

PART 1 APPENDIX A: TEMPLATE – BRIEF PRIVACY ANALYSIS

Tailoring this template to your own project

- Add your own branding and formatting throughout this document.
- Review the list of questions and risks in sections 2.1 and 2.2 of the template to suit your organisation and project.
- If your organisation has written policies, procedures or guidelines on privacy, you could add these as a background reference section at the end of the document.
- Update the sign-off list in section 5 to include:
 - people who should be involved in preparing and reviewing the document (for example the project manager)
 - people who need to review and approve the document (for example, the privacy officer).

[Project name]

Brief Privacy Analysis

<Day> <Month> <Year>

1. Project summary: [TITLE]

1.1 Brief description of the project

- a) Describe your existing systems and the main changes that are proposed
- b) Describe the purpose of the change, including any projected benefits to your organisation or to the individuals affected
- c) Identify the main stakeholders or entities involved, and their role in the project.

1.2 Personal information that the project will involve

In the table below, describe:

- the personal information that will be collected, used and/or disclosed
- the source of the information
- the purpose of the information for your project.

Note: "Personal information" is any information about an identifiable living person. However, a person doesn't have to be named in the information to be identifiable.

Type of personal Information	Source of Information	Purpose of information for the project

2. Privacy assessment

2.1 Areas that are risky for privacy

Some types of projects are commonly known to create privacy risks. If the project involves one or more of these risk areas, it's likely that a PIA will be valuable.

Use this checklist to identify and record whether your proposal raises certain privacy risks. Delete any that do not apply.

Does the project involve any of the following?	Yes (tick)	No (tick)	If yes, explain your response
Information management generally			
A substantial change to an existing policy, process or system that involves personal information <i>Example: New legislation or policy that makes it compulsory to collect or disclose information</i>			
Any practice or activity that is listed on a risk register kept by your organisation <i>Example: Practices or activities listed on your office's privacy risk register or health and safety register</i>			
Collection			
A new collection of personal information <i>Example: Collecting information about individuals' location</i>			
A new way of collecting personal information <i>Example: Collecting information online rather than on paper forms</i>			
Storage, security and retention			
A change in the way personal information is stored or secured <i>Example: Storing information in the cloud</i>			
A change to how sensitive information is managed <i>Example: Moving health or financial records to a new database</i>			

Does the project involve any of the following?	Yes (tick)	No (tick)	If yes, explain your response
Does the project involve any of the following?	Yes (tick)	No (tick)	If yes, explain your response
<p>Transferring personal information offshore or using a third-party contractor</p> <p>Example: Outsourcing the payroll function or storing information in the cloud</p>			
<p>A decision to keep personal information for longer than you have previously</p> <p>Example: Changing IT backups to be kept for 10 years when you previously only stored them for 7</p>			
Use or disclosure			
<p>A new use or disclosure of personal information that is already held</p> <p>Example: Sharing information with other parties in a new way</p>			
<p>Sharing or matching personal information held by different organisations or currently held in different datasets</p> <p>Example: Combining information with other information held on public registers, or sharing information to enable organisations to provide services jointly</p>			
Individuals' access to their information			
<p>A change in policy that results in people having less access to information that you hold about them</p> <p>Example: Archiving documents after 6 months into a facility from which they can't be easily retrieved</p>			
Identifying individuals			
<p>Establishing a new way of identifying individuals</p> <p>Example: A unique identifier, a biometric, or an online identity system</p>			

Does the project involve any of the following?	Yes (tick)	No (tick)	If yes, explain your response
New intrusions on individuals' property, person or activities			
Introducing a new system for searching individuals' property, persons or premises <i>Example: A phone company adopts a new policy of searching data in old phones that are handed in</i>			
Surveillance, tracking or monitoring of movements, behaviour or communications <i>Example: Installing a new CCTV system</i>			
Changes to your premises that will involve private spaces where clients or customers may disclose their personal information <i>Example: Changing the location of the reception desk, where people may discuss personal details</i>			
New regulatory requirements that could lead to compliance action against individuals on the basis of information about them <i>Example: Adding a new medical condition to the requirements of a pilot's license</i>			
List anything else that may impact on privacy, such as bodily searches, or intrusions into physical space			

2.2 Initial risk assessment

If you answered “Yes” to any of the questions above, use the table below to give a rating – either **Low (L)**, **Medium (M)**, or **High (H)** – for each of the aspects of the project set out in the first column.

For risks that you’ve identified as Medium or High, indicate (in the right-hand column) how the project plans to lessen the risk (if this is known).

If you answered “No” to all the questions in 2.1 above, move on to section 3 below.

Aspect of the Project	Rating (L, M or H)	Describe any medium and high risks and how to mitigate them
<p>Level of information handling</p> <p>L – Minimal personal information will be handled</p> <p>M – A moderate amount of personal information (or information that could become personal information) will be handled</p> <p>H – A significant amount of personal information (or information that could become personal information) will be handled</p>		
<p>Sensitivity of the information (eg health, financial, race)</p> <p>L – The information will not be sensitive</p> <p>M – The information may be considered to be sensitive</p> <p>H – The information will be highly sensitive</p>		
<p>Significance of the changes</p> <p>L – Only minor change to existing functions/activities</p> <p>M – Substantial change to existing functions/activities; or a new initiative</p> <p>H – Major overhaul of existing functions/activities; or a new initiative that’s significantly different</p>		

<p>Interaction with others</p> <p>L – No interaction with other agencies</p> <p>M – Interaction with one or two other agencies</p> <p>H – Extensive cross-agency (that is, government) interaction or cross-sectional (non-government and government) interaction</p>		
<p>Public impact</p> <p>L – Minimal impact on the organisation and clients</p> <p>M – Some impact on clients is likely due to changes to the handling of personal information; or the changes may raise public concern</p> <p>H – High impact on clients and the wider public, and concerns over aspects of project; or negative media is likely</p>		

3. Summary of privacy impact

The privacy impact for this project has been assessed as:	Tick
<p>Low – There is little or no personal information involved; or the use of personal information is uncontroversial; or the risk of harm eventuating is negligible; or the change is minor and something that the individuals concerned would expect; or risks are fully mitigated</p>	
<p>Medium – Some personal information is involved, but any risks can be mitigated satisfactorily</p>	
<p>High – Sensitive personal information is involved, and several medium to high risks have been identified</p>	
<p>Reduced risk – The project will lessen existing privacy risks</p>	
<p>Inadequate information – More information and analysis is needed to fully assess the privacy impact of the project.</p>	

3.1 Reasons for the privacy impact rating

Briefly summarise your reasons for the rating you gave above.

4. Recommendation

Do a full privacy impact assessment

Describe:

- the likely timing of the PIA
- the level of complexity that will be needed
- who will be responsible for doing the PIA

or

A full privacy impact assessment is not required

Explain why a PIA is not needed

5. Sign off

Name

Position (Project Manager)

Signature

____/____/____
Date

Name

Position (Manager)

Signature

____/____/____
Date