



Mr Neil Grummitt

General Manager, Policy Development
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Australian Prudential Regulation Authority
GPO Box 9836
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December 26, 2012

Submission to APRA: on 'Draft Prudential Practice Guide PPG 235 Managing Data Risk'

Dear Mr Grummitt,

The recently introduced Enhancing Privacy Protection Bill 2012 exposes business to risk of heavy fines if an employee misuses authorised access to steal data (fraud due to theft of data).

Recently the Attorney General, Ms Nicola Roxon admitted, at a Canberra Press Conference, that the greatest threat to data security within Government is corrupted public servants. Recent surveys have also indicated that over 70% of data thefts, within the business community, are committed by insiders.

There is currently no legislation that will allow Police to charge employees who steal 'data'. This was confirmed by Senior Fraud Squad Detectives at a meeting in Sydney on Wednesday December 19th. <http://datatheft-au.blogspot.com.au/2012/12/senior-fraud-squad-police-agree-there.html>

Correspondence between the writer and various ministers on both sides of Parliament, at Federal and State level, indicate there is complete ignorance of the lack of legislative powers for Police to prosecute employees who steal critical data.

We do hope APRA will undertake to close this significant gap in current law in PPG 235.

Kind regards

A handwritten signature in blue ink that reads "Brad Robinson".

Brad Robinson
Data Theft Australia



CC: The Hon Bruce Billson MP