

Privacy Impact Assessment and Report (K2 Project Management System)

A **Privacy Impact Assessment (PIA)** process involves the following steps:

1. Conduct a threshold assessment
2. Plan the PIA
3. Describe the project
4. Identify and consult with stakeholders
5. Map the personal information flow
6. Identify the privacy risks
7. Identify options to address the privacy risks
8. Respond and review

1. Threshold Assessment

Did the privacy threshold assessment result in a PIA being deemed necessary? Comment and attach privacy threshold assessment results:

A Privacy Threshold Assessment was conducted which indicated a PIA was necessary as this project:

- Involved a new way of collecting and storing personal information
- Involves the collection of personal information in relation to research applications and may factor into the decision to fund the research
- Involves the migration of some personal information from the current system into K2
- Involves publishing some personal information to the website
- Will require users access a different system to update their details
- Will involve user authentication

PIA PLAN

This project covers the migration to a new project management information system, K2. K2 is a workflow solution which will integrate with a number of our core systems, including the finance system, the CRM, SharePoint and our website. In addition to implementing the new system, data will be migrated from Clarity.

Privacy planning is a key aspect of this project as the system will be collecting new user information (which may include financial information), integrating with other systems that contain personal information and migrating data from an existing system.

This project is led by Nicole Legovich, Senior Manager, Corporate (Information Systems and Business Improvements). The project team consists of Gerard McTaggart, Systems Coordinator and Kristy Middlebrook, Data Coordinator, as well as external consultants from K2, who will assist with the implementation of the new system. Nicole will also be responsible for the PIA.

Privacy will be considered throughout the project:

- At collection – a collection notice will be included when users request access to the system.

- Users can request access to the system, via a form, to complete a research application or to respond to a request for quotation.
- Advisory Panel Members or users acting on selection panels/committees will also be set up in the system
- Internal staff will be set up in the system
- User data will be migrated from the current system.
- Storage
 - Part of the procurement process for K2 defined that all data be stored securely in Australia. This is a cloud-based solution, but the data will be hosted in an Australian Data Centre.
- Access
 - User access will be restricted based on their role/requirement within the system.
 - Users will have the ability to access their information and request updates be made
- Disclosure
 - The data will be disclosed in the following ways:
 - As part of the assessment of the application
 - To allow relevant staff to make contact about the application or subsequent project
 - To inform users of related opportunities they may find of interest
 - To process payments or raise invoices
 - In the context of the research, data will be published to the company website and the growAG website to make the public aware of the research outcomes.

Stakeholder consultation will be built into the project timeline as required.

Privacy will be considered throughout the life cycle of the project and as any additional changes are made to the system in future.

2. PROJECT DESCRIPTION

Project: K2 Project Management System

Description of project

AgriFutures Australia wants the way our stakeholders engage with us to reflect our values. Our current project management information system, Clarity PPM, is not intuitive and our stakeholders found it difficult to use. In addition, the system was heavily customised around our internal processes when first implemented which makes it difficult to maintain and update. To streamline our internal processes, create efficiencies, allow for the business to change over time and for our stakeholders to have a positive experience, we need to replace Clarity.

Roles and responsibilities:

Nicole Legovich, Senior Manager, Corporate (Information Systems and Business Improvements) will be leading the project with assistance from Gerard McTaggart, Systems Coordinator and Kristy Middlebrook, Data Coordinator.

K2 will be providing technical staff to assist with the implementation of the new system.

Scope:

AgriFutures Australia is replacing our current Project Management Information System, Clarity, with K2. This project will encompass the implementation of the K2, including integrations with core systems (finance, CRM, SharePoint, and websites). There will also be a migration of data from Clarity into K2.

Privacy elements

Personal information will be collected from users in relation to research applications or responses to request for quotations, as well as for external users who are members of advisory panels or selection committees/panels.

This will include:

- Name
- Address
- Phone number
- Email
- Organisation
- Role within organisation
- Direct line supervisor within organisation
- Bank details (which will be collected by the system but stored in the finance system)

Information is collected to facilitate the funding of research and disclosed to enable that research to be managed. The outputs of the research are also published.

3. STAKEHOLDERS

Stakeholder consultation:

Privacy and the security of the personal information collected were a core requirement of the system and thoroughly investigated as part of the procurement process by the selection panel which comprised:

John Harvey, Managing Director, AgriFutures Australia
Michael Beer, General Manager, Business Development, AgriFutures Australia
Mila Bristow, Senior Manager, Research, AgriFutures Australia
Nicole Legovich, Senior Manager, Corporate, AgriFutures Australia
Gerard McTaggart, Systems Coordinator, AgriFutures Australia
Shaun Nell, Senior Business Advisor, Strategic Directions Group
Paul Byrne, Specialist Business Advisory, Strategic Directions Group
Graeme Tolson, General Manager, Business and Finance, CRDC

Internally, as part of the contract review process, Erin Hulm, Manager, Legal Services reviewed K2's privacy clauses and was satisfied that although K2 could not comply with AgriFutures Australia's privacy policy, K2 will adhere to the Cloud Services Policy. That policy outlines that K2 will maintain appropriate administrative and technical safeguards to maintain the security, confidentiality, and integrity of our Data. K2 shall not monitor, access or modify our Data or usage of the Service except to provide the Service, address technical issues with the Service, at our request or with our permission, or as compelled by law as specified in Section 6.

4. PERSONAL INFORMATION FLOW

1. User requests access to system by completing an online form.
2. Their identity is validated through Azure Active Directory
3. Information is only collected to manage the research and to communicate the outcomes – beyond the initial application, this will be covered by a contract.
4. Their information is stored in the system (or stored in the CRM and finance system – TBC). The data will be stored securely and hosted within Australia.
5. Access to the data will be limited to those who require it to perform their duties.
6. Users will be able to see their information and request for it to be updated.
7. Information will only be disclosed in the context of managing research, making or collecting payments, communicating related opportunities or publishing the research outputs.

5. PRIVACY IMPACTS & MITIGATION

Risk	Mitigation
Data is lost/altered during the migration	<ul style="list-style-type: none"> • Data in both systems will be backed up and has disaster recovery provisions • Users will be advised of the transition to the new system and be given access to check their personal information is correct
Data is used for an intent other than the one it was collected for	<ul style="list-style-type: none"> • Access to the data will be controlled based on the user's role. • A collection notice will be included at the point of collection notifying potential users how their data will be used. AgriFutures staff will comply with this and will seek permission to contact users for any purpose not covered by the collection notice
Data is accessed without permission	<ul style="list-style-type: none"> • While every precaution is taken to secure the data, should a breach occur, AgriFutures Australia will follow their Data Breach Response Plan

6. RESPOND AND REVIEW

This PIA will be revisited throughout the project to ensure that any additional privacy aspects that arise are properly addressed.


Document Information

Date PIA completed:	2/09/2020
Status:	Draft completed
Prepared by:	Nicole Legovich
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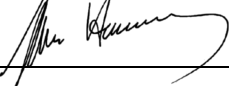
Endorsement and approval

Project manager:

I **recommend** the project proceeds as proposed in this document.

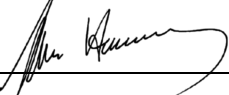
Name:	Nicole Legovich		
Position:	Senior Manager, Corporate (Information Systems and Business Improvements)		
Signature		Date:	2/09/2020

The following officer/s have **endorsed** this document:

Name:	John Harvey		
Position:	Managing Director		
Signature		Date:	14.09.2020

Project Executive/privacy officer/senior management:

I **agree** to the project proceeding as proposed in this document.

Name:	John Harvey		
Position:	Managing Director		
Signature		Date:	14.09.2020