).
  - What data do they have access to (i.e. full data set, de-identified etc) :
  - Backend - Full deidentified analysed data set.
  - Frontend – analysed data, deidentified and graphs.

**Name of system:** *GitHub*

- What it is being used for: Server control (i.e. backup of data etc)
- What data is being stored in it: Deidentified survey data
- Where it is being hosted: Azure servers (San Fransisco)
- Who has access to it: Voconiq Data Scientist and Chief Data Scientist
- What data do they have access to (i.e. full data set, de-identified etc) : Raw and analysed data sets. Deidentified.

**Name of system:** *Amazon S3*

- What it is being used for: Additional data analysis where required
- What data is being stored in it: Raw deidentified data sets
- Where it is being hosted: Asia Pacific Sydney region (ap-southeast-2)
- Who has access to it: Data Engineer, Voconiq Data Scientist and Chief Data Scientist
- What data do they have access to (i.e. full data set, de-identified etc) : Raw and analysed data sets. Deidentified.

**Name of system:** *SharePoint*

- What it is being used for: Storage
- What data is being stored in it: Final report and associated collateral.
- Where it is being hosted: Microsoft, Au
- Who has access to it: Voconiq project team members
- What data do they have access to (i.e. full data set, de-identified etc) : Full reports and project management documentation. All data is deidentified and analysed.

Information / data will be deidentified, and only shared using the interactive platform dashboards after initial collection through Qualtrics. Access to the interactive platforms is dependent on partnership status, will be closely monitored and access only granted with AgriFutures approval. Any datasets shown on the dashboard have additional privacy settings on them (i.e. you cannot apply so many filters that you may be able to identify a group of people/person based on the response).

Privacy will be considered:

- At collection:
  - Prior to undertaking the survey, participants consent to participation and understand the terms they are agreeing to.
  - Collected data will be immediately deidentified and hosted appropriately.
  
- Storage:
  - Relevant data related roles involved in the project will at all times adhere to the Australian Code for the Responsible Conduct of Research
  - Stored in deidentified form in archival format. These deidentified sets are stored in Github and Amazon A3 – allowing for review of coded data where required.
  - Data will be retained for a minimum of 5 years post end of collection, on the above storage systems, which is archived if this also aligns with the end of a data agreement. An annual review system which monitors collected and archival data against agreements and licencing is in place. Once this term has elapsed, and pending the licencing of the data agreement, and the permissions given from those who provided the data, it may be retired.
  
- Access
  - Voconiq have agreed to create unique usernames and passwords for each RDC/partner that is granted access to the interactive dashboard by AgriFutures Australia. This will ensure transparency of usage and provides the ability to track the use of data, if a data breach were to occur.
  - AgriFutures Australia will only approve access to the interactive dashboard to RDCs/Partners once they have agreed to the “Dashboard Terms of Use” agreement.
  - AgriFutures Australia has requested an administrative login to the interactive dashboard platform to have visibility or usage, and ensure the terms of use are strictly adhered to by any external stakeholders.
  - Any users will be accountable to the “Dashboards Terms of Use” agreement.
  
- Policy and procedures:
  - Data collection will comply with the AgriFutures Privacy Policy and General Collection Statements.
  - A formal terms of use document has been drafted to ensure all users adhere to best practice/uses.

Stakeholder consultation will be built into the project timeline as required.

Privacy will be considered throughout the life cycle of the project and as any additional changes are made to the system in future.

### 3. Describe the project

**Who is responsible for the project:**

Project: PRO-016542 - Community Trust Quantitative Research 2022-2025  
Program Manager: Georgina Toose, Senior Manager, Collaboration  
Program Support: Michael Beer, General Manager, Rural Futures, Tasmin Rowe, Manager, Workforce Policy, & Jock Pattinson, Coordinator, Collaboration

**What will the project deliver/achieve:**

- Develop capability across industry sectors to monitor, anticipate and respond to shifts in the levels of trust the community has in Australia's rural industries,
- Introduce a common language and foster an understanding across industry sectors around the community trust challenge, and
- Test best practice approaches, strategies and interventions for building, rebuilding and maintaining community trust, and share these learnings with the wider sector.

**Voconiq's Core Components include:**

- three (3) annual national surveys with corresponding analysis,
- data provision via a custom interactive dashboard designed from the ground up to empower Agrifutures Australia and its project partners to extract maximum value from the data,
- a set number of briefings and traditional reports to extract maximum value from the work for different needs within Agrifutures Australia and member industries.

Voconiq's Project Management support will be appropriate for the nature of this extension and be a transparent mechanism to enable specific industries to scale up their engagement with the work through key personnel as required.

Additional services provided by Voconiq to enhance core deliverables will include focal studies and Advisory services.

#### 4. Identify and consult with stakeholders

**Internal stakeholder engagement:**

- Manager, Governance and Compliance, Jess Grant, consulted to review the PIA threshold form and identify course of action through the PIA. Ongoing support provided through the PIA process.
- Senior Manager, Corporate, Information Systems and Business Improvements, Nicole Legovich, consulted to understand the ICT related concerns.

**External stakeholder engagement:**

- Voconiq
- Ruth Redfern, CRDC
- Maxie Hanft, GRDC
- Samantha Jamieson, MLA
- Mini Singh, Aus Eggs
- Lucy Noble, Hort Innovation
- Martin Blumenthal, NSW DPI
- Dr Jennifer Marshall, FRDC

## 5. Map the personal information flow

Data collection Data is in raw format	Data Query Data is in processed format	Data Analysis Data is in presentation format	Reporting
Qualtrics (Survey tool)	Github (Version control and cleaned data storage)  Amazon S3 bucket (additional analysis)	ShinyApps (Primary analysis)	ShinyApps (Dashboard)  Sharepoint (Internal company storage - word documents, PDFs, etc)

- 1) Identified survey participants will be invited by Voconiq to complete the survey using a link to the Qualtrics system.
- 2) Participants complete the survey using Qualtrics. Data is queried from Qualtrics and pulled into Github as a de-identified data set. Github is used for version control and cleaning. Amazon S3 is used for more complex analysis.
- 3) Access to the data will be limited to those who require it to perform their duties and contractual obligations. No data in its raw or backend analysed form is publicly available. In Qualtrics, GitHub, Amazon and Shiny backend nobody can access unless they have an access token. These tokens are held by the Chief Data Scientist at Voconiq and may be revoked at any time. The tokens also have a time limit (one year in most instances) so users need to be refreshed to continue access. This is in line with the Voconiq privacy policy : <https://statics.teams.cdn.office.net/evergreen-assets/safelinks/1/atp-safelinks.html> )
- 4) Voconiq will store and review the data received from the survey, reporting as per the project contract with AgriFutures Australia.
- 5) All relevant data will be collated, deidentified and stored in one of the approved host systems.
- 6) Relevant data will be analysed and reported accordingly into the interactive dashboard platforms.

## 6. Identify the privacy impacts

<i>Risk</i>	<i>Mitigation</i>
Data is lost/alterd during the migration	<ul style="list-style-type: none"> <li>• Data is backed up in a number of different systems (GitHub and SharePoint).</li> <li>• Ensure only the required personal information is collected to successfully carry out the project.</li> </ul>
Data is used for an intent other than the one it was collected for	<ul style="list-style-type: none"> <li>• Access to the data will be controlled based on the user's role.</li> <li>• AgriFutures staff will comply with this and will seek permission to contact users for any purpose not covered by the user terms of use.</li> </ul>

Data is accessed without permission	<ul style="list-style-type: none"> <li>Whilst we are confident every precaution is being taken to ensure there is no breach, and data is secured, if there was an incident, AgriFutures Australia will follow the Data Breach Response Plan.</li> </ul>
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## Dealing with Risk

Insignificant Consequence and Unlikely Likelihood – **Low (2)** Risk Rating, due to the deidentified data use, and risk management implemented on all software to control any breach.

### Privacy Risk Assessment Matrix (Relative Severity of Risk)

Likelihood	Consequences				
	Insignificant 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
5 Almost Certain	<b>S</b>	<b>H</b>	<b>H</b>	<b>E</b>	<b>E</b>
4 Likely	<b>M</b>	<b>S</b>	<b>H</b>	<b>E</b>	<b>E</b>
3 Possible	<b>L</b>	<b>M</b>	<b>S</b>	<b>H</b>	<b>H</b>
2 Unlikely	<b>L</b>	<b>L</b>	<b>M</b>	<b>S</b>	<b>H</b>
1 Rare	<b>L</b>	<b>L</b>	<b>L</b>	<b>M</b>	<b>S</b>

Risk Rating	Risk score	Description
<b>E</b>	(9-10)	Extreme risk – Generally not tolerated, requires risk transfer or discontinuation of activity/risk.
<b>H</b>	(7 – 8)	High risk – Avoid where possible, if unavoidable likely to require strict management in the form of risk action plans and formalised reporting.
<b>S</b>	(6)	Significant risk – Likely to require formal monitoring and management by the Leadership Team Team.
<b>M</b>	(5)	Medium risk – Likely to require day to day management oversight.
<b>L</b>	(2-4)	Low risk – Generally accepted with minimal ongoing review.

## 7. Respond and review

Actions taken to ensure data collected for storage in the Community Trust Quantitative Research 2022-2025 project is treated in line with the Privacy Principles.

This PIA will be revisited throughout the project to ensure that any additional privacy aspects that arise are properly addressed.


### Document Information

Date PIA completed:	26/07/2023
Status:	Draft Completed
Prepared by:	Tasmin Rowe
Position:	Manager, Workforce Policy
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### Endorsement and approval

Project manager:

I **recommend** the project proceeds as proposed in this document.

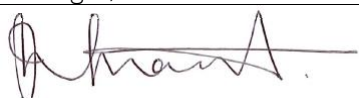
Name:	Georgina Toose		
Position:	Senior Manager, Collaboration		
Signature		Date:	27/07/2023

The following officer/s have **endorsed** this document:

Name:	Michael Beer		
Position:	General Manager, Rural Futures		
Signature		Date:	31/07/2023

Project Executive/**privacy officer**/senior management:

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

Name:	Jessica Grant		
Position:	Manager, Governance and Compliance (Privacy Officer)		
Signature		Date:	03/08/2023