

XAMAX

Consultancy

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Mr J. McMillan
The Information Commissioner
Office of the Australian Information Commissioner

Dear John

Re: Consultation Process re OAIC Guide to Information Security

This Submission in relation to the above matter has been prepared in my role as an eBusiness consultant. (In addition, I'm aware of the Australian Privacy Foundation's Submission, and have participated in its preparation). This document is open for publication.

Given a somewhat tighter focus, the OAIC's Guide could be highly valuable to organisations.

Information is central to the operations of almost all business enterprises, government agencies and non-profit organisations. Computers, software and networks are inherently insecure. And threats to information security are substantial, and increasing.

As a result, every organisation needs to have at least a minimum set of information security safeguards in place – for its own sake, to protect the interests of the organisations it deals with, and to protect the personal data of its staff and other individuals whose data it holds.

I submit that the OAIC's Guide should declare a minimum set of safeguards; and then stress the need for risk analysis, and, depending on the findings, additional risk management measures above and beyond that minimum. Such a 'minimum safeguards' section would be of greatest use to organisations if it were expressed in a self-contained Appendix to the Guide.

By way of example, I attach a two-page brochure that proposes a set of safeguards that my IT security assignments lead me to believe is the minimum acceptable. (My intention is that a version of this document be distributed through various channels, possibly bearing the Xamax logo, but possibly not). Other consultants might prioritise the safeguards a little differently.

Yours sincerely



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