

# OFFICE OF THE OFFICIAL SECRETARY TO THE GOVERNOR-GENERAL



PRIVACY POLICY

OCTOBER 2025

TO BE REVIEWED: OCTOBER 2027

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# **INTRODUCTION**

# **Policy Details**

### Policy owner

This policy is owned and managed by the Deputy Official Secretary and Executive Officer.

### Release and review history

Version	Approved by	Description	Date
1.0	Official Secretary — Mark Fraser	Original version	June 2018
1.1	-	Update	September 2021
1.2	Deputy Official Secretary – Jeff Barnes	Update to include Cloud Awards and minor revisions	April 2024
1.3	Deputy Official Secretary – Jeff Barnes	Update to reflect change in handling of nominator info in Cloud Awards update	October 2025

## Purpose

The *Privacy Act 1988* (Privacy Act) requires entities bound by the Australian Privacy Principles (APPs) to have a privacy policy. This privacy policy outlines the personal information handling practices of the Office of the Official Secretary to the Governor-General (the Office), including when requesting, collecting and managing personal information required to administer the Australian honours system. The Office also has a summary privacy policy and an Australian Honours and Awards privacy statement, both of which are available on the Governor-General's and the Office's public website, www.gg.gov.au.

The Office is committed to ensuring the APPs pertaining to management of personal information are embedded into policy and practices, and that staff have adequate awareness of compliance requirements under the Privacy Act.

This policy is written in simple language. The specific legal obligations of the Office when collecting and handling your personal information are outlined in the Privacy Act, and in particular in the APPs.

# Scope

This policy is relevant to all staff of the Office, and to individuals whose personal information is disclosed to the Office through interactions with the Office, including through the Office's administration of the Australian honours system.

# Legislation and standards/principles

The <u>Privacy Act 1988</u> was introduced to promote and protect the privacy of individuals and regulates how Australian Government agencies and other organisations handle personal information.

The 13 Australian Privacy Principles (APPs) are detailed in the Office of the Australian Information Commissioner's Australian Privacy Principles.

The <u>Privacy (Australian Government Agencies – Governance) APP Code 2017</u> sets out how agencies are to apply and comply with APP1.2 of the Australian Privacy Principles (APPs).

The Office is required to manage Australian Government records in accordance with the <u>Archives Act</u> 1983.

The Office's information technology services are provided according to Commonwealth and industry best practice in ICT Security Management, including:

- Protective Security Policy Framework
- Australian Government Information Security Manual
- ISO/AS/NZS 31000:2018 Risk Management Guidelines
- <u>ISO/IEC 27001:2022 Information Security, cybersecurity and privacy protection Information security management systems Requirements</u>
- ISO/IEC 27040:2024 Information Technology Security Techniques Storage Security

# Monitoring and review

This policy will be reviewed biannually or when information handling practices or the operating environment change and updated if required.

# **Summary**

This document outlines how the Office of the Official Secretary to the Governor-General (the 'Office') handles personal information in accordance with the *Privacy Act 1988*. The Office collects, holds, uses and discloses personal information for various functions and activities, such as administering the Australian honours system, planning and managing the Governor-General's program, providing advice and service delivery to the Governor-General and stakeholders, and educating and informing Australians about the role of the Governor-General. The Office collects personal information from different sources, such as nominators, referees, employees, contractors, job applicants, and the Australian Electoral Roll. The Office only uses and discloses personal information for the purposes it was collected, or if the individual agrees or would reasonably expect it, or if it is otherwise legally required or authorised. The Office takes information security seriously and takes measures to protect personal information from misuse, interference, loss and unauthorised access, modification and disclosure.

# COLLECTION OF PERSONAL INFORMATION

### Overview

We collect, hold, use, and disclose personal information to carry out functions or activities to assist the Governor-General and Official Secretary to the Governor-General to fulfil their functions and duties, including recruitment of staff for the Office.

These functions and activities include:

- administration of the Australian honours system,
- planning and managing the Governor-General's program including, but not limited to, events management and correspondence,
- providing high quality advice and service delivery to the Governor- General and stakeholders,
- delivering effective governance and management arrangements in support of the official duties of the Governor-General, which include constitutional, ceremonial, community and Commander-in-Chief responsibilities,
- ensuring efficient and effective stewardship of the properties in accordance with heritage requirements and approved capital works and maintenance programs, and
- educating and informing Australians about the role of the Governor-General.

# Collection of your personal information

The Office collects personal information that is reasonable and necessary to administer the Australian honours system and to support the administrative functions of the Office of the Official Secretary to the Governor-General, including meeting any legislative requirements. The kinds of personal information we collect include:

- details of people nominated for Australian Honours and Awards and information from those deemed suitable to provide comment on nominations,
- information collected from employees, job applicants, contractors and others in relation to
  employment or engagement through contract (this may include sensitive information such as
  medical information in relation to compensation and rehabilitation matters, which may be
  disclosed to an Approved Rehabilitation Provider or other party involved in compensation and
  rehabilitation),
- information collected by contracted service providers in compliance with contractual measures as required by the Privacy Act,
- details of individuals, their position and contact information for the planning and conduct of official events, functions and visits,
- details provided by individuals who correspond with the Office or the Governor-General, and
- financial information to process payments.

The nature of the personal information collected may include, but is not limited to: names, date and place of birth, occupation and/or employer, gender, nationality, relationship to nominee or guest, contact details (including telephone, email and residential or postal address), biographical information, financial information for making or receiving payments, and referee reports.

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The Office may also collect sensitive information in relation to administration of the Australian honours system. This information may include, but is not limited to: names, date and place of birth, occupation, gender, nationality, contact details (including telephone, email and residential or postal address), biographical information (including sensitive information about ethnicity and details of ongoing disabilities), and referee reports. The Office only collects sensitive information about Honours and Awards nominators, referees and nominees (as part of the sounding process) with consent. The collection of sensitive information about nominees as part of an Order of Australian nomination form is authorised under the constitution of the award.

People nominated for awards will generally not be made aware that their personal information has been collected unless their nomination is successful.

When you are making a general enquiry regarding awards administered by the Australian Honours and Awards Secretariat, you have the option of dealing with the Office anonymously or using a pseudonym. However, for most dealings with us, particularly for nominations for Australian Honours and Awards, we need to have the name and contact information.

### How does the Office collect personal information?

At all times we aim to only collect the information we need for the particular function or activity we are carrying out.

The main way we collect personal information about you is when you give it to us. We may also collect personal information:

- from third parties such as nominators, referees, and general members of the public,
- through independent research or social media, or
- from the Australian Electoral Roll, to identify or locate individuals who:
  - o are nominated, or are being considered for nomination, for an honour or award within the Australian Honours and Award System, or
  - o have been selected to provide a reference connected with such a nomination.

#### Collecting through our websites

The Governor-General's and Office's public website, www.gg.gov.au, is hosted in Australia. There are a number of ways in which we collect information through our website and associated social media (Facebook, Instagram and YouTube).

#### Web analytics

Our Internet Service Provider makes a record of your visit and logs the following information for statistical purposes:

- entry and exit pages,
- how often the site was used,
- how much information was downloaded,
- the country you are browsing from,
- what browser types are being used,
- the user's Internet Service Provider's server address,
- date and time of visit, and
- previous site visited.

No attempt is made to identify users or their browsing activities except in the unlikely event of an investigation, where a law-enforcement agency exercises a warrant to inspect the Internet Service Provider's logs.

#### Australian Honours and Awards Portal

We may collect your personal information in a variety of ways, including by phone, in writing, email, or via the Australian Honours and Awards Portal service.

Accounts created within the Portal are required to gather the first name, surname and email of the account owner. Additional data used for the purpose of identifying and contacting the account owner, such as telephone numbers, are also requested. Data submitted through the Portal is transitioned to the Australian Honours and Awards Cloud Awards system, a customer relationship management application powered by Microsoft Dynamics 365 and used to administer the Australian Honours and Awards system. A nominator's name and email address is shared, via the Portal, to referee that the nominator has selected to provide comment. Nominators are notified when the referee has submitted their comment via the Portal.

More information about how the Australian Honours and Awards Secretariat utilises the personal data of users can be found on the Governor-General's and the Office's public website, www.gg.gov.au.

#### Cookies

The Australian Honours and Awards Portal uses cookies to store information for various purposes. A table describing the types of cookies used by the Portal can be found on the <u>Microsoft website</u>. Most cookies are only stored for the period in which a user is logged in to and using the Portal.

The website administered by the Office and using the gg.gov.au URL does not use cookies. Sites linked from this website are not subject to this privacy statement and you are encouraged to review their statements.

### Use and disclosure of personal information

The Office only uses and discloses personal information we hold for the purposes we collected it, if you agree or would reasonably expect us to do this or if we are otherwise legally required or authorised.

Our use and disclosure of personal information is for our functions and activities as described above. Specific examples about how we use and disclose information for administering the Australian honours system are included in our Australian Honours and Awards privacy statement.

We will only use you email address for the purpose for which you have provided it and will not add it to a mailing list. We will not use your email address for any other purpose, and will not disclose it without your consent.

Correspondence sent to the Governor-General will be processed and entered into the Office's Records Management System but will only be available to the appropriate people within the Office.

We would not ordinarily disclose personal information overseas except for the Australian honours system and governance and management arrangements in support of the official duties of the Governor-General.

# How does the Office protect your personal information?

The privacy of personal information is of paramount importance. All personal information will be treated in accordance with the *Privacy Act* and the APPs. The Office takes information security seriously and uses a range of procedural, IT and physical measures to ensure that your personal

information is held securely and protected from misuse, interference, loss and unauthorised access, modification and disclosure. The guidelines and principles that relate to ICT Security Management are listed in the Legislation and standards/principles section of this document.

Under the Archives Act 1983, the Office is not permitted to destroy Australian Government records (which may contain personal information) except in specified and controlled circumstances. If the personal information is not held in an Australian Government record and there is no other legal impediment to doing so, the Office will take such steps as are reasonable in the circumstances to destroy or de-identify the information when it is no longer required for the Office functions.

# Privacy Management Plan

To align with the *Privacy (Australian Government Agencies – Governance) APP Code 2017*, the Office has established a Privacy Management Plan to outline information on the current level of Privacy Maturity and the strategies utilised by the Office. This plan identifies and tracks specific privacy goals and targets and details how the Office will meet its compliance obligations. This plan is reassessed biannually.

# DATA BREACH

### Definition

A Data Breach is defined by the Office of the Australian Information Commissioner as the unauthorised access or disclosure of personal information, or loss of personal information.

# Consequences of a data breach

A data breach may cause the person(s) involved harm to mental or physical wellbeing, financial loss and/or reputational damage. A data breach may also have serious consequences for the Office, resulting in reputational damage which could in turn affect Office business such as the Honours process.

### Notifiable Data Breaches (NDB) Scheme

The Notifiable Data Breaches (NDB) scheme under Part IIIC of the *Privacy Act 1988* established requirements for entities in responding to data breaches. Entities have data breach notification obligations when a data breach is likely to result in serious harm to any individuals whose personal information is involved in the breach.

# Data Breach Response Plan (DBRP)

The Office has established a Data Breach Response Plan. This framework establishes the roles and responsibilities involved in the management of a data breach incident, and a robust system of procedures that will be taken should a data breach occur.

In short, the DBRP details the process to:

1. Contain the data breach to prevent any further compromise of personal information as soon as possible.

- 2. Assess the data breach by gathering facts and evaluating the risks, including potential harm to affected individuals and taking appropriate, reasonable and proportionate action to remediate the risk of harm.
- 3. Notify individuals and the Information Commissioner if required. If the breach is an eligible data breach under the Notifiable Data Breach (NDB) scheme it may be mandatory to notify.
- 4. Review the incident and consider what actions can be taken to prevent future breaches.

The Office maintains a Data Breach Log in which any data breach incidents are recorded.

# **CONTACTING US**

# Accessing and correcting your personal information

You may request access to your personal information held by the Office and request that it be corrected if you believe it to be inaccurate. If we refuse a request for access or correction to personal information, we will provide you with written reasons for that refusal. We will respond to a request for access or correction within 30 days after the request is made.

Requests for correction of personal information can be made to us at the contact below.

# How to make a complaint

If you wish to complain to us about how we have handled your personal information, if you believe that the Office has breached the APPs, or that the Office has made an error with the handling of personal information, you should submit the complaint in writing. If you need help lodging a complaint, you can contact us. A complaint should include a brief description of the specific privacy concern, and any action or dealings that have been had with a staff member to address the concerns.

If we receive a complaint from you about how we have handled your personal information we will determine what (if any) action we should take to resolve the complaint.

We will tell you promptly that we have received your complaint and then respond to the complaint within 30 days.

### How to contact us

Contact the Privacy Officer if you want to:

- make a privacy enquiry;
- obtain access to or seek correction of your personal information held by the Office; or
- make a privacy complaint about the Office.

Privacy Officer- Office of the Official Secretary to the Governor-General

phone: (02) 6283 3533email: privacy@gg.gov.aupost: Privacy Officer

Office of the Official Secretary to the Governor-General

**Dunrossil** Drive

#### Yarralumla ACT 2600

If you are not satisfied with our response, you can take the matter to the Office of the Australian Information Commissioner by:

• email: enquiries@oaic.gov.au or

• mail: GPO Box 5218, Sydney NSW 2001.

You can also phone the OAIC Enquiries Line 1300 363 992.