

Executive Summary and Recommendations of the Privacy Impact Assessment of the IPC GIPA Tool

Background

The GIPA Tool enables agencies to input and track progress of requests made under the *Government Information (Public Access) Act 2009 (GIPA Act)*. It also enables agencies to submit their annual GIPA data to the IPC. This data is subsequently used in the production of the Information Commissioner's annual reporting on the operation of the GIPA Act.

Use of the GIPA tool for case management is optional. However, agencies must use the GIPA tool for the submission of annual statistics. Therefore, agencies may be likely to use it for case management throughout the year.

A previous PIA was undertaken in 2016, and is published alongside user guides, FAQs and other materials relating to the GIPA Tool on [the IPC website](#).

The IPC's 'Recommendations Status Register' for the 2016 PIA shows that all recommendations that were made were accepted and implemented into the tool.

In view of the time that has passed since the last PIA, the IPC has decided to refresh the PIA. IPC wishes to assure itself and the public that the tool in operation today continues to align with law and public expectations.

We have made a total of 5 compliance recommendations and 3 best practice recommendations. All are summarised in the following tables.

Recommendations

Compliance recommendations

We have made 5 compliance recommendations against the provisions of the *Privacy and Personal Information Protection Act 1998 (PPIPA)*.

Where a specific recommendation is classified as '**Compliance**', it means that this item alone may constitute a compliance gap, and remediation should therefore be prioritised.

	Recommendation	IPP reference
RECOMMENDATION 1	Make a technical change to the functionality of the tool such that IPC staff administrators cannot see personal information relating to GIPA requests of other agencies, negating any perception of or risk of disclosure to the IPC.	PPIPA s9, s10
RECOMMENDATION 2	Remove field to collect identification of an applicant as being Aboriginal or Torres Strait Islander.	PPIPA s8(2)
RECOMMENDATION 3	Implement processes to ensure all users are authorised to access the information held in the GIPA tool.	PPIPA s12(c), PPIPA s12(d)



	Recommendation	IPP reference
RECOMMENDATION 4	Regularly validate authorised users with official GIPA contacts at regulated agencies.	PPIPA s12(c), PPIPA s12(d)
RECOMMENDATION 5	Verify the deletion of backups.	PPIPA s 12(c), PPIPA s 12(d)

Best practice recommendations

We have made 3 best practice recommendations.

Where a recommendation is classified as **‘Best practice’**, it means that it is not in and of itself a compliance gap. However, we note that ‘best practice’ findings still contribute towards a comprehensive privacy governance framework and may also need to be prioritised to meet program obligations.

	Recommendation	IPP reference
RECOMMENDATION 1	Include a short collection notice in the tool acknowledgement letter function and encourage agencies to use it.	PPIPA s10
RECOMMENDATION 2	Users should be reminded not to enter Proof of Identity (POI) document numbers in the free text field for POI. This information should be included in the User Guide. A pop-up (or ‘just in time notification’) would be an effective way of reminding people of how these fields are to be used in a privacy protecting way.	PPIPA s12(a), PPIPA s8(2)
RECOMMENDATION 3	When agencies are onboarded to the tool they should be reminded that they retain responsibility for these records under the State Records Act. This information should also be included in the User Guide.	PPIPA d12(a), PPIPA d12(b)