



Privacy Management Plan

Independent Parliamentary Expenses Authority

Background

What is a Privacy Management Plan?

The Australian Government Agencies Privacy Code requires agencies to have a privacy management plan (PMP).

A PMP is a strategic planning document in which the Independent Parliamentary Expenses Authority (IPEA):

- identifies its privacy goals and maturity targets, and
- sets out how it will meet its compliance obligations under the Australian Privacy Principles.

IPEA has developed this PMP with reference to the OAIC's *Interactive PMP Explained* resource for guidance on how it identified compliance gaps and opportunities to improve maturity.

What are the next steps?

This PMP builds on actions taken by IPEA since the introduction of the Australian Government Agencies Privacy Code in 2018 to increase its privacy maturity and describes steps that IPEA should take to continue working towards its maturity targets. When reviewing its privacy performance, IPEA will refer to this PMP to assess how well it has met and delivered its privacy targets.

Privacy risk profile

In the course of preparing this PMP, IPEA has considered various matters relevant to its privacy risk profile. The details of these considerations are provided below.

Privacy risk profile rationale

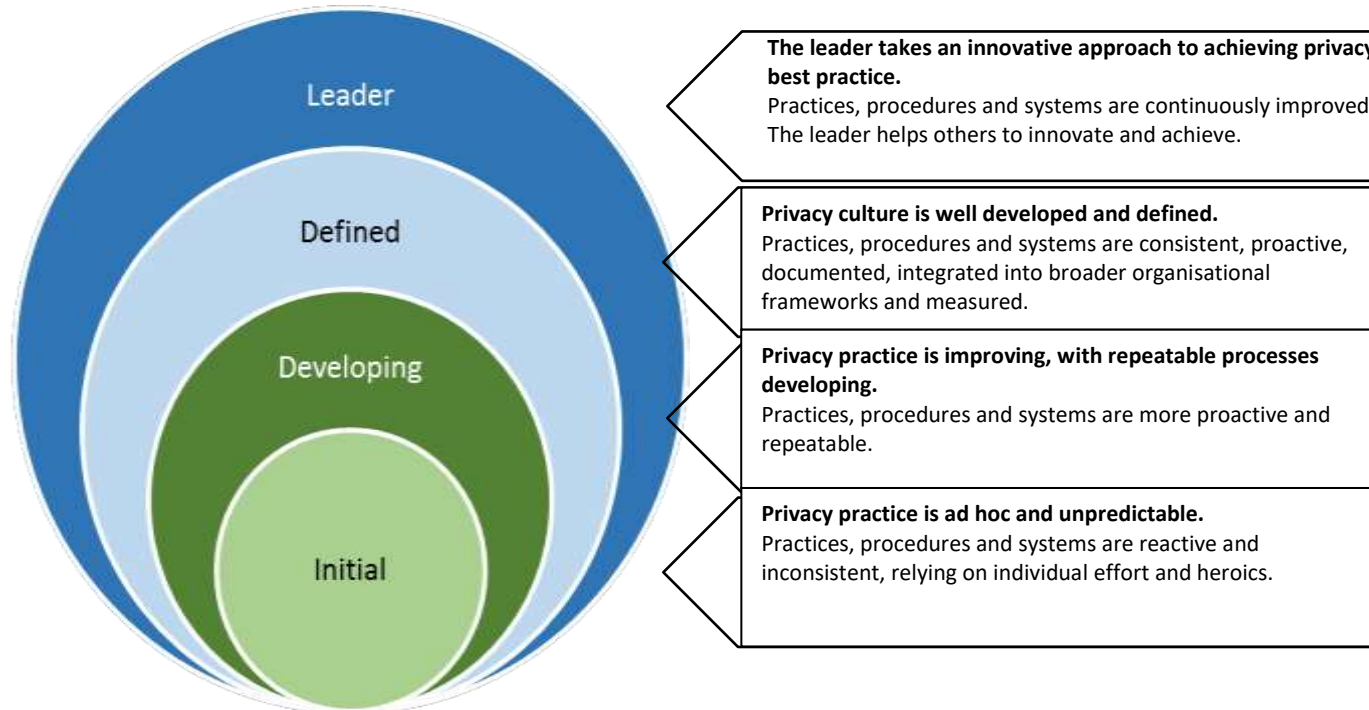
IPEA has a high privacy risk profile. Agencies which provide complex public services to individuals and handle a significant amount of personal information.

IPEA collects and holds a broad range of personal information relating to parliamentarians their spouses and dependent children, family and MOPS Act staff in records including:

- information relating to current and former members of Parliament and eligible family members for the administration, monitoring and auditing of work expenses, including financial information;
- names, addresses and phone numbers of parliamentarians and their staff;
- information about parliamentarians' work, including work in their electorate.
- schedules and travel itineraries;
- sensitive information, for example, information about a person's political party membership and associated activities engaged in by that person;
- information about job applicants and employees relating to employment with IPEA (e.g. personal details, referee and emergency contact details, banking information, superannuation details, employment contracts, training and development, performance management, leave records, etc.);
- information relating to staff employed under the Members of Parliament (Staff) Act 1984 in the context of the administration, monitoring and auditing of travel expenses, including financial information;
- comments on IPEA social networking services; and
- information relating to the performance of IPEA's obligations as an employer, for example work health and safety assessments, incidents and investigations in accordance with the Work Health and Safety Act 2011.

Current state

The Maturity Framework requires IPEA to assess its maturity across four maturity levels. The maturity levels are outlined in the below diagram.



The attributes for each maturity level within the Maturity Framework are described in detail in Appendix 1: *Privacy Program Maturity Assessment Framework* of the OAIC's [Interactive Privacy Management Plan](#).

Governance & Culture

Attribute	Current Level	Target Level (for current plan)	Rationale/Commentary	Steps to reach target level
Privacy Champion	Developing	Defined	IPEA has a designated Privacy Champion who promotes a culture of privacy that values and protects personal information. The Privacy Champion also supports the integration of privacy practices, procedures and systems into broader organisational frameworks.	Steps to improve the privacy culture in IPEA will include: <ul style="list-style-type: none"> - continued participation in Privacy Awareness Week activities; and - the privacy Champion will leverage privacy resources and best practice approaches used by other agencies.
Privacy Values	Developing	Defined	There is a connection between IPEA's values and respect for the protection of personal information. IPEA has information and resources relating to privacy on both the intranet and the internet. IPEA will undertake activities to enhance privacy awareness, such as holding Privacy Awareness Week activities.	In the future, IPEA may use privacy awareness as a capability enabler in its Corporate Plan. If this occurs, the privacy officer will work with the relevant areas during the strategic planning process to better connect IPEA's privacy culture with its documented values.
Privacy Officer	Developing	Defined	IPEA has one designated privacy officer. There are established practices, procedures and systems to support their obligations and these are documented and integrated into broader organisational frameworks. The Privacy Officer is currently reviewing IPEA's Privacy Policy and Data Breach Response Plan and any associated policies.	The privacy officer will continue to review practices, procedures and systems. This will assist to identify ways to achieve IPEA's privacy goals. The privacy officer will seek out opportunities to discuss best practice privacy approaches with other organisations at forums targeted toward privacy officers (OAIC and AGS events).

Management and accountability	Developing	Defined	IPEA has assigned responsibility for privacy compliance and privacy management to a dedicated Privacy Officer. The Privacy Officer, is responsible for handling enquiries and complaints, and responding to requests for access and correction.	In the future, IPEA may engage with an external auditor to conduct an initial health check to measure IPEA's performance in relation to privacy management. All recommendations will be considered and potentially implemented as part of a continuous review process.
Awareness	Developing	Defined	IPEA staff are aware of the importance of the protection of personal privacy for current/former parliamentarians and staff. There is a strong awareness of IPEA's policy to deal with potential data breaches. Staff are encouraged to report any potential data breaches as soon as possible. Generally, staff are aware of the steps required to mitigate harm relating to a potential data breach.	In preparation for Privacy Awareness Week, the Privacy Officer will investigate engaging ways for the Privacy Champion and the privacy officer to promote a positive privacy culture in IPEA. Regular 'Curious Conversations' about Privacy.