



**CHARTERED SECRETARIES
AUSTRALIA**

Leaders in governance

13 June 2008

Information Security Breach Notification Consultation
Office of the Privacy Commissioner
GPO Box 5218
Sydney NSW 2001

Sent by email to: consultation@privacy.gov.au

Dear Madam/Sir

**Draft Voluntary Information Security Breach
Notification Guide: Consultation Paper**

CSA welcomes the opportunity to comment on the Draft Voluntary Information Security Breach Notification Guide (the Guide), released for consultation in April 2008.

CSA is the peak professional body delivering accredited education and the most practical and authoritative training and information on governance, as well as thought leadership in the field. Our members are all involved in governance, corporate administration and compliance with legislative and regulatory obligations, including those under privacy legislation at both Commonwealth and state levels, and as such are fully aware of their statutory obligations to maintain the security of personal information.

CSA commends the Office of the Privacy Commissioner for its development of the Guide, which we believe provides a practical and balanced approach to the notification of affected persons of data security breaches regarding their personal information. CSA notes that the guidance provided largely mirrors existing practices and processes in place in many organisations, as well as providing assistance to those organisations seeking to implement such practices and processes.

CSA members believe that the Guide outlines steps that any organisation could reasonably follow to respond to a breach of privacy, and that it can be followed easily by businesses of all sizes and in all industry groups. CSA notes that any individual has the right to report a breach to the Privacy Commissioner should an organisation not have taken steps as outlined in the Guide.

CSA strongly recommends that the Guide remain voluntary and principles-based, providing flexibility to organisations to assess the security breach and their response to it.

Yours sincerely

Tim Sheehy
CHIEF EXECUTIVE