



# PRIVACY IMPACT ASSESSMENT

Transfer of 2021 Census records to the National Archives of Australia

March 2023





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## PART 1 - INTRODUCTION

### 1.1 Background

#### Transfer and retention of name identified Census records by the National Archives of Australia

Under the terms of the *Census and Statistics Act 1905*, the ABS must conduct a Census of Population and Housing every five years. In Censuses prior to 2001, Census records were destroyed after the statistical data was extracted and processed. The 2001 Census coincided with celebrations for the Centenary of Federation. To commemorate the Centenary the Australian Government decided to make an exception to Census record deletions for the 2001 Census. The *Census Information Legislation Amendment Act 2000* amended both the *Census and Statistics Act 1905* and the *Archives Act 1983* to allow people to choose to preserve their 2001 Census name-identified information. Their information was to be retained by the National Archives of Australia (the Archives) on microfilm, as part of the Centenary of Federation Time Capsule Project. The Time Capsule preserves, for future generations, information about people in Australia at the start of the 21st century.

In 2006, the Government made further amendments to the *Census and Statistics Act 1905* to permit, where a person consented each Census, to the ongoing transfer of 'name identified' Census records to the Archives, where they will be securely held and accessible only after 99 years. In accordance with the *Census and Statistics Act 1905* and the *National Archives Act 1983* this name-identified Census information will not be available for any purpose (including to courts and tribunals) within the 99-year closed access period and cannot be accessed, altered, or retrieved before that time. The first batch of information, from the 2001 Census, will be publicly available in 2100. Those accessing the information could include the public, genealogists, historians, social analysts, and other researchers.

Since 2001, after data processing and release of Census statistics the Time Capsule data has been transferred from the ABS to the Archives and stored and managed by the Archives. The form and manner of the transfer is agreed by the Statistician and the Director-General of the Archives for each Census, in line with advances in technology and systems.

#### 2021 Census Privacy Impact Assessment

Since the introduction of The *Australian Government Agencies Privacy Code 2017*, Australian Government agencies subject to the *Privacy Act 1988* have been required to conduct a Privacy Impact Assessment (PIA) for all 'high privacy risk' projects or initiatives that involve new or changed ways of handling personal information.

Recommendation 9 from the [2021 Census of Population and Housing PIA](#) released in July 2020 noted the need to conduct additional independent PIAs for activities that are 'renewed' for each Census, including the Time Capsule data. This recommendation recognised that Census questions and other policy settings (e.g., data retention, security and third-party involvement) may change between each Census, and privacy risks should be re-evaluated each Census. Technology and systems have both changed since the previous, 2016 Census, transfer of data to the Archives. The ABS is committed to ensuring that appropriate controls are in place to reduce the privacy risk associated with high-volume transfer of Census Records to the Archives.

## 1.2 Purpose, scope, and approach

### Purpose

The purpose of this PIA is to:

- Consider the potential privacy impacts on the personal information provided to the ABS through the transfer of Census data to the Archives, i.e the Census Time Capsule, including:
  - ensuring the appropriate Quality Assurance (QA) checks are in place to identify and capture the correct records for transfer
  - the secure transfer and storage of the records
- Identify privacy risks in relation to the Australian Privacy Principles (APPs) and community expectations
- Identify, assess, and outline risk mitigation strategies to manage privacy impacts.

### Scope

The data flows and processes involved, and the protections for managing personal and sensitive information include: the image creation of the Census data file; QA checks of the data; capturing the transfer of the records to the Archives; and the storage, retention, and deletion practices. This PIA also assesses the overall compliance of the project with the APPs. The processes behind the data transfer have all been in consultation with the Archives throughout transfer planning and development.

This PIA covers only the transfer process of the Census files to the Archives. The collection, processing, storage, retention, and destruction of Census information, as part of standard Census practices, outside of the transfer, are out of scope of this PIA, as is the ongoing storage of the Census information by the Archives.

### Approach

The ABS followed the Office for Australian Information Commissioner's (OAIC) [Guide to undertaking privacy impact assessments in completing this PIA](#), including: PIA analysis and compliance check; addressing risks; and development of this report.

## 1.3 Personal and Sensitive Information

### Personal Information

#### Definitions

The *Privacy Act 1988 (Cth)*<sup>1</sup> defines personal information as “...information or an opinion about an identified individual, or an individual who is reasonably identifiable...”<sup>2</sup>.

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<sup>1</sup> <https://www.oaic.gov.au/privacy/the-privacy-act/>

<sup>2</sup> <https://www.oaic.gov.au/privacy/guidance-and-advice/what-is-personal-information/>

## Sensitive Information

The Privacy Act defines 'sensitive data' as information or an opinion about an individual's:

- racial or ethnic origin
- political opinions
- health information
- religious affiliation
- sexuality
- criminal record.

Individual unit record level Census data items collected (including name and address, and other Census responses) include both personal and sensitive information. For a full list of data items please see [Sample copies](#) of the 2021 Census forms on the ABS website. The collection of this personal and sensitive information is out of scope of this PIA.

## Use of Personal and Sensitive Information in the transfer of data to the Archives

Images of 2021 name identified Census information is transferred to the Archives for each person who has, or whose parent or guardian has, agreed to the retention and transfer.

Within multi-person households, if only one person wants to participate in the transfer of data, then only that person's information is retained and imaged for transfer (See Attachment A for example transfer agreement questions in the Household, Personal, Interviewer and Special Short Forms). If a person answers 'Yes, agrees' in response to the relevant question, then their personal information supplied on that Census form is imaged in preparation for transfer to the Archives. If a person answers 'No, does not agree', or does not answer the question, or marks both yes and no, the information will not be imaged for transfer.

## 1.4 Legislation and Policies

As a Commonwealth organisation, the ABS is bound by the *Privacy Act 1988 (Cth)*, including the Australian Privacy Principles (APPs). Compliance with the APPs is assessed in [Part 3](#) of this PIA.

The *Census Information Legislation Amendment Act 2000* amended both the *Census and Statistics Act 1905* and the *Archives Act 1983* to allow people to choose to preserve their name-identified information recorded on their Census form.

### Census and Statistics Act 1905

Census data is collected by the ABS under Section 8 of the *Census and Statistics Act 1905* (the Act). Unlike other questions, the Census Time Capsule question on the form does not relate to a specific Census Topic and is not listed with other topics in the Census Regulations. Rather, the Census Time Capsule was made possible by an amendment to the Act. Section 8A of the Act relates to the transfer of Census information to the Archives.

### **8A Transfer of Census Information to the Archives**

If:

- (a) A form is given to the Statistician or an authorised officer under section 10 in relation to the Census taken in the year 2001 or a later year and

- (b) A person has consented, in accordance with the form, to the information contained in the form being transferred to the custody of the Archives under this section.

The Statistician must transfer the information to the custody of the Archives in a form and manner agreed by the Statistician and the Director-General of the Archives.

### **Archives Act 1983**

Section 22B of the *Archives Act 1983* sets out a longer open access period for Census information in the Time Capsule (99 instead of the usual 20 years). It also exempts Census information from the 'accelerated or special access' normally available under Section 56 of the Archives Act. This means there are no provisions in the Archives Act that would enable access to Census information to anyone before 99 years have passed. Section 30A of the Archives Act, along with Section 19A of the *Census and Statistics Act 1905*, provides further protection for Census information during the 99 years and prevents the Archives from sharing the information with anyone, including the ABS.

## **1.5 Addressing community expectations**

While the collection, use or disclosure of personal information may be authorised by legislation, this does not necessarily mean it meets community expectations.

Public trust is critical to the reputation of the ABS and to people's willingness to participate in ABS and government projects. While public consultation did not take place for this PIA, there was strong consideration of community attitudes and expectations regarding privacy implications and risks from the transfer of Census data to the Time Capsule. Further, Time Capsule data only exists if someone has explicitly consented to it, therefore changing public perceptions around the risk of harm to a person's privacy. The ABS applies several security controls for the project to mitigate risks, which are detailed in Parts 2 and 3 of this PIA.

## **PART 2. DATA USE AND INFORMATION FLOWS**

The ABS is responsible for extracting the Time Capsule data and image creation, the QA checks of the data, safe transfer of the records to the Archives and the storage and retention and deletion practices for data held at the ABS. The Archives is responsible for the storage, access and retention practices for the data once it has been transferred.

### **2.1 Extracting Time Capsule data and image creation**

The Time Capsule question is asked on the Census form in relation to every person in a household. Parents and guardians who complete the Census form on behalf of children are asked to complete this question for them. For people who are legally unable to make a choice, their legal guardians can answer on their behalf.

If only one person in a household wants to participate in the Census Time Capsule, then only that person's information is retained and imaged for transfer (See [Attachment A](#) for example questions in the Household, Personal, Interviewer and Special Short Forms). If a person answers 'Yes, agrees' in response to the question, then their personal information supplied on that Census form is imaged in preparation for transfer to the Archives. If a person answers 'No, does not agree', or does not answer the question, or both yes and no are marked, the information will not be imaged for transfer.

## 2.2 Retention of information

The ABS recognises that retaining data when it is no longer needed presents security risks. The information the ABS collects as part of the Census is considered and treated as a Commonwealth Government Record and is stored, used, and destroyed in accordance with the *Archives Act 1983* and the APPs, including keeping the data secure. Once the Time Capsule data is transferred to the Archives, all ABS copies of the data/files are deleted.

The Information going to the Archives is stored for 99 years in their network with metadata. The data sits in this network unless Archives migrates data sets or runs a transformation program requiring a move from one system into another. After 99 years the Archives will release the 2021 Census data so that it is publicly available, in however manner and format the National Archive of Australia is subject to in 2120.

## PART 3. AUSTRALIAN PRIVACY PRINCIPLES

### APP 1 – Open and transparent management of personal information

*APP 1 requires that an entity manages personal information in an open and transparent way, including having a clear, up to date privacy policy that is publicly available. APP 1 also requires that an APP entity takes reasonable steps to implement practices, procedures and systems that ensure it complies with the APPs.*

#### Compliant

The key policies for ABS management of personal information - [ABS Privacy Policy for Statistical Information](#) are compliant with APP 1.

The [ABS Privacy Policy for Statistical Information](#) describes how the ABS handles personal information that is collected for producing official statistics including the Census. The Policy outlines:

- the kinds of personal information collected and held by the ABS
- how we collect data and keep personal information safe
- how personal information is used
- accessing and correcting personal information
- our legislative responsibilities
- how privacy complaints and enquiries can be raised and managed.

The ABS has a clear and up to date [Privacy Policy](#) which is publicly available. The collection of personal information, including name and address for the Census Time Capsule, is explicitly stated in the [2021 Census Privacy Statement](#). It states that this information will not be made available for any purpose until 2120 and cannot be accessed, altered, or retrieved before that time. It further links to a more [in depth document](#) about the Census Time Capsule, if people are wanting more information, which states that:

*'This personally-identified Census information will not be available for any purpose (including to courts and tribunals) within the 99 year closed access period and cannot be accessed, altered or retrieved before that time.'*

The [2021 Census of Population and Housing Australian Privacy Principle 5 Census Data Collection Notice](#) also outlines privacy relating to Time Capsule data.

All four Census Forms and the online form gave respondents information about how to access information relevant to Census Privacy. Please see [Attachment A](#) for example Time Capsule questions.

## APP 2 – Anonymity and pseudonymity

*APP 2 requires that APP entities give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.*

### Not Applicable

APP 2 is not applicable as this PIA is not looking at the collection of information, only usage.

## APP 3 – Collection of solicited personal information

*APP3 covers the collection of both personal and sensitive information, the means of collections, and solicited personal information.*

### Not Applicable

APP 3 is not applicable as this PIA is not looking at the collection of information, only usage.

## APP 4 – dealing with unsolicited personal information

*APP 4 requires that where an APP entity receives unsolicited personal information, it must determine whether it would have been permitted to collect information under APP 3. If APP 4.3 applies to the personal information, then the entity must destroy the information or ensure that it is de-identified as soon as possible, but only if it is lawful and reasonable to do so. If [subclause 4.3](#) does not apply in relation to the personal information, APPs 5 to 13 will apply to that information.*

### Not Applicable

APP 4 is not applicable as there is no new collection of personal information as part of this project.

## APP 5 – notification of the collection of personal information

*APP 5 requires that where an APP entity collects personal information about an individual, it must take reasonable steps to notify the individual, or otherwise ensure the individual is aware of certain matters, which are outlined in APP 5.2.*

### Not Applicable

APP 5 is not applicable as there is no new collection of personal information as part of this project.

At the time of collection, the [2021 Census Privacy Statement](#) and the [2021 Census of Population and Housing Australian Privacy Principle 5 Census Data Collection Notice](#) clearly set out notification of the Time Capsule process. This process is also referenced on all paper forms (See [Attachment A](#)), and was outlined in the online form.

## APP 6 – use or disclosure of personal information

*APP 6 requires that an APP entity only use or disclose personal information for the particular purpose for which it was collected (the 'primary purpose'), or for a secondary purpose if the person has consented or if an exception applies, such as where the secondary use or disclosure is required or authorised by or under an Australian law.*



## Compliant

The information collected through the Census is used to create image records for transfer to the Archives in line with the primary purpose. The ABS clearly sets out the primary and secondary purpose of the Time Capsule Census data as authorised in ABS and Census legislation and this is clearly notified to the public through: the [2021 Census Privacy Statement](#); [2021 Census of Population and Housing Australian Privacy Principle 5 Census Data Collection Notice](#), and is referenced on all paper forms (See [Attachment A](#)) and the online form.

The ABS has adequate QA processes and systems in place that represent reasonable steps to ensure the quality of personal information, and that only records where consent has been given are transferred. Time Capsule data is in its rawest form possible; the comments and responses are not edited; and only data that has been consented to on the form/online form is transferred. If any data is missing it is not entered. The Tick Box to this question needs to be very clear, if there are multiple ticks or any unclear tick/s on the paper form the ABS will not include the data in the Time Capsule. If a response is on a paper Household form, with multiple respondents, those who do not agree will not have their data transferred.

## APP 7 – direct marketing

*APP 7 requires that organisations must not use or disclose personal information for the purpose of direct marketing unless an exception applies, such as where the individual has consented.*

### Not applicable

The ABS does not use or disclose personal information for direct marketing purposes. APP 7 is not relevant as it applies to organisations rather than to agencies like the ABS. The ABS has not been otherwise prescribed for the purposes of s7A of the *Privacy Act 1988*.

## APP 8 – cross-border disclosure of personal information

*APP 8 requires that before an APP entity discloses personal information to an overseas recipient, the APP entity must take reasonable steps to ensure that the overseas recipient does not breach the APPs (other than APP 1) in relation to the information, unless an exception applies, such as the individual has given informed consent.*

### Not applicable

APP 8 does not apply as cross-border data transfers are not relevant to this project: no data are accessed or transferred out of Australia.

## APP 9 – adoption, use or disclosure of Government Related identifiers

*APP 9 requires that certain classes of APP entities must not adopt, use, or disclose a person's government related identifier as its own identifier of the individual unless an exception applies.*

### Not applicable

APP 9 does not generally apply to government agencies apart from some prescribed commercial activities. Time Capsule Census data does not hold any Government related identifiers.

## APP 10 – quality of personal information

*APP 10 requires that an entity must take reasonable steps to ensure the personal information it collects is accurate, up to date, and complete.*

### Compliant

The ABS has adequate QA processes and systems in place that represent reasonable steps to ensure the quality of personal information, and that only records where consent has been given are transferred to the Archives.

Time Capsule data is in its rawest form possible; the comments and responses are not edited and only data that has been consented to on the form/online form is transferred. If any data is missing it is not entered. The Tick Box to this question needs to be very clear, if there are multiple ticks or any unclear tick/s on the paper form the ABS will not include the data in the Time Capsule. If a response is on a paper Household form, with multiple respondents, those who do not agree will not have their data transferred.

## APP 11 – security of personal information

*APP 11 requires that an APP entity must take reasonable steps to protect personal information it holds from misuse, interference, and loss, as well as unauthorised access, modification, or disclosure. It must also take reasonable steps to ensure personal information is destroyed or deidentified once it is no longer needed.*

### Compliant, but further action recommended

#### Security within ABS and with the transfer of Census data to the Archives

All personal information collected by the ABS is protected in accordance with the Australian Government [Protective Security Policy Framework](#) and with the Australian Government records management regime.

Under the [2021 Census PIA](#), Recommendation 4 stated: ‘Conduct independent security risk assessments for key 2021 Census components’ including ‘The Time Capsule’. This was due to the Time Capsule:

- containing roughly 50% of 2021 Census data
- containing names and addresses
- requiring a secure transfer
- being maintained by a third party.

ABS agreed and noted that ‘The ABS works closely with the National Archives of Australia in the secure transfer of nominated Census records to the Time Capsule. The ABS will review security arrangements for this process prior to the transfer’. This was implemented with the chain of custody documentation approved by the Archives.

#### Access

All ABS staff who are involved in the physical handover of the data require a Negative Vetting Level 2 Clearance. Only a very limited number of ABS Census, and Technology and Security staff have access to the Time Capsule data before the transfer, on a strictly need-to-know basis. The steps in the process of the transfer are also on a need-to-know basis only, and have been approved by the ABS Chief Information Officer.

### Deletion/Retention of Data

The ABS will destroy its copy of Time Capsule data immediately after transfer to the Archives, and Archives has confirmed the transfer is complete to their storage environment. Deletion by the ABS is in accordance with the General Records Authority 31 (GRA31)<sup>3</sup>.

While appropriate processes have been put in place to protect Census data, and provide assurance of its protection, the Census Time Capsule processes were not defined in the 2021 Census Data Protection Plan. It will be best practice to ensure these processes are outlined in the 2026 Census Data Protection Plan.

### **Storage of data at the Archives**

The Archives has informed the ABS its new archival system, where the Time Capsule data will be stored, is in the process of being formally accredited at a PROTECTED level, up from the current OFFICIAL: SENSITIVE security classification. Archived data in this system are expected to be migrated once the Archives has been accredited. This includes previous preserved Census data collections. Consultation with Archives and the ABS Chief Information Officer, including the acting Program Manager, CISO, Security and Infrastructure Branch, affirms the proposal from the Archives is appropriately secure and it is appropriate the data be stored in the Archives system.

#### **PIA Recommendation 1**

Include reference to 2026 Census Time Capsule processes in the 2026 Census Data Protection Plan.

## **APP 12 – access to personal information**

*APP 12 requires that an APP entity that holds personal information about an individual must give the individual access to that information on request unless an exemption applies.*

### **Compliant**

Recommendation 8 from the [2021 Census PIA](#) states that the ABS should ‘Clarify and strengthen access restrictions to data held in the Time Capsule.’ The ABS agreed, noting the [2021 Census Privacy Statement](#), and [2021 Census of Population and Housing Australian Privacy Principle 5 Census Data Collection Notice](#), contain clear messaging about access restrictions for data held in the Time Capsule by Archives. The ABS website states that the Time Capsule data will not be available for any purpose (including to courts and tribunals) within the 99-year closed access period and cannot be accessed, altered, or retrieved before that time. This is also in accordance with [Section 30A](#) of the *Archives Act 1983*.

Time Capsule data is compliant with APP12. As stated in the [2021 Census Privacy Statement](#), Time Capsule data cannot be accessed by the public for 99 years.

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<sup>3</sup> <https://www.naa.gov.au/information-management/records-authorities/types-records-authorities/general-records-authority-31>

## APP 13 – correction of personal information

*APP 13 requires that an APP entity must take reasonable steps to correct personal information to ensure that, having regard to the purpose for which it is held, is accurate.*

### Compliant

Census data, once it has been submitted on a Census form, cannot be accessed, or changed.

## PART 4. CONCLUSION AND RECOMMENDATIONS

This PIA has considered the privacy risks associated with the transfer of 2021 Census Time Capsule data to the National Archives of Australia. Analysis against the APPs has found ABS involvement in the transfer of data to the Archives to be compliant. Three recommendations are presented to further enhance ABS privacy practices for this and subsequent Censuses. The first recommendation is related to the APP analysis in [Part 3](#) of the PIA, and two are high level recommendations for the 2026 Census.

### Recommendations from APP Analysis

#### **Recommendation 1 – APP 11**

Include reference to 2026 Census Time Capsule processes in the 2026 Census Data Protection Plan.

### High Level Recommendations for the 2026 Census

#### **Recommendation 2**

The ABS should conduct a Privacy Threshold Assessment for the transfer of data to the National Archives of Australia during each Census cycle to determine if a PIA needs to be undertaken, as systems, legislation and processes are generally subject to change. This should be incorporated into the *Census Privacy Strategy 2021 to 2028*.

#### **Recommendation 3**

The ABS should consider working with the National Archives of Australia to do a Privacy-by-Design review of the data transfer, and include requirement for a potential combined PIA in the *2026 Census PIA Plan*. Although we cannot control or assume responsibility for the privacy implications of the data past the point of transfer to the Archives, we do have broader social licence considerations, and the perception of risk that Census data is not safe would adversely affect the reputation of the ABS.



## ATTACHMENT A: TIME CAPSULE QUESTION EXAMPLES FROM PAPER FORMS

### Question 65 Household Form

**65** Does each person agree to their name, address and other information on this form being kept by the National Archives of Australia and then made publicly available after 99 years?

- Answering this question is **OPTIONAL**.
- A person's name-identified information will not be kept by the National Archives where a person does not agree or the answer is left blank.
- Information provided to the National Archives will include answers to all questions on the form including Question 28 (long-term health conditions).
- **Please check with each person before answering – leave blank for those people whose views are not known to you.**

**i** Go to [www.census.abs.gov.au/questions](http://www.census.abs.gov.au/questions) for more information.

Person 1	Person 2	Person 3	Person 4	Person 5	Person 6
<input type="checkbox"/> Yes, agrees	<input type="checkbox"/> Yes, agrees	<input type="checkbox"/> Yes, agrees	<input type="checkbox"/> Yes, agrees	<input type="checkbox"/> Yes, agrees	<input type="checkbox"/> Yes, agrees
<input type="checkbox"/> No, does not agree	<input type="checkbox"/> No, does not agree	<input type="checkbox"/> No, does not agree	<input type="checkbox"/> No, does not agree	<input type="checkbox"/> No, does not agree	<input type="checkbox"/> No, does not agree

### Question 56 Personal Form

Please use **CAPITAL** letters only. 1

**56** Does the person agree to their name, address and other information on this form being kept by the National Archives of Australia and then made publicly available after 99 years?

- Answering this question is **OPTIONAL**.
- A person's name-identified information will not be kept by the National Archives where a person does not agree or the answer is left blank.
- Information provided to the National Archives will include answers to all questions on the form including Question 26 (long-term health conditions).

**i** Go to [www.census.abs.gov.au/questions](http://www.census.abs.gov.au/questions) for more information.

Yes, agrees

No, does not agree

### Question 10 Special Short Form

**10** Do you agree to your name and other information on this form being kept by the National Archives of Australia and then made publicly available after 99 years?

- Answering this question is **OPTIONAL**.
- A person's name-identified information will not be kept by the National Archives where a person does not agree or the answer is left blank.

Yes, I agree    ► **Go to Q11**

No, I do not agree    ► **No more questions**





Question 60 Census Interviewer Household Form

28	
<p><b>60 Does each person agree to their name, address and other information on this form being kept by the National Archives of Australia and then made publicly available after 99 years?</b></p> <ul style="list-style-type: none"> <li>• Answering this question is <b>OPTIONAL</b>.</li> <li>• A person's name-identified information will not be kept by the National Archives where a person does not agree or the answer is left blank.</li> <li>• Information provided to the National Archives will include answers to all questions on the form including Question 59 (long-term health conditions).</li> </ul>	
Person No.	
1	<input type="checkbox"/> Yes, agrees <input type="checkbox"/> No, does not agree
2	<input type="checkbox"/> Yes, agrees <input type="checkbox"/> No, does not agree
3	<input type="checkbox"/> Yes, agrees <input type="checkbox"/> No, does not agree
4	<input type="checkbox"/> Yes, agrees <input type="checkbox"/> No, does not agree
5	<input type="checkbox"/> Yes, agrees <input type="checkbox"/> No, does not agree
6	<input type="checkbox"/> Yes, agrees <input type="checkbox"/> No, does not agree
7	<input type="checkbox"/> Yes, agrees <input type="checkbox"/> No, does not agree
8	<input type="checkbox"/> Yes, agrees <input type="checkbox"/> No, does not agree
9	<input type="checkbox"/> Yes, agrees <input type="checkbox"/> No, does not agree
10	<input type="checkbox"/> Yes, agrees <input type="checkbox"/> No, does not agree
11	<input type="checkbox"/> Yes, agrees <input type="checkbox"/> No, does not agree
12	<input type="checkbox"/> Yes, agrees <input type="checkbox"/> No, does not agree

SAMPLE

