



This checklist has been developed from the 'good practice principles for management of personal information' defined in the Ombudsman Western Australia *Guidelines - Management of Personal Information*. This checklist will assist agencies to conduct a check of their processes for managing personal information.

### COLLECTION Only collect personal information necessary for service delivery

Type of info	<p>Does your agency from time to time check the type of personal information it collects to ensure it is:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> being collected for a lawful purpose?</li> <li><input type="checkbox"/> being used for a purpose that is directly related to the agency's functions or activities?</li> <li><input type="checkbox"/> necessary to perform these functions or activities?</li> </ul>
Process of collection	<p>Does your agency from time to time review the way in which you collect personal information to ensure that your collection process is:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> lawful and fair?</li> <li><input type="checkbox"/> staff are operating within the good practice principles?</li> <li><input type="checkbox"/> not collecting information in an unreasonably intrusive way?</li> </ul>
Communication	<p>Does your agency clearly communicate to your clients:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> that the personal information has been collected?</li> <li><input type="checkbox"/> the purpose for which the information is being collected?</li> <li><input type="checkbox"/> that the collection of the information is authorised by or required under law (if this is the case); and</li> <li><input type="checkbox"/> that your agency may disclose the information to others to deliver its functions or activities to the individual?</li> </ul>

### ACCURACY, ACCESS AND CORRECTION Personal information collected, used and disclosed is accurate and current. Agencies allow individuals reasonable access to their personal information and take reasonable steps to make requested corrections or deletions.

Accuracy	<ul style="list-style-type: none"> <li><input type="checkbox"/> Does your agency check that personal information collected and used is accurate, up to date, complete and not misleading?</li> <li><input type="checkbox"/> Does this checking process extend from collection points, through data entry to service delivery?</li> <li><input type="checkbox"/> Is this checking process proportionate to the risks posed by the use of inaccurate information to your clients and to the efficiency and effectiveness of your agency?</li> <li><input type="checkbox"/> Does your agency have a proactive process for updating information from time to time to ensure it is accurate prior to using it? Does your agency inform individuals that they have the right to access their personal information and how they can provide updates as required?</li> </ul>
Access and Correction	<ul style="list-style-type: none"> <li><input type="checkbox"/> Does your agency have a safe, legal and effective process for deleting information that is no longer needed for service delivery or any other purpose, which also complies with your Recordkeeping Plan?</li> <li><input type="checkbox"/> Do your agency's processes include a cross-check of amendments to personal information held in Information and Communication Technology (ICT) systems and in paper files to ensure consistency?</li> <li><input type="checkbox"/> Does your agency use information from complaints about inaccurate information to continuously improve the accuracy of its personal information databases?</li> </ul>

### STORAGE AND SECURITY Personal information is protected from misuse, loss and inappropriate access and disclosure

ICT Systems	<ul style="list-style-type: none"> <li><input type="checkbox"/> Does your agency have controls to protect personal information from unauthorised access by staff and other people as an integral part of the design and operation of your ICT systems?</li> <li><input type="checkbox"/> Does your agency check that the established controls are working in practice, including at any branches or other offices?</li> </ul>
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STORAGE AND SECURITY continued	
Paper form and on paper files	<ul style="list-style-type: none"> <li><input type="checkbox"/> Is personal information stored on your agency's paper files subject to a similar level of security to that stored in your ICT systems? Does your agency check whether the established controls over paper-based information are working in practice, including at any branch or regional offices?</li> <li><input type="checkbox"/> Does your agency monitor the security of personal information on paper files when it is being transported between branch offices?</li> </ul>
Protecting sensitive information	<ul style="list-style-type: none"> <li><input type="checkbox"/> Has your agency identified which personal information is sensitive personal information that might require additional safeguards and does your agency give staff guidance to classify this information appropriately and consistently?</li> <li><input type="checkbox"/> Does your agency limit access to personal information to staff who 'need to know' for the purposes of service delivery?</li> </ul>
USE Personal information is used only for the primary purpose it was collected, except in certain defined circumstances	
Agency use	<ul style="list-style-type: none"> <li><input type="checkbox"/> Does your agency from time to time check that you are using personal information only for the purpose it was collected or for authorised secondary purposes?</li> <li><input type="checkbox"/> Does your agency use personal information for secondary purposes, for example: Marketing; Strategic planning; or Statistical purposes? If you answered yes above, has your agency taken steps to ensure that you are applying good practice principles for managing personal information in these circumstances?</li> </ul>
Third party use	<ul style="list-style-type: none"> <li><input type="checkbox"/> Does your agency actively ensure that third party service providers with access to personal information adhere to the good practice principles for its management and protect it from inappropriate use?</li> </ul>
DISCLOSURE Personal information is not disclosed to any people or organisations other than the individual concerned, except in certain defined circumstances	
Agency disclosure	<ul style="list-style-type: none"> <li><input type="checkbox"/> Does your agency clearly identify to staff when personal information can be disclosed and when it cannot, and does it monitor whether staff follow these requirements?</li> </ul>
Third party disclosure	<ul style="list-style-type: none"> <li><input type="checkbox"/> Does your agency monitor whether third party service providers clearly identify to staff when personal information can be disclosed and when it cannot, and does it monitor whether staff follow these requirements?</li> </ul>
TRANSPARENCY The type of personal information that is collected and held, and the principles for its management, should be accessible to clients and other interested members of the public	
Access	<ul style="list-style-type: none"> <li><input type="checkbox"/> Is a description of the type of personal information you collect and hold, and how you manage this personal information, easily accessible to your clients and other interested members of the public?</li> </ul>
Promotion	<ul style="list-style-type: none"> <li><input type="checkbox"/> Does your agency promote, from the highest organisational level, the importance of the effective management of personal information as an integral element of core business?</li> </ul>

**Other resources**

This checklist should be used in conjunction with the Ombudsman Western Australia *Guidelines - Management Personal Information* and *Good practice principles for managing personal information*, available on our website at [www.ombudsman.wa.gov.au/Publications/Guidelines.htm](http://www.ombudsman.wa.gov.au/Publications/Guidelines.htm).

**Ombudsman Western Australia**

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