

Privacy Impact Assessment
For
Check in CBR App

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Executive summary/introduction

This Privacy Impact Assessment is to assess the privacy impacts of using the Check in CBR App (CCA) on the Australian National University (ANU) Acton Campus.

To meet contact tracing requirements, it is proposed that optional use of the CCA be implemented on the Acton campus. Staff, students and visitors accessing campus buildings will be invited to 'check in' using the CCA. 'Check-in' will be optional, but encouraged to help make the ANU 'COVID safe'. Some buildings may have alternative contact tracing procedures in place, relevant to the local area. Use of the CCA will improve contact tracing capabilities on campus, for prompt and accurate contact tracing.

As the data will be collected, stored and used by ACT Health, the ANU has no control over the handling of personal information by the CCA, and University staff will not have access to data provided via the CCA.

Project description

To improve contact tracing capabilities on the ANU Acton Campus, the COVID Response Office proposes to introduce the use of the CCA for individuals (staff, students and visitors) accessing buildings.

Use of the CCA will be optional, and no compliance monitoring will be in place to confirm if individuals have 'checked-in'. The implementation of the CCA will not replace any local contact tracing processes, but is intended to complement them. Any local system that collects personal data at the university must have a PIA.

The information collected will not be accessible to ANU, or stored in any ANU systems. Data collected is stored by ACT Health for 28 days, and used, as required, for undertaking contact tracing for COVID-19, and other purposes authorised by law.

What is the CCA:

The Check In CBR app is a contactless, secure and convenient way for customers to sign into a Canberra venue.

The app helps protect the community by assisting with faster contact tracing. The app enables individuals to check-in to venues and have this data stored securely with ACT Health in the event contact tracing is needed due to a confirmed case of COVID-19 in the community.

Use of the app will help the ACT Health contact tracing team quickly identify and assist anyone who may have been exposed to COVID-19.

During the COVID-19 public health emergency non-essential businesses and undertakings are required by law to ask for the first name and phone number of people who attend their venue. Use of this app enables businesses to comply with these laws.

The personal information collected by the CCA is not available to ANU for any purpose.¹

The personal information collected will be managed in accordance with the [ACT Health Privacy Policy](#).

¹ <https://www.covid19.act.gov.au/business-and-work/check-in-cbr>

Threshold assessment

As personal information is collected stored and disclosed, a PIA is required, even though the information is not handled by the ANU.

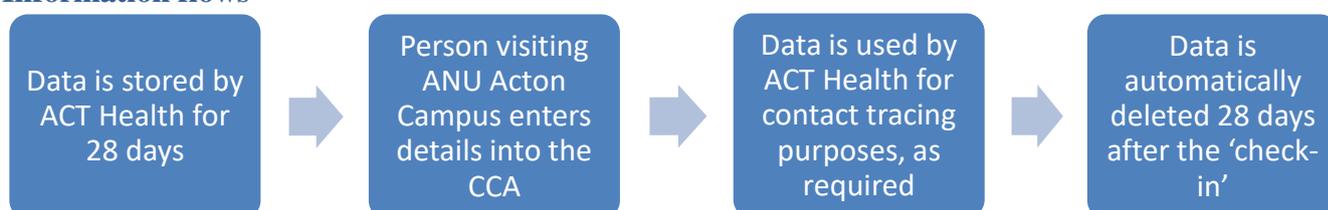
Consultation with stakeholders

The Privacy Impact Assessment has been prepared consistent with the ANU Guideline: Privacy Impact Assessment with consultation with the following:

- ANU Privacy Officer
- Public Health Lead – COVID Response Office
- ACT Health Department
- Office of the ANU Chief Information Security Officer

The Privacy Impact Assessment will be reviewed by the COVID Response Office if there is a change in the use of the CCA on campus, a new system is implemented or if there is a significant upgrade to the CCA.

Information flows



5.1 Data collection

The CCA collects the following personal information:

1. First name;
2. Last name;
3. The first name and last name of any other attendees the user checks-in using the CCA;
4. Phone number;
5. Email address.

5.2 Data storage

No data collected in the CCA is stored by ANU.

ACT Health provided the following information regarding storage of data collected in the CCA:

Information collected in the app goes directly to ACT Health and is stored for 28 days to assist with contact tracing (if required).²

5.3 Data security

The CCA is not managed by ANU, therefore the University has no control over the security of the CCA or any other systems used to handle the information collected.

ACT Health provided the following information regarding the cyber security of the CCA:

The back-end is hosted in Microsoft Azure and has undergone security testing before being made available to the public. The app itself is only available via trusted sources: the Google Play Store and Apple App Store.³

² <https://www.covid19.act.gov.au/business-and-work/check-in-cbr>

³ <https://www.covid19.act.gov.au/business-and-work/check-in-cbr>

The Office of the CISO has advised that the Check-in CBR App is their recommended solution for contact tracing requirements.

5.4 Data accuracy and access

Individuals provide their personal information for each ‘check-in’. ACT Health advised that no record of the devices associated with a check-in are kept, and as a result, details of a previous ‘check-in’ will not update when the user changes their contact details. The ACT Health contact tracing team have other ways to contact individuals who have a change of contact details since their last ‘check-in’.

Individuals wishing to review their personal information held by ACT Health will need to contact ACT Health directly. Individuals must make a formal request in writing to ACT Health and send it to GPO Box 825, Canberra ACT 2601.

5.5 Data retention

ACT Health advised that personal information is deleted automatically 28 after the user has ‘checked-in’ on the CCA. The deletion process runs daily.

Privacy management

Privacy Impact	Necessity/ Impact Rating/ Impact Response	Impact Treatment Plan
Collection: Personal information will be collected without a clear purpose, which could increase the risk of unauthorised uses and disclosures.	Unlikely/ High/ Mitigate	Data collected by CCA is only for the purposes of contract tracing confirmed cases of COVID-19, or other uses authorised by law. The personal information collected will be managed in accordance with the ACT Health Privacy Policy . Information on the purpose of collection to be included in signage on campus.
Collection, use or disclosure: Consent for collection, use or disclosure of information may not be valid.	Unlikely/ High/ Mitigate	Individuals will need to download the CCA, register and ‘check-in’ each time providing consent. Use of the CCA on campus will be optional. Information on the purpose of collection to be included in signage on campus.
Use or disclosure: Individuals may be surprised or upset by a secondary use or disclosure, resulting in privacy complaints and/or negative publicity.	Possible/ High/ Mitigate	Individuals may assume data is being collected by ANU, not ACT Health Information that the data is being collected by ACT Health, not ANU, to be included in signage on campus. ANU will not have access to the CCA data.
Information security: The organisation or agency does not have basic information security standards in place.	Possible/ High/ Mitigate	ANU has no control over the design, security and access of the CCA, or subsequent information flows/integrations. Suitability of the use of a product of this nature to be reviewed by Office of the CISO.

		Information that ANU cannot guarantee the security of the CCA to be included in signage on campus.
Access and correction: Individuals are not able to easily access and correct their personal information.	Unlikely/ High/ Mitigate	Individuals can view and update their information in the CCA at any time. Information on how to request access to data held by ACT Health to be included in signage on campus.

Conclusion/recommendations

It is important to note that ANU has no control over the handling of personal information collected by the CCA. Implementation of the CCA on campus must ensure individuals do not presume the CCA is managed or controlled by ANU.

This Privacy Impact Assessment will be reviewed if changes are made to the use of CCA by the ANU, if the CCA undergoes any changes, or if ACT Health make changes to their information handling practices for the CCA data. Any changes to privacy impacts will be recorded with an impact treatment plan.

Recommendations:

1. Information promoting the use of CCA on campus must clearly state the data is collected by ACT Health and the additional information handling guidance identified in section 6.
2. ANU COVID webpage to be updated to include information about the CCA, and must clearly state the data is collected by ACT Health and the additional information handling guidance identified in section 6.
3. This Privacy Impact Assessment for the CCA will be made available on the ANU COVID website.
4. The use of the CCA on campus to be reviewed and approved by the Office of the CISO.

Approved	
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