



**SHOULD WE SUBSCRIBE TO THE  
BIOMETRICS INSTITUTE PRIVACY CODE ?**

**A CHECK LIST**

**Introduction**

The Biometrics Institute Privacy Code was designed for the protection of Institute members and their clients, has been approved by the Federal Privacy Commissioner and is part of the Privacy Act. It enables you to guarantee that you protect your clients' privacy in a professional manner. It is your benchmark and it's your evidence that you have in place systems and procedures that comply with Australia's Privacy Act.

If you answer yes to any of the questions below, we strongly recommend that you subscribe to the Biometrics Institute Privacy Code. All subscribers' names will be recorded on the Biometrics Institute's website for the information of clients and the public.

If the answer is no, then follow the proposed actions.

Question/ Answer	Tick appropriate	Action to take, If answer is:
<b>Do you use biometrics in any area of your organisation's activities? (This can include fingerprints, photos, eye scans, face and hand geometry, voice prints etc)</b>		
	<input type="checkbox"/> No	<input type="checkbox"/> Yes -> sign up to the Biometrics Institute Privacy Code <a href="http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81">http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81</a>
<b>Are you about to design or roll out a project which involves biometrics?</b>		
	<input type="checkbox"/> No	<input type="checkbox"/> Yes -> sign up to the Biometrics Institute Privacy Code <a href="http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81">http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81</a>
<b>Do you need evidence that you have complied with the Privacy Act?</b>		
	<input type="checkbox"/> No	<input type="checkbox"/> Yes -> sign up to the Biometrics Institute Privacy Code <a href="http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81">http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81</a>
<b>Do you need a benchmark against which you can measure changes in your environment which affect privacy?</b>		
	<input type="checkbox"/> No	<input type="checkbox"/> Yes -> sign up to the Biometrics Institute Privacy Code <a href="http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81">http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81</a>

<b>Would your organisation be embarrassed by bad publicity about the way you handle your client's personal information?</b>		
	<input type="checkbox"/> No	<input type="checkbox"/> Yes -> sign up to the Biometrics Institute Privacy Code <a href="http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81">http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81</a>
<b>Would your reputation or business be affected by publicity about privacy breaches within your organisation?</b>		
	<input type="checkbox"/> No	<input type="checkbox"/> Yes -> sign up to the Biometrics Institute Privacy Code <a href="http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81">http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81</a>
<b>Legally, does the Privacy Commissioner have the power to audit your privacy protection policies and procedures?</b>		
	<input type="checkbox"/> No	<input type="checkbox"/> Yes -> sign up to the Biometrics Institute Privacy Code <a href="http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81">http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81</a>
<b>Do you handle medical records or sensitive personal information that must be protected in a professional manner?</b>		
	<input type="checkbox"/> No	<input type="checkbox"/> Yes -> sign up to the Biometrics Institute Privacy Code <a href="http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81">http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81</a>
<b>Does your organisation in any way handle or sight documents which use or will use biometrics? (Can be passports, future driver licences or health cards)</b>		
	<input type="checkbox"/> No	<input type="checkbox"/> Yes -> sign up to the Biometrics Institute Privacy Code <a href="http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81">http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81</a>
<b>Is our organisation eligible to become a Biometrics Institute Code Subscriber?</b>		
a) The Code applicant must be a member of the Biometrics Institute <u>and</u>	<input type="checkbox"/> Yes	<input type="checkbox"/> No -> Sign up for membership. Download application form from: <a href="http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=26">http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=26</a>
b) The Code applicant must be an "organisation" within the meaning of the Privacy Act 1988, refer to Section 18BA of the Act.	<input type="checkbox"/> Yes	<input type="checkbox"/> No -> Opt-in: <a href="http://www.privacy.gov.au/business/register/index.html">http://www.privacy.gov.au/business/register/index.html</a>

<b>Our organisation is a government agency. Can we become a Code subscriber?</b>		
See Clause C.4. of the Code. Australian Government agencies are not legally required to comply with the Code. However, Australian Government agencies at both a state and federal level may choose to follow the Code; they may also prefer tenderers to be signatories to the Code. We cannot stress strongly enough that government agencies become Code Subscribers to increase public trust in biometrics and their own organisations.	<input type="checkbox"/> No	<input type="checkbox"/> Yes -> sign up to the Biometrics Institute Privacy Code (you have to be a member of the Biometrics Institute) <a href="http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81">http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81</a>
<b>Our organisation is not based in Australia, should we still become Code Subscribers?</b>		
If your organisation is conducting business in Australia, you should subscribe to the Code.	<input type="checkbox"/> No	<input type="checkbox"/> Yes -> sign up to the Biometrics Institute Privacy Code (you have to be a member of the Biometrics Institute) <a href="http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81">http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=81</a>
<b>We are a Biometrics Institute member. Is the Code subscription compulsory to members?</b>		
Subscription is voluntary.	<input type="checkbox"/> No	<input type="checkbox"/> Subscribe voluntarily. We cannot stress strongly enough that organizations should become Code Subscribers to increase public trust in biometrics and their own organizations.
<b>Does the Privacy Code require Privacy Impact Assessments and Privacy Audits?</b>		
See BIPP: 13.3 A Code Subscriber shall conduct privacy impact assessments as part of the planning and management process for biometrics implementation. A Code Subscriber must consider "end-to-end" privacy management issues when providing a product or service to an information technology system. This is a regime which covers at least the secure collection, storage and transmission of biometrics and any associated records. This also includes privacy audits, privacy impact statements, access control and other	n/a	<input type="checkbox"/> Yes -> request information about the Biometrics Institute PIA service <a href="http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=27">http://www.biometricsinstitute.org/displaycommon.cfm?an=1&amp;subarticlenbr=27</a>

<p>procedures related to a holistic privacy policy and procedures regime. This requires biometric providers to take a holistic view of their role in managing privacy across an enterprise.</p>		
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