



SPATIAL PRIVACY IMPACT ASSESSMENT FRAMEWORK

What is a Privacy Impact Assessment?

A Privacy Impact Assessment (PIA) is a risk mitigation tool to identify, manage, minimize and eradicate privacy impacts of new technologies, information systems, policies, programs and processes on privacy of data subjects.

The Federal Privacy Commissioner ¹ and the Victorian Privacy Commissioner have issued guidelines on how to conduct privacy impact assessments. These statutory offices strongly encourage technology developers and implementers to conduct PIAs for large scale high privacy risk projects² and it is expected that PIAs will become a mainstream practice soon.

Key benefits include:-

- ❖ Reduced costs in retrofitting solutions, litigation, uninvited media attention;
- ❖ Instils general public confidence that privacy impacts were considered; and
- ❖ Consider privacy issues early and 'build in' privacy, rather than 'bolt on'.

What is a Spatial Privacy Impact Assessment?

Traditionally, privacy impact assessments of IT projects focus on informational privacy. However, the very nature of spatial data means that bodily and territorial privacy aspects may need to be considered too, thus creating a need for impact assessment of projects that revolve around personal spatial information.

Why do a Spatial Privacy Impact Assessment?

Spatial information collected during different phases of a project may include

- ❖ Spatial Information: Geographically referenced data with no personal information.
- ❖ Personal Spatial Information: Geographic component along with personal information, such as cadastral data.
- ❖ Personally-sensitive Spatial Information: Geographic component revealing sensitive personal information such as ethnicity, sexual orientation, etc.

The ability to make selective inferences with spatial technologies is equivalent to creation of new information. Some of this newly generated information may reveal sensitive private information such as political affiliation, religious beliefs, professional or trade memberships in direct violation of privacy principles (NPP 10) which requires explicit consent of the data subject when collecting sensitive information.

Spatial technologies are quite different from traditional information systems, in the sense that they permit location of a data subject to be used as a personal identifier and enables the synthesis and analysis of information not possible with other systems, where isolated pieces of information in a spatial repository when drawn together, give a very detailed picture of a specific location and the people associated with that location. Information as

¹ <http://www.privacy.gov.au/publications/pia06/index.html>

² <http://www.privacy.gov.au/act/review/review2005.htm>

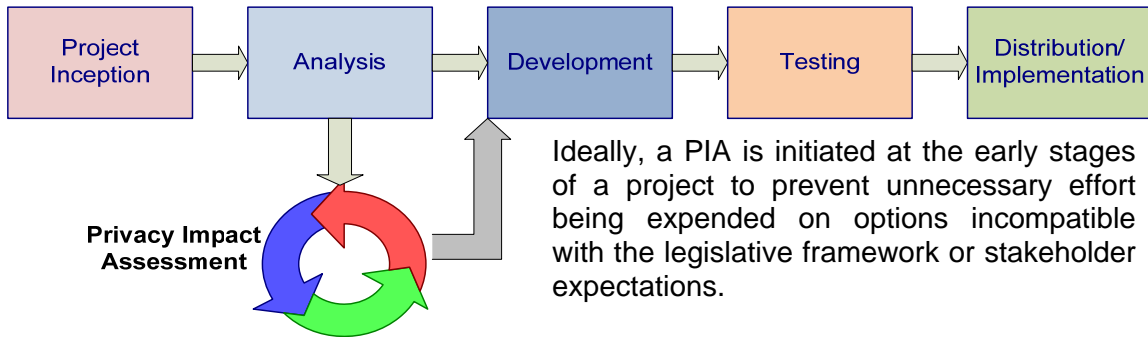


benign as a postcode when associated with an identifiable individual's information may reveal demographics and location.

These issues, quite unique to spatial technologies, warrant a careful approach in handling of personal information where the possibility of collection of irrelevant information, its use for unrelated purposes, data inaccuracies, and the generation and use of information without consent may create legal and ethical dilemmas. Thus any spatial project that deals with personal information should consider all privacy impacts.

When to do an impact assessment?

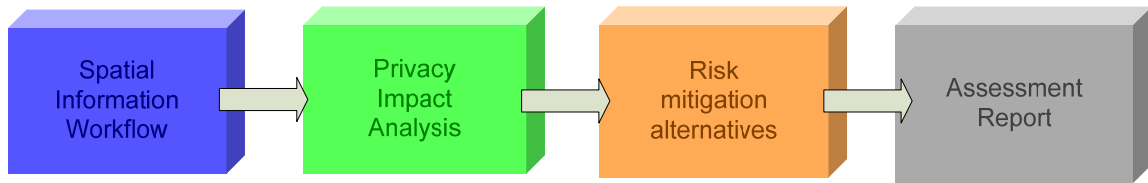
If a proposed project significantly involves spatially driven personal information, then serious consideration should be given to conducting a PIA



Ideally, a PIA is initiated at the early stages of a project to prevent unnecessary effort being expended on options incompatible with the legislative framework or stakeholder expectations.

OMNILINK's Approach

OMNILINK's PIA Framework synthesizes the spatial informational inputs and critically analyses them, formulates alternative privacy-sensitive approaches and identifies the strengths and weaknesses in the information management life-cycle.



OMNILINK's PIA builds on the OFPC PIA Guide customising it to the complex environment of spatial information management. The output of PIA details information about how spatial information is being received, utilized, managed and passed on. It also makes recommendations on strategies that decrease the likelihood of privacy risks.

Why OMNILINK?

OMNILINK possesses the domain knowledge of the spatial industry and can also advise on the appropriate and effective privacy protective measures (technological, legislative and policy) that could be implemented. Being the only consultancy operating in spatial privacy, we believe that this combination of skills would help us serve you better.

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