



GPA Global Privacy and Data Protection Awards 2021

Entry Form

To submit an entry to the GPA Global Privacy and Data Protection Awards please complete and email this form to secretariat@globalprivacyassembly.org no later than **14 June 2021**.

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2¹ applies.

1. CONTACT DETAILS FOR THIS ENTRY

Privacy/Data Protection
Authority:

Office of the Privacy Commissioner, New Zealand

2. ELIGIBILITY

By submitting this entry, I confirm that (*please tick all boxes to confirm*):

- The Authority is a member of the Global Privacy Assembly
- The initiative described in this entry was undertaken since January 2020.
- I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat.

3. CATEGORIES

Please indicate which category you wish to enter.

*Please tick **one**; please use a separate form for each category you wish to enter:*

- Education and Public Awareness
- Accountability
- Dispute Resolution and Enforcement
- Innovation
- People's Choice

4. DESCRIPTION OF THE INITIATIVE

a. Please provide a brief summary of the initiative (no more than 75 words)

NotifyUs is an innovative online tool we built to:

¹ [GPA Rules and Procedures](#), Rule 6.2 'Assembly documents':

Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures.

- Assist organisations to self-assess if a privacy breach has caused or is likely to cause serious harm to affected individuals, and therefore must be formally notified to us;
- Enable organisations to securely report a privacy breach to us online with the information we require;
- Allow us to easily analyse and report on common causes, systemic issues and trends, to inform our education and compliance initiatives.

b. Please provide a full description of the initiative (no more than 350 words)

Our new Privacy Act came into effect on 1 December 2020. It made it mandatory for organisations to report to us any privacy breach that has caused or is likely to cause serious harm to individuals. Till then, organisations that had reported privacy breaches to us had done so on a voluntary basis, largely so we could provide them with guidance and support as a trusted adviser. The reports came through a multitude of channels and varied in the information provided, but were small enough in number to be managed manually. We needed something more robust and user friendly to manage what we expected would be an exponential increase in notifications once they became mandatory.

In close consultation with business, industry, the government and not for profit sectors, we designed and built an automated online tool that offers the following.

- Self-assessment – Organisations can anonymously complete a short and simple set of questions about the type of breach and harm, and be given an immediate online response if their privacy breach is likely notifiable to us.
- Online reporting – The NotifyUs tool steps organisations through an online reporting form, with user friendly guidance throughout.
- Online updates – The tool allows for organisations to easily update the information they have provided to us, noting that at the time they first report a privacy breach to us, they may not have all the information required.
- Security – NotifyUs uses end-to-end encryption to ensure that notifications can be securely transmitted to us.
- Timely alerts 24/7 – The tool alerts us in real-time to notifications of breaches that require an urgent response because the risk of serious harm is immediate.
- Analytics – NotifyUs allows us to capture, analyse and report on common causes, systemic issues and trends, so that we can better target our education and compliance initiatives. The richness and consistency of the data helps ensure that our decisions can be evidence-based and intelligence-led.
- Administrative ease – The tool has enabled us to effectively manage and respond to the 100% increase in the number of breaches reported to us, by reducing the administrative burden.

c. Please explain why you think the initiative deserves to be recognised by an award (no more than 200 words)

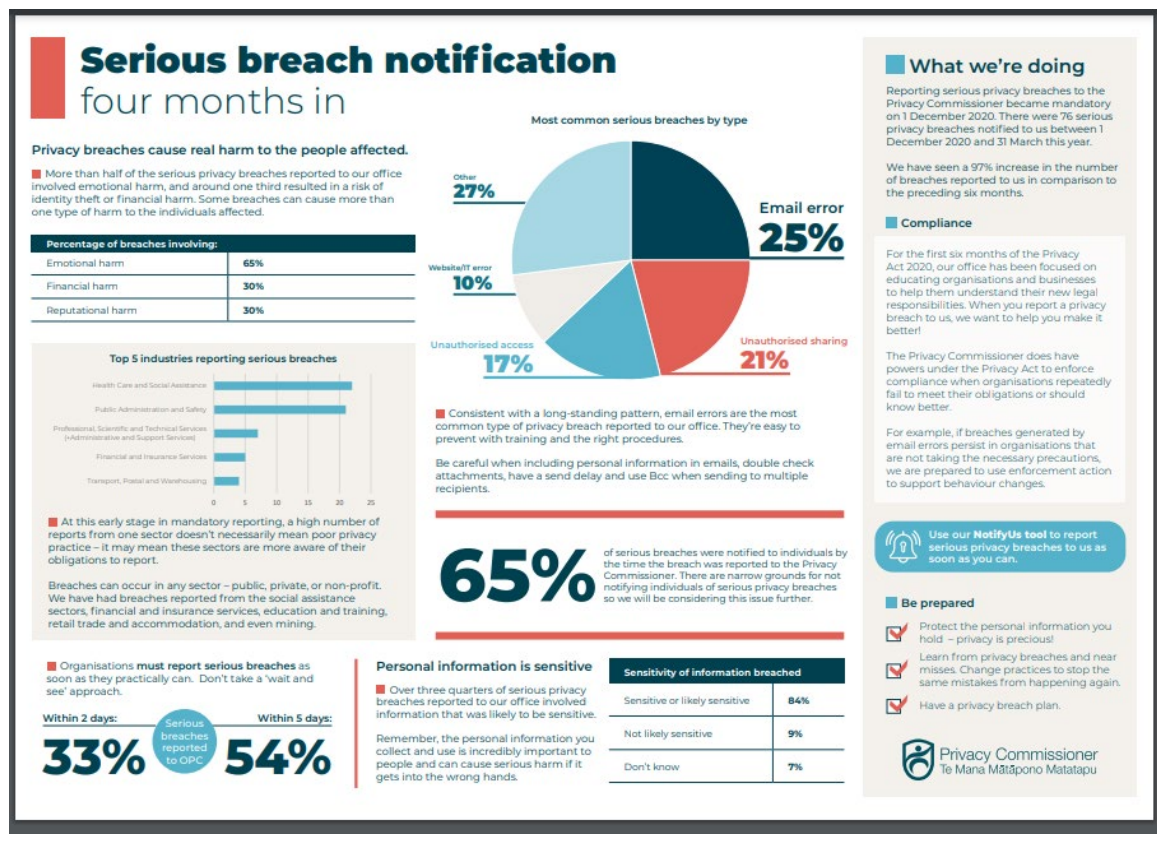
NotifyUs is an example of innovation in the use of technology to meet regulatory requirements. It has made it easier, especially for small and medium organisations, to understand and respond to their privacy breach obligations under our new Act. The self-assessment of whether their privacy breach is notifiable is both anonymous and very user-friendly and they can securely report

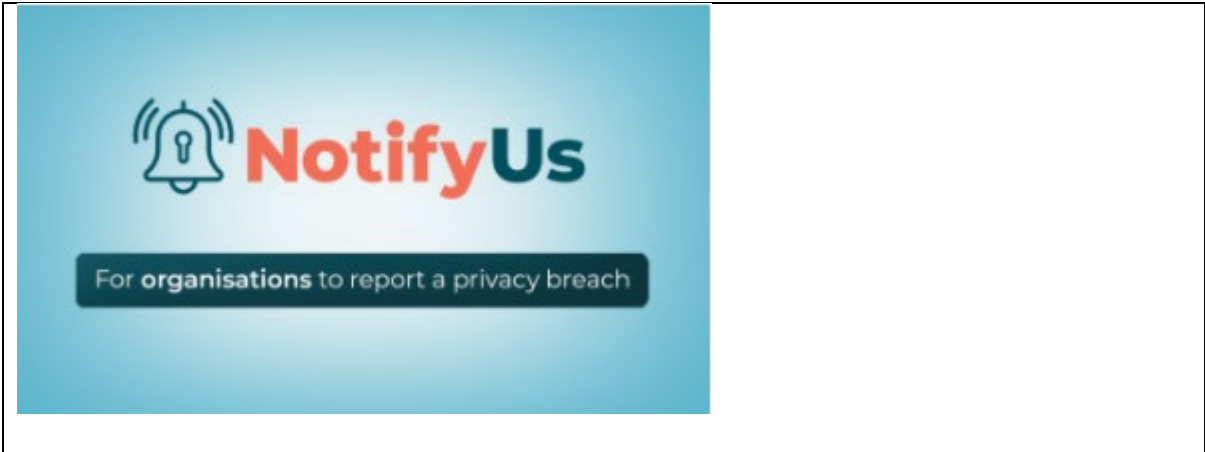
a breach to us through a guided, step-by-step online process. NotifyUs has also made it administratively easier for us to implement and manage the new mandatory regime, and provided us with a richness of data that allows us to better target our resources for the maximum public good. This is exemplified in this [infographic](#) about the top issues and trends we have identified four months in.

The success of the tool is also exemplified in a recent instance where an organisation reported a privacy breach to us with immediate risk of serious harm, just as our offices were closing for a long holiday weekend. Someone had taken a video of a mental health patient being restrained by law enforcement officers under our Mental Health Act and had posted the video online. The NotifyUs tool automatically alerted us to the notification as soon as we received it due to the risk of serious harm being immediate; we were able to respond to the organisation immediately with the advice they needed; and the online post was taken down not long after. NotifyUs works for organisations and works for us 24/7.

d. Please include a photograph or image, if you wish (This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided)

<https://privacy.org.nz/assets/Privacy-Week/Serious-breach-notification-infographic.pdf>





- e. Please provide the most relevant link on the authority's website to the initiative, if applicable (*The website content does not need to be in English*)

<https://privacy.org.nz/responsibilities/privacy-breaches/notify-us/>

- f. Please provide any other relevant links that help explain the initiative or its impact or success (*e.g. links to news reports or articles*):

Media release

<https://privacy.org.nz/publications/statements-media-releases/office-of-the-privacy-commissioner-launches-privacy-breach-reporting-tool/>