

FOI and Privacy Regional Roadshow

Barwon Health's structure and informal release
Kirsty Miller, Patient Information Release Unit Manager
23 February 2023



Acknowledgement of Country

We, Barwon Health, acknowledge the Traditional Owners of the land, the Wadawurrung people of the Kulin Nation. We pay our respects to the Elders both past and present. We thank the Traditional Owners for custodianship of the land, and celebrate the continuing culture of the Wadawurrung people acknowledging the memory of honourable ancestors. We also welcome all Aboriginal and Torres Strait Islander people present today.



**Barwon
Health**



Vital statistics

- One of the largest and most comprehensive regional health services in Australia, providing care at all stages of life and circumstance
- Annual budget over \$700 million
- Employ more than 8,300 staff and volunteers
- 21 sites
- One of the largest employers in the region
- Services covering nearly all specialities, with the exception of organ transplant and neurosurgery
- 406 acute hospital beds and >1000 beds in total

Overall FOI team

- In 2021/2022 FY 1,040 FOI requests
- Vast majority are for health records
- Remainder are termed “corporate requests”
- Some requests for “amendments” to health records
- In 2021/2022 ROI processed over 8000 requests for information, including requests for on-going patient care

Heath Information Services – PIRU Team

- One Manager – .8 FTE
- 2 FOI officers – 1 FTE
- 3 ROI Officers – 1.2 FTE
- 3 Reviewers – .64 FTE
- (in addition to this Legal Services deals with some requests where required)

How are requests for documents processed at Barwon Health

- Formally under the *Freedom of Information Act 1982* (Vic) (**'the Act'**), and
 - Informally under s16 of the Act where we can properly do so, taking in to consideration legislation such as the *Health Services Act 1988* (Vic) and the *Health Records Act 2000* (Vic)
-
- FOI Team handles the most formal requests
 - ROI Team processes most informal requests

Documents made available outside of the Act as an informal release

- Discharge Summaries,
- Medications charts,
- Operation Reports,
- Pathology reports,
- Radiology reports – requests for copies of films,
- Time of Birth,
- Certificate of attendance,
- Any release of information request for ongoing patient care with authorisation,
- Invoices,
- Repeated requests seeking the same information i.e. patient changed solicitor with appropriate authorities, and
- Consideration is always made for 'Corporate Requests'

Benefits of processing outside of the act

- Allows for efficiencies
 - Less administration work required per request
 - Patients get their information quicker
 - Usually smaller requests requiring less time to process
- No fees are charged
- Less burden on our reviewers and FOI Officers
- Negotiate what is received by the patient and how provided

When would we process via the FOI Act

- When the patient wants to request the record under Act to preserve their rights
- If we hold concerns regarding patient safety i.e. if we needed to consider s33(4)
- If information will need to be redacted (without consent) under a permissible exemption, i.e. information communicated to us in confidence, family violence concerns or a secrecy provisions applies such as child protection report
- Specific authorities are required such as Third party requests



**Barwon
Health**

Going forward

- Considering making more documents available as a standard practice
- The hospital is looking at developing platforms for patients to view their records via an online portal in conjunction with our EMR, in line with relevant legislation.
- Allows for more openness and transparency with treatment and increased patient trust

How do you get onboard with informal release?

- OVIC in conjunction with the HCC have put together guidance via a Practice note from November 2022 to assist
- Put together a procedure so all team members are clear as to what the parameters are
- Create a request form so it can be clearly documented



**Office of the Victorian
Information Commissioner**



FOI & Privacy Regional Roadshow

23 February 2023

Shantelle Ryan, Assistant Commissioner - Public Access
Operations & Compliance

**Office of the Victorian Information
Commissioner**

Freedom of Information | Privacy | Data Protection

The Office of the Victorian Information Commissioner



Rachel Dixon, Joanne Kummrow, Sven Bluemmel

OVIC is an independent regulator with combined oversight of information access, information privacy, and data protection.

We support Victorians by:

- overseeing access to government information;
- protecting information privacy rights;
- advising on the lawful sharing of information; and
- promoting effective information security.

FOI Professional Standards



The Victorian FOI Professional Standards Framework



www.ovic.vic.gov.au

- The Professional Standards commenced operation on 2 December 2019.
- The Standards are binding and apply to every Victorian agency subject to the FOI Act.
- The Principal Officer of an agency is responsible for ensuring any officer or employee concerned with the operation of the FOI Act complies with the Professional Standards.
- **The FOI Professional Standards Framework** - includes information about how OVIC identifies, records and monitors agency compliance with the Standards.
- **Professional Standards Self-assessment Tool** - for agencies to measure their adherence to, and compliance with, the Standards.

The FOI Agency Information Service

- A service to provide FOI Practitioners with tailored information and guidance in administering the FOI Act and compliance with the Professional Standards.
- FOI Practitioners can email their query to our dedicated mailbox: AskFOI@ovic.vic.gov.au
- Published guidelines available at ovic.vic.gov.au



FOI Education and Training

HOW CAN WE HELP?

I'm a member of the public

FREEDOM OF INFORMATION
[Agency practice notes](#)
[OVIC online decisions](#)
[Professional Standards](#)

PRIVACY
[Privacy Officer Toolkit](#)
[IPP Guidelines](#)
[Privacy Impact Assessments](#)


DATA PROTECTION
[Recordkeeping obligations hub](#)
[Protective Data Security Framework](#)
[Protective Data Security Standards](#)

NEWS [More News](#)

PRIVACY TRAINING

OVIC provides free training on the Privacy and Data Protection Act 2014 to Victorian public sector staff

[Register here](#)



- *Over **730** de-identified Notice of Decisions published on OVIC's website and AUSTLII*
- ***25** Procedural Practice Notes*
- ***17** Exemption Practice Notes*
- *Templates*
- *Monthly Information Access Series live and recorded webinars*
- *Monthly training webinars for VPS Staff*
- *E-Learning modules across Privacy and FOI*
- *Consumer videos*

Events Training Webinars **Online Learning** Speeches and presentations

Online Learning

We provide range of free e-learning modules through our online learning portal.

The online learning portal is a Moodle platform distributed by eCreators and hosted by Amazon Web Services in Sydney.

By clicking the link below, you will be leaving the OVIC website. For more information, view our [collection notice](#) and [website privacy statement](#).

[Visit our online learning portal](#)

Privacy

- Introduction to privacy in the Victorian public sector;
- Privacy Impact Assessments; and
- Managing the privacy impacts of data breaches.

Freedom of Information

- Processing a request;
- Professional Standards;
- Introduction to the exemptions in Part IV of the FOI Act;
- Section 30;
- Section 32;
- Section 33;
- Section 34;
- Section 35; and
- Section 38.

Agency FOI Information Service



AskFOI@ovic.vic.gov.au

OVIC contact details

T: 1300 00 6842

Enquiries: enquiries@ovic.vic.gov.au

Reviews: reviews@ovic.vic.gov.au

Complaints: complaints@ovic.vic.gov.au

www.ovic.vic.gov.au

Local Government FOI experience

OVIC Regional Forum, 23 February 2023

Image Malmsbury




**Macedon
Ranges**
Shire Council

Acknowledgement of Country

Macedon Ranges Shire Council acknowledges the Dja Dja Wurrung, Taungurung and Wurundjeri Woi Wurrung Peoples as the Traditional Owners and Custodians of this land and waterways.

Council recognises their living cultures and ongoing connection to Country and pays respect to their Elders past, and present.

The bottom of the page features decorative wavy lines in shades of light blue and grey, creating a sense of movement and depth.

Planets align

Position Description

- FOI Officer
- Privacy Officer

Legislation

- FOI Act 1982
- PDP Act 2014
- LGA Act 2020

Access to information

- FOI Request
- FOI Decision
- Informal release

Tale of two Councils

East Gippsland Shire Council

- Information Management
- Governance
- Experienced FOI Officer
- Dedicated, part-time
- Effective systems / processes
- Succession planning
- Collaboration

Macedon Ranges Shire Council

- Governance
- Inexperienced FOI Officers
- Not only responsibility
- Legacy systems / processes
- Transition issues
- System challenges
- Ongoing contractor support

Challenges



Resourcing



Proactive release



Document retrieval



Staff awareness



Variability / unpredictability



Legislative process

Risk
Council business
Council meeting procedures
Informal release of information
Councillor Conduct Officer

Governance
Councillor inductions
Agenda management
Election management
Privacy breach management
Gender Equality Officer
Security Lead for VPDSF

Privacy Officer
Business Continuity Plan
Geographical place naming

Freedom of Information
Conflict of Interest
Personal Interest Returns
Integrity matters

Public Interest Disclosure
Records Management
Information Security Lead
Councillor expenses

Delegations
Charter of Human Rights reviews
Councillor Briefings
Legislative compliance

Complaints Officer
Register management
Ombudsman complaints

Insurance

Opportunities



Proactive release



Upskilling



OVIC resources

- Local Government specific



materials



Collaboration



Image High Street, Lancefield

Patricia Clive

Coordinator Governance
Macedon Ranges Shire Council

T 03 5422 0352 | M 0436 815 720

E pclive@mrsc.vic.gov.au

W mrsc.vic.gov.au

Working Together | **Honesty** | **Accountability** |
Innovation | **Respect**

mrsc.vic.gov.au

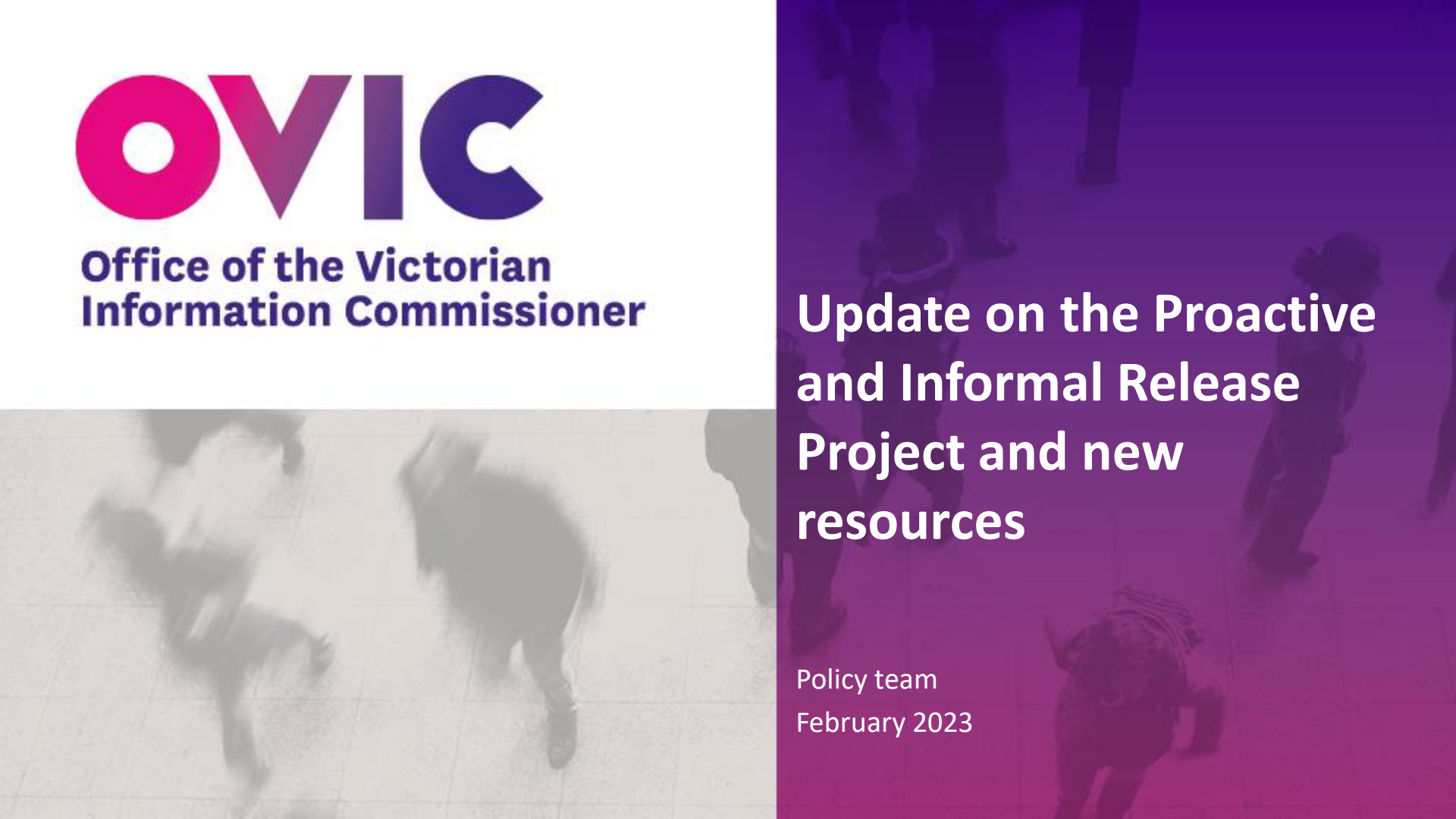
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**Macedon
Ranges**
Shire Council



**Office of the Victorian
Information Commissioner**

A high-angle, slightly blurred photograph of a crowd of people walking on a light-colored, tiled floor. The image is split vertically: the left half is in grayscale, and the right half is overlaid with a solid magenta color. The people are seen from above, their legs and feet in motion, creating a sense of a busy public space.

Update on the Proactive and Informal Release Project and new resources

Policy team
February 2023

Accessing Victorian government-held information



Proactive
release

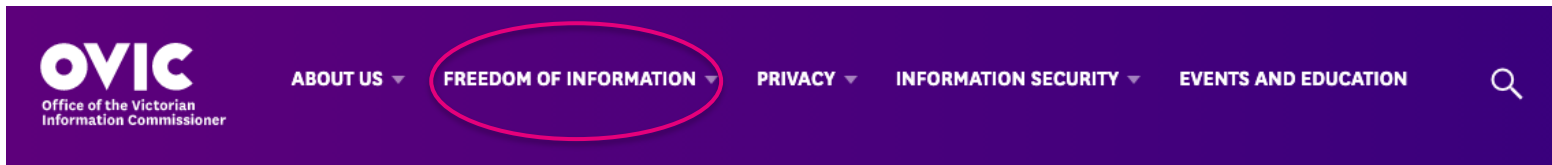


Informal
release



Freedom of
information

New guidance available



Welcome to the Office of the Victorian Information Commissioner

We are the primary regulator and source of independent advice to the community and Victorian government about how the public sector collects, uses and discloses information.

[Contact OVIC here](#)

Sector specific guidance

PROACTIVE AND INFORMAL RELEASE

These practice notes cover informal and proactive release generally, and also provide sector specific guidance

[Proactive release of information](#)

[Informal release of information](#)



[Releasing Council information proactively and informally under the *Local Government Act 2020* and *Freedom of Information Act 1982*](#)



[Release of health records held by Victorian public sector agencies](#)

All resources available online

Guidance materials for agencies

- Introduction to public access to information in Victoria
- Proactive release of information practice note
- Informal release of information practice note
- Releasing Council information proactively and informally under the LGA and the FOI Act
- Release of health records held by Victorian public sector agencies

Guidance material for the public

- Proactive and informal release – guidance for the public

Webinar recordings

- Recorded proactive and informal release webinars for agencies

Video (Vimeo)

- How to release information proactively and informally

Research papers

- Enhancing Victoria's FOI culture to be open by design (OVIC)
- Proactive and Informal Release Behavioural Change report (Decision Design)
- Monash University Part II Study on the Culture of FOI in Victoria (Monash University)



Contact us

policyteam@ovic.vic.gov.au



**Office of the Victorian
Information Commissioner**

**OVIC's reviews and
complaints process**

**OVIC's Professional
Standards**

23 February 2023

Contents

Reviews v Complaints

Reviews process

Complaints process

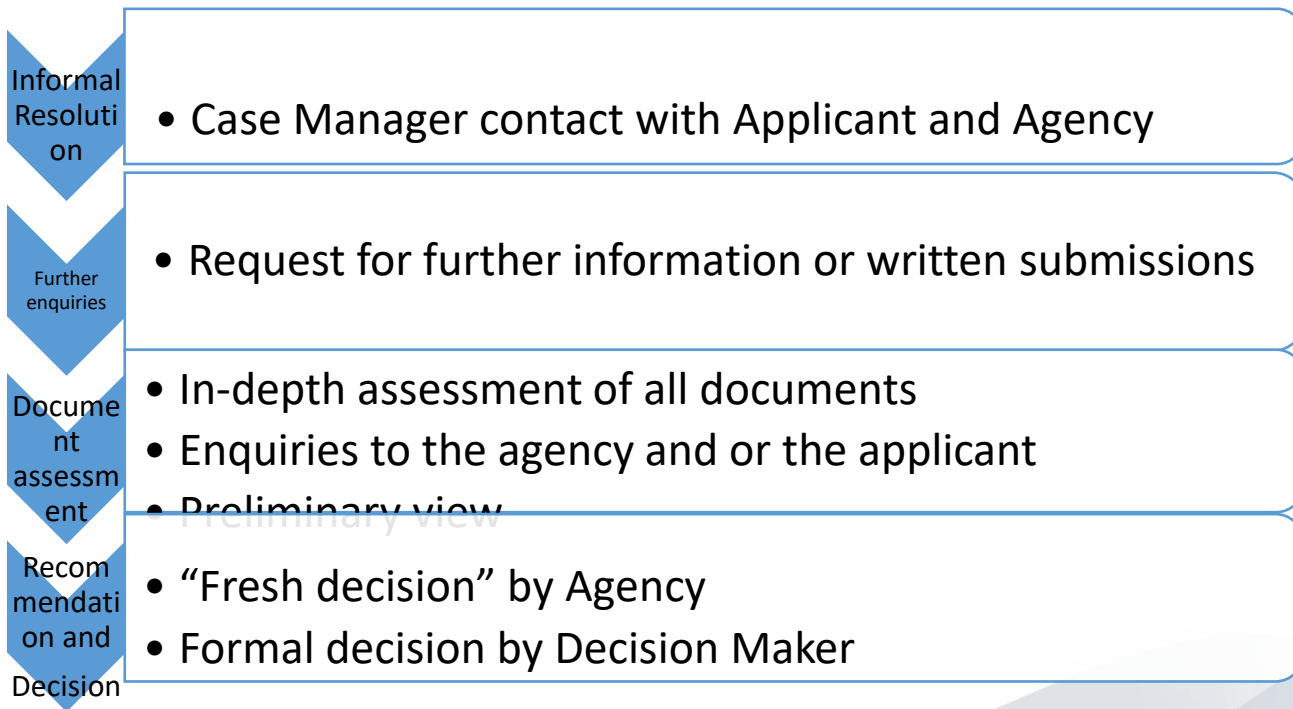
Professional Standards

Tips for best practice

The basics – Review v Complaint

- Reviews
 - ‘merits review’ of Agency decision, conducted by OVIC
 - OVIC’s powers set out in Part VI of the FOI Act
 - Commissioner’s decision made in place of the agency’s
 - Outcome can be appealed to VCAT
- Complaints
 - Investigation into non-compliance with the FOI Act
 - OVIC’s powers set out in Part VIA of the FOI Act
 - Outcome cannot be appealed to VCAT

Public Access Reviews process



Reviews – how to assist OVIC



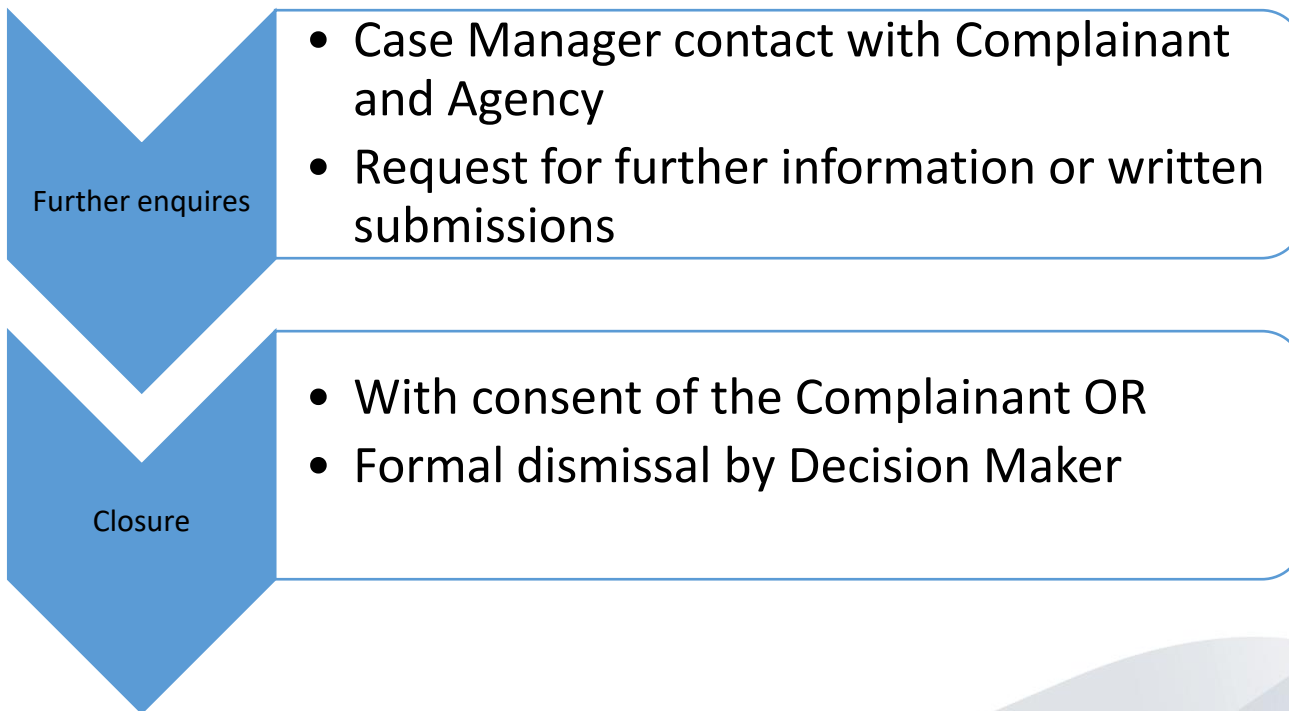
Document transfer
forms / marked up
documents



Written submissions

YES ✓	NO ✗
Detailed, specific information about the FOI request and the documents	Merely quoting legislation
Comprehensive answers to OVIC questions	Repeating decision letter
Clear and concise	Long and legalistic
s49H(1) – as little formality and technicality as possible	

Public Access Complaints process



Complaint Handling



Natural Justice and
Procedural Fairness
considerations



Collection of new and
relevant information
prior to
determination



Resolution can come
as a result of 1 point,
or multiple



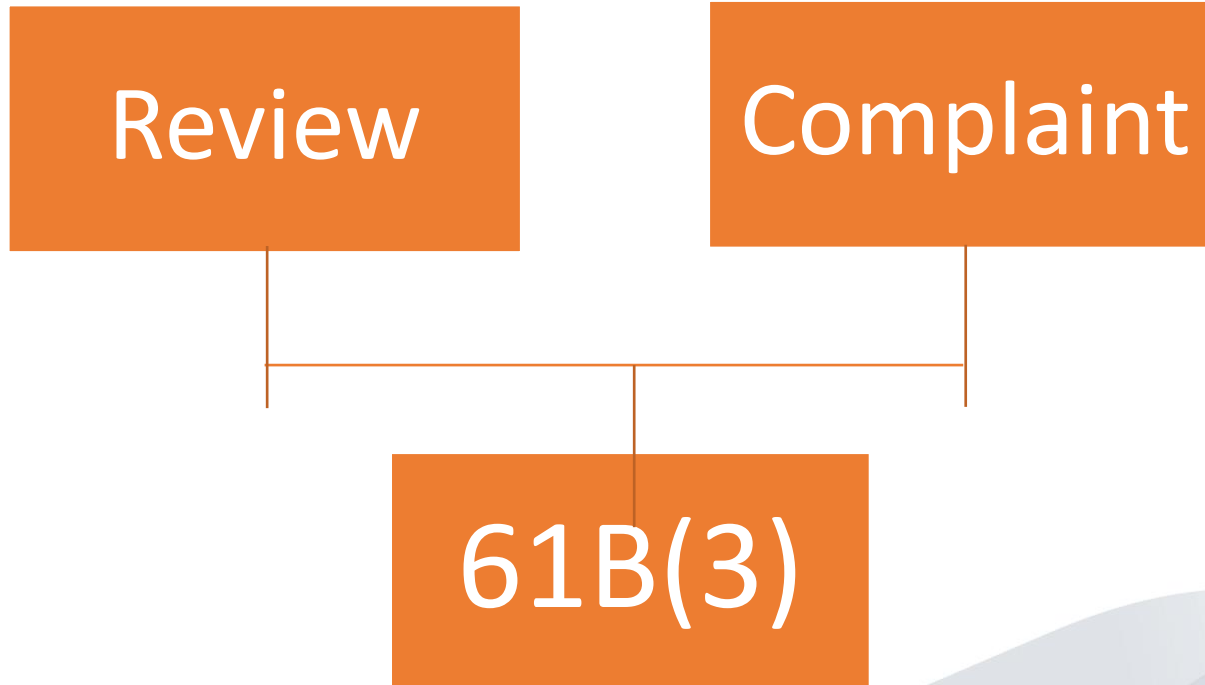
The value of
information learned
during a complaint



Communicating in a
tailored manner,
plain English



Review AND Complaint



Professional Standards



33 Standards based on
11 Themes



Engagements and
Breaches



Non-compliance



GENERAL - The basics

- Commenced 2 December 2019
- Apply to and bind all Victorian Agencies subject to the FOI Act
- Elaborate on obligations under the FOI Act
- Articulate expectations for FOI practitioners when performing their FOI function
- Referred to as “engagements” when a PS matter is recorded

GENERAL - What do they aim to do?

- improve communication between agencies and applicants;
- ensure agencies process FOI requests in a timely manner;
- clarify any unclear terms or tests of the Act; and
- help agencies apply the FOI Act in a modern way.

GENERAL – Types of breaches

- **Minor or technical**
 - where an agency's action or inaction results in a minimal risk of detriment to members of the public or OVIC
- **Substantial, persistent or systemic**
 - relate to an agency's action or inaction where there is moderate to high risk of detriment to members of the public or OVIC

OVIC - Dealing with non-compliance

Minor or technical

- Request further information, a written submission or response from the agency
- Request that an agency participate in an educational activity or refer agency to online resources
- Meet with agency to discuss obligations
- Address non-compliance in covering letter to the agency
- Ongoing monitoring of performance

Substantial, persistent or systemic

- Request further information, a written submission or response from the agency
- Request that an agency participate in an educational activity or refer agency to online resources
- Meet with agency to discuss obligations
- Address non-compliance in covering letter to the agency
- Ongoing monitoring of performance
- Make a finding of breach
- Report breach in OVIC's annual report
- Internal referral for consideration of an own motion investigation

OVIC – existing resources

- FOI Professional Standards Framework:

- <https://ovic.vic.gov.au/freedom-of-information/resources-for-agencies/professional-standards/the-foi-professional-standards-framework/>

- Practice Note 1: The Professional Standards

- <https://ovic.vic.gov.au/freedom-of-information/resources-for-agencies/practice-notes/the-professional-standards/>

- Professional Standards – introduction and interpretation

- https://ovic.vic.gov.au/freedom-of-information/resources-for-agencies/professional-standards/#_Introduction_and_interpretation

- Professional Standards – Self-assessment tool

- <https://ovic.vic.gov.au/freedom-of-information/resources-for-agencies/professional-standards/professional-standards-self-assessment-tool/>

Professional Standards – Self-assessment tool

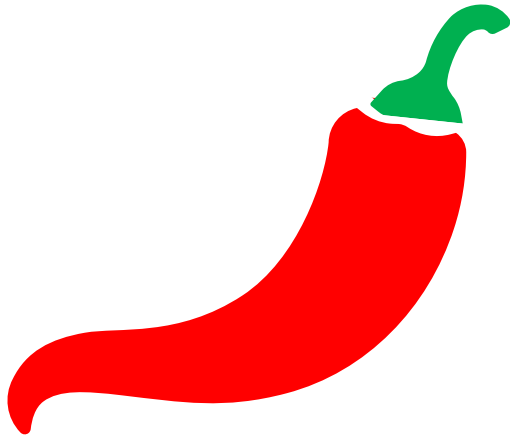
- Developed to assist in identifying PS engagements, a “how to”
- Covers 18 of the 33 standards
- Designed to help drive regular “checks” of files, particularly by case managers following the allocation of a new review or complaint.

<https://ovic.vic.gov.au/freedom-of-information/resources-for-agencies/professional-standards/professional-standards-self-assessment-tool/>

FOI Hot Tips

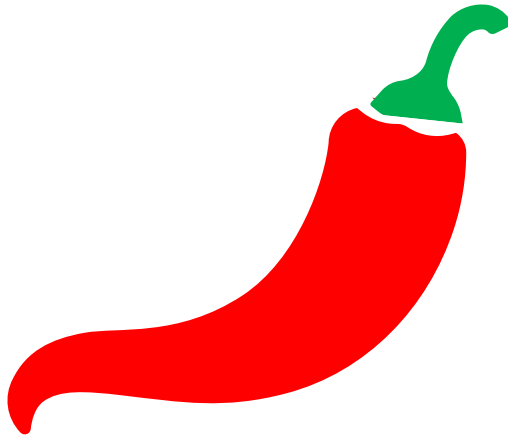


HOT TIP #1



**Share information with the Applicant
from the relevant area of your Agency**

HOT TIP #2



A clear record makes for an easy answer

Template 3 – Record of document search – D20/5532

Record of document search under the Freedom of Information Act 1982 (Vic)

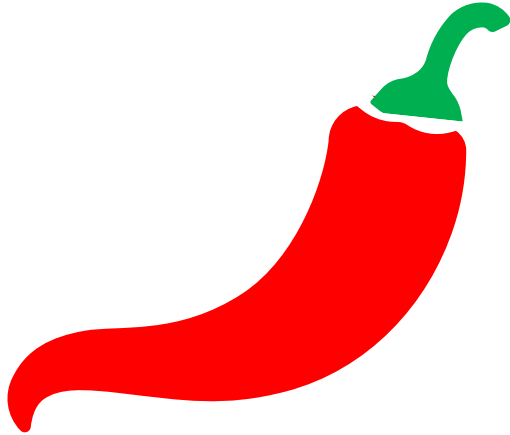
Where a search for documents is conducted, an agency must ensure it keeps a record of the searches undertaken, including information relating to the locations searched, the method or type of searches undertaken and, where applicable, the key words used in the searches (*Professional Standard 6.1*). An example is included in the table below.

The record of document search should be completed by the FOI officer to record all searches conducted in relation to the applicant's FOI request. Include consultation with other business areas in the agency and the results of those searches, where applicable.

Record of document search under the Freedom of Information Act 1982 (Vic)							
Applicant: Jane Smith				Date valid request received: 13 September 2018			
Agency reference: FOI12345				Decision due date: 14 October 2018			
FOI officer: Morgan Grey							
Date	Time taken	Name, position and area of officer who conducted the search	Locations searched	Describe searches (method or type of search)	If applicable, key words used	Result of searches	If relevant, why a document could not be located or why it does not exist
18/09/2018	1 hour 25 mins	Jamie Chan, Project Officer, Infrastructure Projects team	Email accounts for Jamie Chan, Michael Brown and Sam Lines in the Infrastructure Projects team TRIM	Key word search	Green wedge project Green wedge AND project GWR Green project GW project	Located 20 emails, one report and one briefing Did not locate consultant reports	Consultant reports not located because the

FOI111

HOT TIP #3



The power of the decision letter

Schedule of documents

No.	Date of document	Document description	No. of pages	Decision
1	[insert date]	[insert document description]	[insert number of pages]	[insert your decision on the document, including whether you decided to release it in full, in part or refuse in full. If you decide to release a document]

OVIC
Office of the Victorian
Information Commissioner

ABOUT US ▾ FREEDOM OF INFORMATION ▾ PRIVACY ▾ INFORMATION SECURITY ▾ EVENTS AND EDUCATION



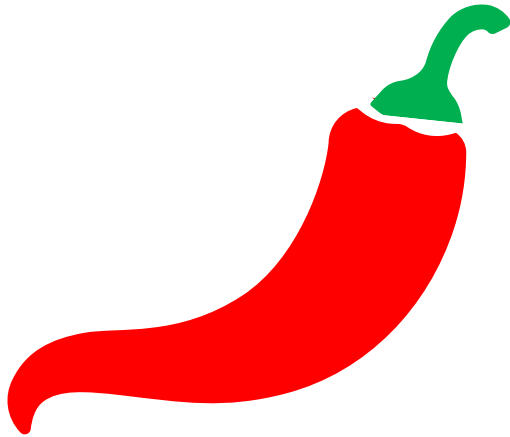
Home / Freedom of Information / Resources for agencies / Practice notes

PRACTICE NOTES

These practice notes provide guidance on how to facilitate access to information under the *Freedom of Information Act 1982* (**FOI Act**) and the [Professional Standards](#).

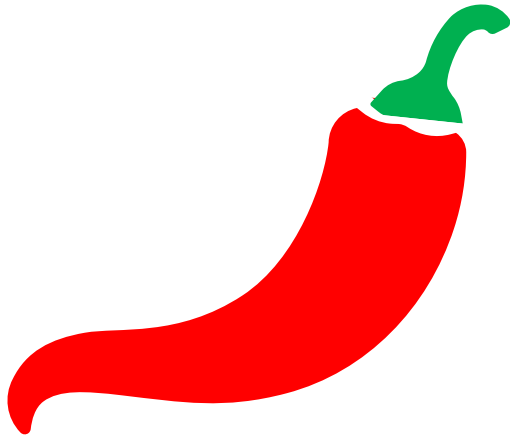
They are complemented by customisable [templates](#) that agencies can use when corresponding with applicants, third parties, and internal staff.

HOT TIP #4



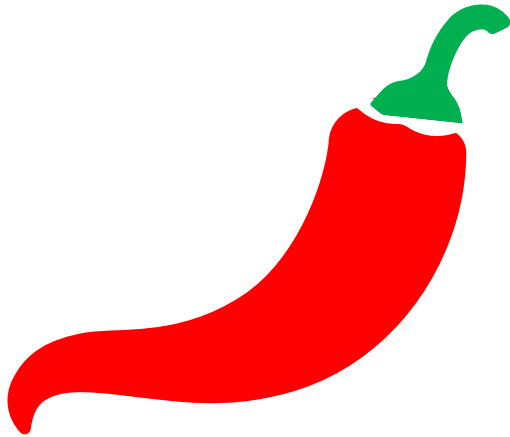
Agencies can use markup documents provided by OVIC at their discretion

HOT TIP #5



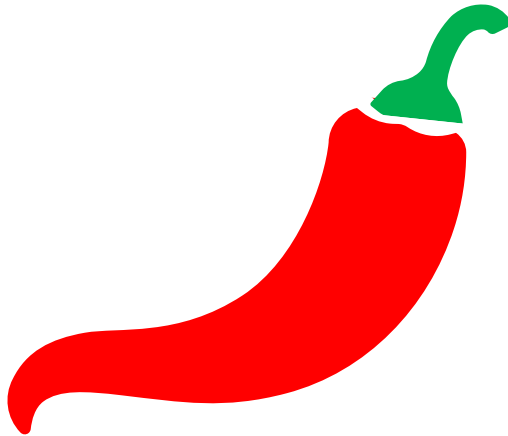
**If you need more time to
respond to OVIC,
communicate it early**

HOT TIP #6



**‘Personal affairs information’
may mean different things to
different people**

HOT TIP #7



You can search for past decisions about a given document type

Decisions & Case Notes All Other Resources

SEARCH BY TYPE SEARCH BY STREAM

☒ Decision ☐ Case Note ☐ Freedom of information Browse Decisions by year

Free Text Search Date From date To date

health records

Headnote Agency Select an agency

Insert keyword...

Sections in the Freedom of information Act Select a section

Search

Search Result (30)

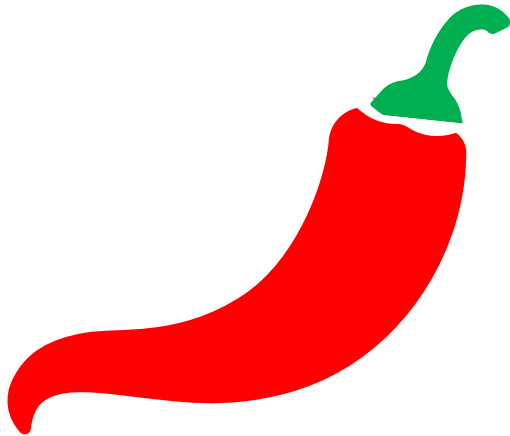
YMB and Ambulance Victoria (Freedom of Information) [2022] VICmr 144 (31 May 2022)
 FREEDOM OF INFORMATION - personal affairs information - personal affairs of agency officers - disclosure unreasonable - medical records - health records - ambulance records - patient care records
[Read more](#)

YNg and Castlemaine Health (Freedom of Information) [2022] VICmr 150 (6 June 2022)
 FREEDOM OF INFORMATION - medical records - mental health records - client note - documents affecting personal privacy of other parties - personal affairs information - unreasonable disclosure of information - section 35(2A6)
[Read more](#)

YMB and Bendigo Health Care Group (Freedom of Information) [2022] VICmr 153 (7 June 2022)
 FREEDOM OF INFORMATION - medical records - health records - personal affairs information - disclosure unreasonable
[Read more](#)

YFY and Eastern Health (Freedom of Information) [2022] VICmr 73 (15 February 2022)
 FREEDOM OF INFORMATION - medical records - health records - deceased family member - deceased parent - next of kin - personal affairs information - unreasonable disclosure - information obtained in confidence - disclosure contrary to the public interest
[Read more](#)

HOT TIP #8



AskFOI@ovic.vic.gov.au!

HOW DO I ACCESS THE SERVICE?

Please include the following information in your email:

1. Your question to be answered;
2. The general nature of your query and relevant section of the FOI Act;
3. A short summary including any relevant background or contextual information; and
4. The outcome sought by seeking advice.

When emailing your questions and accessing the service please **de-identify** the subject matter and/or the applicant.

Prior to accessing the service, we encourage agencies to consider the [FOI agency resources](#) available on OVIC's website.

FOI & Privacy Regional Roadshow February 2023

Day-to-day privacy

Anique Owen - Acting Manager, Privacy Guidance and Dispute Resolution
Jack Kennedy – Privacy Guidance Advisor and Conciliator
Office of the Victorian Information Commissioner

Agenda


Topics

- Privacy resources
- Collecting personal information
- Using and disclosing personal information

From this presentation, you will be able to:

- Identify, locate and use tools for privacy officers and employees
- Gain an appreciation of the common privacy themes seen in smaller and regional organisations
- Take practical lessons on how to collect, use and disclose personal information back to your workplace.

Privacy Officer Toolkit

 ovic.vic.gov.au/privacy-officer-toolkit/



The importance
of privacy



Role of the
Privacy Officer



Privacy law
– an overview



The PDP Act
– a deep dive



Reviewing and
improving practices



Handling internal
enquiries



Raising awareness
of your role



Privacy
Policies



Collection
notices



Privacy impact
assessments



Handling
complaints



Data
breaches

OVIC

Working
with OVIC



Training
and networking



Most common
topics



Shareable
resources

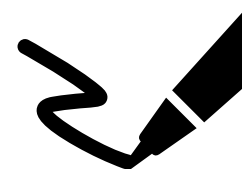
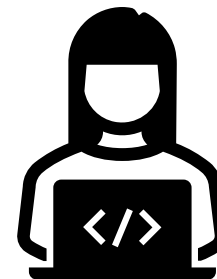
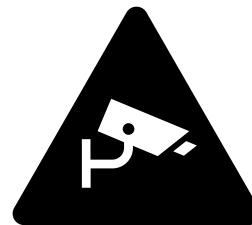
OVIC

Office of the Victorian
Information Commissioner

Slido: #OVIC2023

Collection

The first step that attracts obligations under the PDP Act



Key considerations

1. Collection must be necessary for one or more functions or activities
2. Collection can only be by lawful and fair means and not in an unreasonably intrusive way
3. Organisations are required to include a collection notice
4. It is best to collect information directly from the individual, but that may not always be possible

Collection via Surveillance devices

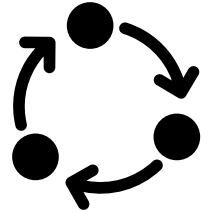
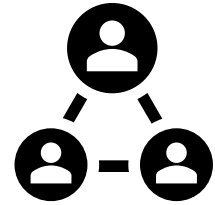
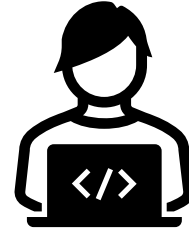
1. Clearly define and articulate the purpose of the collection via surveillance
2. Ensure the surveillance is limited in scope and duration
3. Consider whether third parties may have their personal information collected accidentally e.g. where you're using dashcams, or body-worn cameras
4. Establish appropriate oversight and accountability mechanisms to detect any misuse.

Collection via surveys and public engagement

1. Undertake a privacy impact assessment to identify privacy risks early
2. Prepare a collection notice specific to the activity or function and provide a copy to all participants when you are collecting their personal information
3. If you are promoting the survey online, include reference to the collection notice
4. Ensure your privacy policy is up to date and reflects your current information handling practices

IPP 2 - Use and Disclosure

- Customer service telephone calls
- External disclosure to third-parties
- Internal use and disclosure

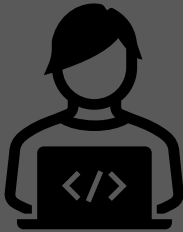


IPP 2 - Use and disclosure



- Is the use or disclosure for the same purpose it was collected as per IPP 2.1?
- Is the use or disclosure for a related and reasonably expected secondary purpose as per IPP 2.1 (a)?
- Does the use or disclosure meet one of the exemptions under IPP 2.1 (b)-(h)? (e.g. authorised by or under law, where consent has been provided, etc.)

Examples of external disclosures



- Customer service telephone calls
- Emails to customers
- Emails to organisations (public or private)
- Responding to requests by external agencies

Scenario:

Information disclosed via phone call



Sarah is a new customer service officer at a local council. She has been hired during a busy period where Council have received a large increase in phone calls. She received some training before being placed on the phones to help relieve the pressure on other staff and to help reduce wait times.

Sarah receives a call from James, who explains that his sister is getting married, and that he is helping to send out invitations but is unable to confirm a mailing address for their old family friend Alexandra, who lives within the region.

Sarah knows she can access Alexandra's contact details and believes that James appears genuine. She notices that the call queue continues to grow. She feels like she probably shouldn't disclose the address but likes to help people wherever she can.

James asks if she can quickly provide the address, because he has lots of invitations to mail out and is running out of time on his lunch break. Sarah knows that if she gives him the mailing address, she can quickly attend to the queues and avoid criticism from her new manager who has mentioned that short call times are a priority.

She discloses the address, thinking to herself "what's the worst that could happen?"

Scenario:

Information disclosed via phone call



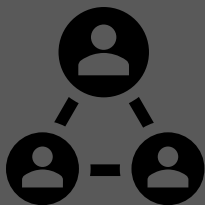
What type of harm could arise from this disclosure?

What steps could Council take to prevent this from occurring?

- Training and processes – is it specific and tailored to the role?
- Culture - do employees feel comfortable to ask questions when they're unsure whether to disclose information?
- Access controls – should Sarah have access to Alexandra's personal information?

Scenario:

Disclosing personal information to a contracted service provider

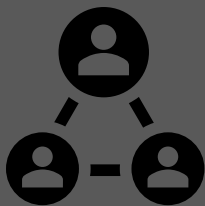


A fictitious water corporation has signed a contract with a survey company to gauge customer's views on their services.

The third-party has asked the water corporation to disclose the entire customer database to them so they can begin the survey.

Scenario:

Disclosing personal information to a contracted service provider



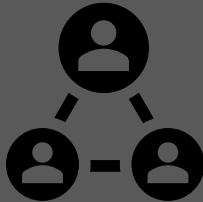
- What information is required for the survey company to receive to fulfill their contract?
- Are customers given the option to opt-out of the survey?
- How does the company assure the water corporation that they handle personal information securely?

Examples of internal use and disclosure



- Sending emails
- Phone calls
- Meetings
- Databases
- Registers

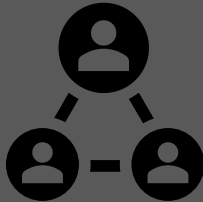
Key considerations



Access controls

- Who needs access to what type of information? Who needs permission to edit data?
- Does your system allow you to restrict access to information based on role and relevance?
- Are there routine audits on which employees have accessed certain information?

Key considerations



Processes, policies and procedures

- Have you conducted a privacy impact assessment (PIA)?
- What type of privacy training is provided to staff? Is it general or tailored based on position and role?
- How often do you provide training?
- What resources can employees refer to if they're unsure? Is there a process manual or standard operating procedure?
- Are there routine audits on which employees have accessed certain information?