



## Privacy Threshold Assessment

### Project Details

Project name	Interim Service Management Tool (SMT)
Business owner	Director, ICT Service Management
Threshold assessment drafter	Program Management and Delivery Project Officer and Director
Description of the project	<p>The ICT Futures Project transition involves moving from the previous DXC provided ServiceNow SMT to an interim SMT provided by Cirrus Networks Pty Ltd (Cirrus) that will provide a subset of SMT functions including incident, request, change and problem management for Geoscience Australia.</p> <p>The Interim SMT is based on Cherwell's SMT technology (a Commercial Off the Shelf product) and is hosted on private cloud infrastructure wholly within Australia.</p>
Types of personal information being handled as part of the project	<p>The interim SMT will handle users':</p> <ol style="list-style-type: none"> <li>1. first and last names;</li> <li>2. Geoscience Australia email addresses;</li> <li>3. contact telephone numbers (which may occasionally be private mobile phone numbers)</li> </ol> <p>The personal information will be used as part of integration with Geoscience Australia's Active Directory environment with those details being associated to accounts, requests and incidents.</p>
What is the purpose of handling the personal information?	<p>The handling of personal information is necessary to support the provision of ICT services to Geoscience Australia staff.</p> <p>The users' email address, first name, last name and Geoscience Australia telephone number (or mobile number) will be used to authenticate self-service access to the SMT or to verify telephone identification for support calls. The information will enable users to instigate requests and incidents. The personal information may be stored by ICT support staff selectively (as part of user driven actions) as part of incident, problem and request creation and management.</p> <p>The personal information will be used also to identify a user within Geoscience Australia's organisational structure to allow for approval workflows to be directed to the relevant approvers (approvers are an identified attribute within user profiles in the SMT).</p> <p>Email addresses will be used to provide updates pro-actively to requesting or identified users of the progress of their incident and/or request.</p>

	<p>Controls which are relevant to the handling of this data, and minimise the privacy risk include:</p> <ul style="list-style-type: none"> <li>• There will be staff communications regarding the introduction of the interim SMT.</li> <li>• Reporting in relation to incidents, problems, requests and changes will only be reported on in aggregate with no personal information attached to the reports. Only a limited number of administrators will have access to be able to view the personal information as part of them acquitting their duties.</li> <li>• The interim SMT hosts content wholly within Australia with the provider contractually required to comply with the <i>Privacy Act 1988</i>.</li> </ul>
Stakeholders	<ul style="list-style-type: none"> <li>• Corporate Division (ICT Service Management) – own the system and require information on Geoscience Australia’s ICT request, incident, problem and change requirements and will benefit for the reporting and visibility provided by the SMT.</li> <li>• GA staff – users of the SMT who will benefit from the functionality as part of the refreshed Cirrus ICT services.</li> </ul>

## Part 1: Personal information handling

**Does the project involve new or changed ways of handling personal information?**

- Yes** Complete Part 2 of the assessment below.
- No** It is not necessary to complete a privacy impact assessment (PIA). Record the decision at Part 3 and file this assessment with the Privacy Officer.

## Part 2: Determining potential for a high privacy risk

Consider the following questions and record each answer as ‘yes’, ‘potentially’ or ‘no’. 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	Potentially	No
<p><b>Handling large amounts of personal information?</b></p> <p><i>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.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Will the project involve:**

Yes

Potentially

No

**Handling sensitive personal information?**

*Sensitive personal 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).*

**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?*

**Handling personal information in a way that could have a significant impact on the individuals concerned?**

*Consider the potential consequences for the individuals concerned. For example, negative impacts on physical and mental wellbeing, reduced access to public services, discrimination, and financial loss or identity theft.*

**Disclosing personal information outside of your entity?**

*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.*

**Handling personal information of individuals who are known to be vulnerable?**

*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.*

*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.*

Will the project involve:	Yes	Potentially	No
<b>Using or disclosing personal information for profiling or behavioural predictions?</b>  <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>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Using personal information for automated decision-making?</b>  <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>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Systematic monitoring or tracking of individuals?</b>  <i>For example, the introduction or enhancement of a surveillance system, the monitoring of communications, tracking an individual's geolocation or behaviour.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Collecting personal information without notification to, or consent of, the individual?</b>  <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 type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Data matching (linking unconnected personal information)?</b>  <i>For example, a new data matching program combining, comparing or matching personal information obtained from multiple sources.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Any other relevant factors that may have a significant impact on the privacy of individuals?</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Part 3: Decision & declaration

If you have answered 'Yes' or 'Potentially' to any of the questions in Part 2, 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 the 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. The project does not carry any high privacy risks.

#### Business owner sign-off

Position	Director, ICT Service Management	Date	20 May 2021
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#### Privacy Officer sign-off

Position	Director, Governance	Date	19 May 2021
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