



Australian Government

Department of Health and Aged Care

Phase 2A of the COVID-19 Vaccine Strategy

Update 2 to the implementation of the COVID-19 Vaccine Strategy Privacy Impact Assessment

Agency Consolidated Response

Department of Health and Aged Care

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Title: Phase 2A of the COVID-19 Vaccine Strategy

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Context

This document has been prepared by the Department of Health and Aged Care (**Health**). It is intended to respond to the recommendations provided by Maddocks in their Phase 2A Update 2 to the COVID-19 Vaccine Strategy Implementation Privacy Impact Assessment (PIA) Report dated 31 August 2022.

Maddocks Recommendation 1 Documentation of responses to the recommendations

We **recommend** that Health ensure that it has properly documented its consideration of each of the recommendations made in **Sections A to E of Part E – Project Description and Privacy Analysis for Each Change**, including to ensure that it has recorded:

- where Health decided to implement a recommendation, when and how that recommendation was implemented; and
- if Health decided not to implement a recommendation, the reasons why it was not considered practical or otherwise feasible to do so, and noting any alternative strategies that were implemented to address the identified risk.

Response:

Health considered each of the recommendations made in the COVID-19 Vaccination Strategy Phase 2 PIA report at the time that each section was prepared and then finalised. Health intends to comply with this recommendation and, subject to resourcing and competing priorities, may either do so in a consolidated form or ensure that appropriate records have been kept across various documents.

Maddocks Recommendation 2 Continued implementation of the recommendations in the Original PIA report and Phase 1b Update report

As many of the privacy impacts and risks identified in this Phase 2a Update PIA report will be mitigated by the strategies recommended in the Original PIA report and the Phase 1b Update PIA report, we **recommend** that Health continue to implement those recommendations, particularly by continuing to ensure that:

- there is open and transparent communication about how personal information will be handled in connection with the Vaccine Strategy (**Recommendation 2** of the Original PIA report);
- the contractual or other administrative arrangements with Health's Partners and other third parties impose suitable privacy obligations, including in relation to the protection and security of personal information (**Recommendations 4 and 5** of the Original PIA report); and
- Vaccine Providers are appropriately trained, and provided with suitable guidance, about their privacy obligations (**Recommendations 2 and 3** of the Original PIA report).

Response:

Health agrees with this recommendation, which it believes has been implemented in relation to this roll-out of the COVID-19 Vaccine Strategy.

Maddocks Recommendation 3 Ongoing data governance

We **recommend** that Health continue to ensure its governance arrangements include processes to appropriately consider the privacy impacts of any proposed new or changed use or disclosures of personal information collected as part of Phase 2a (such as through requirements for the undertaking of a privacy threshold assessment as part of system change proposals, or before any new use or disclosure of data collected). This will ensure that any privacy impacts or risks are considered before any new handling of personal information occurs.

Response:

Health agrees with this recommendation, which it believes has been implemented in relation to this roll-out of the COVID-19 Vaccine Strategy.