



Australian Government

Australian Radiation Protection and Nuclear Safety Agency

Privacy Impact Assessment Template

**For the Submission of Dose Records to the
Australian National Radiation Dose Register**

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Contents

- Disclaimer 3**
- Why Complete a Privacy Impact Assessment? 3**
- 1. Introduction 4**
 - 1.1 Background of ANRDR..... 4
 - 1.2 Objective 5
 - 1.3 Relationship of ANRDR to APP entities and the collection of personal information 5
- 2. ANRDR Personal Information 6**
 - 2.1 Information in the ANRDR..... 6
 - 2.2 ANRDR Information Flow 6
- 3. Implementing the Disclosure of Dose Records to the ANRDR..... 7**
- 4. Privacy Statement..... 8**
- 5. Assessment of Compliance with the APPs 9**
 - 5.1 APP 1 Open and Transparent Management of Personal Information 9
 - 5.2 APP 2 Anonymity and Pseudonymity 10
 - 5.3 APP 3 Collection of Solicited Personal Information 10
 - 5.4 APP 4 Dealing with Unsolicited Personal Information 11
 - 5.5 APP 5 Notification of the Collection of Personal Information..... 11
 - 5.6 APP 6 Use or Disclosure of Personal Information 12
 - 5.7 APP 7 Direct Marketing 13
 - 5.8 APP 8 Cross Border (Overseas) Disclosure of Personal Information..... 13
 - 5.9 APP 9 Adoption, Use or Disclosure of Government Related Identifiers 13
 - 5.10 APP 10 Quality of Personal Information..... 14
 - 5.11 APP 11 Security of Personal Information 14
 - 5.12 APP 12 Access to Personal Information 14
 - 5.13 APP 13 Correction of Personal Information 15
- 6. Privacy Risk Mitigation..... 15**
- 7. Conclusion 16**
- 8. References..... 16**

Disclaimer

This template for a PIA self-assessment should be used as a guide only. ARPANSA recommends that organisations who wish to participate in the ANRDR obtain their own legal advice relating to their privacy obligations for the disclosure of personal information to the ANRDR.

Why Complete a Privacy Impact Assessment?

The disclosure of personal information associated with radiation dose records to the Australian National Radiation Dose Register (ANRDR) requires addressing the requirements of the *Privacy Act 1988* (Cth) (the Privacy Act).

A Privacy Impact Assessment (PIA) is a systematic assessment of an activity that identifies the impact that the activity might have on the privacy of individuals, and sets out the mitigation strategies for managing, minimising or eliminating that impact.

PIAs are an important component in the protection of privacy, and should be part of the overall risk management and planning process of APP entities. An APP entity is defined in the Privacy Act as an agency or organisation with an annual turnover of \$3 million or more.

Completing the PIA for the disclosure of dose records to the ANRDR will:

- describe the flow of personal information
- assess the possible impact on an individuals' privacy
- identify options for avoiding, minimising or mitigating negative privacy impacts
- ensure all privacy requirements are met

The information provided in Sections 1 – 3 is extracted from the ANRDR Privacy Impact Assessment for reference.

1. Introduction

1.1 Background of ANRDR

The International Atomic Energy Agency (IAEA) publishes International Safety Standards requiring that occupational dose records of individual workers are kept and made available to the relevant regulatory authority and to the individuals concerned.

The IAEA GSR Part 3 (2014) states that:

“Exposure records for each worker shall be maintained during and after the worker's working life, at least until the former worker attains or would have attained the age of 75 years, and for not less than 30 years after cessation of the work in which the worker was subject to occupational exposure.”

This requirement has been adopted in Commonwealth, state and territory regulatory frameworks across Australia. Internationally, it is considered best practice to strengthen the application of this requirement by establishing a central dose register to allow storing, maintaining, and retrieving records of occupational exposure. Canada (Zielinski et al. 2008) and many European (Frasch et al. 2001) countries have established comprehensive central registers for recording occupational doses.

In 2008, the Australian Government, in cooperation with industry, initiated the development of the ANRDR, which was launched in 2010 as a centralised database designed for the long-term storage and maintenance of dose records for workers occupationally exposed to radiation in the Australian uranium mining and milling industry.

The ANRDR is administered by ARPANSA as part of its statutory objective to protect the health and safety of people, and the environment, from the harmful effects of radiation, and to promote national uniformity in radiation protection. Consistent with this role, and to ensure that operation of the ANRDR meets the best practices of the more established national dose registers in Canada and Europe, ARPANSA is expanding the ANRDR beyond the uranium industry to include all workers occupationally exposed to ionising radiation in industries including mineral sands mining and processing, Commonwealth Government entities, aviation, medical, research, regulatory, industrial and any other applicable industries.

Dose records are submitted by the employer to ARPANSA containing personal information which allows the ANRDR to match dose data to the relevant worker for the purpose of generating personal dose history reports on request and to detect doses of workers who may have exceeded an occupational dose limit.

The [APPs](#), which are contained in schedule 1 of [the Privacy Act](#), outline how APP entities must handle, use and manage personal information. An APP entity is defined in the Privacy Act as any Commonwealth Government agency or a private sector organisation with an annual turnover of more than \$3 million.

1.2 Objective

The objective of this PIA is to demonstrate compliance with the APPs contained in the Privacy Act, and to identify potential privacy risks and mitigation strategies. This PIA will be provided to ANRDR stakeholders as part of the on-boarding process to assist those organisations in meeting their own privacy obligations.

Workers who are occupationally exposed to radiation will benefit from the long-term storage and maintenance of their dose records, which will allow them to check and monitor their own occupational exposure. The ANRDR will provide a facility for the retrieval of their dose records throughout the course of their career, and beyond, regardless of where in Australia they have worked, or for whom.

For employers, the information contained in the ANRDR will assist in developing better work practices to improve safety for occupationally exposed workers in Australia by facilitating the optimisation of radiation protection programs. Analysis of the ANRDR data provides information on industry exposure trends and a comparison of doses received by workers across different work practices. These industry trends are published in an annual ANRDR newsletter which is publicly available on ARPANSA's website. ARPANSA does not identify any individuals or employers in this publication.

1.3 Relationship of ANRDR to APP entities and the collection of personal information

A number of state, territory and Commonwealth legislative requirements currently exist to ensure the health and safety of workers. In particular, radiation dose monitoring is performed to protect workers from the harmful effects of radiation. However, until the establishment of the ANRDR, there was no central national repository for the long-term storage and maintenance of workers' doses. The implementation of the ANRDR was designed to close this gap in dose record management to meet international best practice and to promote national uniformity for dose record management.

The ANRDR was established with the purpose of being a central repository for the long term storage and maintenance of dose records allowing individuals to obtain their dose records regardless of where in Australia they have worked throughout the course of their career, including when an employer has ceased to operate. As such, the disclosure of dose records to the ANRDR forms part of the primary purpose for which this information was collected by the employer and is also directly related to ARPANSA's function of protecting the health and safety of people and the environment from the harmful effects of radiation. This is achieved by:

- enabling workers to access their personal dose histories
- facilitating dose optimisation efforts in the workplace by providing a feedback mechanism to industry in the form of dose trend analyses

2. ANRDR Personal Information

2.1 Information in the ANRDR

The ANRDR receives radiation dose data, employer details and some personal information of workers which is disclosed by registered organisations. Collectively, this information is considered a radiation dose record. Dose records are submitted to the ANRDR on a quarterly basis which are linked in the ANRDR for individuals who have existing records. The ANRDR assigns a government unique identifier for all individuals to assist with linking records and administrative functions. The unique identifier is only used for internal ANRDR purposes.

Personal information is provided to ensure that doses are matched to the correct worker. This personal information includes:

- full name
- date of birth
- gender
- employee number

2.2 ANRDR Information Flow

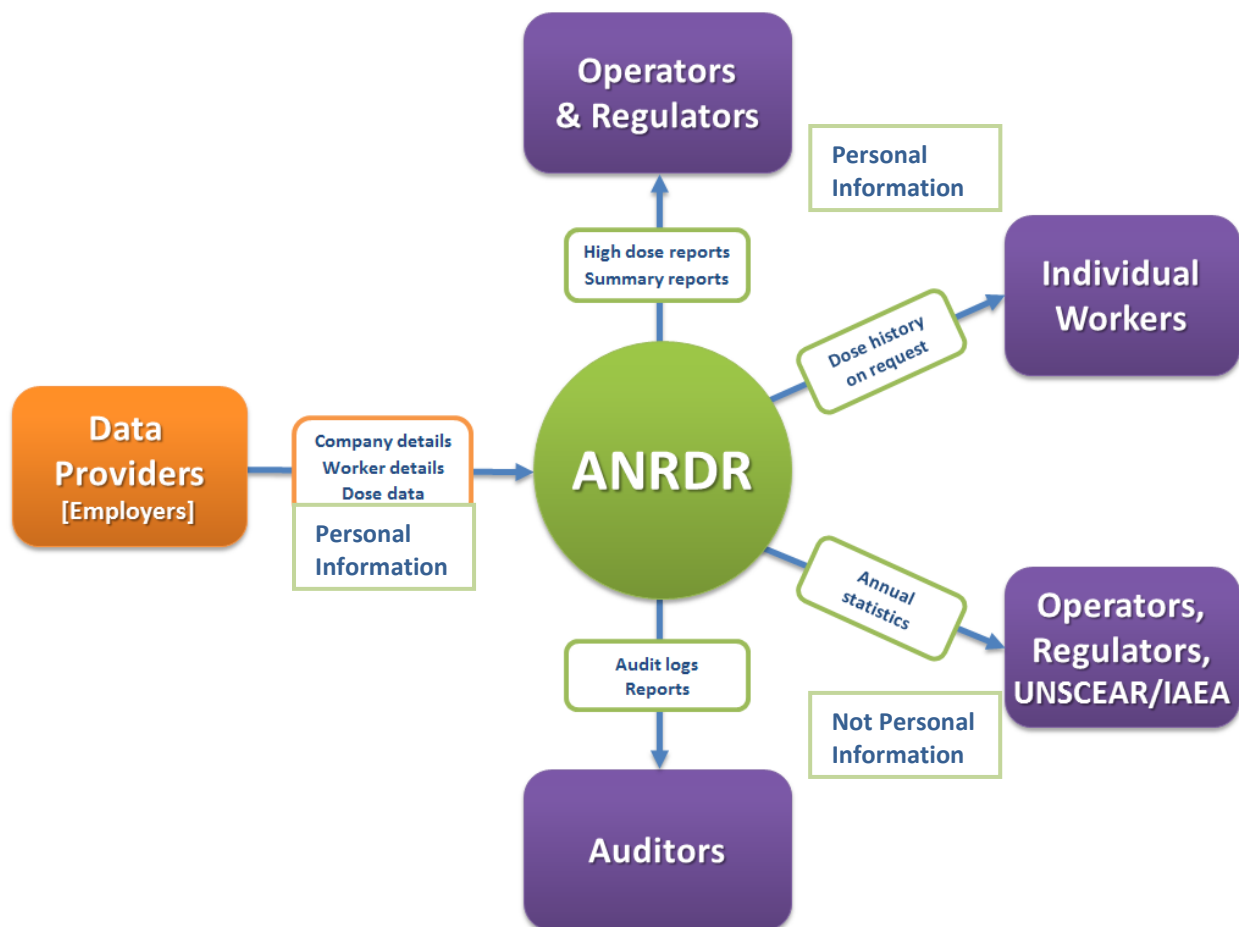


Figure 1: ANRDR Information Flow

Figure 1 shows the information flow required for the operation of the ANRDR. Personal information and dose data is provided to the ANRDR by employers of monitored individuals. This information is available to individuals upon request and disclosed to the relevant employer and regulatory authority in the event that an individual exceeds any radiation dose limit set in the Radiation Protection Series No. 1 (RPS 1). Contribution of data to national and international surveys, and other reports produced by the ANRDR, such as audit reports and statistical data analyses, do not contain personal information.

3. Implementing the Disclosure of Dose Records to the ANRDR

The ANRDR team will work with each APP entity to determine the most suitable means of meeting their privacy requirements for the disclosure of dose records to the ANRDR. In all cases, the employer must notify the employees that their dose data and some of their personal information will be provided to the ANRDR. The employer's privacy policy should be updated to reflect the changes.

The ANRDR provides a worker Outreach Program which can be used as a communication tool to assist employers in informing their workers about the implementation of the ANRDR in their workplace and to provide them with the necessary information about the use of their personal information.

The Outreach Program consists of brochures and posters that can be used as physical or electronic means of communication, and a customisable PowerPoint slide is also available to be integrated into induction or radiation safety training presentations. The ANRDR team is available to assist in this process.

APP entities intending to implement the ANRDR would have already established a method for the collection of personal information for the purpose of storing and maintaining dose records and for general human resources (HR) purposes. The ANRDR team will work with APP entities to establish the storage and maintenance of dose records in the ANRDR as part of the primary purpose of collection. For example, a clause may be inserted into an organisation's radiation management plan (RMP) to state that dose records are collected for disclosure to the ANRDR.

ARPANSA recommends that an APP entity planning to join the ANRDR complete their own privacy impact assessment to ensure that they meet their obligations in relation to the Privacy Act. It is important to note that disclosure of dose records to the ANRDR becomes part of the primary purpose for which this information is collected by the employer.

Under APP 6, there are three options by which dose records may be disclosed to the ANRDR:

Without individual consent:

1. Reasonable expectation – The disclosure of personal and sensitive information for directly-related purposes is permitted without individual consent, provided that an individual would reasonably expect the information to be disclosed. Disclosure can occur if the following criteria are met:

- individuals are informed of the disclosure
- the employer's privacy policy reflects the disclosure
- a service level agreement between the ANRDR and the APP entity is implemented.

To provide further justification for this approach, the service level agreement puts an APP entity in a position of being a contracted service provider via the provision of dose records to the ANRDR. Section 6A (2) of the *Privacy Act 1988* (Cth) notes that there cannot be a breach of an APP for a contracted service provider meeting an obligation under the contract in the event that the obligation is inconsistent with a principle. Note, however, that the operation of the ANRDR and disclosure of dose records by APP entities to the ANRDR is consistent the requirements of the APPs.

The Office of the Australian Information Commissioner (OAIC) provides a [guide](#) for each APP and the guide for APP 6 discusses the reasonable expectations test. Communication of the disclosure of dose records to the ANRDR as part of the primary purpose is aligned with the reasonable expectations provided in the guide.

2. *Legal requirement* – Disclosure to the ANRDR can be achieved if a legal requirement is established. In Queensland and the Northern Territory, for example, the disclosure of dose records to the ANRDR has been made a legal requirement for specific mining operations. In Queensland, the requirement to submit data to the ANRDR has been incorporated into the mandatory mining code, whilst in the Northern Territory this requirement has been imposed through a change in regulations.

Alternatively, a legal requirement can be implemented through a radiation licence condition amendment or an amendment to the radiation management plan (RMP) if there is a legal obligation for an APP entity to abide by all requirements specified in their RMP. This method is currently used by the uranium industry in South Australia. Due to the classification of dose records as classified information in that state, an additional approval from the Minister was required.

With individual consent:

3. *Individual consent* – APP 6 also allows for the disclosure of personal information by individual consent. This option is only recommended as a temporary solution for an APP entity with a small number of monitored workers until a change to their privacy policy or a legal requirement can be implemented.

4. Privacy Statement

A copy of your APP entity privacy statement or policy should be included in this section as evidence that it reflects the disclosure of personal information to the ANRDR.

The ARPANSA privacy policy and ANRDR privacy statements are available at:

<http://www.arpansa.gov.au/AboutUs/privacypolicy.cfm>

<http://www.arpansa.gov.au/services/ANRDR/PrivacyStatement.cfm>

5. Assessment of Compliance with the APPs

This assessment should be completed with reference to the APPs. Guidance is available from the Office of the Australian Information Commissioner website:

<https://www.oaic.gov.au/individuals/privacy-fact-sheets/general/privacy-fact-sheet-17-australian-privacy-principles>

<https://www.oaic.gov.au/agencies-and-organisations/app-guidelines/>

Descriptions of any relevant processes, systems or improvement actions should be included in each section.

Additional questions may be added to address any specific sections of the APPs that are required for your industry or organisation but have not been included in this template.

Information in some tables relating to the ANRDR has been pre-filled for your convenience.

5.1 APP 1 Open and Transparent Management of Personal Information

The objective of this principle is to ensure that APP entities manage personal information in an open and transparent way.

Open and Transparent Management of Personal Information		Y	N	APP
4.1.1	The APP entity has a document freely available for workers that sets out the policies for the management of personal information.			1.3 & 1.5
4.1.2	The APP entity has steps in place to allow an individual to know what personal information it holds about them and for what purposes it collects, uses and discloses it. This includes information about how they can access their information and report potential breaches.			1.2 & 1.4
4.1.3	The APP entity has processes in place to deal with inquiries and complaints from individuals about the entity's compliance with the APP.			1.2
4.1.4	The APP entity has means to provide copies of the privacy policy in various formats.			1.6

Risk identifier: If you answer NO to any of the above you will need to address the risk appropriately in the Privacy Risk Mitigation Section 6

An APP entity intending to implement the ANRDR should ensure that they have a privacy policy that meets the requirements of the APPs and any additional requirements within their jurisdiction.

5.2 APP 2 Anonymity and Pseudonymity

Anonymity and Pseudonymity		Y	N	APP
4.2.1	Do individuals have the option to not identify themselves, or use a pseudonym when dealing with the APP entity relating to information about the ANRDR?			2.1
4.2.2	Is the APP entity required by law to only deal with individuals who have identified themselves?			2.2
4.2.3	Is it practical for the APP entity to deal with individuals who have not identified themselves?			2.2

If you answer NO to 4.2.1 then either 4.2.2 or 4.2.3 must be answered as a YES for risk mitigation.

Individuals may seek information regarding systems and processes anonymously. It is not practical for an APP entity to deal with individuals for employment purposes without knowing personal details.

5.3 APP 3 Collection of Solicited Personal Information

This section applies to the collection of information as solicited by the APP entity from another entity or individual. Solicited personal information relates to any personal information received by the APP entity that is requested by the APP entity and is required for their dose record management system.

Collection of Solicited Personal Information		Y	N	APP
4.3.1	Does the APP entity solicit personal information from other sources that is then submitted to the ANRDR? (i.e. from individuals)			3
The following only apply if you answered YES to 4.3.1.				
4.3.2	Is the information collected necessary for the operation of the APP entity's radiation monitoring program?			3.1/3.2
4.3.3	Is the information being collected classed as sensitive?			3.3 & 3.4
4.3.4	Is the information collected by lawful and fair means?			3.5
4.3.5	Has the individual consented to the information collection?			3.6
4.3.6	Does a law or court order exist for the collection of the information*?			3.6
4.3.7	Is it reasonable or practical to obtain individual consent?			3.6

If you answered YES to 4.3.2 then you will need to review the relevant guideline for APP 3.

**Generally there exist legal requirements for APP entities to monitor exposed workers and record radiation exposures.*

As there is no clear guidance or requirement on how radiation dose records are classified, some APP entities classify these records as sensitive (health) information while others classify them as personal information. Regardless of the classification type, the disclosure of radiation dose records to the ANRDR is permitted as part of the primary purpose for which this information was collected by the employer.

To establish the relationship of disclosure to the ANRDR as part of the primary purpose, an APP entity will need to update their privacy policy and communicate the disclosure to their employees.

5.4 APP 4 Dealing with Unsolicited Personal Information

Unsolicited personal information relates to any personal information that is received by the APP entity that was not specifically requested by the APP entity and is not required for their dose record management system.

Dealing with Unsolicited Information		Y	N	APP
4.4.1	Is the APP entity able to accept unsolicited information relating to its radiation exposure information?			4.1, 4.2 & 4.4
4.4.2	If the information could not have been collected as part of normal operations, do processes exist to destroy the information?			4.3

For APP entities that are Commonwealth agencies or 'contracted service providers', records are exempt from being destroyed or de-identified even if unsolicited.

Responses to these questions will not affect your ability to submit personal information to the ANRDR; however, it is recommended that all APP entities address these questions to ensure they meet their privacy obligations.

5.5 APP 5 Notification of the Collection of Personal Information

The APP entity must take reasonable steps to notify workers of the collection and use of their personal information, before, or at the time it collects personal information. If this is not practicable, reasonable steps must be taken as soon as practicable after collection.

Notification of the Collection of Personal Information		Y	N	APP
4.5.1	Have reasonable steps been taken to ensure that individuals whose information has been collected are made aware of the following:			5.1 & 5.2
	<ul style="list-style-type: none"> Identity and contact details of the APP entity? 			5.2
	<ul style="list-style-type: none"> The fact that the APP entity has collected the information for disclosure to the ANRDR? 			5.2
	<ul style="list-style-type: none"> If the collection is required or authorised by law*? 			5.2
	<ul style="list-style-type: none"> The purpose of collection of the information (i.e. radiation management)? 			5.2
	<ul style="list-style-type: none"> Consequences to individuals for the information not being collected? 			5.2
	<ul style="list-style-type: none"> The privacy policy contains information how an individual can access and correct the information? 			5.2
	<ul style="list-style-type: none"> That the privacy policy contains information how an individual may complain about a breach of the APPs and how it is dealt with? 			5.2
	<ul style="list-style-type: none"> Whether the APP entity will disclose personal information to any party in Australia (i.e. ANRDR)? 			5.2

** Most workers monitored for radiation protection purposes are done so under the requirements of a Radiation Management Plan which is generally a legal requirement.*

The ANRDR has a range of communication tools available in its Worker Outreach Program to assist an APP entity to engage workers and inform them that their radiation dose records will be disclosed to the ANRDR.

5.6 APP 6 Use or Disclosure of Personal Information

It is recommended that the Guideline for APP 6 be used to complete this section.

<https://www.oaic.gov.au/agencies-and-organisations/app-guidelines/chapter-6-app-6-use-or-disclosure-of-personal-information>

Some of the responses relating to the ANRDR have been pre-filled for your convenience.

Use or Disclosure of Personal Information		Y	N	APP
4.6.1	Has the disclosure of dose records to the ANRDR been established as part of the primary purpose of collection?			6.1
4.6.2	Is the information disclosed to the ANRDR used or disclosed for a secondary purpose?	X		6.1
4.6.3	Is the disclosure of information from the ANRDR directly related to the primary purpose?	X		6.2
4.6.4	Has the individual consented to the use or disclosure?			6.1
4.6.5	If NO to 4.6.4, which of the following exemptions apply?			6.2
	<ul style="list-style-type: none"> Is the use or disclosure authorised by law? Would the individual reasonably expect the use or disclosure and is the secondary purpose related to the primary purpose of collection*? 			
4.6.6	If the APP entity is an agency, is the personal information biometric?		X	6.3
4.6.7	If the APP entity is an organisation, does subsection 16B(2) (permitted health situation) apply [^] ?		X	6.4
4.6.9	Is the purpose of disclosure of information from the ANRDR available to workers in written form?	X		6.5
4.6.10	Is personal information in the ANRDR disclosed for marketing purposes?		X	6.7
4.6.11	Are government-related identifiers disclosed by the ANRDR?		X	6.7

** Guidelines for APP 6 describe reasonable expectations and include an example where an entity has notified the individual of the particular secondary purpose.*

[^] 16B(2) relates to a permitted health situation for the collection of health information about an individual for:

- Research relevant to public health or public safety
- The compilation or analysis of statistics relevant to public health or public safety
- The management, funding or monitoring of a health service

The ANRDR team will work with APP entities to establish the disclosure of dose records to the ANRDR as part of the primary purpose of collection by the employer. The functions of the ANRDR align with ARPANSA's statutory objective to protect people from the harmful effects of radiation.

Disclosure of dose records from the ANRDR to the individual, employer or relevant state, territory or Commonwealth regulator is one of the ANRDR's primary functions and permitted under APP 6.2 (a)(i).

As there is no clear guidance or requirement on how dose records are classified, some organisations classify these records as sensitive (health) information while others classify them as personal information. Regardless of the classification type, the disclosure of dose records to the ANRDR is permitted as part of the primary purpose for which this information was collected by the employer.

In the event that an individual has exceeded a dose limit while working for a single employer, it is expected that the regulator will be notified of the situation by the employer. The ANRDR will capture situations where individuals have changed employers and/or jurisdictions and cumulatively exceeded a dose limit. As new employers may not be aware of the worker’s previous exposures, the ANRDR will link the records and provide feedback to the regulator. This secondary purpose is directly related to the primary purpose of the ANRDR.

The ANRDR relies on the disclosure of dose records from APP entities. As the ANRDR is part of the primary purpose for the collection of dose records, the disclosure of the data to the ANRDR from an APP entity meets the requirements of APP 6.

ARPANSA has a privacy policy and the ANRDR has a privacy statement that details the circumstances under which potential disclosure of information from the ANRDR may occur. These documents are publically available from the ARPANSA web site. The ANRDR privacy statement is included in section 3 of this document.

Sections 4.6.4 and 4.6.6 do not apply to the ANRDR under the Privacy Act (1988).

Individuals may provide consent for the disclosure of their dose history reports to an agreed third party if required and the disclosure of information to the employer or regulator is an extension of the employer’s obligation to report dose limit exceedances to a relevant regulatory authority.

5.7 APP 7 Direct Marketing

The implementation of a program to disclose dose records to the ANRDR does not require the use or disclosure of personal information for the purpose of direct marketing.

5.8 APP 8 Cross Border (Overseas) Disclosure of Personal Information

The ANRDR does not disclose personal information to any individual or organisation outside of Australia.

5.9 APP 9 Adoption, Use or Disclosure of Government Related Identifiers

The responses in this section have been pre-filled for your convenience.

Adoption, Use or Disclosure of Government-Related Identifiers		Y	N	APP*
4.9.1	Does the implementation of the ANRDR program require the adoption of government-related identifiers?		X	9.1
4.9.2	Is the ANRDR unique government identifier used by or disclosed to the APP entity?		X	9.2

** APP 9.3 relates to the adoption, use or disclosure by an organisation of an individual’s government-related identifier by a regulation. This does not relate to the implementation of the ANRDR.*

A unique government identifier is assigned to an individual the when their records are submitted to the ANRDR for the first time. The identifier is used to link future uploads of dose records to the individual’s existing record. The identifier has no purpose other than for internal ANRDR use and the ANRDR does not use any other existing unique government identifiers.

5.10 APP 10 Quality of Personal Information

Quality of Personal Information		Y	N	APP
4.10.1	Are processes in place to ensure the quality of the personal information collected, used and disclosed by the APP entity for the ANRDR?			10.1 & 10.2

If you answer NO to this section you will need to complete details in the Risk Mitigation Section 6.

Describe here the relevant systems that are in place to ensure the quality of information.

5.11 APP 11 Security of Personal Information

Security of Personal Information		Y	N	APP
4.11.1	Are security processes in place to protect personal information?			11.1
4.11.2	Is there a requirement to destroy records relating to personal information once the use or disclosure requirements are met?			11.2

Commonwealth agencies are not required to destroy records, as Commonwealth records are exempt.

5.12 APP 12 Access to Personal Information

The responses in this section have been pre-filled for your convenience.

Access to Personal Information		Y	N	APP
4.12.1	Are processes in place for individuals to access their information from the ANRDR?	X		12.1 & 12.4
4.12.2	Do any exceptions apply to the provision of information to individuals?		X	12.2, 12.3, 12.5, 12.9 & 12.10
4.12.3	Can information be provided to a mutually agreed third party?	X		12.6
4.12.4	Are any fees associated with the provision of information?		X	12.7 & 12.8

The ANRDR has been established to provide free dose history reports to individuals or an agreed third party upon request. No exceptions apply to the disclosure of information to the individual.

5.13 APP 13 Correction of Personal Information

Some of the responses relating to the ANRDR have been pre-filled for your convenience.

Correction of Personal Information		Y	N	APP
4.13.1	Are individuals able to request changes from the APP entity to personal information submitted to the ANRDR?			13.1, 13.3 & 13.5
4.13.2	Can the individual request a correction to personal information already in the ANRDR directly from the ANRDR?	X		
4.13.3	Do processes exist to review personal information submitted to the ANRDR for accuracy?			13.1 & 13.3
4.13.4	Is the APP entity able to correct information that has been disclosed to the ANRDR?	X		13.2
4.13.5	Do any circumstances exist where the APP entity cannot correct personal information it holds on request?			13.3 & 13.4
4.13.6	Are corrections fee-free and available within 30 days?			13.5

If you answer NO to 4.13.1 you will need to complete details in the Risk Mitigation Section 6.

ARPANSA recommends that the APP entity has a process in place for workers to update their personal details in the case where a worker has identified that the employer maintains incorrect personal information or if there is a change in a person’s circumstances that results in a change of personal information.

The ANRDR makes available a personal information correction form through which an individual may request to have their personal information that is already contained in the ANRDR to be corrected. The ANRDR regularly reviews personal information contained in the ANRDR for quality and works with the APP entities to correct information when errors or changes have been identified.

6. Privacy Risk Mitigation

Any risks identified in the PIA need to be addressed here. This table may be amended as required.

APP number and clause	Risk identified	Mitigation strategy

7. Conclusion

The conclusion of the PIA to be added here and some extracts from the ANRDR PIA is included for reference.

This section should include the preferred method for the disclosure of radiation dose records to the ANRDR.

Personal information is disclosed to the ANRDR by the APP entity so that an individual can track their occupational radiation exposure incurred over the course of their career, regardless of where in Australia they have worked, or for whom. This information is stored and maintained by ARPANSA in accordance with the APPs defined in the Privacy Act. ARPANSA recommends that each APP entity complete their own PIA to demonstrate compliance with the APPs.

ARPANSA's assessment against the APPs shows that the disclosure of personal information to the ANRDR by APP entities can be achieved via a number of methods. The simplest method is for an APP entity to enter into a service agreement with ARPANSA while ensuring that the disclosure is communicated to their employees and their privacy policy is updated accordingly.

Alternatively, APP entities may make the disclosure of data to the ANRDR a legal requirement by amending their RMPs, requesting a licence condition amendment or working with ARPANSA and the relevant regulatory authority to amend relevant codes, guides, standards or legislation.

8. References

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