

nsw.gov.au Privacy Threshold Assessment Guide



Guidance Note:

- The Privacy Threshold Assessment (PTA) is a tool designed for evaluating the collection of personal information through webforms or publication of personal information on webpages hosted on nsw.gov.au.
- It is not suitable for examining privacy practices of webforms/webpages located on sites linked to nsw.gov.au.
- It may be however used to evaluate applications or features intended to be used on nsw.gov.au on a case-by-case basis.

Please note, the PTA questions are incorporated in the Help Hub PIA request form and have been included here for your **reference only**. To complete the PTA questionnaire for your webform(s)/webpage submit a PIA request via Help Hub [link](#).

1. Purpose of the PTA

The purpose of the PTA is to help identify any potential privacy risks that may arise from collecting or publishing personal, sensitive, and/or health information on nsw.gov.au. It also helps to decide what type of a Privacy Impact Assessment (PIA) is needed. Although not every webform/webpage will require a full PIA, a PTA should be conducted for each one. More information can be found in the [PTA outcomes and privacy risk assessment](#) section.

2. Multiple webforms/webpages

If you have multiple webforms that collect similar personal information/webpages that disclose personal information, you may be able to complete a single PTA questionnaire for all of them. Please contact the nsw.gov.au privacy team on Help Hub ([link](#)) to verify if this option is available.

3. Key definitions

- **Personal information:** information or an opinion about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion provided. The PTA questionnaire provides examples of personal information.
- **Sensitive personal information** is not defined in the *Privacy and Personal Information Protection Act 1998* (NSW) (PPIP Act). However, examples of sensitive personal information are provided in section 19(1) of the PPIP Act. In addition, an exhaustive list of sensitive information is included in section 6 of the *Privacy Act 1988* (Cth). The list of sensitive personal information included in the PTA questionnaire combines information from both Acts.
- **Health information:** includes personal information that is about the physical, mental health or disability of an individual, or a health service provided to an individual.

4. Further assistance

If you need help filling out the PTA questionnaire in the Help Hub or have any questions about the PTA process, please contact the nsw.gov.au privacy team via Help Hub ([link](#)).

5. PTA outcomes and privacy risk assessment

The nsw.gov.au privacy team will review the responses to the PTA questions. Based on this evaluation, the outcomes can be as follows:

Privacy risk*	Outcomes
Low, Medium	PIA Lite required
High, Extreme	A full PIA required

*The privacy risk rating is based on the NSW Department of Customer Service (DCS) Risk Matrix.

The privacy risk depends, among other factors, on the type and volume of personal information (PI) collected or published and it has been assessed against the DCS Risk Criteria as follows:

Type and volume of personal information (PI) collected or published	Privacy risk
<ul style="list-style-type: none"> Webform does not collect/ webpage does not publish PI or additional PI (for existing, modified webforms/webpages) where compared with the existing and current PIA. Webform: <ul style="list-style-type: none"> collects limited PI (basic contact details: name, email address, phone number) for the purpose directly related to the agency's function or activities and the collection is necessary and relevant for that purpose <p>AND/OR</p> <ul style="list-style-type: none"> uses free-text fields (enquiries, complaints etc.) <p>AND</p> <ul style="list-style-type: none"> the PI is collected on a small scale (up to 100 individuals on average complete a webform per month) 	Low
<ul style="list-style-type: none"> Webpage publishes PI Webform: <ul style="list-style-type: none"> collects various types of PI (address, DOB, bank details etc.) <p>AND/OR</p> <ul style="list-style-type: none"> allows/requires attaching files that may contain PI (excluding sensitive or health information) <p>AND/OR</p> <ul style="list-style-type: none"> involves the collection of PI about an individual other than the person completing the webform <p>AND/OR</p> <ul style="list-style-type: none"> PI is collected on a medium scale (more than 100 but less than 1000 individuals on average complete a webform per month). 	Medium
<ul style="list-style-type: none"> Webpage publishes sensitive personal information/health information or information about vulnerable individuals. Webform: <ul style="list-style-type: none"> collects various types of PI, including sensitive and/or health information, and/or government identifiers <p>AND/OR</p> <ul style="list-style-type: none"> allows/requires attaching files that may contain sensitive and/or health information <p>AND/OR</p> <ul style="list-style-type: none"> involves the collection of sensitive and/or health information about an individual other than the person completing the webform <p>AND/OR</p> <ul style="list-style-type: none"> personal, sensitive and/or health information is collected from vulnerable individuals <p>AND/OR</p> <ul style="list-style-type: none"> collected PI may have a significant impact on an individual <p>AND/OR</p>	High, Extreme

<ul style="list-style-type: none"> the collection may impact the community's reasonable expectations of privacy AND/OR PI is collected on a large scale (more than 1000 individuals on average complete a webform per month). 	
<ul style="list-style-type: none"> Webform collects/webpage discloses PI, but an exemption applies under the <i>Privacy and Personal Information Protection Act 1998</i> (NSW), Division 3, including, but not limited to: s27A Exemptions relating to information exchanges between public sector agencies; or s27B Exemptions relating to research. 	Assessed on a case-by-case basis

• PTA questions

Please note, these questions are for your **reference only**. To complete the PTA questionnaire for your webform/webpage submit a PIA request via Help Hub [link](#).

Question:
<p>1. What the webform or the webpage will be used for (<i>select one only</i>):</p> <ul style="list-style-type: none"> Subscription to a newsletter Processing an order Submitting an enquiry Submitting complaint/feedback Registration for an event Requesting information under the GIPA Act Providing services to an individual Making a decision about an individual Taking an action about an individual Automated decision-making (where a decision is made using technology, e.g., a computer program) Conducting survey Conducting research or statistics in the public interest Providing information to another public sector agency (Webpage only) Publishing personal information Other, please specify:
<p>2. Will the webform collect or the webpage publish personal information (PI)? (<i>The most common examples of PI are listed in the question below</i>)</p> <ul style="list-style-type: none"> Yes No
<p>3. If 'Yes', please select the type(s) of PI intended to be collected or published:</p> <ul style="list-style-type: none"> Name (may incl. first name, middle name(s), other name(s), family name/surname) Email address Phone number (incl. landline and/or mobile) Address (may incl. street address, suburb, state, postcode) Date of birth Place of birth Gender Marital status Family information (may incl. relationship to individual, such as siblings, parents, children status etc.) Bank account details Credit card details Financial information (may incl. estates, assets, liabilities, income, expenses, debts etc.) Education level completed Educational history Occupational status Occupation details Occupational history Photo of an individual

Question:
<ul style="list-style-type: none"> • Signature • Language • Dietary requirements • Other information or opinion about an individual (please specify):...
<p>4. Will the webform collect details of government identifiers? <i>(The most common examples of government identifiers are listed in the question below)</i></p> <ul style="list-style-type: none"> • Yes • No
<p>5. If 'Yes', please select the type(s) of government identifier(s).</p> <ul style="list-style-type: none"> • Driver licence number • Passport number • Tax File Number (TFN) • Australian Business Number (ABN) in relation to a sole trader • Medicare number • Centrelink Reference number • Other (please specify):...
<p>6. If the webform will collect TFN, please provide the name of legislation authorising the collection. Please see the <i>Privacy (Tax File Number) Rule 2015</i> for details.</p>
<p>7. Will the webform collect or the webpage publish health information (including about physical or mental health or a disability of an individual)?</p> <ul style="list-style-type: none"> • Yes • No
<p>8. Will the webform collect or the webpage publish sensitive PI? <i>(A list of sensitive PI is included in the question below)</i></p>
<p>9. If 'Yes', please select the type(s) of sensitive PI intended to be collected and/or published.</p> <ul style="list-style-type: none"> • Racial or ethnic origin (incl. Aboriginal and Torres Strait Islander origin) • Political opinions or membership of a political association • Religious beliefs or affiliations • Philosophical beliefs • Trade union membership • Membership of a professional or trade association • Sexual orientation, practices, or activities • Criminal records • Genetic information about an individual that is not otherwise health information • Biometric information that is to be used for the purpose of automated biometric verification or biometric identification • Biometric templates
<p>10. Estimate the number of individuals who may complete the webform on average per month based on historical data collection, if available:</p> <ul style="list-style-type: none"> • up to 100 • more than 100 but less than 1000 • more than 1000
<p>11. Will the webform use a free-text field(s)?</p> <ul style="list-style-type: none"> • Yes • No
<p>12. Will the webform allow/require attachment of files that may contain personal, health, or sensitive information?</p> <ul style="list-style-type: none"> • Yes • No
<p>13. If 'Yes', please select the type of information that will/may be included in the attachment <i>(select all that apply)</i>:</p> <ul style="list-style-type: none"> • personal

Question:
<ul style="list-style-type: none"> • health • sensitive
<p>14. Will the webform specifically collect/webpage publish personal, health, or sensitive information of individuals considered vulnerable? (<i>Most common examples of vulnerable individuals are listed in the question below</i>)</p> <ul style="list-style-type: none"> • Yes • No
<p>15. If 'Yes', please identify the groups of vulnerable individuals whose information will be collected or published:</p> <ul style="list-style-type: none"> • Children and young people • Older people • People with disability • Aboriginal and Torres Strait Islander peoples • People from culturally and linguistically diverse communities • Other vulnerable individuals (please specify):...
<p>16. Will the webform involve the collection of personal, health or sensitive information about an individual other than the person completing the webform?</p> <ul style="list-style-type: none"> • Yes • No
<p>17. If 'Yes', select the type of information that will be collected (select all that apply):</p> <ul style="list-style-type: none"> • personal • health • sensitive
<p>18. Specify the solution you are going to use for transferring webform submissions:</p> <p><i>Please refer to the section 'Transferring webform submissions' in the Creating a webform article for more information.</i></p>
<p>19. Provide the URL of the webform/webpage or attach the draft of the webform/webpage if available: ...</p>
<p>20. Go live date: ...</p>
<p><i>The following four questions pertain to the information needed to recommend an appropriate Privacy Collection Notice (PCN). Article</i></p>
<p>21. Is the collection of information from an individual required by law or voluntary? (select one only):</p> <ul style="list-style-type: none"> • required by law • voluntary
<p>22. If the collection is required by law, please provide the name of the legislation, the relevant section, and the consequences for the individual if they fail to provide the information:...</p>
<p>23. Will your agency be sharing the collected information with another government agency or a third party?</p> <ul style="list-style-type: none"> • Yes • No
<p>24. If 'Yes', please provide details: ...</p>