

Mr Timothy Pilgrim
Privacy Commissioner
Office of the Australian Information Commissioner
GPO Box 5218
SYDNEY NSW 2001
Email: consultation@oaic.gov.au

16 January 2013

Consultation – Guide to information security: ‘Reasonable steps’ to protect personal information

Dear Mr Pilgrim

Thank you for the opportunity to comment on the Office of the Australian Information Commissioner’s *Guide to information security: ‘Reasonable steps’ to protect personal information*. The Australasian Retail Credit Association (ARCA) appreciates the extension of time granted for us to provide you with this submission.

ARCA is the industry association for retail Credit Providers and Credit Reporting Bodies as defined in the *Privacy Act (Cth) 1988*. ARCA exists to promote best practice in credit risk assessment and responsible credit, as well as to promote better standards in consumer credit reporting. ARCA takes a leadership role in promoting the sharing of information to enable Credit Providers to better serve their customers.

ARCA has restricted its comments to those questions asked in the Discussion Paper on which we wish to express a view. Some ARCA Members may provide their own submission on those matters that they may wish to express an alternative view.

ARCA found the guide a useful and easy to read document. ARCA Members have advised us that it provides sufficient information so as to be helpful to them in determining how to meet their compliance obligations, but not so prescriptive as to inhibit their operation or to dampen innovation.

Like many of our Members, ARCA supports the *ISO 27000 series* as the global standard for information security. The AS/NZS ISO 27000 series supports a risk based assessment of threats and vulnerabilities, based on a range of criteria including needs of each organisation, including the current processes, size and structure.

We support the release of the OAIC Guide and urge the OAIC to ensure it is kept relevant and current in the interests of supporting ARCA Members.

Further, we support the OAIC producing such well reasoned and accessible guidance on other particular matters within your regulatory purview on an as-

needs basis in the future, where such guidance can support our Members to achieve their compliance obligations.

For any additional information or comment regarding this submission, please contact Matt Gijselman, ARCA Head of Public Affairs, on 02 9236 2426 or email mgijselman@arca.asn.au.

Yours sincerely

A handwritten signature in black ink, appearing to be 'D. Paull', with a stylized, cursive script.

DAMIAN PAULL
Chief Executive Officer