



## Privacy Threshold Assessment Request Form

Use this form to request a Privacy Threshold Assessment (PTA) for:

1. all new projects; and
2. any other activities

which involve changes to the way the agency manages (i.e. collects, uses, stores, exchanges or discloses) any customer or staff personal information.

Send your complete PTA Form, including National Manager approval to  
**Section 47E**

### Customer Safety

Customer safety is a priority of Services Australia. Before any project commences, business areas should consider the following questions:

- Will this change improve the customers' ability to interact in a manner that projects their privacy?
- Does this change protect the customer's information so that a third party (including nominees) cannot see sensitive information that could be used to cause harm?
- Does this change enable a customer to share their safety concerns before providing us with their information?
- Does this change provide options for the customer to choose how and when they interact with us safely?
- Will this change provide the customers with sufficient information and/or choice about how their data is used?
- Does this change enable the previous information provided by the customer about their safety concerns to be considered in the outcome?
- Will this change increase the likelihood of the customer being harmed or threatened?

**Part 1—Project details**

Project or activity name	Recruitment process – seeking the use of Criteria Corp and Vervoe recruitment tools
Unique Project Identifier	N/a
Who is responsible for the project (i.e. the Project Manager)?	<div style="background-color: #cccccc; padding: 20px; text-align: center;"> <h1>Section 22</h1> </div> <p><b>Branch/Team:</b> Recruitment &amp; Onboarding / National Recruitment</p> <p>Contact Number: N/a</p>
Date this form was completed	25 July 2024
Expected implementation date of the project	05/08/2024
<p>If this is an enhancement of an existing project, please advise if it already has a Privacy Threshold Assessment, Privacy Impact Assessment (PIA), or has any privacy advice been completed for this project or a related project?</p> <p>If so, please provide details and a PLEXID (if known), or a project identifier.</p>	<p><input checked="" type="checkbox"/> Yes, PTA completed</p> <p>Details: DLEX 52030, PLEX 51863</p> <p>The SOVA and Referoo recruitment tools were brought before a DataTest and PTA in Oct/Nov 2023.</p> <p>The tools noted on this PTA are very similar in nature and are also undergoing a DataTest process.</p> <p>We are confident that:</p> <ul style="list-style-type: none"> <li>- candidates' personal information is only used for the purposes of the recruitment process.</li> <li>- Information is securely secured in Amazon Web Services in Sydney, Australia.</li> <li>- Personal information collected will be destroyed following the expiration of the merit pools. (18months after advertisement)</li> </ul>

**Part 1—Project details**

	<input type="checkbox"/> Yes, PIA completed Details:
	<input type="checkbox"/> Yes, Privacy Advice completed Details:
	<input type="checkbox"/> No

**Part 2—Project description**

1. Briefly describe the project* or activity, <ul style="list-style-type: none"> <li>○ use plain English;</li> <li>○ avoid overly technical language, acronyms or jargon;</li> <li>○ include enough detail to allow external stakeholders to understand the project.</li> </ul>
<p>Description: Preparing to undertake large scale APS3, APS4 and APS5 recruitment exercises for Customer Service Delivery Group to meet the ongoing demand for Service Officers.</p> <p>Working with a recruitment provider, this large-scale recruitment exercise is expected to be advertised in the coming months and is anticipated to attract aprox 3000-5000 applications.</p> <p>Candidates will submit an application via the agency's eRecruitment system <span style="background-color: #cccccc;">Section 47G</span>.</p> <p>Similar products (SOVA and Referoo) have completed and passed PTA in Oct/Nov 2023 as noted above.</p>
2. Is this project new business or an enhancement to an existing business process?
<input type="checkbox"/> New Business <input checked="" type="checkbox"/> Enhancement - The Criteria platform has been in use by the agency for a number of large-scale recruitment activities since Dec 2020 – previously called Allcami.  <span style="background-color: #cccccc;">Section 47G</span>
3. If the project involves a change in the way existing business is being conducted, please describe the way the new or enhanced process will differ (if other project management documentation is available, please attach).

**Part 2—Project description**

Description:

Section 47G

We have not been able to locate a previous PTA in the PTA register for the use of these platform; therefore it is assumed the platforms have not been tested/assessed prior to its original use.

**Part 2a-Customer Safety**

4. Will this change improve the customer's ability to interact in a manner that protects their privacy?

No

5. Does this change protect the customer's information so that a third party (including nominees) cannot see sensitive information that could be used to cause harm?

Yes

6. Does this change enable a customer to share their safety concerns before providing us with their information?

Yes

7. Does this change provide options for the customer to choose how and when they interact with us safely?

To comply with merit principles, all candidates must use the same assessment tools to complete activities, candidates cannot select a different tool. Candidates have options under RecruitAbility and reasonable adjustment whereby an adjustment to the use of a tool may be considered on an individual case by case basis.

Section 47G

8. Does this change enable the previous information provided by the customers about their safety concerns to be considered in the outcome?

N/a

9. Will this change provide the customer with sufficient information and/or choice about how their data will be used?

Yes. Candidates are supplied the privacy declaration by the platform provider, and when they create a candidate profile in the e-recruitment system.

10. Will this change increase the likelihood of the customer being harmed or threatened?

No

### Part 3 -Threshold self-assessment

If you answer Yes to a question, you'll need to include the relevant score for each question. Write your score in the column next to the question. If you answer No to a question, your score is zero.

11. Will any personal information* (of either customers, agency employees or other people) be collected, stored, used or disclosed in the project?	<b>SCORES</b> <i>Place scores in highlighted cells</i>
<input checked="" type="checkbox"/> Yes – please score yourself <b>5 points</b> and then go to question 12. <input type="checkbox"/> No –please submit the endorsed PTA to Privacy@servicesaustralia.gov.au	5
12. If the project or activity involves personal information, please list <ul style="list-style-type: none"> <li>the types of information that is collected, used<sup>1</sup> or disclosed<sup>2</sup> (e.g. name, address, date of birth) and</li> <li>whether there will be any data matching or comparison of two sets of personal information?</li> </ul>	
First name, last name, email address – all disclosed by the candidate for the purposes of recruitment process. No data matching will occur.	
13. Does the project involve any sensitive information <sup>3</sup> , or protected information <sup>4</sup> ? If yes score yourself <b>5 points</b> .	No
Description of types of sensitive and/or protected information collected:	N/a

<sup>1</sup> Use of personal information includes passing information from one part of the agency to another.

<sup>2</sup> Disclosure of personal information describes when information is given or released outside of the agency.

<sup>3</sup> Sensitive information is personal information which is also:

- information or an opinion about an individual's: racial or ethnic origin; political opinions; religious beliefs or affiliations; philosophical beliefs; membership of a trade union; membership of a political, professional or trade association; sexual orientation or practices; or criminal record; that is also personal information; or
- health information about an individual; or
- genetic information about an individual that is not otherwise health information; or
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- biometric templates.

<sup>4</sup> Protected information is generally information about a person collected under the relevant legislation (such as the social security law or similar) that is, or was, held in the records of the agency. Protected information can only be obtained, recorded, used, disclosed or communicated if permitted by the relevant legislation.

<p>14. If possible, please also provide the name of any relevant legislation or legislative rules that authorise the collection, use and disclosure of information for the project.</p> <p><i>Note: wherever possible, please specify the section of the relevant legislation or instrument (e.g. an Act, or Ministerial Guideline or Direction).</i></p>	N/a
Description:	N/a
<p>15. Does the project involve changes:</p> <p>a. To where and how the personal information is stored; [score 1 point each]</p> <p>b. To where the personal information is stored (e.g. in the cloud, stored or sent overseas etc.); [score 5 points, if both score 5 points for each category]</p>	5
<p>If yes, please give details below:</p> <p>The candidates first name, last name and email address is provided to the third party so they can receive a link to the assessment portal.</p> <p>Criteria corp - "Customers in Australia and the Asia-Pacific region will have their data stored in the Australia AWS location"</p> <p><a href="https://www.criteriacorp.com/files/docs/files/Criteria-LegalAndCybersecurityFAQs.pdf">https://www.criteriacorp.com/files/docs/files/Criteria-LegalAndCybersecurityFAQs.pdf</a></p>	
<h1>Section 47G</h1>	
<p>Criteria Corp and Vervoe are both ISO27001 (International Information Security Standards) certified. They both comply with GDPR, Australian Privacy Legislation and Australian Cyber Security Centre standards.</p>	
<p>16. Does the project involve new ways to:</p> <p>a. identify an individual; or [score 1 point]</p> <p>b. access personal information? [score 5 points]</p>	N/A
If yes, please give details below:	



17. Does the project involve changes to where sensitive information is stored; e.g. in the cloud, shared drive [score 5 points]	N/A
If yes, please give details below:	
18. What are the drivers for this change (e.g. Government requirement, changes in legislation, the Master Plan or enhanced processes)?	
Description: DataTest requirement that recruitment tools are subjected to the PTA.	
19. Is personal information being used/stored: <ul style="list-style-type: none"> <li>• outside of a core system</li> <li>• overseas</li> <li>• in a cloud?</li> </ul> If so, <p>a) what are the <u>existing</u> controls in place to protect personal information related to the project (e.g. is access to a software limited to key roles)?</p> <p>b) do you have Controls Plan registered under the <a href="#">Control of Customer Information Outside Core Systems</a> policy?</p> If yes score yourself <b>5 points</b> for each category	5
Note: please refer to any existing and/or current Control Plans in the description refer to them.	
Description: Criteria corp - "Customers in Australia and the Asia-Pacific region will have their data stored in the Australia AWS location" <a href="https://www.criteriacorp.com/files/docs/files/Criteria-LegalAndCybersecurityFAQs.pdf">https://www.criteriacorp.com/files/docs/files/Criteria-LegalAndCybersecurityFAQs.pdf</a>	
<h1>Section 47G</h1>	
Criteria Corp and Vervoe are both ISO27001 (International Information Security Standards) certified. They both comply with GDPR, Australian Privacy Legislation and Australian Cyber Security Centre standards.	
20.If the project involves an exchange of customer information, has it been recorded on the agency's Customer Information Exchange Register? Note: the Register can be accessed <a href="#">here</a> .	
<input type="checkbox"/> Yes – please go to question 21	N/A

<input type="checkbox"/> No – please include a reason below that it has not been included in the Register <input type="checkbox"/> Unsure  Reason:	
21. If 'yes' to the above, have you developed a process within your team to ensure the information recorded for the project is updated regularly in the Customer Information Exchange Register? Note: the Register can be accessed <a href="#">here</a> .	
<input type="checkbox"/> Yes <input type="checkbox"/> No – please ensure that your project team makes updates in the Register.	
<p><b>Add all your scores together</b></p> <ul style="list-style-type: none"> <li>• <i>Total below 5 points - No privacy impact assessment or Privacy assurance advice required</i></li> <li>• <i>Total between 5 and 11 points – Probably no privacy impact assessment required, but privacy assurance advice may assist you to comply with privacy requirements</i></li> <li>• <i>Total over 11 points – the project may require a privacy impact assessment, please provide your completed signed PTA form to <a href="mailto:privacy@servicesaustralia.gov.au">privacy@servicesaustralia.gov.au</a></i></li> </ul>	TOTAL=15



## Part 4 Approvals

I confirm that this Privacy Threshold Assessment (PTA) is accurate and complete. The PTA correctly identifies personal and sensitive information handled in this project or initiative.

It is the Agency's intention to publish PTAs on its intranet site.

Do you have any concerns (e.g. Commercial in confidence or Cabinet in confidence) relating to this PTA being published? NO

If YES, please explain: N/A

**Name of Project Manager (Criteria corp):** Section 22

**Signature of Project Manager (Criteria corp):** Section 22

**Date:** 25 / 07 /2024

**Name of Project Manager** Section 22

**Signature of Project Manager** Section 22

**Date:** 25 / 07 / 2024

**Name of National Manager:**

**Ben Bolt**

**Signature of National Manager:**

**Refer to email from Ben Bolt dated 31 july 2024.**

**Date:** 31/ 07/2024

**If you have any feedback or further comments, please add them in the box below.**

Feedback and comments:

- **Criteria recruitment tool** has been used in previous recruitment processes to collect candidate responses. It is a digitally friendly tool that is easy for candidates to navigate. It only collects candidates name and email address. Questions hosted in the tool are designed by Services Australia staff bespoke to Services Australia requirements based on the recruitment process.

# Section 47G

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## Background and process

### Privacy Threshold Assessment

The purpose of this Privacy Threshold Assessment (PTA) Request Form is to assist in evaluating if your project requires a Privacy Assurance Advice (PAA) or Privacy Impact Assessment (PIA). To ensure the agency complies with its privacy and secrecy obligations, please involve us as soon as possible in the life cycle of the project.

After you complete the PTA Request Form and the self-assessment, please have your National Manager sign the form and then email to form to Privacy at [privacy@servicesaustralia.gov.au](mailto:privacy@servicesaustralia.gov.au).

### Background

When the agency is developing a project, (including a programme, system, application or initiative that involves the management of personal information), the project – and its components – must comply with secrecy provisions in relevant Centrelink, Child Support or Medicare legislation, as well as the requirements of the *Privacy Act 1988* (the *Privacy Act*).

Therefore, any project that involves the collection, storage, access to, use or disclosure of personal or protected information requires a PTA to be completed.

### Process—Phase 1 of 3

A PTA is phase 1 of a 3-phase privacy assessment process.

Completing phase 1 will assist the Privacy Team to identify if phase 2 – a PIA or PAA – is required.

If phase 2 is required, the PIA or PAA may need to be conducted by an external provider. Please ensure that funding will be available for a PIA, if required.

Phase 3 involves ensuring the recommendations in the PIA or PAA are implemented.

### Publications

The agency is required to keep a Register of PIAs undertaken, and may publish the PIA Register on the department's website, including its response to the recommendations set out in the PIA report. The published register will contain a link to a version of each PIA.

### Operational Privacy Policy

For more information on how your business area should handle privacy, please refer to the agency's [Operational Privacy Policy](#).