



**Australian
Privacy
Foundation**

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31 March 2014

Mr T. Pilgrim
Privacy Commissioner
Office of the Australian Information Commissioner

consultation@oaic.gov.au

Dear Timothy

Re: Guide to Undertaking PIAs

The Australian Privacy Foundation (APF) appreciates the opportunity to provide a submission in relation to this matter, and thanks the Commission for the short extension beyond the originally advertised submission date.

We attach our Submission.

We draw to attention a request made in section 2 of the Submission regarding any material changes that might be made in the next phase that impact significantly on the many good features in the Consultation Draft.

Thank you for your consideration.

Yours sincerely

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Australian Privacy Foundation
Submission
OAIC's Guide to Undertaking PIAs
Consultation Draft of March 2014

31 March 2014

1. Background

The Australian Privacy Foundation (APF) is the primary national association dedicated to protecting the privacy rights of Australians. The APF's primary activity is analysis of the privacy impact of systems and proposals for new systems. It publishes and indexes resources on privacy laws and privacy issues. It provides continual background briefings to the media on privacy-related matters.

The APF has been very active in relation to privacy impact assessment for many years, and has contributed to scores of PIA and PIA-like processes, in both the public and private sectors, and through parliamentary processes.

The APF draws particular attention to the following previous submission and its Policy Statement:

- APF Submission to the then OFPC, re Privacy Impact Assessment Guidelines, February 2005, at <http://www.privacy.org.au/Papers/OFPC-PIA-0502.rtf>
- APF Policy Statement on Privacy Impact Assessments, April 2013, attached, and at: <http://www.privacy.org.au/Papers/PS-PIA.html>

2. Introduction

Subject to the qualifications and suggestions expressed in the remainder of this Submission, APF congratulates OAIC on producing a document that is readable, useful, and expressed in a 'firm but friendly' style, and that provides effective privacy-protective guidance while remaining practicable from the viewpoint of the government agencies and corporations to which it is addressed.

There are many specific features of the Consultation Draft that are important and valuable, and which the APF would express specific support for, if time and resources permitted.

We appreciate that there is a possibility that changes may be made to the current version, perhaps on the basis of open or even closed submissions by other organisations, which may negatively impact features that APF considers to be important and valuable.

In the event of such changes being considered, APF requests the opportunity to supplement this submission with further, positive statements, explaining why the relevant features are important and valuable to the protection of privacy.

3. Qualifications and Suggestions

APF draws to attention the following aspects of the Consultation Draft.

In a few cases, the content falls short of what APF believes it should contain.

We also make a number of suggestions for clarifications and improvements.

(1) Privacy Beyond Information Privacy

At several points, the Draft makes clear that there are multiple types of privacy, and that these are relevant to PIAs – even though the scope of the Commissioner's powers are heavily focused on just one of these, information privacy. The APF supports this approach.

In identifying the other types of privacy, the Draft refers to "bodily, territorial and communications privacy" (p.3, fn. 3; and p.7, end of second para.).

The concept of 'territorial privacy' is rather limited. It is strongly associated with Warren and Brandeis (1890) and the concepts of 'the right to be let alone' and 'intrusions', particularly by the media. APF has found it to be much more effective in its analyses, discussions and presentations to substitute 'behavioural' for 'territorial', because it conveys a suitably comprehensive indication of the scope of the concerns.

APF further notes that the previous version of the Guide included a reference that adopts 'behavioural' in preference to 'territorial'. **APF accordingly suggests** that 'behavioural' be substituted for 'territorial'.

(2) A Stronger Link with Risk Management Procedures

On p.3, at the bottom, brief mention is made that "PIAs can be incorporated into [organisations'] existing project management and risk assessment processes".

The version of May 2010 went further, by mentioning specific Risk Management Standards.

APF suggests the inclusion of mention of ISO/IEC 31000 (the series of generic standards) and ISO/IEC 27005 (Information security risk management). These are the successors to the Australian Standards mentioned in the earlier version of the Guide.

(3) Power to Direct Private Sector Organisations

On p.5, the Draft states that the power does not extend beyond government agencies, which is of course correct.

However, **APF suggests** that it would be to the benefit of all parties for the section to convey that Parliament has already given consideration to the extension of the power to encompass the private sector, and that the Attorney-General will be considering the matter again in the future. (Inclusion of a specific reference to s.33D(7) may or may not be worthwhile).

(4) General Recommendation to Conduct a PIA

Generally, the Draft strongly conveys to all organisations the benefits of conducting a PIA. However, on p. 6, the second para. of section 1 is capable of being read a little differently.

APF recommends that the first sentence be followed by one to the effect that, even if an organisation has no obligation to comply with the Privacy Act, the Commissioner recommends application of this Guide, e.g. as a matter of good business practice, and because a PIA offers benefits to the organisation, as well as to the public.

(5) PIAs Beyond Information Privacy

On p.7, first para., the statement is made that "If personal information is not involved in the project, ... a PIA will not be necessary" (emphasis added).

Privacy impacts arise in many circumstances, whether or not personal information is involved. For example, surveillance technologies such as CCTV have behavioural privacy implications whether or not video is recorded; and demands for samples of body fluids, e.g. for on-the-spot drug-testing,

have impacts on privacy of the person, whether or not the person's identity is apparent, and whether or not data is collected and associated with that identity.

We note that the final sentence of the following para. says "You might also find it useful to undertake a PIA" in such circumstances. This recovers the ground somewhat but not sufficiently.

APF recommends that the statement identified in the first para. of this section be re-phrased.

(6) Threshold Assessment

A project sponsor may well gain benefit from the conduct of a limited PIA, including consultations, even in circumstances in which the sponsor, quite reasonably, considers that no actual negative impacts will arise.

APF suggests that, in s.1 on pp. 6-7, the existence of concerns among stakeholders – whether or not those concerns are justified – be identified as a further factor in a threshold assessment.

(7) 'Sensitive' Information

In s.6, a number of specific data-items are declared to be sensitive personal information.

However, these are not the only circumstances in which individuals are particularly sensitive about personal data and its handling. In addition to such 'statutory sensitivity', there is what might be termed 'situational sensitivity'.

Organisations conducting PIAs should be encouraged to consider the various categories of individuals affected by their projects, and use their consultative processes to establish which information and which information-handling gives rise to concerns among which categories of stakeholder.

APF recommends that the expressions including the words 'sensitive information' be re-visited in fn. 5 of p.8, p.11 (top), p.13 (middle), p.28 (middle), and p.37 (bottom).

(8) Advocacy Organisations

The Guide expressly mentions the benefits of engagement with privacy advocacy organisations, as follows: "some form of more targeted consultation should be undertaken, for example with groups representing relevant sectors of the population, or advocacy groups with expertise in privacy" (at the end of s.4 on p.12).

This is very welcome. APF is one of a score of organisations that are frequently engaged in the better forms of PIA process. It is to the benefit of all parties that such engagement be encouraged. Further, it would be valuable for the discovery of relevant advocacy groups by organisations conducting PIAs to be facilitated.

(i) The current Draft qualifies the statement quoted in the first para. of this section with the words "If widespread public consultation is not possible".

There are benefits in engaging with relevant advocacy groups in many circumstances, e.g.

- open, public consultation can be an expensive and slow undertaking, whereas consultation with advocacy groups can be brisker and more cost-effective
- particular segments, such as the socially, lingually and educationally disadvantaged, are particularly challenging to engage with, and organisations conducting PIAs may find it much more effective to engage with their interests through representative organisations
- particularly during the early phases of requirements elicitation and conceptual design, many members of the public have difficulty grasping the descriptions and demonstrations that an organisation may provide, whereas advocacy organisations are more likely to be able to understand the propositions and evaluate their impacts

APF recommends that the qualification be adapted, and either expressed in an open-ended manner, or expanded to reflect the wide range of circumstances in which engagement with representative and advocacy groups is advantageous.

- (ii) this point is not mentioned under the heading 'Consultation', in s.2 on pp.10-11.

APF recommends specific mention of engagement with representative and advocacy groups in that segment as well.

(9) Pre-Existing Mitigating Factors

The concept of mitigating factors is well-embedded in many parts of the Guide. These are important in many designs, as ways of softening the negative impact of privacy-invasive measures that are demonstrably necessary in order to enable a beneficial outcome to be achieved.

APF suggests that mention be made, in s.6 on p.17, that an additional consideration in impact analysis is factors that already exist and that have the capacity to mitigate negative privacy impacts.

(10) Complaints-Handling Mechanisms

In Step 6, on p.18, 4th bullet, a key question is expressed as "Is there a complaint-handling mechanism?".

APF suggests that a more helpful question to present to an organisation conducting a PIA is something like 'Is the complaint-handling mechanism sufficiently visible, comprehensive and effective'?

(11) Compliance

In general, APF welcomes the manner in which the Guide emphasises genuine impact assessment, and distinguishes compliance checks as an element within the more general process.

However, APF suggests that the description of compliance should be expressed more broadly.

In Step 6 on p. 18, under 'Ensuring compliance', it is not only "privacy legislation" that is relevant. Many other statutes contain provisions that, intentionally or incidentally, relate to privacy. Prominent among them are agencies' enabling legislation, and legislation establishing regulatory and consumer-protective regimes. In addition, tort law includes a number of features that protect privacy.

APF recommends that an expression such as 'compliance with privacy legislation and all other relevant legislation and case law' would convey the organisation's responsibilities more clearly.

Further, in Step 9, regarding the content of a PIA Report at the top of p.31, it will frequently be necessary for the scope to be much broader than just "the APPs".

APF recommends that this statement be broadened.

(12) Anonymity and Pseudonymity

In Step 6, re APP 2, on p.20, there are broader questions that organisations conducting PIAs need to consider.

APF recommends at least the addition of a question such as 'Are there categories of individual affected by the project who have good reasons for seeking to interact with your organisation pseudonymously or anonymously?'.

(13) PIA Report Content

- (i) In Step 9 on pp.29-32, the text could be read as advising organisations to omit important information from the PIA Report.

Although it is valuable for the main body of the Report to be no longer than necessary, it is very important that all information be provided that is necessary for an adequate understanding of the project, the impacts and the solutions. APF has found it necessary on several occasions to reject documents provided by organisations as being inadequate as a basis for evaluation and consultation.

APF recommends supplementing the current comments with words to the effect that more detailed information is appropriately provided in Appendices to the Report.

- (ii) It is normal for Appendices to a PIA Report to communicate the nature of consultations, who participated in them, and what the outcomes of the process were.

APF suggests that a statement be made to this effect.

- (iii) At the top of p.32, the words "there may be circumstances when the full release of a PIA may not be appropriate" are capable of being misinterpreted as countenancing the suppression of information that is necessary to enable a reasonable public understanding of the process and outcomes.

APF suggests that a more appropriate expression would be that "there may be circumstances when the release of the full PIA Report, including all Appendices, may not be appropriate".

(14) Implementation

Step 10 on p.32 does not convey sufficiently strongly that a PIA process culminates in commitments by an organisation, and delivery against those commitments. Anything less represents a breach of the trust that the organisation has developed with the participants in the process, and the affected parties as a whole.

There are circumstances in which assessment is performed separately from the project rather than being embedded within it, resulting in mere recommendations, rather than organisational commitments in favour of some design features and against others. This is not a complete PIA, and the process is not finished.

The APF's Policy Statement addresses this point specifically, identifying as a vital outcome of a PIA process "a Privacy Management and Control Plan [which] documents the problems, and how they are to be addressed, including the specific design features that achieve avoidance or mitigation of each specific negative privacy impact" (p.4 of the attached copy).

APF recommends that the Guide be amended:

- (a) to deprecate the notion that a PIA is completed merely by the uttering of recommendations;
- (b) to convey that the PIA process is incomplete until it has resulted in commitments to the delivery of specific privacy protections, mitigating measures and controls.

APF recommends that the heading be changed to 'Implement the measures'.

(15) Review and Audit

Step 10 on pp.32-33 confounds two distinct activities:

- Independent Review can be valuable in some circumstances, for the reasons explained. Such a review is best conducted at the time, and is of the process and its initial outcomes;
- Audit is vital as well, but is a separate activity; and it is always necessary. Audit is conducted some time after the completion of the PIA process. Its purpose is to establish whether the measures have been implemented as intended, whether the intended outcomes have been achieved, and whether additional or adapted measures are needed

APF recommends that Step 10 be amended to comprise three separate sub-sections:

- Implementation – as defined in (14) above, not as in the current draft
- Independent Review
- Audit

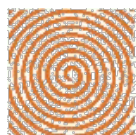
(16) Resources

Under 'Other Resources' on p.38, the Draft refers to iapp's resources. These are for members only, however. Moreover, they are almost entirely oriented to US contexts, and largely irrelevant to Australian conditions.

APF recommends that the pointer to iapp be deleted from the Draft, until and unless iappANZ deliver some resources that are specific to, and appropriate to, the Australian context.

APF further notes that no mention is made of the considerable resources and indexes that APF makes freely available, including its Policy Statements, its submissions on matters relevant to PIAs, and its resource pages on privacy laws across the jurisdictions. These have considerable hit-rates.

APF suggests that the APF site be added to the resource-list.



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The association that campaigns for privacy
protections

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APF Policy Statement on Privacy Impact Assessments

Privacy Impact Assessment (PIA) is a systematic process that identifies and evaluates, from the perspectives of all stakeholders, the potential effects on privacy of a project, initiative or proposed system or scheme, and includes a search for ways to avoid or mitigate negative privacy impacts.

This Policy Statement comprises the following sections:

- [an outline of distinctive differences between a PIA and other privacy-related business processes](#)
- [a list of the characteristics of a PIA](#)
- [comments on guidance documents published by Australian Privacy Commissioners](#)

PIA compared with Other Business Processes

A PIA differs from other privacy-related business processes, in the following ways:

Activities Conducted Prior to a PIA

- **Privacy Strategy Formulation.** This process considers privacy from a corporate perspective; whereas a PIA considers it from the perspectives of all stakeholders, and focusses on a particular initiative, scheme, program or project. In this Policy Statement, the term 'project' is used to encompass all such categories of activity
- **Privacy Issues Analysis.** This process is a preliminary, internal assessment of the potential issues that may arise from a project, and is generally undertaken at a very early stage in the project life-cycle; whereas a PIA is performed at greater depth, and through the project life-cycle, and involves engagement with stakeholders
- **PIA Screening Study, or 'Threshold Assessment'.** This process is an initial, 'broad-brush' survey, which is undertaken early in the project life-cycle in order to determine whether a PIA needs to be performed, and if so what scope the PIA should have; whereas a PIA is an in-depth assessment of privacy impacts

Activities with Narrower Scope than a PIA

- **Data Privacy Impact Assessment.** This process is a study of the impacts of a project on only the privacy of personal data; whereas a PIA considers all dimensions of privacy
- **Internal Cost/Benefit Analysis.** This process is an assessment of the costs and benefits of a project from the viewpoint of the organisation alone, and is often limited to financial costs and benefits; whereas a PIA adopts a multi-perspective approach, taking into account the interests of all stakeholders, and considers costs and benefits of all kinds, not just those that have measurable financial impact
- **Internal Risk Assessment.** This process is an assessment of the risks arising in relation to a project from the viewpoint of the organisation alone; whereas a PIA adopts a multi-perspective approach, taking into account the interests of all stakeholders
- **Privacy Impact Statement.** This process is a declaration by the organisation; whereas a PIA is a process
- **Legal Compliance Assessment.** This process is an assessment of the extent to which the project complies with relevant laws; whereas a PIA assesses a project against the needs, expectations and concerns of all stakeholders

Activities Conducted Subsequent to a PIA

- **Privacy Policy Statement (PPS).** This is a declaration of the organisation's undertakings in relation to privacy; whereas a PIA is a process used to establish what undertakings need to be given
- **Privacy Management Planning and Control.** This is a systematic process of ensuring that a Privacy Management Plan is articulated and implemented, and its performance monitored, in order to give effect to the privacy-relevant decisions made during the project; whereas a PIA is the process that identifies the problems, and identifies solutions to them
- **Privacy Audit.** This process is an assessment conducted after a project is implemented; whereas a PIA is conducted before and in parallel with a project, and ensures that harmful and expensive problems that an audit would later expose are avoided, and that unavoidable negative impacts on privacy are minimised and the harm mitigated

Characteristics of a PIA

In order to fulfil its purpose, a Privacy Impact Assessment process needs to have all of the following characteristics.

1. Purpose of the PIA

From the perspective of people whose privacy may be negatively affected by a project, the PIA's purpose is to ensure that the project's impacts and implications are understood prior to implementation, and that unnecessary negative impacts are avoided or that mitigating measures are in place.

From the perspective of the sponsoring organisation(s), the PIA's purpose is to enable the organisation and its partners to appreciate privacy concerns, to avoid or mitigate negative privacy impacts and implications, and to do so at a sufficiently early stage in the project life-cycle that costly re-work and feature retro-fit are avoided.

2. Responsibility for the PIA

The responsibility for the conduct of a PIA rests with organisations that sponsor, propose or perform projects that have the potential to negatively impact privacy.

In many cases, external expertise will be acquired under contract, because few organisations would find it appropriate to invest in full-time employees who already had, and could sustain, up-to-date knowledge in such a specialised area. In addition, an appropriate consultant can provide access to external perspectives that may otherwise be difficult for the organisation to appreciate. However, merely delegating the conduct of the PIA to an external contractor does not satisfy the requirements. Similarly, an assessment undertaken by a regulatory or oversight agency is not a PIA, but rather a form of accountability and external control.

Within the sponsoring agency, governance arrangements are necessary, to ensure that:

- responsibility for the PIA rests with an appropriate senior executive
- relevant staff are involved, and commit sufficient time to the process
- the organisation has intellectual ownership of the process and the information arising from it
- the information arising from the process is assimilated and internalised rather than walking out the door when consultants leave
- the conclusions reached are articulated forward into the design rather than lying dormant in the PIA Report

3. Timing of the PIA

The PIA must be commenced sufficiently early that information arising from it is fed forward into the design process. If that is not the case, then there is a considerable risk that the design will have undue negative privacy impacts, and that re-work and feature retro-fitting will be necessary. This creates project risk, and gives rise to delays and to much higher costs than is the case where an in-depth understanding of privacy concerns is factored into the design process from the outset.

Where a project is large or long, the PIA process needs to be multi-phased, commencing at project initiation or at least during the requirements analysis phase, and running in parallel and inter-leaved with design, implementation and deployment.

4. Scope of the PIA

A PIA process has to have sufficient scope. Three aspects are particularly crucial to a successful undertaking.

• The Dimensions of Privacy

A PIA process must not be limited to data/information privacy, i.e. the protection of personal data. Other categories of importance are:

- privacy of the physical person
- privacy of personal behaviour
- privacy of personal communications.

• Stakeholders

The perspectives of all stakeholders must be reflected, not merely those of the sponsor(s) and its/their strategic partners. In particular, the scope of the stakeholder notion must include:

- the categories or segments of individuals whose privacy is or may be affected by the project
- representative associations and advocacy organisations for the interests of the categories or segments of individuals whose privacy is or may be affected by the project

Stakeholder Analysis needs to be undertaken in order to identify the categories of entities that are or may be affected by the

project, and whose actions may affect the success of the project

• Reference-Points

A PIA process must of course take into account laws relevant to privacy. This may include one or more privacy or data protection statutes, but it also includes many other pieces of legislation that provide incidental protections or that establish privacy-relevant regulatory requirements, and, in common law jurisdictions, torts (such as confidentiality) and case law. In the case of government agencies and government business enterprises, their own enabling and/or governing legislation generally also contains privacy-relevant requirements.

However, the reference-points used in identifying negative privacy impacts need to be much broader than just the applicable laws. There are many public needs, expectations and concerns that are felt by individuals, categories of individuals and communities that may not be (or may not yet be) reflected in law. A PIA process that overlooks these aspects will result in a design that earns opprobrium from advocacy organisations and the affected public. Hence, despite being legally compliant, schemes will encounter resistance, and be the subject of complaints and negative media coverage.

5. Stakeholder Engagement

The PIA process must include meaningful engagement by the sponsoring organisation with all stakeholders. For meaningful engagement to be achieved, all of the following are necessary:

- early contact with all stakeholders and notification of the nature of the project
- information provision, to enable stakeholders to consider the proposal and formulate their views
- consultative processes, such that stakeholders can seek clarifications, and communicate their views
- sufficiently early conduct of consultation that the outcomes can be fed forward to and reflected in the design, rather than the PIA Report arriving after the key design decisions have been made and changes have become costly
- interactions among stakeholders, in order to overcome barriers to communication, avoid misunderstandings, develop shared appreciation of the aims and constraints, and enable participants to work together towards constructive outcomes
- communication to participants of a summary of the process and outcomes
- exposure to participants of the draft PIA Report
- publication of the final PIA Report, to ensure that the public is informed, and as a means of supporting accountability

Some organisations may be concerned about the exposure of information of commercial or competitive value or security-sensitivity, and others about the disclosure of information that is subject to constraints, e.g. because no Cabinet decision has yet been made. It is necessary to reconcile the need for meaningful engagement with the affected public against such security and confidentiality limitations.

6. Orientation

The PIA process needs to have appropriate orientation.

• Process vs. Product

The PIA needs to be clearly and consistently depicted as being primarily about process. If, on the other hand, a PIA is projected or perceived as being merely a formal procedure that produces a PIA Report, then the project will fail to achieve the insights, understanding, behavioural change and business process features that an effective PIA process leads to.

• Solutions vs. Problems

PIA is a form of risk management. This means that it goes beyond 'problems', 'issues' and 'concerns', and extends to a search for 'solutions'. More specifically, it involves active search for means of avoiding negative privacy impacts wherever that can be achieved, and for means of mitigating the negative impacts where avoidance is not feasible.

7. The PIA Process

A preliminary privacy issues analysis process enables projects to be screened, and threshold tests applied, in order to determine whether a PIA is necessary, and, if so, what the scope of the assessment should be.

The PIA process as a whole needs a degree of structure, such as a preliminary phase, followed by preparatory, performance, documentation and review phases.

Considerable benefits can be gained from integration of the PIA process into relevant corporate processes, such as project funding, project approval, risk management, project management and internal review mechanisms.

PIA guidance documents offer considerable value in planning and performing the process; but they need to be applied intelligently rather than being thought of as a recipe, and checklists need to be recognised as not necessarily being sufficiently comprehensive to support the assessment of any particular project.

8. Outcomes from the PIA Process

The documents that are produced by the PIA process importantly include the following:

- a PIA Report. This documents the process and its results
- a Privacy Management and Control Plan. This documents the problems, and how they are to be addressed, including the specific design features that achieve avoidance or mitigation of each specific negative privacy impact

The outcomes derive from the implementation of the Privacy Management and Control Plan. They importantly include the following:

- insights, understanding and behavioural change
- design features
- minimal negative privacy impacts on individuals
- achievement of the sponsoring organisation's aims in an effective and efficient manner, without attracting negative media coverage, and with the support of (or at least without unreasonable opposition by) the relevant public, and representatives and advocates for their interests

Guidance Documents Published by Australian Privacy Commissioners

The Australian Privacy Commissioner

The Commonwealth Commissioner published a PIA Guide 2006. There has been one subsequent revision ([OAPC 2010](#)).

In general, much of that document provides valuable guidance; but unfortunately it suffers from several critical deficiencies, which the Privacy Commissioner has declined to address. These are:

- consultation is entirely omitted from the description of the PIA process
- there is no mention of the role of representatives and avocates for affected population segments
- the orientation is strongly towards impacts and issues, with far less attention paid to solutions
- although mention is made of the need to avoid harm to privacy, no mention at all is made of mitigating measures

The Victorian Privacy Commissioner

Since the revisions made to its original 2004 document, the guidance document published by the Victorian Privacy Commissioner ([OVPC 2009a](#)) is one of the best such documents published anywhere in the world.

Its one disadvantage is that it structures and describes the PIA process in terms of the preparation of the PIA Report - which risks readers thinking of a PIA as a mere product rather than primarily a process. On the other hand, the Template ([OVPC 2009b](#)) and the Accompanying Guide ([OVPC 2009c](#)) draw the assessor well beyond mere legal compliance, place considerable emphasis on consultation and solution-orientation, and provide instruction without permitting the assessor to abandon intellectual engagement with the work.

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