



# IMPLEMENTATION REPORT

Cloud DataLab Privacy Impact Assessment

June 2021



## OVERVIEW

In 2020 the Australian Bureau of Statistics (ABS) conducted the Cloud DataLab Privacy Impact Assessment (PIA). The [Cloud DataLab PIA](#) was published in June 2020 accompanied by an [assurance report](#) from external privacy advisors Maddocks who were engaged to provide independent advice, review, and assurance for the PIA process and report. At the same time, a [Response to 2020 Cloud DataLab PIA](#) was also published, outlining the ABS' response to each of the recommendations and suggestions presented in the PIA.

This Implementation Report presents the progress since the publication of the Cloud DataLab PIA towards each of the recommendations for compliance with the [Australian Privacy Principles \(APPs\)](#) and suggestions to enhance privacy best practice for Cloud DataLab.

The seven recommendations in the Cloud DataLab PIA have been addressed in full. The ABS has taken steps to ensure privacy is protected and data is kept safe and secure in responding to and implementing the best practice recommendations.

## 1. SUMMARY OF RECOMMENDED ACTIONS

The Cloud DataLab PIA identified seven areas of improvement to ensure data practices comply with the APPs. The best practice recommendations relate to the storage of microdata in the Cloud DataLab, as well as the collection, storage and use of personal information of Cloud DataLab Users. The recommendations are summarised along with the relative APPs in Table 1 below.

Table 1: Summary of best practice recommendations

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### APP1 – Open and transparent management of personal information

**Recommendation 1** Update online materials to provide information about the storage and security of microdata in the DataLab, including use of cloud infrastructure.

**Recommendation 2** Clearly describe the collection, storage, use and disclosure of personal information about Users in collection notices and/or user agreements.

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### APP5 – Notification of the collection of personal information

**Recommendation 3** Create an APP5 notice to Cloud DataLab Users to make them aware of how their personal information will be used, including that it will be stored on a Cloud-based service, used by an off-shore service provider, and disclosed to Data Custodians. Take additional steps to ensure all Users are made aware of the collection notice.

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### APP6 – Use or disclosure of personal information

**Recommendation 4** Ensure the APP5 notice notifies Users that their personal information may be disclosed to Data Custodians in order for them to approve access to microdata.

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### APP11 – Security of personal information

**Recommendation 5** Implement any outcomes arising from security assessments to assure the continued security of microdata in the Cloud DataLab.

**Recommendation 6** Implement any outcomes arising from security assessments to assure the continued security of personal information of Cloud DataLab Users.

**Recommendation 7** Create a deletion and retention policy specific to DataLab User accounts and related personal information.

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## 2. RESPONSE TO BEST PRACTICE RECOMMENDATIONS

Outcomes to address all the recommendations have been delivered. In discussing the recommendations below, we have noted:

- the ABS' acknowledgement and commitment to the recommendations (published as the ABS' response); and
- actions taken in the past 12 months to achieve recommendation outcomes.

### Storage of microdata in the Cloud Datalab

#### Recommendation 1

*Update online materials to provide information about the storage and security of microdata in the DataLab, including use of cloud infrastructure.*

##### **ABS' response in June 2020**

Agreed - The ABS is committed to open and transparent management of the microdata that is stored in the Cloud DataLab. The ABS plans to update information on its website about storage and security of microdata.

##### **Action – Complete**

The ABS is committed to being open and transparent about how we keep information safe and secure. We have a strong data protection culture and extensive experience in keeping data secure as Australia's national statistical organisation and as an Accredited Integrating Authority.

ABS has released a [DataLab Privacy Notice](#) to inform users of the way microdata is stored using secure cloud infrastructure. The ABS enforces a robust framework of protections that work together to protect your privacy, strengthen the security of your data, and meet legislative requirements. You can find more information about how we manage your privacy at [Privacy at the ABS](#).

#### Recommendation 5

*Implement any outcomes arising from security assessments to assure the continued security of microdata in the Cloud DataLab.*

##### **ABS' response in June 2020**

Agreed – The ABS has agreed to recommendations in the security assessment of the Cloud DataLab and will implement recommendations before the Cloud DataLab becomes fully operational.

##### **Action – Complete**

The ABS delivered on its commitment to implement recommendations before the cloud DataLab became fully operational in March 2021.

We secure all our information in accordance with the [Protective Security Policy Framework](#). Assessments are made against security requirements documented in the Australian Government [Information Security Manual](#) (ISM) issued by the Australian Signals Directorate (ASD).

The ABS commits to a 2-yearly Information Security Registered Assessors' Program (IRAP) to ensure the currency of microdata security measures within the cloud DataLab. ABS systems that store and process statistical data are subjected to independent security assessments by independent ASD certified security assessors.

## Next steps

The ABS will continue to maintain its IRAP certification for the Cloud DataLab until the next security assessment cycle takes place. The ABS is committed to supporting 2-yearly IRAP reviews with the next scheduled for the second half of the 2021/22 financial year. Any outcomes arising from this security assessment will be reviewed and implemented accordingly to continue assuring the security of microdata in the cloud DataLab.

## Collection, Storage and Use of personal information of Cloud DataLab Users

### Recommendation 2

*Clearly describe the collection, storage, use and disclosure of personal information about Users in collection notices and/or user agreements.*

#### **ABS' response in June 2020**

Agreed - The ABS is committed to being open and transparent about the use of personal information of Cloud DataLab Users. The ABS is updating User agreements and developing a new APP5 notice for Users of the Cloud DataLab that will clearly explain the collection, use and disclosure of their personal information.

#### **Action – Complete**

The ABS has updated relevant user agreements and released a [DataLab Privacy Notice](#) to inform users of the ABS DataLab about the collection, use and disclosure of their personal information.

#### **Next Steps**

Provide updated user agreements to existing ABS DataLab users, including an option to opt-out of using the DataLab.

### Recommendation 3

*Create an APP5 notice to Cloud DataLab Users to make them aware of how their personal information will be used, including that it will be stored on a Cloud-based service, used by an off-shore service provider, and disclosed to Data Custodians. Take additional steps to ensure all Users are made aware of the collection notice.*

#### **ABS' response in June 2020**

Agreed - The ABS is developing a new APP5 notice for Users of the Cloud DataLab which will cover details of how their personal information will be used. Once the system is fully operational, Cloud DataLab Users will be provided this information as part of registering to access the Cloud DataLab.

#### **Action – Complete**

The ABS has updated relevant user agreements and released a [DataLab Privacy Notice](#) which is now accessible from the DataLab portal, and provided to users during the user registration process.

### Recommendation 4

*Ensure the APP5 notice notifies Users that their personal information may be disclosed to Data Custodians in order for them to approve access to microdata.*

### **ABS' response in June 2020**

Agreed - The new APP5 notice for Users of the Cloud DataLab will cover how their personal information will be used.

#### **Action – Complete**

The ABS [DataLab Privacy Notice](#) is accessible from the DataLab portal and contains information that addresses the disclosure of personal information to Data Custodians for the primary purpose of approving and administering access to de-identified data in DataLab.

### **Recommendation 6**

*Implement any outcomes arising from security assessments to assure the continued security of personal information of Cloud DataLab Users.*

### **ABS' response in June 2020**

Agreed – The ABS has agreed to recommendations in the security assessment of the Cloud DataLab and will implement recommendations before the Cloud DataLab becomes fully operational.

#### **Action – Complete**

The ABS delivered on its commitment to implement recommendations before the cloud DataLab became fully operational in March 2021.

Recommendation 5 includes further details about information security and independent assessments which are also relevant to this completed action.

#### **Next steps**

The ABS will continue to maintain its IRAP certification for the cloud DataLab until the next security assessment cycle takes place. The ABS is committed to supporting 2-yearly IRAP reviews with the next scheduled for the second half of the 2021/22 financial year. Any outcomes arising from this security assessment will be reviewed and implemented accordingly to continue assuring the security of personal information of Cloud DataLab Users.

### **Recommendation 7**

*Create a deletion and retention policy specific to DataLab User accounts and related personal information.*

### **ABS' response in June 2020**

Agreed – The ABS will create a deletion and retention policy that specifically covers information about Cloud DataLab User Accounts and related personal information.

#### **Action – Complete**

The ABS has developed a DataLab deletion and retention policy relating to user accounts and related personal information. The policy governs ABS' approach to deletion and retention of personal information, consistent with requirements of the [Records Disposal Authority](#) guidelines.

#### **Next steps**

ABS will routinely review the need to retain personal information relating Users of the DataLab.

### 3. NEXT STEPS

The ABS is committed to protect privacy and ensure data security when providing access to microdata and handling the personal information of Users. As the Cloud DataLab continues to adapt and evolve to meet user expectations, methodological and technological advancements, the ABS will continue to improve data handling practices and infrastructure for the Cloud DataLab to preserve privacy, ensure data security, and increase data quality and utility.

The ABS will continue to monitor changes in Cloud DataLab and consider updating the PIA if further developments require a privacy impact re-assessment.