



# LINKAGE OF ABS ADDRESS REGISTER WITH CENSUS DATA AND/OR CONTACT DATA

## PRIVACY IMPACT ASSESSMENT

ABS response

June 2018





## ABS response to a Privacy Impact Assessment of the Linkage of Address Register with Census Data/Contact Data

### Overarching response

ABS thanks Information Integrity Solutions for a comprehensive assessment of privacy implications of the linkage of the ABS Address Register with data obtained from the Census of Population and Housing ('Census Data') and data related to telephone numbers obtained from external sources ('Contact Data'). The Address Register was established in 2015 to provide the ABS with a comprehensive list of all physical addresses in Australia. The Address Register was initially developed for improving the efficiency and effectiveness of the Census of the Population and Housing and will be used to increase the efficiency and effectiveness of Household Surveys from July 2018. This Privacy Impact Assessment examines two additional strategies to make further efficiencies.

As noted by Information Integrity Solutions, the additional linkage proposals align with the broader ABS Transformation program to: reduce risks to statistical outputs; reduce costs; reduce red tape for providers; achieve faster turnaround in dissemination of statistics; and enhance ABS' statistical capability to deliver a more sustainable statistical program.

ABS accepts all seven recommendations and will give further consideration to their implementation in our ongoing operations.

The linkage of the ABS Address Register with data obtained from the Census of Population and Housing (proposal 1) will not be implemented for ABS household surveys in the foreseeable future, subject to further methodological investigation.

The linkage of the ABS Address Register with data related to telephone numbers obtained from external sources (proposal 2) will progress to pilot testing, as per Recommendation 3.





## **7.1 Recommendation 1 - Social Licence and Transparency**

To retain social licence, Information Integrity Solutions noted that it is important that the ABS should not stop at the question 'can the ABS use the data this way', but should go further and ask should the ABS use the data in this way? For example, by asking 'what is the public value and benefit in the ABS using the data this way and what is the least possible intrusive means of attaining such public value and benefit?'

Information Integrity Solutions considers that should the two proposals be implemented [Proposal 1 – linking addresses with Census data for more focussed sampling; and Proposal 2 – linking addresses with contact data for calling respondents), that ABS should provide maximum transparency to the community on its approach in line with APPs 1 and 5. This includes outlining the consultations that have taken place should the ABS adopt the consultation recommendations in this report. Further, Information Integrity Solutions recommends providing information on the ABS website in appropriate locations (such as the Survey Charter and Privacy Policy) including:

- The fact that an Address Register has been created and from what sources of data and what will be stored in the Address Register (ABS can make clear the Address Register alone does not contain identifiable information)
- The policy with respect to the use of the information in the Address Register – including whether other entities will be allowed to use or access the Address Register (if that eventuates)
- The relevant privacy safeguards that surround a more focused sample design and selection approach – a documented protocol for ABS staff to follow for when Unequal Probability sampling techniques are considered appropriate (see Recommendation 4)
- That contact numbers may be obtained from third parties (such as IPND (if this eventuates) and Sensis White Pages), the conditions when they will be used, for example, to contact survey respondents – with an option to opt-out of contact in this manner after first use
- This external PIA or other risk assessment reports that have been done to identify and mitigate privacy risks

In addition, ABS may consider reiterating how the decision for increasing the efficiency of survey operations for certain populations (Aboriginal or Torres Strait Islander persons in this case) was made, such as what were the governance and consultations procedures it has gone through, what were the major concerns and the mitigating strategies, etc. There should also be adequate opportunities for concerned people to inquire to that effect.

### **ABS response**

#### **Agreed**

ABS recognises the importance of increased transparency and efficiency of our operations. This is particularly important for vulnerable populations and those that are over-researched or over-surveyed.

#### **Linking addresses with Census data for more focussed sampling (Proposal 1)**

The ABS is transforming its statistical business. In 2016, the ABS used an address register to significantly reduce costs for the 2016 Census of Population and Housing. Building on the success of the 2016 Census experience, the ABS will be using an address register to significantly reduce costs for a range of household surveys such as the National Aboriginal and Torres Strait Islander Survey. There are two options for using an address register. The first, using an address register without other auxiliary information such as Census data, has commenced and was not the subject of this Privacy Impact Assessment. The second, using an address





register with auxiliary information such as Census data, is under investigation including assessing privacy impacts through this independent Privacy Impact Assessment.

At this stage, the ABS has concluded the costs and risks associated with the use of an address register with auxiliary information such as Census data is not commensurate with the benefits which may accrue given the current known ABS household survey program. The proposal to link addresses with Census data for more focussed sampling will therefore not be implemented in the foreseeable future and is subject to further methodological investigation.

ABS will continue to explore whether gains from using more focussed sampling can be achieved, on a case by case basis. If methodological investigations demonstrate the costs and risks associated with the use of an address register with auxiliary data such as Census data are commensurate with the benefits which will accrue, the ABS agrees to develop documentation and publish in appropriate channels and stages of projects, details of

- Privacy safeguards that surround the more focussed sample design and selection approach
- How decisions for increasing the efficiency of survey operations for certain populations (Aboriginal or Torres Strait Islander persons for example) was made, including what were the governance and consultations procedures undertaken, what were the major concerns and mitigation strategies, and how concerned people may inquire to this effect.

#### **Linking addresses with contact data for calling respondents (Proposal 2)**

ABS agrees to continue engaging with the community to provide transparency in how information is used, and how privacy is protected and maintained. ABS will carry out further work to improve its approach to consultation. As part of this, ABS will develop documentation and publish in the appropriate channels and stages of projects, details of:

- the ABS address register, its data sources, and access arrangements and protections, and
- information about how we contact individuals and where we source information from.





## **7.2 Recommendation 2 - Consultation with Communities of Increased Interest**

Information Integrity Solutions recommends that the ABS should initiate consultations and engagement activities for the communities that will be subject to Unequal Probability sampling (e.g. Aboriginal or Torres Strait Islander persons living in Aboriginal or Torres Strait Islander-sparse areas, persons with a Disability, persons from a Culturally and Linguistically Diverse Background, etc.). The ABS should ensure that its engagement and communications staff have the capabilities necessary to tap into the affected community's sentiment.

The starting point might be to hold consultations regarding who are the suitable representatives to represent the interests of the community being considered for unequal probability sampling within areas. Information Integrity Solutions recommends that the ABS should ensure these representatives have the competence to understand the privacy risks, the objectives of the ABS, the impact on the community of interest and have the credibility to represent that community.

The form in which these consultations take is dependent on the community of interest. In the case with the Aboriginal or Torres Strait Islander Community, the ABS (e.g. NCATSIS) already has strong relationships with key members and representative groups of the Aboriginal or Torres Strait Islander persons, which can be leveraged to determine the appropriate consultation methodology for the specific community.

Information Integrity Solutions also considers it useful for the ABS to obtain feedback on whether the community of interest would be likely to alter their future Census responses if they know they may be used to increase the efficiency by which ABS can select them for other Household Surveys.

### **ABS response**

#### **Agreed**

ABS agrees to undertake consultations and engagement with communities of increased interest, noting further methodological investigation is required to understand the gains that more focused sampling may deliver. When these gains are established, ABS will consult and engage with the community of interest to ensure future proposals are appropriate and provide appropriate privacy safeguards.





### **7.3 Recommendation 3 - Pilot Testing**

It is already apparent to ABS through its qualitative surveys conducted by ORC International in 2017 that a few people are not comfortable with ABS using Census data integrated with other data to more efficiently select households for surveys. This PIA also identifies the lack of publicly available information which would inform people that use of their Census data is contemplated for more focused sampling. As such, ABS needs to consider whether it should proceed with the first proposal, and if so what steps it will adopt to address concerns in the overall community and communities of interest.

As such, after consultations with the community of interest, and where the ABS is satisfied that respective community sentiment and privacy concerns are addressed and proceeds with the proposals Information Integrity Solutions recommends that the ABS only implement the more focused sampling design methods gradually, starting from a smaller part of the population. A gradual implementation can ensure the ABS will be well aware of the level of comfort people have with using their Census Data for more focused sampling design, and have the time to fine tune the policy, privacy risks or public perceptions that are unforeseen in earlier stages.

Information Integrity Solutions also recommends that the ABS run pilot testing to determine the level of effectiveness (including whether people are comfortable with being contacted by phone) as part of the survey. For instance, the ABS can call a small number of respondents using the obtained Contact Data, explain to them how their number is obtained from IPND (if that eventuates) and/or Sensis, and seek their feedback. This would allow the ABS to obtain a view as to the level of sensitivities that may or may not exist around the use of IPND or Sensis data to contact survey respondents. Once testing has been done to determine how well contact in this way is received, adjustments should be made accordingly.

Additionally, in any communications with the community of interest during pilot testing and roll out if proposal 2 proceeds, communications should reflect the level of skill, education and language of the affected population.

#### **ABS response**

##### **Agreed**

As noted under Recommendation 2, further methodological investigation is required to understand the gains of more focused sampling based on the address register before any details or consultation about implementation can be progressed.

ABS agrees to run pilot testing to determine the level of effectiveness, including whether people are comfortable with being contacted by phone, of linking addresses with contact data for calling respondents. ABS will make adjustments based on this feedback.

Should this proposal be adopted at a larger scale, further details will be published on the ABS website. Additionally, the ABS acknowledges that technical documentation is not accessible to all levels of skill, education and language amongst affected populations. ABS commits to developing and providing plain language explanations about our contact methods, and to place these on our website and provide to affected populations.





#### **7.4 Recommendation 4 - Unequal Sampling Policy**

Information Integrity Solutions recommends that the ABS develops a clearly articulated policy as to when Dwelling level Census Data will be used for more focused selection of dwellings within areas if it decides to proceed with the Proposal. The policy should list out the prerequisite conditions that would have to be fulfilled before more focused sampling using Census Data at the dwelling level within areas takes place. For example:

- when the respondents are hard to locate (their prevalence is lower than a certain percentage in a particular geographical area)
- when there are no alternatives to locate the respondents (other means have been exhausted but are ineffective to locate respondents with the characteristics of interest)
- when there are legitimate reasons for identifying the respondents (whether reasons are legitimate should be decided by an external oversight body, e.g. the NATSIHS Advisory Group)
- when there are adequate announcements, consultations and engagement prior to the commencement of the process

#### **ABS response**

##### **Agreed**

As noted under Recommendation 2, further methodological investigation is required to understand the gains of more focused sampling based on the address register, before any details or consultation about implementation can be progressed.





## **7.5 Recommendation 5 - Address Register and Address Register IDs**

Information Integrity Solutions recommends that prior to commencing linkages, the ABS removes Address Register access from staff whose daily operations would not require the use of the Address Register and that Address Register IDs are not contained on survey results. Removal of staff-wide access would reduce the likelihood of the Address Register content being personal information in combination with other data sets.

Minimising access to the Address Register and Address Register IDs is likely to reduce re-identification, through adding data sets together, as Address Register IDs would not be easily linked to addresses if the Address Register is not universally available to all staff.

A unique ID (Master ID) can be used in lieu of the Address Register ID throughout the process, including on the survey frames and final survey datasets. Separate concordance files can be created to enable address and contact information to be made available for data acquisition, and to enable analysis of Census Dwelling indicators against reported survey data. This would reduce the risk of personal information being revealed to ABS staff involved in the linkages and supports the ABS' strong separation principles.

### **ABS response**

#### **Agreed**

As noted under Recommendation 2, further methodological investigation is required to understand the gains of more focused sampling based on the address register, before any details or consultation about implementation can be progressed.

If implementation is progressed, ABS would adhere to its obligations as an accredited Integrating Authority. As an accredited Integrating Authority, ABS has been independently assessed as meeting eight criteria:

1. ability to ensure secure data management;
2. demonstrated ability to ensure that information that is likely to enable identification of individuals or organisations is not disclosed to external users;
3. availability of appropriate skills;
4. appropriate technical capability;
5. lack of conflict of interest;
6. culture and values that ensure protection of confidential information and support the use of data as a strategic resource;
7. transparency of operation; and
8. appropriate governance and administrative framework.

Access controls and ABS' strong separation principles are inherent in these criteria.







## **7.6 Recommendation 6 - Opportunity to Opt-Out of Future Phone Contact**

Information Integrity Solutions recommends that the individuals contacted by phone should be asked their preferred contact method after ABS staff ring, and if they choose not to be contacted by their IPND-listed public number again, the ABS should ensure that the dwelling should not be contacted with the same IPND-listed public number for that dwelling again in the future.

### **ABS response**

#### **Agreed**

ABS agrees to explore opt-out mechanisms in its pilot testing (Recommendation 3).





### **7.7 Recommendation 7 - Compliance with APPs**

Information Integrity Solutions recommends that ABS review its compliance with the APPs in light of the risks Information Integrity Solutions has identified in the Compliance Table, in particular focusing on the high risk areas relating to open and transparent management of personal information, notification of the collection of personal information, use of personal information and quality of personal information. Information Integrity Solutions has provided specific recommendations affecting open and transparent management of personal information as this is likely to have the most impact in mitigating the other risks identified.

#### **ABS response**

##### **Agreed**

ABS agrees to review compliance with APPs in light of the risks Information Integrity Solutions has identified, and in particular focusing on high risk areas listed in the independent Privacy Impact Assessment report prepared by Information Integrity Solutions.

