

# Privacy Impact Assessment

## **Executive Summary**

This Privacy Impact Assessment (PIA) has been developed as part of a proposal for permitted research, by Crosby Textor Research Strategies and Results Pty Ltd (C|T Group).

As a research entity, the C|T Group is seeking authorisation from the Australian Communications and Media Authority (ACMA) to use and disclose unlisted mobile number information, in accordance with the Telecommunications Regulations 2001.

The mobile number information will be used for research the C|T Group will conduct on behalf of the Liberal Party of Australia to understand public opinion on a range of political and public policy issues.

The express purpose of the PIA is to ensure that the C|T Group is taking all reasonable steps to ensure that our research project implements all best practices, procedures and systems to ensure full privacy compliance and identify better practices.

The C|T Group will direct the project and fieldwork will be carried out principally by EMRS, a subsidiary of Crosby Textor Research Strategies Research Pty Ltd, through Computer Assisted Telephone Interviewing. As such, in performing the PIA the C|T Group has also tested privacy measures in place at EMRS.

Catherine Douglas, Managing Director of C|T Group's Australian research and campaigns business, was responsible for overseeing the PIA and in ensuring recommendations are implemented.

## ***Findings & Recommendations***

The PIA determined that operational procedures of the C|T Group and its subsidiary EMRS were sufficiently robust to protect the privacy of individuals to which the mobile information belongs.

Further documentation and formalisation of business practices related to destruction of data, onboarding procedures, routine changing of passwords has taken place as a result of the assessment to further strengthen operations and security. An example of C|T Group's existing privacy policy can be found on the website: <https://crosbytextorgroup.com/privacy-notice/>.

## **Privacy Impact Assessment Methodology**

The C|T Group, in consultation with the Liberal Party of Australia, conducted this PIA following the guidelines set out by the Office of the Australian Information Commissioner.

The Privacy Impact Assessment was conducted over a period of approximately six weeks in November and December 2018 as a part of a routine compliance review of the C|T Group's operations.

The C|T Group in Australia carried out this appraisal with support from its UK based Chief Compliance Officer, Leah James, and in partnership with its field agency, EMRS. It also received input from its consulting lawyer during the assessment.

In addition to its own internal processes, the C|T Group regularly consults with external stakeholders. For example:

- All researchers at the C|T Group are members of the Australian Market & Social Research Society of Australia (AMRS). In addition to reviewing industry bulletins, team members attend relevant briefings and conferences to stay abreast of changes to the Code of Conduct and trends affecting the industry
- The C|T Group regularly consults its lawyers on matters related to privacy
- As a UK headquartered consultancy, the C|T Group is also fully compliant with the General Data Protection Regulation, which requires extensive consultation with government and independent organisations

## **Project Description**

The research project will be conducted through Computer Assisted Telephone Interviewing across federal and state electorates, for the upcoming federal election.

Through a series of different surveys, C|T will seek to understand the perceptions of Australian voters towards policies, candidates and parties. The likely social benefits to come from this research will be the formulation of public policies based on the views and preferences expressed by voters.

During the course of the project, C|T ensures that collection, use and disclosure of personal information is consistent with the Privacy Act 1988, in accordance with the registered APP Code, the Privacy – Market and Social Research – Code 2014.

All of C|T's surveys are scripted and responses are supplied to interviewers in the event a question arises during the interview that is not addressed in the initial script. If a respondent shares that they would not like to continue, the call is terminated and none of the information from the interview is retained.

The final form of this research will be delivered in PowerPoint presentation format to the Liberal Party of Australia, with accompanying anonymised data tables. The conduction and end product of this research will be in full compliance with the AMRS Code of Professional Behaviour, and all local laws concerning data collection relevant to our business.

## **Analysis**

During the course of a research interview, in this case conducted via Computer Assisted Telephone Interviewing, information from a respondent may be disclosed that identifies the respondent. It may then be possible for an organisation to identify what a respondent says or thinks about a particular topic; in this case, how a respondent views a political representative, candidate, party or policy. Should a person be identified, it may be possible for them to be targeted with unwanted information by political parties or to have their views about a topic, organisation or person known when they do not wish for them to be.

The research project, like nearly all research undertaken by the C|T Group, is carried out on an anonymous basis. The C|T Group takes a number of steps to ensure the identity of respondents is not revealed at any time during the process.

After data collection has concluded and prior to any data being made available internally to researchers or sent externally to clients, all identifying information (including phone number) is removed from the data file to be used. This guarantees anonymity of each respondent to be surveyed. This practice event extends to reviewing all written comments or answers provided to ensure no phone numbers or identifying details (names, addresses etc) are included in the final data file.

The C|T Group has a series of measures in place to protect against a privacy breach including technology and onsite security, documented policies and procedures, employee and vendor contracts, and onboarding and routine training.

For example:

- Hardcopies are shredded immediately after use or placed in locked secure shredding bins. No material is left unattended either in the office or outside.
- Entry to the office requires an electronic pass. All employees are briefed during ongoing and throughout their tenure on confidentiality, which is also a condition of their contract.

As an additional measure, the Liberal Party Australia has agreed with the C|T group that information will be provided directly by the IPND manager to the C|T Group, rather than to the Party.

## **Conclusion**

In summary, C|T has rigorous processes in place to effectively manage privacy of individuals' data.

Through this impact assessment, C|T has taken action to further document and formalise business practices related to destruction of data, onboarding procedures and routine changing of passwords. This includes:

- Amending scripts for CATI interviews and focus groups
- Updating and distributing an employee handbook
- Updating employee contracts
- Updating the privacy policy
- Updating job set up forms
- Providing instructions on changing of passwords

## **Appendix 1**

### **About the C|T Group**

Founded by campaign strategists Sir Lynton Crosby and Mark Textor, the C|T Group offers a world renowned brand of successful, research-driven campaigns.

The C|T Group combines decades of experience in research, political campaigns, strategic communications, media, and corporate intelligence to deliver winning strategies at the highest levels of business and government.

Having worked on successful election and corporate campaigns across four continents, we understand the need for timely, actionable intelligence, so our clients can focus the right message and resources on their most persuadable 'swing voters' to get the results they want.

Our team of over 80 international, multilingual staff operate from offices in London, Sydney, Canberra, Milan and Washington D.C.

### ***Research***

The C|T Group believes in providing answers, not just information. A successful campaign knows which audience will decide the outcome, where they are, what they think and how to communicate with them. This is why cutting-edge opinion research is at the heart of our business.

Traditional research approaches will tell you what people think, the C|T Group's method is to find out why they think it. These insights allow us to create values-based campaign strategies that are rooted in fact and are emotionally resonant with our clients' target audiences.

Our research-driven approach has been successfully deployed in campaigns across the globe, whether in national elections, corporate positioning, complex financial transactions or brand architecture development.

The research services we offer include:

- Public opinion polling
- Focus groups and in-depth interviewing
- Corporate image and brand research
- Financial transactions research
- Shareholder research
- Employee and workplace culture research
- Telephone and online canvassing