



Traveller Information and Medicare Enrolment Privacy Impact Assessment

ABS response update - three-year review

December 2020



The ABS is committed to upholding the privacy, confidentiality and security of the personal information it collects, and is committed to transparency of its data integration activities.

Why the ABS response has been updated

Updated information on the TRIPS-MCD Ongoing Data Integration Project (formerly known as the TRIPS and MEDB Data Integration Project) is being provided due to a three-year review.

TRIPS – Travel and Immigration Processing System data held by the Department of Home Affairs.

MCD – Medicare Consumer Directory data (previously the Medicare Enrolment Database - MEDB) held by Services Australia.

A comprehensive overview of the Project was provided in the [Privacy Impact Assessment](#) (PIA) report on 28 July 2017. The PIA identified some potential residual privacy risks associated with the Project and made three recommendations to mitigate these risks. The [Australian Bureau of Statistics \(ABS\) response](#) to the recommendations of the PIA was released on 12 September 2017.

As part of a three-year review the ABS has updated information on each response.

BACKGROUND

The ABS is required by legislation (subsection 9(2) of the Census and Statistics Act 1905) to collect such information as is necessary for the production of quarterly population estimates for each state. For more than 50 years, Outgoing Passenger Cards (OPC) were used as a source of state of residence information in the production of official population estimates. With the discontinuation of the OPC in July 2017 a data gap existed for state information for all international departures. To maintain high quality population estimates the ABS implemented a new methodology that made use of other existing data sources, including information sourced from Medicare enrolment records.

In partnership with the Department of Home Affairs, Services Australia and the Department of Health it was agreed in 2017 that this project was required for the ongoing production of official quarterly population estimates. This data integration project has been in place since.

The continuation of this project is necessary for the ABS to produce population estimates in line with legislative requirements. It ensures that the reliability, credibility and timeliness of state and territory population estimates are upheld. A high degree of accuracy is required for these estimates as they are used to calculate the distribution of Goods and Services Tax to the states and territories and entitlement of the numbers of seats in the House of Representatives for each state and territory. Population estimates are also integral to social, economic and population policy development, planning and budgeting at the national and state levels.

UPDATED RESPONSES TO RECOMMENDATIONS

Recommendation 1

To promote transparency and public debate about the benefits of, or any privacy concerns relating to, the Project:

- the project description on the National Statistical Service (NSS) Data Integration Project Register should include information about the nature of the information that will be collected by the ABS from Home Affairs and Services Australia, and why that information is required by the ABS; and
- the ABS website should include clear and accessible information about the Project, including a link to the NSS Data Integration Project Register.

Agreed in Principle.

The National Statistical Service (NSS) website has been discontinued since this recommendation was made. However, the ABS remains committed to the transparency of its statistical data integration activities. The [Data Integration](#) pages on the ABS website provide detailed information on ABS Data Integrations projects, including how the ABS keeps personal information safe and the uses and benefits of data integration. Information specifically on the [Traveller Information and Medicare Enrolment Data Integration Project](#) is also available on the ABS website under the [Data Integration Project Register](#).

Information is also published on the ABS website in the Methodology section of the various statistical outputs which depend on this data linkage, e.g. Overseas Arrivals and Departures, Australia.

Recommendation 2

As part of the review of the ABS Privacy Policy, consideration should be given to including information about the collection of TRIPS and MCD data from Home Affairs and Services Australia, and the use of that information in data integration processes.

Agreed

The ABS has updated the [Privacy Policy](#) for website users to access a privacy overview as well as detailed explanation on the management of personal information in ABS statistical collections. This includes data integration projects. A more detailed position on data integration and privacy is specifically addressed on the Data Integration page '[Keeping integrated data safe](#)'. Whilst the Privacy Policy and the data integration safety page do not explicitly identify the TRIPS and MCD data project, the principles of the policy apply to this data set. A simple project summary on the [Traveller Information and Medicare Enrolment Data Integration Project](#) is available on the ABS website.

Recommendation 3

At the end of the three-year Project period, if a decision is made to continue the Project:

- the data retention periods should be reviewed to ensure that TRIPS and MCD data is only retained for the minimum period reasonably required to obtain and manage the quality of the statistical data produced by the data integration process;
- appropriate procedures are implemented for the secure deletion of data that is no longer required; and
- any material changes to the Project should be subject to a separate PIA.

Agreed

Continuation of the Project

As part of ABS governance processes and consistent with the [High-Level Principles for Data Integration Involving Commonwealth Data for Statistical and Research Purposes](#), any ongoing data integration projects will be subject to review and re-approval every three years.

The TRIPS-MCD Ongoing Data Integration Project has now been in place for three years. The Project continues to achieve its objective to maintain high quality state and territory population estimates. The quality of the outputs being produced have proven to be very high, according to ABS' own analysis and a wide range of stakeholder feedback. The suitability of the MCD data for this purpose has therefore fulfilled the expectations of the assessment undertaken in the development of the project.

During the past three years, a range of other data sources (Commonwealth and state and territory) have been assessed by the ABS as part of its ongoing data integration work program. No new dataset has been identified that has sufficient coverage, timeliness, and ongoing consistency to meet the current requirement for population estimates.

The ABS continues to review its practices and policies as an Integrating Authority. This data integration project complies with secure data management requirements and no identifiable data can be shared across departments (including which travellers require information about their state of usual residence). As a result, the linkage project requires the full MCD dataset for this linkage.

This project has been reviewed and as a result of the above, is approved for continuation as an ongoing data integration project by the ABS.

Data retention reviewed

ABS will ensure that the TRIPS and MCD data collected for the purposes of this project is retained only for the minimum period required, consistent with current data retention policy. As part of the three-year review, the retention period for the TRIPS and MCD input source data files will change from a minimum period of 22 months to a minimum period of 7 months. The data files will be kept for this period of time for any re-processing, revisions or quality assurance analysis that might be required.

The linked datasets, which do not include any personal information, are used in line with ABS practices for de-identified data.

Verification of deletion of the above datasets will be subject to existing internal assurance mechanisms which is compliant with the Government's Information Security Manual and certified by the Australia Signals Directorate of June 2018.

No changes to the Project

There have been no material changes made to this project or to the key elements as described in the original PIA. There have been no changes to the collection of source data, processing, compiling outputs or how the outputs are used. The processes continue to reflect best practice for safe data integration and in line with community expectations.

The functional separation procedures to data integration are still in place. The TRIPS and MCD name data are still 'anonymised' as part of the data linking process, and only 'scrambled' Medicare card information (i.e. not real Medicare identifiers) are used. No health information, or any other 'sensitive information' (as defined in the Privacy Act) are included in the MCD or TRIPS data.

Any changes to the Project would require an assessment of the privacy impact of these changes and be subject to approval. Due to no material changes the PIA report on 28 July 2017 remains current.