



Awareness of privacy obligations

How three Queensland government agencies educate and train their employees about their privacy obligations

Report No. 1 to the Queensland Legislative Assembly for 2018-19

Slide 1 – Welcome

Welcome to our presentation summarising our audit on awareness of privacy obligations. This presentation is only a summary and the full report can be accessed from our website: www.oic.qld.gov.au.

Slide 2 – Context

The inadvertent or deliberate disclosure of personal information can have serious consequences for the individual whose privacy the agency breached, the agency concerned and the employee responsible for the breach.

- Individuals may suffer discrimination, embarrassment, financial or even physical and psychological harm.
- The organisation may experience reputational damage and loss of public trust and confidence in its ability to protect personal information.
- Employees may be subject to disciplinary action such as termination of employment.

The community entrusts Queensland government agencies with their personal information. To maintain this trust, agencies need to handle personal information appropriately, and safeguard it. This includes protecting personal information against loss, unauthorised access and other misuse. The Information Privacy Act 2009 provides safeguards for handling personal information in the public sector environment. Government agencies, and their employees, must comply with the Act and the privacy principles.

One mitigation strategy agencies can adopt is to train and educate their employees about information privacy and information security obligations and expectations.



Slide 3 – Audit objective

The objective of the audit was to determine whether agencies educate and train their employees about their obligations under the Information Privacy Act 2009 appropriately. We considered whether three government agencies - the Public Trust Office, the Department of Communities, Disability Services and Seniors and TAFE Queensland:

- identify education and training as a strategy for mitigating privacy and information security risks
- ensure their education and training material appropriately covers information privacy and information security
- educate and train their employees, at induction and as part of a periodical refresher program, on information privacy and information security.

Slide 4 – Key findings

The three audited agencies have recognised the value of educating and training their staff on information privacy and information security in mitigating privacy risks. However, the effectiveness of their training varies. This is because they have adopted different training content, set different requirements for completing the training and established different processes to make sure employees complete the training.

At the time of our audit, the agencies had either implemented or recognised the need for mandatory training on information privacy and security at induction. But only one agency had planned to make regular refresher training mandatory.

The three agencies adopted information privacy training modules that are accurate and consistent with the legislation. However, only one agency's training module was comprehensive and tailored to the context of the agency with examples that illustrate in a practical way how the Act and the privacy principles apply in an employee's day-to-day role.

The information security training for two agencies was comprehensive and met their needs in raising staff awareness of potential security threats to information assets.

Training completion rates for the three agencies show that their processes or systems for ensuring employees complete the relevant training modules within the prescribed period are not always effective. One agency achieved a high completion rate however, its current process did not support timely completion of training within the specified period. We found the three agencies use a learning management system for delivering their training. While their learning management systems are able to monitor training completion, one agency had not activated this functionality for the information privacy module.



Slide 5 – Recommendations

Agencies should consider the privacy risks of their various functions and identify education and training as a risk mitigation strategy. Therefore, we recommend that all agencies:

- a. include information privacy and information security training in their mandatory induction process for all employees.
- b. mandate periodic refresher training on information privacy and information security for all employees.
- c. ensure their training content on information privacy and information security is comprehensive, contemporary and tailored to the context of the agency.
- d. implement systems and procedures to ensure all employees complete mandatory training on information privacy and information security when due.

Slide 6 – For more information

As part of our suite of online courses, we offer general awareness modules on right to information and information privacy. For more information about this audit and our right to information and information privacy training, please visit our website at www.oic.qld.gov.au.