



**Australian  
Privacy  
Foundation**

<http://www.privacy.org.au>

[Secretary@privacy.org.au](mailto:Secretary@privacy.org.au)

<http://www.privacy.org.au/About/Contacts.html>

30 July 2015

Mr Glenn King, CEO, ServiceNSW  
[Glenn.King@service.nsw.gov.au](mailto:Glenn.King@service.nsw.gov.au)

Cc: Dr Elizabeth Coombs, Privacy Commissioner  
[Elizabeth.Coombs@ipc.nsw.gov.au](mailto:Elizabeth.Coombs@ipc.nsw.gov.au)

Dear Mr King

**Re: ServiceNSW 'Digital Profile Service'**

The Australian Privacy Foundation (APF) is the country's leading privacy advocacy organisation. A brief backgrounder is attached.

APF notes the report in itNews of 28 July 2015 relating to the intention of ServiceNSW to "launch a digital profile service", along the lines of the Commonwealth's myGov.

Schemes of this kind harbour massive privacy threats, not just because of data security and identity fraud, but also in terms of deeper intrusion by governments into personal lives.

We note that the conduct of a PIA is regarded as an obligation in NSW, particularly in relation to proposals that harbour high risks of privacy intrusion, and that no mention is made of a PIA on the ServicesNSW web-site in relation to any of its services.

Would you please advise:

- (1) what Privacy Impact Assessment (PIA) processes have been undertaken;
- (2) what organisations have been engaged with during that process; and
- (3) where a copy of the PIA is to be found.

Thank you for your consideration.

Yours sincerely

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## **Australian Privacy Foundation**

### **Background Information**

The Australian Privacy Foundation (APF) is the primary national association dedicated to protecting the privacy rights of Australians. The Foundation aims to focus public attention on emerging issues that pose a threat to the freedom and privacy of Australians. The Foundation has led the fight to defend the right of individuals to control their personal information and to be free of excessive intrusions.

The APF's primary activity is analysis of the privacy impact of systems and proposals for new systems. It makes frequent submissions to parliamentary committees and government agencies. It publishes information on privacy laws and privacy issues. It provides continual background briefings to the media on privacy-related matters.

Where possible, the APF cooperates with and supports privacy oversight agencies, but it is entirely independent of the agencies that administer privacy legislation, and regrettably often finds it necessary to be critical of their performance.

When necessary, the APF conducts campaigns for or against specific proposals. It works with civil liberties councils, consumer organisations, professional associations and other community groups as appropriate to the circumstances. The Privacy Foundation is also an active participant in Privacy International, the world-wide privacy protection network.

The APF is open to membership by individuals and organisations who support the APF's Objects. Funding that is provided by members and donors is used to run the Foundation and to support its activities including research, campaigns and awards events.

The APF does not claim any right to formally represent the public as a whole, nor to formally represent any particular population segment, and it accordingly makes no public declarations about its membership-base. The APF's contributions to policy are based on the expertise of the members of its Board, SubCommittees and Reference Groups, and its impact reflects the quality of the evidence, analysis and arguments that its contributions contain.

The APF's Board, SubCommittees and Reference Groups comprise professionals who bring to their work deep experience in privacy, information technology and the law.

The Board is supported by Patrons The Hon Michael Kirby and Elizabeth Evatt, and an Advisory Panel of eminent citizens, including former judges and former Ministers of the Crown.

The following pages provide access to information about the APF:

- Policies <http://www.privacy.org.au/Papers/>
- Resources <http://www.privacy.org.au/Resources/>
- Media <http://www.privacy.org.au/Media/>
- Current Board Members <http://www.privacy.org.au/About/Contacts.html>
- Patron and Advisory Panel <http://www.privacy.org.au/About/AdvisoryPanel.html>

The following pages provide outlines of several campaigns the APF has conducted:

- The Australia Card (1985-87) <http://www.privacy.org.au/About/Formation.html>
- Credit Reporting (1988-90) <http://www.privacy.org.au/Campaigns/CreditRpting/>
- The Access Card (2006-07) [http://www.privacy.org.au/Campaigns/ID\\_cards/HSAC.html](http://www.privacy.org.au/Campaigns/ID_cards/HSAC.html)
- The Media (2007-) <http://www.privacy.org.au/Campaigns/Media/>