



COVID-19 Vaccination Status

Privacy Impact Assessment Report

Document information

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Prepared by:	Governance and FOI Officer	

Endorsement and approval

Business Owner:

I recommend the project proceeds as proposed in this document.

Position:	Chief Executive Officer
Date:	14/12/2021

Privacy Officer:

I support the project proceeding as proposed in this document.

Position:	A/g Director, Governance
Date:	25/11/2021

1. Introduction

1.1 Purpose

This privacy impact assessment (PIA) report identifies possible impacts on the privacy of individuals through the handling of information about their COVID-19 vaccination status, and how negative impacts will be mitigated or minimised.

1.2 Applicable legislation

This PIA analyses the privacy impacts of collecting, storing, using and disclosing the COVID-19 vaccination status of our employees and labour hire contractors ('contractors') in certain circumstances. Privacy impacts are assessed against the Australian Privacy Principles (APPs) set out in the *Privacy Act 1988*.

Geoscience Australia must comply with any relevant public health orders enacted by state and territory governments in responding to the COVID-19 pandemic. In some cases these contain mandatory vaccination requirements that could apply directly to our staff. For example, the Northern Territory COVID-19 Directions (No. 55) 2021 require those performing work that involves contact with Aboriginal and Torres Strait Islander people to have received one vaccination before 13 November 2021 and be fully vaccinated by 25 December 2021.

Other legislation, such as the *Anangu Pitjantjatjara Yankunytjatjara Land Rights Act 1981*, afford the traditional owners of lands rights to restrict access and impose conditions for entry. This can extend to mandatory vaccination requirements that could apply to our staff and contractors conducting fieldwork.

1.3 Project description

Understanding the vaccination status of our employees, contractors and service providers can help us to assess and manage the risk that our staff and associates could catch COVID-19 or spread COVID-19 to vulnerable persons while undertaking work on our behalf. This presents a major health risk to those vulnerable persons and a reputational risk for Geoscience Australia.

Our main higher risk activities are all international travel, most domestic travel or fieldwork especially in remote or Indigenous communities, face to face interaction with children through our education program and our front of house activities, for example, building reception and security officers (the Higher Risk Activities).

Geoscience Australia's current approach to vaccinations is that outside of Higher Risk Activities, it will not be mandating vaccinations or enquiring about vaccination status.

For Higher Risk Activities, managers will be required to discuss vaccination status and sight vaccination evidence before approving employees and contractors to conduct Higher Risk Activities.

Contract managers and staff undertaking procurements will also be required to consider whether service providers will be engaged in Higher Risk Activities in the course of providing goods and services to Geoscience Australia. Where service providers will be undertaking Higher Risk Activities related to Geoscience Australia, procurement managers will be required to include appropriate requirements to mitigate these risks in approaches to market and contracts. Contract managers of existing service providers will be required to discuss vaccination status risks with those existing service providers.

A Manager's Guide has been developed to support managers in these situations.

1.4 Stakeholders

The following areas of Geoscience Australia were consulted in developing the entity's approach:

- Geoscience Australia Executive
- Identified Branch Heads
- Human Resources
- Legal Services

- Land Air Marine Access
- Governance
- Office of the Chief Scientist
- Exploring for the Future Program

1.5 Review

This PIA will be reviewed in the event of a change to Geoscience Australia’s current approach or if there is a significant change to state or territory public health orders regarding mandatory vaccinations that is likely to affect our employees, contractors and/or service providers.

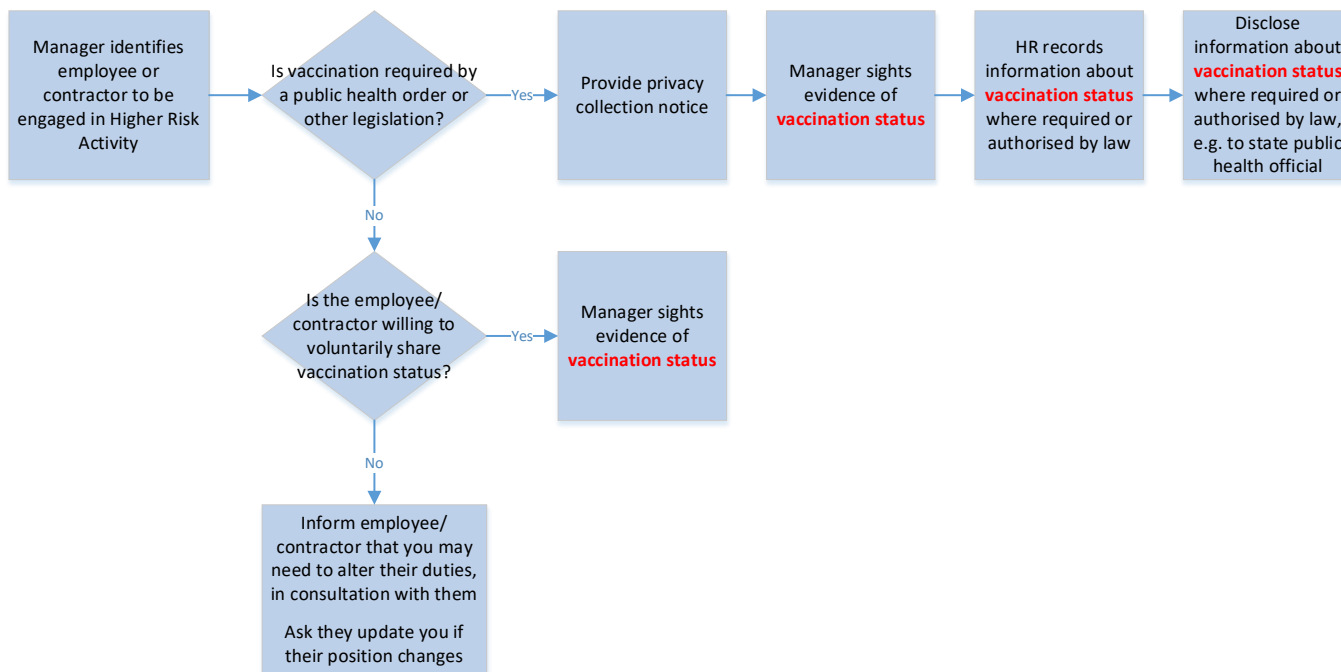
2 Personal information flows

The following diagram shows how information relating to the vaccination status of employees and contractors may be collected, stored, used and disclosed.

The types of information collected may vary depending on the specific public health order, but is likely to include the name of the employee/contractor, dates of their COVID-19 vaccinations, type of evidence provided and the name of the manager sighting the evidence.

It is unlikely that personal information regarding the vaccination status of individuals will be collected from service providers as these contractual arrangements, and related discussions, will be based on vaccination risks and COVID safe practices more generally.

Vaccination status is considered sensitive information under the *Privacy Act 1988*.



3 Analysis and compliance check

In summary, Geoscience Australia:

- will not solicit or collect information about the vaccination status of staff or contractors except in relation to Higher Risk Activities
- may request staff or contractors whose duties involve Higher Risk Activities to voluntarily disclose their vaccination status
- is unlikely to collect information about individuals’ vaccination status from service providers

- will only collect, use, store and disclose information about vaccination status as required or authorised by law, or in a manner the individual has otherwise consented to.

The positive privacy impacts of this approach are:

- understanding the vaccination status of our employees and contractors, and the vaccination risks of service providers, helps Geoscience Australia to assess and manage the risk that our staff and associates could catch COVID-19 or spread COVID-19 to vulnerable persons while undertaking work on our behalf
- sharing their COVID-19 vaccination status allows staff and contractors involved in Higher Risk Activities such as fieldwork to continue to participate in those activities.

3.1 Compliance with APPs

APP description	Summary of personal information involved and process to manage	Assessment of compliance
<p>APP1 - Open and transparent management</p> <p><i>APP entities must manage personal information in an open and transparent way. This includes having a clearly expressed and up to date privacy policy.</i></p>	<p>The Geoscience Australia Privacy Policy, available at www.ga.gov.au/privacy, explains how the entity manages personal information.</p>	Complies
<p>APP2 - Anonymity and pseudonymity</p> <p><i>Individuals must have the option of not identifying themselves, or of using a pseudonym. Some exceptions apply.</i></p>	<p>To manage risks associated with staff engaged in Higher Risk Activities and to comply with public health orders regarding mandatory vaccination, it is impractical for Geoscience Australia to deal with staff and contractors using anonymity or pseudonyms.</p> <p>Public health orders (where applicable) require the entity to deal with identified individuals.</p>	Complies
<p>APP3 - Collection of solicited personal information</p> <p><i>Outlines when an APP entity can collect personal information. Higher standards apply to the collection of sensitive information.</i></p>	<p>The collection of staff and contractor vaccination status (considered 'sensitive information') is directly related to Geoscience Australia's ability to safely and/or lawfully undertake those activities identified as higher risk in the context of COVID-19.</p> <p>In the absence of a relevant public health order, it is voluntary for staff and contractors to provide their vaccination status. However, for Higher Risk Activities, not having visibility of vaccination status may require us to alter the relevant individual's duties in consultation with them and they will be informed of this upfront.</p> <p>Generally, individuals must consent to the collection of their sensitive information. However, an exemption applies where the collection is required or authorised by law. As Geoscience Australia will only collect this information where required by a public health order or other law, individuals will not be asked to provide formal written consent.</p> <p>Unless a law requires otherwise, Geoscience Australia will not obtain a copy of an employee or contractor's evidence of vaccination. The evidence can be shown in person or displayed on screen through videoconference for the manager to sight and verify but they will not keep a copy.</p> <p>Where we are required by law to maintain a record of a worker's vaccination status, the preferred approach will be for the manager, upon sighting evidence of vaccination, to advise HR of the employee's name,</p>	Complies

	vaccination status (e.g. first dose, second dose, exempt, unvaccinated) and the type of evidence sighted so that this may be recorded in a central register. However, the types of information collected will ultimately be determined by the applicable legislation.	
<p>APP4 - Dealing with unsolicited personal information</p> <p><i>Outlines how APP entities must deal with unsolicited personal information.</i></p>	<p>Whilst Geoscience Australia does not intend to collect a copy of the evidence of vaccination, it is conceivable that an employee or contractor may provide an unsolicited copy of their evidence. Notwithstanding that Geoscience Australia may, depending on the circumstances, be permitted to collect this information under APP3, managers should immediately delete any copies they receive, including from their deleted items in Outlook.</p> <p>This is especially relevant for COVID-19 digital certificates as these contain individual healthcare identifiers (IHIs) that have specific requirements around collection, use and disclosure under the <i>Healthcare Identifiers Act 2010</i> (see also APP9).</p>	<p>Complies</p> <p>Better practice recommendation: Add guidance on dealing with unsolicited personal information to the Manager's Guide</p>
<p>APP5 - Notification of collection</p> <p><i>Outlines when and in what circumstances an APP entity that collects personal information must tell an individual about certain matters.</i></p>	<p>Managers will provide a privacy collection notice to their staff or contractors prior to collecting information about their vaccination status as required by a public health order. A sample notice is included in the Manager's Guide.</p>	<p>Complies</p>
<p>APP6 - Use or disclosure</p> <p><i>Personal information may only be used for the purpose it was collected. Some exceptions apply.</i></p>	<p>Personal information will only be used for the purpose for which it was collected and disclosed in accordance with the collection notice – generally, to comply with Commonwealth, state or territory public health orders or other legislation that require workers to be vaccinated in certain circumstances.</p>	<p>Complies</p>
<p>APP7 - Direct marketing</p> <p><i>An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.</i></p>	<p>N/A. No information will be used for direct marketing.</p>	<p>Complies</p>
<p>APP8 - Cross-border disclosure</p> <p><i>Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas. Some exceptions apply, e.g. if information is subject laws substantially similar to the APPs.</i></p>	<p>Geoscience Australia is unlikely to disclose vaccination status to an overseas entity. Should this become necessary, for example when international business travel resumes, consent will be obtained from the individual concerned as required.</p>	<p>Complies</p>
<p>APP9 - Government related identifiers</p> <p><i>Outlines the limited circumstances in which organisations may adopt, use and disclose government related identifiers.</i></p>	<p>Geoscience Australia does not intend to collect, use or disclose government related identifiers unless required by law to provide a copy of an employee or contractor's COVID-19 digital certificate as evidence of vaccination. The <i>Healthcare Identifiers Act 2010</i> contains strict rules on the purposes for which IHIs may be collected, used and disclosed.</p>	<p>Complies</p>
<p>APP10 – Quality</p> <p><i>APP entities must take reasonable steps to ensure information is accurate, up to</i></p>	<p>The vaccination status of an employee or contractor will be verified by their manager sighting evidence of their COVID-19 vaccination(s) either in person or on screen via videoconference.</p>	<p>Complies</p>

<i>date, complete and relevant prior to using it.</i>		
<p>APP11 – Security</p> <p><i>APP entities must take reasonable steps to protect personal information they hold from misuse, interference and loss, and from unauthorised access, modification or disclosure.</i></p>	<p>Information about vaccination status will be stored securely in a central register within Geoscience Australia's enterprise document and records management system. The register will be maintained by Human Resources and access restricted to a small number of staff with a 'need to know'. Staff with access to the register may only use or disclose information contained within it for the purpose it was collected for.</p> <p>Any personal information that is stored in Geoscience Australia's corporate systems is protected in accordance with the requirements of the Protective Security Policy Framework (PSPF).</p>	<p>Complies</p> <p>Better practice recommendation: Develop instructions regarding the use and disclosure of information contained within the register; include a field to indicate the purpose of collection as per the collection notice</p>
<p>APP12 – Access</p> <p><i>Individuals have a right to request access to their personal information noting exceptions apply, e.g. FOI Act exemptions.</i></p>	<p>Individuals may request access to their personal information by contacting the Privacy Officer, in accordance with the Geoscience Australia privacy policy.</p>	<p>Complies</p>
<p>APP13 – Correction</p> <p><i>APP entities must take reasonable steps to correct personal information they hold to ensure it is accurate, up-to-date, complete, relevant and not misleading.</i></p>	<p>Corrections or updates to our record of an individual's vaccination status may be requested by the individual's manager upon sighting evidence of current vaccination status.</p>	<p>Complies</p>

4 Privacy management – addressing privacy risks

Identified privacy risk	Actions to mitigate	Responsible official	Date for completion
Geoscience Australia collects, uses or discloses individual healthcare identifiers when it is not authorised to do so	Add guidance on dealing with unsolicited personal information to the Manager's Guide	Director Legal Services	Completed 25 November 2021
Sensitive information is used or disclosed for a purpose other than for which it was collected	<p>Vaccination status register:</p> <p>1) Develop instructions regarding the use and disclosure of information contained within the register</p> <p>2) Include a field to indicate the purpose of collection as per the collection notice</p>	Chief Human Resources Officer	<p>Recommendation 1) to be completed by 15 December 2021.</p> <p>Recommendation 2) completed 25 November 2021</p>