



Privacy Threshold Assessment

Project Details

Project name	Geoscience Australia Data Portal: Analysis of usage statistics (AusSeabed Persona)
Date	23/10/2020
Project manager/ Responsible official	Marine Project Manager
Threshold assessment drafter	Marine Project Manager
Description of the project	<p>It is part of an existing project (the EFTF Data Portal).</p> <p>This portion of the project will analyse information about data downloaded from the portal, including download file types, sizes, frequency, and job coverage. The analysis will be consolidated into high level reports and graphs and shared with relevant internal and external stakeholders.</p>
Set out a brief description of the types of personal information being handled as part of the project	<p>The existing process of downloading data from the portal requires users to provide an email address in order to receive the data they are requesting. For the purpose of collating usage statistics, only the domain component of users' email addresses will be logged. As such, the amount of personal information handled will be very limited as individuals are generally not identifiable from their email domain alone. IP address information is not captured.</p> <p>For a very small number of cases, there may be a one-to-one correlation between an email domain and an individual, e.g. where an individual has registered their name as a domain and is the only user of that domain.</p> <p>Access to the domain information will be limited to a small number of staff within Digital Science and Information (who have access to the data logs) and the requesting business area. Domain information will not be shared externally except potentially in aggregated form, e.g. as a proportion of users from industry, government, academia, etc downloading resources from the portal.</p> <p>Notwithstanding there being a very small likelihood of personal information being disclosed, the risk of serious harm to any individual should this occur is unlikely. The processes identified for filtering out personal information are proportionate to the risk.</p>
What is the purpose of the personal information handling/legal authority	Consistent with the Geoscience Australia Privacy Policy, personal information is collected from portal users for the primary purpose of providing products and services via the portal. The de-identification of users' download information for the purpose of collating portal usage statistics is related to this primary purpose.

Stakeholders	NEMO Marine, NEMO Operations, MEG, DiSI, Any other groups with personas on the portal (https://portal.ga.gov.au)
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Part 1: Handling personal information

	Yes	No	Potentially
Will the project involve new or changed ways of handling personal information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Part 2: Determining potential for a high privacy risk

Consider the following questions and record each answer as 'yes', 'no' or 'potentially'. The purpose of these questions is to help you screen for factors which point to the potential for a high privacy risk project. It's important to note that these questions are non-exhaustive, and you should also consider whether there are any other relevant factors that may indicate that your project is a high privacy risk project.

Will the project involve:	Yes	No	Potentially
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Handling large amounts of personal information?

Consider the amount of personal information and the number of individuals that will be impacted by your project. Even if you consider that each individual will only have a small chance of suffering a negative impact, handling personal information on a large scale can increase the privacy risk associated with your project. You should also consider whether your project will result in significant increases in the volume of personal information being handled through new or existing channels.

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Handling sensitive information?

Sensitive information includes, but is not limited to, information about an individual's racial or ethnic origin, political opinions, religious beliefs or affiliations, criminal records, sexual preferences or practices, biometric information, health information and genetic information.

The privacy risk associated with your project can increase if sensitive information is involved given the potential for adverse consequences for an individual, or those associated with the individual, if it is mishandled (for example, discrimination, mistreatment, humiliation or embarrassment).

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Sensitivities based on the context in which the project will operate?

Consider the context and circumstances surrounding the project. Are there prior concerns over this type of handling or activity? Is the project likely to have community support? Is the handling of personal information novel in any way? What is the current state of technology in this area and has there been any previously identified security or technology flaws? Are there any current issues of public concern that you should factor in? What is the nature of your relationship with individuals that may be impacted by the project? How much control will they have over the handling of their personal information? Would they expect you to use their personal information in this way?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Will the project involve:	Yes	No	Potentially
<p>Handling personal information of individuals who are known to be vulnerable?</p> <p><i>Consider whether the activity may have greater sensitivities or disproportionate impacts on vulnerable populations and certain groups of individuals. This could include children and seniors, people with impaired intellectual or physical functioning, people who are not native speakers of the local language, people with low levels of literacy or education, people from a low socio-economic background, people experiencing financial hardship, people who are Aboriginal or Torres Strait Islanders.</i></p> <p><i>An individual's circumstances, or the increased power imbalance between the individual and an entity, may mean, for example, they are unable to easily consent to, or oppose, the handling of their personal information, understand its implications, or exercise control over their personal information.</i></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Handling personal information in a way that could have a significant impact on the individuals concerned?</p> <p><i>Consider the potential consequences for the individuals concerned. For example, negative impacts on physical and mental wellbeing, reduced access to public services, discrimination, financial loss or identity theft.</i></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Activity-based risk factors

Will the project involve:	Yes	No	Potentially
<p>Disclosing personal information outside of your entity?</p> <p><i>Consider whether your project will involve sharing personal information with another entity, organisation or to any individuals other than the individual to whom the information relates. This might include the use of contractors or sub-contractors. Also consider whether your project will require the disclosure of personal information overseas.</i></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Using or disclosing personal information for profiling or behavioural predictions?</p> <p><i>This includes valuation or scoring, profiling and predicting (including in relation to economic situation, health, personal preferences or interests, reliability or behaviour, location or movements).</i></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Using personal information for automated decision-making?</p> <p><i>This might include the use of artificial intelligence technologies or data analytics techniques on personal information to produce insights for policy-making or improved service delivery. It might also include using automated decision-making to make decisions that affect the rights, entitlements and opportunities of an individual.</i></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Systematic monitoring or tracking of individuals?</p> <p><i>For example, the introduction or enhancement of a surveillance system, the monitoring of communications, tracking an individual's geolocation or behaviour.</i></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Will the project involve:	Yes	No	Potentially
Collecting personal information without notification to, or consent of, the individual? <i>This might include collecting personal information about an individual from a third party without the individual's knowledge or consent. It might also include collecting personal information compulsorily under an existing, or proposed, legislative authority.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Data matching (linking unconnected personal information)? <i>For example, a new data matching program combining, comparing or matching personal information obtained from multiple sources.</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Developing legislation to modify the operation of one or more APPs or which seeks to rely on the required or authorised by law exception to the APPs? <i>This might include legislation or delegated legislation that seeks to modify the operation of one or more APPs in certain circumstances. It might also include legislation that seeks to rely on the required or authorised an exception to the APPs (such as legislation authorising the use or disclosure of personal information).</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Decision & declaration

If you have answered 'Yes' or 'Potentially' to any of the questions in part two, a PIA should be completed. If you are uncertain as to whether you have considered all relevant risks, you are strongly encouraged to seek support from your entity's privacy officer to ensure your assessment is thorough and complete. If still unsure, err on the side of caution and conduct a PIA.

Based on your answers above, is a PIA required?

- Yes** Yes, there are (or potentially are) high privacy risk elements to this project.
- No** No, a PIA is not necessary. This project does not carry any high privacy risks.

Project Manager/Responsible Official Sign-off

Position

Date

Marine Project Manager

20/11/2020

Privacy Officer Sign-off

Position

Date

Director, Governance and Risk

23/11/2020