

The Office of the Information Commissioner reiterates importance of conducting Privacy Impact Assessments to assess privacy risks with remote working arrangements during COVID-19 pandemic

Source: <https://www.oaic.gov.au/privacy/guidance-and-advice/assessing-privacy-risks-in-changed-working-environments-privacy-impact-assessments/>

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Abstract:

The COVID-19 pandemic has seen a significant shift in working arrangements for entities regulated by the *Privacy Act 1988* ('the Privacy Act'), with a large number of employees working remotely. As even in this context, an entity's obligations under the Privacy Act continue to apply, it is useful for entities to conduct a Privacy Impact Assessment ('PIA') to screen for unexpected privacy issues and may help to further mitigate any privacy risks associated with the remote working arrangements that have been implemented,

In short, pursuant to Australian Privacy Principle ('APP') 11 in Schedule 1 to the Privacy Act, entities must take such steps as are reasonable in the circumstances, to protect personal information they hold from misuse, interference and loss, as well as from unauthorised disclosure. Further, the mandatory Notifiable Data Breach scheme requires entities to notify affected individuals and the Office of the Information Commissioner in the event of an eligible data breach.

It is recommended that a PIA be conducted to consider and assess common privacy issues that may arise in a remote working arrangement. If your organisation's remote working arrangements have only had minor adjustments made to it as a result of the COVID-19 pandemic, the PIA you conduct may be only a couple of pages long. However, if the COVID-19 pandemic and the resulting remote working arrangements has seen a significant shift in your business-as-usual practices, a more detailed PIA that considers a broader range of issues will be required.

Some specific things to consider in a PIA of remote working arrangements are:

- Governance, culture and training
- ICT security
- Access security
- Data breaches
- Physical security

For further assistance with conducting PIAs, see our Guidance Note on [Conducting a Privacy Impact Assessment](#).