

Lightning talk



Privacy
Awareness
Week

OVIC
Office of the Victorian
Information Commissioner

Understanding
function creep –
because you can,
doesn't mean
you should

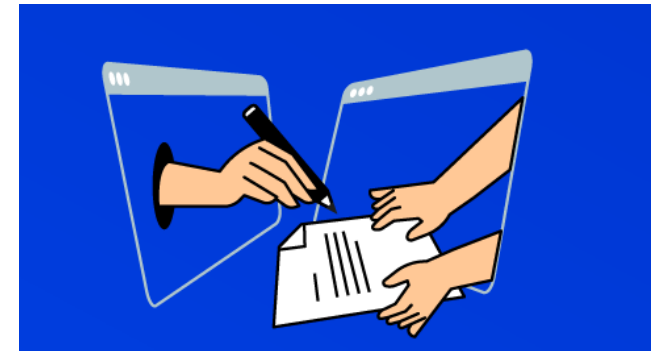
Wednesday 6 May 2026
2 pm – 2.15 pm AEST



What is function creep?

'Function creep' refers to situations where personal information collected for one stated reason is later used for other purposes, perhaps quite unrelated to the original purpose of collection.

Function creep arises where individuals might not have willingly provided their information or tolerated the introduction of a new potentially intrusive practice had they known what uses would eventually be made of their information.



How does function creep occur?

New technologies, systems and AI tools can accelerate the existing risks of function creep because new tools can link information in ways not ordinarily expected, draw inferences and create new personal information in ways that perhaps weren't possible when the data was first collected.



What does IPP 1.1 say?

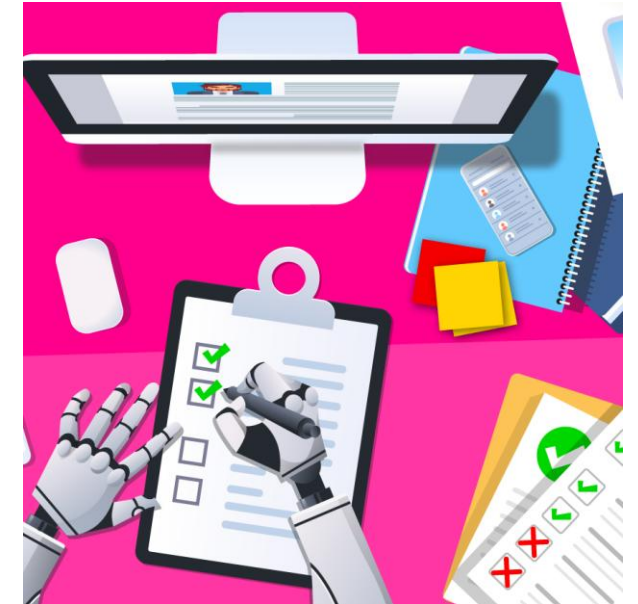
An organisation must not collect personal information unless the information is necessary for one or more of its functions or activities.



What does IPP 1.3 say?

At or before the time (or, if that is not practicable, as soon as practicable after) an organisation collects personal information about an individual from the individual, the organisation must take reasonable steps to ensure that the individual is aware of—

- (a) the identity of the organisation and how to contact it; and
- (b) the fact that the individual is able to gain access to the information; and
- (c) the purposes for which the information is collected; and
- (d) to whom (or the types of individuals or organisations to which) the organisation usually discloses information of that kind; and
- (e) any law that requires the particular information to be collected; and
- (f) the main consequences (if any) for the individual if all or part of the information is not provided.



How does function creep interact with IPP 1?

Personal information may have been originally collected because it was necessary for an organisation's functions or activities, and as such the organisation complied with IPP 1.1.

However, the organisation's collection notice won't encompass the new uses and disclosures that develop with function creep. The individual will not be aware of the matters set out in IPP 1.3.



How does function creep interact with IPP 2?

Personal information may have originally been collected for a legitimate purpose, however over time it may become tempting to use or disclose that information for a different purpose because technology makes it easier, quicker or less intrusive to do so.

Those secondary uses or disclosures however may not be permitted under IPP 2.1.



What harm can arise from function creep?

Function creep can undermine transparency and erode public trust. Individuals may not have provided their information or tolerated a more privacy intrusive practice, if they had known how their information would be later used.

Unexpected secondary uses can also lead to people feeling monitored, judged or treated unfairly.



How can organisations prevent function creep?

Organisations can reduce the risk of function creep by carrying out Privacy Impact Assessments and Security Risk Assessments before introducing new tools or systems and regularly reviewing these over time. Collections notices and privacy policies should also be kept up to date so individuals are aware of how their information will be used. Before using information for a new purpose, organisations should stop and consider whether the use is permitted under IPP 2.



Thanks for watching!

We'd love your feedback in our 2 minute, completely anonymous survey.

Link to complete now available in the chat.

Any questions can be directed to us via email
privacy@ovic.vic.gov.au



Smart tech, smarter choices:
protecting your privacy
in the age of AI

