



Australian Government
Australian Bureau of Statistics
Australian Taxation Office
Department of Education
Department of Health
Department of Human Services
Department of Social Services

MULTI-AGENCY **DATA INTEGRATION** PROJECT

MADIP Board Response to the 2019 Update of the Privacy Impact Assessment of MADIP

November 2019

RESPONSE TO 2019 MADIP PIA UPDATE

BACKGROUND

From July to November 2019, the Australian Bureau of Statistics (ABS) conducted an update to the Privacy Impact Assessment (PIA) for the [Multi-Agency Data Integration Project](#) (MADIP) on behalf of the MADIP Board¹. The ABS consulted with a broad range of stakeholders to inform the PIA and engaged the law firm Maddocks to provide independent consideration and assurance of the PIA and privacy advice throughout the PIA process.

The MADIP PIA Update identifies, and assists in managing the potential privacy impacts of developments in MADIP since the previous PIA was published in April 2018, including the addition of some new types of data in MADIP.

The PIA Update acknowledged the privacy by design approach to MADIP operations and the strong framework of protections that preserve privacy and ensure data security.

The PIA Update also made some recommendations to improve compliance with the Australian Privacy Principles (APPs) and several suggestions to advance privacy best practice.

This document outlines the MADIP Board's response to the recommendations and suggestions from the PIA. The PIA Update report can be accessed via the [ABS website](#).

¹ The MADIP Board member agencies are the ABS, Australian Taxation Office, and the Australian Government Departments of Education, Health, Human Services, and Social Services.

RESPONSE TO 2019 MADIP PIA UPDATE**COMPLIANCE RECOMMENDATIONS**

- R1. The ABS should continue to update its APP 5 collection notices, used when the ABS is collecting personal information as a data custodian, to make it clearer to individuals that their personal information may be used for data integration.**

Agreed.

The ABS is committed to transparency about its collection and use of information for MADIP, including through collection notices. The ABS will continue to test collection notice enhancements to ensure updates to wording are improving transparency as intended.

- R2. In relation to collection of personal information by the ABS as the accredited Integrating Authority for MADIP, the ABS should:**

- **Advocate with entities responsible for collection notices to enhance transparency about their disclosure of personal information to the ABS for MADIP by taking reasonable steps to update notices or otherwise make individuals aware of data use.**
- **Continue to increase transparency about the collection and use of data, including personal information, for MADIP in online materials.**

Agreed.

The MADIP Board supports the ABS taking this advocacy role, noting that the PIA recognises that the decisions to update collection notices and determine 'reasonable steps' lie with entities responsible for collection notices.

The MADIP Board recognises that for some collections there may be no reasonable steps that can be taken to update collection notices. Where notices can be updated, it may take some time to implement changes.

The MADIP Board is committed to building transparency about the data shared with the ABS for the project and supports the ABS in updating MADIP online materials.

- R3. MADIP data sharing documentation should be updated to provide information that confirms the APP 6 authority for sharing data to the ABS for MADIP.**

Agreed.

The MADIP Board notes that existing data sharing documentation for MADIP outlines the legislative or other authority for disclosing data to the ABS, but acknowledges there would be value in providing a more consistent approach to documenting the authority for disclosure by data

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custodians to the ABS, particularly where there is no specific legislative authority. The Board also recognises the value in publishing information about the legislative or other authority for disclosing data to the ABS for MADIP.

R4. The ABS should commit to undertaking a 2 yearly IRAP assessment of the MADIP operating environment as part of a regular program of audits of information security in MADIP.

Agreed.

The ABS has strong protections in place to safeguard the security of MADIP data. The ABS commits to a 2-yearly Information Security Registered Assessors' Program (IRAP) to ensure the currency of MADIP security measures. The next IRAP review will be conducted in 2020.

R5. The ABS should finalise and implement the MADIP Data Retention and Destruction policy.

Agreed.

The ABS will present this policy to the MADIP Board for their approval by early 2020.

RESPONSE TO 2019 MADIP PIA UPDATE**BEST PRACTICE SUGGESTIONS**

S1. The ABS should update online materials to include more information on:

- **Non-enduring linkages that have occurred.**
- **Some summary information about the datasets that have been linked to MADIP.**
- **MADIP's governance framework, including a description of the decision and assessment process (including risk assessments) for new linkages and research projects using MADIP.**

Agreed.

The ABS intends to implement this suggestion, and other transparency-based suggestions raised in this PIA, as part of its broader focus on updating online materials to increase transparency for MADIP in early 2020.

S2. The ABS should continue to obtain advice from a range of sources (including data custodians, whole-of-government building trust initiatives, and stakeholders such as those consulted for this PIA Update) to develop content for online materials for MADIP.

Agreed.

The MADIP Board considers the input of stakeholders invaluable to the ongoing viability of MADIP and to promote the benefits of the research projects undertaken.

S3. The ABS should update online materials to outline the data minimisation approach, including treatment of sensitive data, for MADIP.

Agreed.

S4. Before data are disclosed to the ABS for MADIP, the ABS should:

- **Provide information and assistance to data custodians to aid them in checking data for unsolicited personal information; and**
- **Work with data custodians to decide what reasonable steps, if any, will be taken to reduce the risk of unsolicited information being disclosed to the ABS for MADIP.**

Agreed.

The ABS will update its internal governance documentation to include this as a key step in working with data custodians.

S5. MADIP data sharing documentation should be updated to highlight the issue of unsolicited information and to note the ABS will work with data custodians to take

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reasonable steps to reduce to risk of sharing unsolicited personal information with the ABS for MADIP.

Agreed.

- S6. The ABS should update online materials to provide more information about the management of unsolicited personal information in MADIP.**

Agreed.

- S7. Data custodian agency delegates should confirm that, for their disclosure of data to the ABS for MADIP, APP 5 notification requirements have been met and the APP 6 authority for disclosure (and use by the ABS for MADIP) is identified; data custodian delegates may wish to consult with their agency Privacy Officers or otherwise authorised officers for advice on these matters.**

Agreed.

The MADIP Board recognises that while seeking advice from Privacy Officers and other authorised officers is generally valuable, not all data custodian delegates will need to seek this advice. Also, it may not be necessary to seek it for every instance of data sharing, for example, where the same collection notice applies.

- S8. MADIP data sharing documentation should be updated to provide information that confirms how APP 5 notification requirements are met for collection of data by the ABS for MADIP.**

Agreed.

- S9. The ABS should update and maintain online materials that communicate to the public about the data shared in MADIP.**

Agreed.

- S10. The ABS should enhance information in online materials about the data security protections in place for MADIP.**

Agreed.

- S11. The MADIP Board should establish and document threshold triggers for future updates of the MADIP PIA.**

Agreed.

The MADIP Board will develop a policy with triggers and protocols for updating the MADIP PIA again in the future.

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S12. The MADIP Board should consider leveraging government consultation mechanisms to obtain broad-based advice on privacy issues and ethics issues relevant to MADIP.

Agreed.