



Privacy Impact Assessments

What is a privacy impact assessment?

At Curtin the Privacy Impact Assessment (PIA) process is used to ensure a privacy by design approach whenever we commence a project or activity where personal information or sensitive personal information is accessed, used or shared.

A privacy impact assessment looks at the types of information being used, where it comes from, how it is collected, used and stored, and sets out who will have access to it. It can be used to identify risks and sets out recommendations for managing and minimizing those risks. A privacy impact assessment will assist you to align your project or activity to the Information Privacy Principles (IPPs) and ensure your compliance with the [Privacy Policy](#). It reduces the risk of an Information Breach and assists you to get the best use of information within your project or activity without introducing any unnecessary risks.

Why do we complete privacy assessments?

Under the [Privacy and Responsible Information Sharing Act \(WA\) 2024](#), privacy impact assessments will be mandated for any high privacy impact function or activity. High-Privacy Impact refers to those functions or activities that involve the handling of personal information where any potential for a significant impact is identified or possible.

Impact considers questions such as the nature and sensitivity of the information, security measures that will be in place, how accessible the information will be to others, who will have access to it and whether disclosure of the information has the potential to cause harm to any individual. Privacy harm is measured not by quantity of information but by the likelihood of harm to *any* individual. This means that harm to just one person may be seen as having a high privacy impact.

When do you need to complete a privacy assessment?

- Where automated decision-making is going to be used to support a decision and that decision may affect an individual, or where personal information of an individual is being shared to an artificial intelligence system in order to generate content, forecasts, recommendations, decisions or analytics you will be required to request a privacy impact assessment for the tool you have selected.
- The Assessment and Student Progression Manual procedures for assessment communication will require the permission of the relevant Dean (Learning and Teaching), and approval by both the Privacy Officer and Digital & Technology Solutions (via the Chief Information Officer, Chief Information Security Officer, or authorized officer) for any use of Generative AI in grading student work and/or giving feedback. A Privacy Impact Assessment and Security Assessment must be submitted with the relevant Dean (Learning and Teaching) selected as the request approver for your PIA.
- Where research will use or collect personal information or sensitive personal information, your data management plan will recommend that a privacy impact assessment is completed. After submitting your PIA request, you should send a copy of your draft Data Management Plan and Ethics application to privacy@curtin.edu.au or append them to the PIA request ticket in ServiceNow.
- For other projects and activities, you should complete the Privacy Impact Assessment Checklist, and the Privacy Officer will advise you if the assessment is required.

What information will I need to complete it?

Details of the function, project or activity that you plan to undertake. What are you doing? What outcomes are you looking to achieve (i.e., process improvement, roll out of a new software platform, teaching deliverable, or conducting research). What are you using the information for? What kind of information will you be collecting (i.e., name, email address, ID number, gender identity, medical information etc.)? Where will it come from? Are you extracting a report from a Curtin system, conducting a survey, managing a mailing list or recruiting research participants?

Will there be any use of artificial intelligence, large language models, machine learning or analytics (even using de-identified data)? If you are agreeing to terms of use or a user license, or if you are signing an agreement with another party (i.e., for access to software or for collaborative purposes), what are the details of the third party (who are they, what country are they located in, what do their terms say about use and ownership of the information)?

Who is conducting the project, function or activity? Who will you be sharing the information with, both internally at Curtin (i.e., your supervisor, a research team, other areas within the university, Digital Technology Solutions teams) as well as external collaborators, software developers, research cooperative partners or service contractors?

Your briefing paper, tender documents, procurement request, project plan or research data management plan should hold this information.

How do I complete a Privacy Impact Assessment?

- Refer to the definitions for Personal Information and Sensitive Personal Information on the [Privacy website](#) and consider the types of information you will be using.
- Complete a [Privacy Impact Assessment Checklist](#) to see if a Privacy Impact Assessment will be needed.
- If you are procuring or using any software, cloud or SaaS solution complete a request for a [Security Assessment](#)
- Navigate to [this link](#) to fill in your Privacy Impact Assessment. If you need additional information, you will be able to save a draft of your form and come back to it.

Need further assistance?

Please do not hesitate to contact us on 9266 3965, or at Privacy@curtin.edu.au, should you require additional assistance.

For information about Privacy at Curtin you may wish to visit our website at: [information management and archives/privacy/](#).

Other helpful links

- [Curtin Common Definitions](#)
- [Privacy Impact Assessment advice from the Office of the Australian Information Commissioner](#)
- [ID Care contact and advice for managing privacy impacted individuals](#)