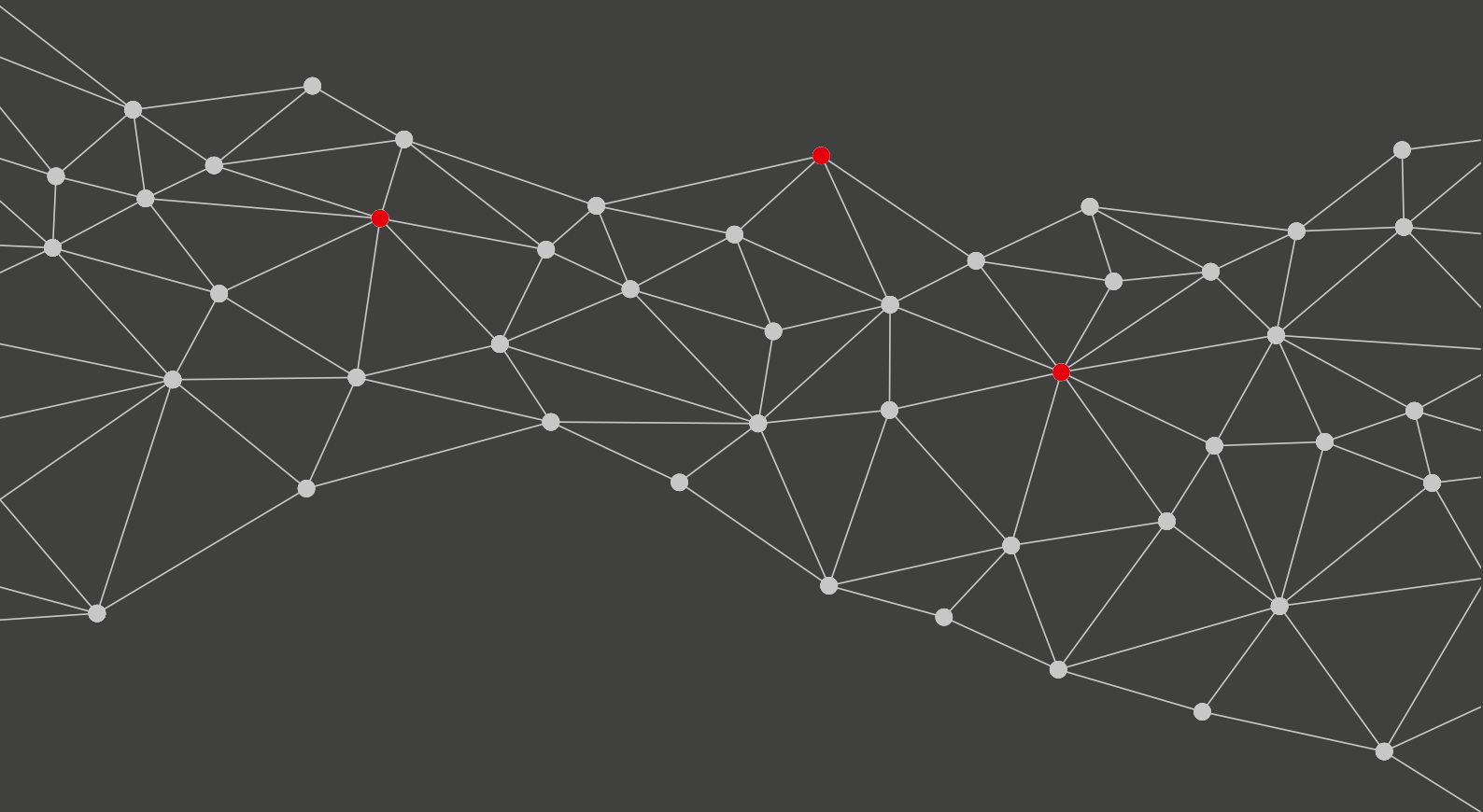# SalingerPrivacy

Privacy Services

Capability Statement

# Privacy builds trust: protect your data, preserve your reputation

No matter what sector you are in, we believe that privacy protection is essential for your reputation. In everything we do, we aim to demystify privacy law, and offer pragmatic solutions – to help you ensure regulatory compliance, and maintain the trust of your customers.

Salinger Privacy was established in 2004 by one of Australia's foremost privacy experts. Our clients come from government, the non-profit sector and businesses across Australia. From ASX20 companies to brand-new start-ups, our clients turn to Salinger Privacy because of our reputation for providing superior quality advice, engaging training and effective compliance solutions.

Salinger Privacy is on the Australian Government's Privacy Services Provider Panel for Privacy Impact Assessments, privacy advice, and privacy training, and our Compliance Kits and eLearning solutions are approved for supply through the Australian Government's Digital Marketplace.

We are also an approved supplier on the Victorian Government's eServices Register; and a fully pre-qualified supplier to the NSW Government.

Salinger Privacy is also an Official Training Partner of the International Association of Privacy Professionals (IAPP).
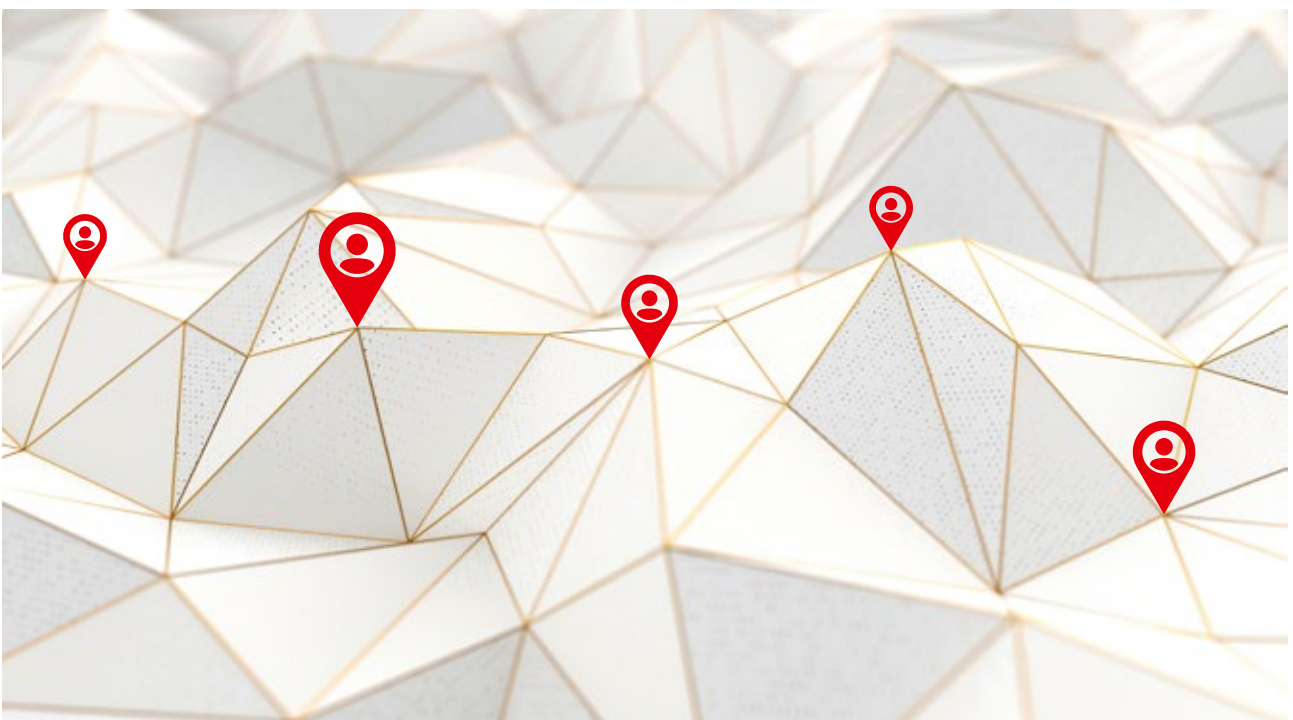
Pragmatic advice, from risk management to privacy by design.

Salinger Privacy can deliver tailor-made solutions to your privacy problems.

By working in partnership with our clients, reviewing people, practices and systems, we can map data flows and identify the critical points of strength and weakness within a product design, a business process, or an organisation's overall privacy management program.

At Salinger Privacy we pride ourselves on taking a pragmatic approach to developing recommendations for our clients. We recognise that it is not always possible to achieve a 'Rolls Royce' standard of privacy protection, and we therefore prioritise recommendations which seek to address high-risk areas, with minimal resourcing input or impact on achieving organisational objectives.

Privacy Impact Assessment

Being involved up-front in the design of new initiatives ensures that privacy compliance and best practice can be 'built-in' rather than 'bolted on'. Privacy Impact Assessment, or PIA, is the ideal tool for assessing new initiatives, whether they are technical, policy or legislative.

We believe a PIA should do more than just assess a proposed project's likely compliance with statutory privacy principles. It should also assess data governance – the policies, procedures and structures which affect accountability for privacy compliance – and consider community or stakeholder expectations.

Our reviews therefore assess both the data flows involved in project / program / system design, and the policies, procedures and accountability mechanisms supporting rollout and implementation.

A PIA report aims to describe and de-mystify an initiative, identify and analyse the privacy implications, and lead to recommendations for minimising privacy intrusion, and maximising privacy protection – while ensuring the initiative's objectives are met. Our recommendations utilise several 'levers' to mitigate privacy risks and build in Privacy by Design, including technology design, business processes, policies and procedures, legislative options, and communication strategies.

As part of our PIAs, where appropriate we partner with independent experts to conduct re-identification risk assessments, or test for algorithmic bias.

Privacy by Design advice

Agile projects need agile privacy advice.

For projects at an early stage, we also offer integrated privacy advice, delivered early and often during ideation and design sprints, rather than the more formal, long-form analysis and advice contained in a traditional PIA Report.

This approach to privacy advice can help shape the outcomes of the project early, by incorporating privacy considerations into project design from the very beginning. An embedded privacy advisor can also share learnings with your project team about how to apply Privacy Design Strategies in future projects.

Algorithmic Impact Assessment

We help our clients build fairness, ethics, accountability and transparency ('FEAT') into AI projects, algorithmic systems and automated decision-making.

Our Algorithmic Impact Assessments use the Four D's Framework to assess privacy risk, across design, data, development, and deployment. As well as examining the various types of privacy-related harm which can arise from algorithmic systems, we partner with the Gradient Institute to test for accuracy, performance, fairness and bias in training data, ML models and AI systems.

Privacy reviews

Whether you need a gap analysis ahead of legal changes, a review of the maturity of your privacy program, or to run the compliance ruler over multiple operational areas, we have extensive experience in conducting organisational reviews, focusing on privacy compliance and data governance.

Our privacy reviews can be a light touch 'health check', or a detailed examination of both policy and practice, to review the level of maturity of the privacy management program, and to highlight compliance gaps and privacy risks in the practices of the organisation.

Data ethics advice

Where privacy legal compliance seeks to answer the 'can we?' question, data ethics seeks to answer the 'should we?' question. We can work with you to identify and manage ethical issues in relation to the use of data, which go beyond legal compliance concerns.

Our advice routinely traverses re-identification risks as well as community expectations, and we maintain a comprehensive library of research into data ethics and the role of trust in maintaining social licence.

Salinger Privacy can help you navigate the complexity of the regulatory environment, and ensure the trust of your customers.

Engaging training, crafted by privacy experts.

Whether you need privacy compliance training or specialised content, we offer unrivalled experience in privacy learning.

Salinger Privacy has multiple training offerings, including public programs, and customised workshops delivered in-house at your premises. We also offer live streaming, webinars, online privacy compliance training modules, customised eLearning programs, and more advanced eLearning modules for privacy professionals.

Tailored privacy training and workshops
In addition to general privacy awareness training suitable for all staff, our specialist seminars and workshops include topics such as:
- Executive briefings for your board or senior leadership team
- Masterclasses – on topics such as data ethics and de-identification
- Privacy by Design – strategies for influencing business process design and solution architecture
- Privacy Risk Management – identifying and mitigating privacy risk in project management

- Privacy Impact Assessment – workshops on how to conduct a PIA
- Privacy Management in Practice – establishing a comprehensive privacy management program within your organisation
- Data Breach Response simulation exercises – interactive, experiential workshops to build team members' capability to respond to real life privacy scenarios, and
- Privacy & Research – privacy obligations for researchers, academics, research support staff, and members of human research ethics committees.

Salinger Privacy is also an Official Training Partner of the International Association of Privacy Professionals (IAPP), offering their professional certification programs for the Australian and New Zealand market.

Online training solutions

Salinger Privacy has developed a range of eLearning solutions which you can offer to specific individuals in key roles, as part of an induction program, or roll out to all staff across your organisation.

Our training content is based on what works. The privacy messages to be delivered to you and your staff have been carefully crafted by our professional trainers, with the benefit of over 20 years' experience in delivering privacy training, for clients across government, business and not-for-profit sectors.

And because we are privacy specialists, our content is kept up-to-date with the latest developments in both the law and technology.

The benefits of eLearning include flexibility of timing so staff can participate in training at a time that suits them; flexibility of location; the ability to include new staff at the time of their induction; and regular reports which help you monitor completion rates and staff performance.

Salinger Privacy offers the following online privacy training programs:

Privacy Compliance Training

A privacy compliance training program suitable for staff at all levels.
Choose either:
- **Privacy Act Compliance Training:** for staff of businesses and federal government agencies regulated by the Australian Privacy Act 1988 (Cth), or
- **Privacy Awareness Training for NSW Public Sector Agencies:** for staff of NSW public sector agencies (State government, State-owned corporations, local councils, and public universities in NSW) regulated by the PPIP Act and HRIP Act.

We can also deliver Privacy Compliance Training for your organisation in two other modes:
- **Branded** – a flat-fee licence to our Privacy Compliance Training program, suitable for large numbers of users, branded for your organisation and available almost instantly.
- **Customised** – our Privacy Compliance Training program, but customised with content and scenarios specific to your organisation's needs.

Privacy Professionals Training

Our Privacy Professionals Training is a series of topic-specific eLearning modules designed for privacy officers, privacy advisors, risk and compliance professionals, ICT teams, and anyone else interested in privacy law and practice.

Bespoke eLearning Solutions

Training programs built just for you. As an example, we partnered with the AMA to design and build an online privacy compliance training module, which was accredited by the RACGP and ACRRM for continuing professional development for those in the medical profession.

Likewise, for IAB Australia, we developed a bespoke training program, to help people who work in the media, marketing and advertising industries understand the essentials of privacy law and practice. The AdTech industry is experiencing rapid technological change, new data protection legislative regimes with trans-national reach, and intense regulatory scrutiny both here and abroad. IAB Australia wanted to offer their members a clear but comprehensive training program to help address the need for professional learning around privacy law requirements. We developed a series of short videos, which were then combined to form a single eLearning program.

Privacy Compliance Kits

Chart a course through your privacy obligations with resources tailored to your needs.

Whether you just want the basics for a start-up, need advice about a particular risk area, or are planning to build a complete privacy management program, we have a Compliance Kit to suit.

Crafted by our team of privacy specialists, each Compliance Kit offers expert guidance and pragmatic tools, such as templates, checklists and briefing papers.

Benefit from our experience: let Salinger Privacy guide you through the regulatory maze.

Navigate your privacy obligations with our Compliance Kits

Expert guidance and pragmatic tools, tailored to your sector.

Australian Government

Business & Non-profit

NSW Public Sector

VIC Public Sector

Exceptional people, deep experience.

Anna Johnston

Our founder and Principal, **Anna Johnston,** is one of Australia's most respected experts in privacy law and practice.

Since establishing Salinger Privacy in 2004 after serving as Deputy Privacy Commissioner of NSW, Anna has provided advice on managing privacy risks to clients including tech start-ups, ASX20 businesses and government agencies. She has assessed large and highly complex cross-jurisdictional public sector projects, reviewed the maturity of privacy programs for clients in the health and financial sectors, and provided advice on data ethics and the application of privacy design strategies to data linkage projects.

Anna has been called upon to provide expert testimony before various Parliamentary inquiries, the Productivity Commission and the European Commission, spoken at numerous conferences, is regularly asked to comment on privacy issues in the media, and has presented as a guest lecturer in Data Privacy Law at UNSW.

Anna has been a member of the IAPP since 2008, and in 2019 was recognised as an industry veteran with the designation of Fellow of Information Privacy (FIP).

In 2022, Anna was honoured for her 'exceptional leadership, knowledge and creativity in privacy' with the IAPP Vanguard Award, one of five privacy professionals recognised globally whose pioneering work is helping to shape the future of privacy and data protection. The Vanguard award was bestowed in reflection of Anna's contributions to the privacy profession, and to the protection of privacy for the benefit of all. In particular, the award recognised Anna's contributions in a voluntary capacity over 20 years, including both formal and informal advocacy on key issues, multiple pro bono advisory positions, and knowledge-sharing through speaking and writing about privacy. Her passionate pursuit of law reform to improve protection against digital harms was called out in particular.

Anna holds a first class honours degree in Law, a Masters of Public Policy with honours, a Graduate Certificate in Management, a Graduate Diploma of Legal Practice, and a Bachelor of Arts. She is a Certified Information Privacy Professional, Europe (CIPP/E) and a Certified Information Privacy Manager (CIPM). She was admitted as a Solicitor of the Supreme Court of NSW in 1996.

Melanie Casley

Melanie Casley, our Senior Privacy Consultant, has deep experience in the application of privacy laws, having worked in the field since 2002, across both regulatory and advisory capacities.

At Salinger Privacy Melanie conducts privacy audits and Privacy Impact Assessments (PIAs) for our clients. She has also worked alongside clients during agile project design sprints, to offer advice on how best to implement 'Privacy by Design' principles to shape project design and outcomes.

Melanie has led PIAs into complex, multi-jurisdictional public sector projects, such as a project to develop a real-time national information-sharing system for child protection, and data linkage and analytics projects in the health and disability sectors. Melanie has also advised private sector clients from tiny start-ups to global mining giant Rio Tinto. For Rio Tinto, she conducted PIAs of projects across the globe, from France and the USA to Zambia and Mongolia.

Melanie previously served as Manager of the Information and Privacy Unit in the Victorian Department of Justice and Regulation, and began her privacy career with a number of policy, training and compliance roles with the Office of the Victorian Privacy Commissioner.

Melanie has given presentations on behalf of Salinger Privacy at events such as OVIC's Victorian Privacy Network. As part of Salinger Privacy's 'Giving Back' program, Mel also provides pro bono advice in her role on the Human Research Ethics Committee for Macquarie University, and edits the privacy law section of the Fitzroy Legal Service's Law Handbook.

Melanie holds a Bachelor of Laws, a Bachelor of Arts, and a Graduate Diploma of Educational Psychology.

Mel is also an accredited mediator, a Certified Information Privacy Manager (CIPM), a Certified Information Privacy Professional, Europe (CIPP/E), a Certified Information Privacy Technologist (CIPT), and a member of the IAPP.

In 2022 Melanie was recognised as an industry veteran by the IAPP with the designation of Fellow of Information Privacy (FIP).

Alex Kotova

Alex Kotova, our Privacy & Technology Specialist, has developed her privacy expertise through roles across multiple industries, including banking, retail, hospitality, gaming and health insurance.

Alex has particular expertise in applying privacy principles to the rapidly moving technology landscape, including the implementation, use and governance of expert systems (including artificial intelligence, machine learning, and algorithms) and other emerging technologies. She has advised extensively on third-party software, complex data flows, and data sharing arrangements. She has a special interest in the operation of data ecosystems, including AdTech and data brokerage.

With her extensive experience in in-house roles, Alex brings to her clients a solid understanding of how privacy risk fits into broader organisational risk profiles and project management activities, to ensure privacy risks are identified and mitigated without disrupting existing risk management processes. She excels at developing a pragmatic understanding of our clients' business operations and objectives to provide tailored and relevant advice on the practical application of privacy principles; the suitability and potential uplift of existing controls; and preparedness for upcoming regulatory changes.

Alex is able to offer advice at all stages of project delivery, including Privacy by Design at the inception of projects, and remediation advice for previously delivered initiatives, systems and processes. She can also advise on the development of policies, procedures and frameworks to enable and support the privacy function, providing governance for its operation in a broader risk management context and uplifting compliance maturity.

Alex holds a Bachelor of Laws / Bachelor of Arts, a Graduate Diploma of Legal Practice and was admitted as an Australian Lawyer in Victoria in 2015. She is also a member of the IAPP, a Certified Information Privacy Manager (CIPM), and Certified Information Privacy Professional – Europe (CIPP/E).

Andrea Calleia

Andrea Calleia, our Director of Learning, has specialised in privacy training since 2003 when she developed the education program for the NSW Privacy Commissioner's Office.

Since joining Salinger Privacy in 2008, Andrea has developed our eLearning programs, and delivers most of our face to face training. She has designed and facilitated bespoke privacy training on behalf of clients including QANTAS, Sage Software and the Office of the Australian Information Commissioner. Andrea is consistently rated '5 out of 5' by our training participants and has been described as 'excellent and engaging', 'enthusiastic, clear and effective'.

Andrea holds a Bachelor of Arts majoring in Education and Human Resources, and a Certificate IV in Training and Assessment.

She is a Certified Practitioner of Human Resources (CPHR) via the Australian Human Resources Institute. Her contribution to the professional learning and development sector was recognised in 2020 with a formal designation as a Fellow of the Australian Institute of Training and Development.

Andrea is also a Certified Information Privacy Manager (CIPM), Certified information Privacy Professional, Europe (CIPP/E), and Certified Information Privacy Technologist (CIPT). She is a member of the IAPP, and a member of the Australian Privacy Foundation.

Since 2020, Andrea has served as a member of the IAPP's ANZ Advisory Board, to promote and serve the privacy profession in Australia and New Zealand.

As part of Salinger Privacy's 'Giving Back' program, Andrea also sits on the Human Research Ethics Committee for the Lifeblood program of the Australian Red Cross.

In 2021, Andrea was recognised as an industry veteran by the IAPP with the designation of Fellow of Information Privacy (FIP).

Dr Chris Culnane

Stephen Wilson

Our Associate **Dr Chris Culnane** of Castellate Consulting is an expert in cyber security and privacy, specialising in the integrity of open data releases.

Chris has conducted complex analysis, research and advisory work for Salinger Privacy clients including the NSW Ministry of Health, and the Office of the Australian Information Commissioner. His work has encompassed re-identification risk calculations, policy and research work in relation to online identifiers, and developing law reform options.

Chris also has a particular expertise in evaluating the privacy risks posed by large datasets, and has written extensively about de-identification and re-identification risks. His work led to the discovery of re-identification risks in the Federal MBS/PBS open data release, and the Victorian government release of Myki data. Chris has also led evaluations of privacy-preserving techniques, including for the Australian Bureau of Statistics and Transport for NSW.

Chris holds a first class honours Bachelor of Science in Computing, a Master of Science in Internet Computing, and a PhD in Computer and Information Systems Security.

Stephen Wilson, our Associate, is a leading international authority on digital identity. His career spans more than 30 years in IT, software engineering and R&D management, in both Australia and the US.

Stephen's privacy experience is founded on many years working in the sensitive sectors of healthcare and government, and forged through highly original research into the complex interplay of privacy and security. He has pioneered privacy engineering and design techniques to tailor practical guidance for information architects, designers and project managers, to help build privacy controls into the formative stages of systems development.

Stephen has helped organisations in government, health and finance throughout the Asia Pacific, with e-security strategy, policy, architecture, privacy, risk management, governance and technology selection. Stephen holds an honours degree in Electrical Engineering, and a Bachelor of Science.

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