



# Privacy and Cyber Security Statement

## LSP Endorsement Model Reporting Requirements

### 1. Purpose and Commitment

The following Statement outlines how NAATI intends to collect, store, manage, and protect information provided by Endorsed Language Service Providers (LSPs) under the LSP Endorsement Model specific to the Reporting Requirements as outlined in the LSP Endorsement Guidelines (Item 12.2 refers).

This Statement should be read in conjunction with the LSP Endorsement Guidelines, NAATI's Privacy Policy, and NAATI's Data Breach Management Policy.

NAATI is committed to ensuring that all information shared by Endorsed LSPs for reporting purposes is handled in strict compliance with:

- The *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs)
- The *Privacy and Other Legislation Amendment Act 2024* (Cth)
- Relevant state and territory information and data protection laws; and
- *The Australian Cyber Security Act 2024* (Cth) and Australian Signals Directorate (ASD) guidance.

### 2. Scope

This statement applies to all information and data provided by Endorsed LSPs as part of their regular reporting obligations under Item 12.2 of the LSP Endorsement Guidelines.

It covers the collection, transmission, storage, use, analysis, and publication of service-related data, including line-by-line service-related data specific to:

- The jurisdiction and postcode where a language service (translating or interpreting service) is delivered
- The type and format of a language service (e.g. translating or interpreting service, provided face to face by telephone, videoconference or other).
- Languages utilised in the language service (e.g. French to English).
- Service theme (For example, a health-related service, legal/justice-related service, a general government service, or a conference-related service)
- The Practitioner's NAATI Certified Practitioner Number (CPN); and
- Service outcomes (delivered, cancelled, or rescheduled).

Although most data is de-identified, the inclusion of the NAATI CPN means that a subset of the dataset may reasonably be considered to constitute *personal information*, as listed under section 6 of the *Privacy Act 1988* (Cth).

### 3. Information Collection

Endorsed LSPs are required to provide service-related data directly to NAATI periodically in order to maintain their Endorsement Status, in accordance with the LSP Endorsement Guidelines.

NAATI will seek the necessary authority from the Endorsed LSP, as well as any Australian, state or territory government agency it is contracted by to deliver language services, to ensure the necessary permissions relating to the sharing of information are in place<sup>1</sup>.

NAATI will make all efforts to ensure ease and consistency of input, which may include templates, structured drop-down fields, and other formatting. Over time, the reporting requirement will help to ensure a greater level of service reporting consistency and reduce the amount of regulatory burden associated with different agencies requesting different levels of service information.

### 4. Classification of Information

Data collected by NAATI through the LSP Endorsement Model’s reporting requirements will be classified into to one of the following three categories:

Classification	Description	Data Examples	Captured through reporting?
<b>De-identified service data</b>	Cannot reasonably identify an individual or entity.	Jurisdiction of service, language/s utilised, Service Theme.	Yes.
<b>Controlled Identifier Data</b>	Includes limited identifiers that may link to an individual through NAATI’s systems.	NAATI Certified Practitioner Number (CPN).	Yes.
<b>Confidential Commercial Data</b>	Data about an LSP’s business operations, not public.	Internal service metrics, financial or compliance reports.	No.

### 5. Use and Disclosure of Information

The data collected is used only for monitoring compliance, aggregated reporting to governments, and sector improvement. NAATI will not disclose raw or identifiable information about any endorsed LSP without their express consent, except where required by law.

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<sup>1</sup> Australian, state and territory government agencies themselves aren’t required to share any internal information; simply to provide the necessary avenue either in the contract/s or by other means for the Endorsed LSPs to share required information to NAATI directly.

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Confidential Commercial Data will not be sought nor collected by NAATI through the LSP Endorsement Model's Reporting Requirements.

The NAATI CPN is considered Controlled Identifier Data. Whilst it is a NAATI-issued identifier, and remains NAATI's intellectual property and a controlled element of NAATI's certification ecosystem, it would be collected by NAATI from Endorsed LSPs solely to:

- Verify practitioner certification and qualification level
- Measure compliance with the LSP Endorsement Model's requirement to engage NAATI-certified practitioners
- Support quality and equity monitoring across jurisdictions

The CPN is **not** used for disciplinary or employment purposes, and NAATI does **not** share CPN-linked data externally in a way that would identify an individual.

NAATI will update its internal permissions, practitioner communications, and certification terms to ensure that all NAATI-certified practitioners are informed of this update in NAATI's usage of their CPN data for aggregated analysis and endorsement reporting. Practitioners will retain their privacy rights under the *Privacy Act 1988 (Cth)*.

### 6. Data Storage and Security Controls

All data provided by Endorsed LSPs through this mechanism is:

- Stored in a secure, access-controlled data enclave separate from aggregated or published datasets.
- Encrypted at rest (AES-256) and in transit (TLS 1.2+).
- Linked only internally to NAATI's Practitioner Registry through an encrypted hash key — not through plain identifiers.
- Accessible only to authorised NAATI personnel within the Data Governance, IT, or Research teams under strict role-based access controls (RBAC).
- Subject to quarterly access audits and automatic logging of all read/write activities.

### Data Minimisation and Separation

- Only minimum necessary CPN data is retained — no personal or contact information is linked within the reporting dataset.
- Aggregation processes use pseudonymisation techniques, replacing CPNs with non-reversible tokens before analytical processing.
- Analytical outputs and reports provided to stakeholders are fully anonymised.

### 7. Data Retention and Disposal

Data will be retained for five years from the date of submission unless otherwise required by law. After this period, data will be securely deleted or permanently de-identified. Aggregated, de-identified data, without any reference to the CPN, may be retained indefinitely beyond 5 years for research and reporting purposes.

## 8. Data Breach Management

NAATI adheres to the Notifiable Data Breaches (NDB) scheme and the 2024 Amendment Act.

In the event of a data breach, or if any incident involves potential unauthorised access to Controlled Identifier Data, NAATI will:

1. Contain and isolate affected systems immediately.
2. Notify the Office of the Australian Information Commissioner (OAIC) and any impacted Endorsed LSPs within 72 hours, as required by the *Privacy Act 1988 (Cth)*.
3. Provide affected parties with full details, including remedial measures and steps to mitigate risk.

## Data Governance and Oversight

NAATI's will oversee the management of the LSP Endorsement Model's Reporting Process in line with NAATI's Privacy Policy and Cyber Security Strategy

NAATI will undertake Annual Privacy Impact Assessments (PIAs). Access controls and encryption practices are independently reviewed by NAATI through annual penetration testing and vulnerability assessments.

Staff receive mandatory annual privacy and cyber security training.

## 9. Access, Correction and Rights of Endorsed LSPs

Endorsed LSPs may **request confirmation of what data NAATI holds, correction of inaccuracies, or deletion of identifiable data** (where lawful). Requests should be made to [companysecretary@naati.com.au](mailto:companysecretary@naati.com.au) and will be responded to within 30 days.

## 10. Publication and Transparency

NAATI may publish aggregated, de-identified statistics to inform policy and sector improvement. No identifiable Endorsed LSP, practitioner, agency or client information will ever be released – including the NAATI CPN data.

NAATI would not collect nor publish data until a threshold of six or more government agencies across two or more jurisdictions are using Endorsed LSPs, so as to mitigate against any likelihood that an agency would be identifiable.

Datasets are anonymised and tested for re-identification risk prior to publication. Aggregated datasets are subject to statistical disclosure control to prevent any risk of re-identification when combined with other datasets.

## 11. Contact

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**12. Review**

This Statement will be reviewed annually, or earlier if legislative or technological changes occur that affect data management or privacy practices.

Updates will be approved by the NAATI Board and published on the NAATI website. This Statement will also be provided to all Endorsed LSPs at the time of their potential endorsement.

**13. Reference materials**

- [NAATI Privacy Policy](#)
- [NAATI LSP Endorsement Guidelines](#)

**Approval**

Date	History/Description	Approval
24 February 2026	Initial Publication	NAATI Chief Executive Officer