



PRIVACY IMPACT ASSESSMENT

ABS response

2017





ABS Response to Independent Privacy Impact Assessment on the TRIPS and MEDB Data Integration Project

The Australian Bureau of Statistics (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.

The ABS is required by legislation to collect such information as is necessary for the production of quarterly population estimates for each state. Historically, information from Outgoing Passenger Cards (OPCs) was used in the production of these population estimates. With the discontinuation of the OPC, the ABS identified that the only feasible alternative to this information that would enable the continued production of high quality population estimates was to implement a new methodology that made use of other existing data sources, including information sourced from Medicare enrolment records.

The ABS commissioned an independent Privacy Impact Assessment (PIA) for this project to obtain input from experts outside the organisation to identify if there were any privacy impacts that may not have been fully recognised, and to ensure the community could have the greatest possible confidence in the outcome of the PIA and the project itself.

The ABS welcomes the recognition in the PIA that ABS has a number of existing privacy enhancing measures in place, including the application of functional separation and anonymisation of data as parts of the linkage process. The ABS also welcomes the acknowledgement that the discontinuation of the OPC and the implementation of this new methodology reduces or eliminates a number of privacy risks to the approximately 4 million travellers leaving Australia each month.

The PIA identified some potential residual privacy risks associated with the project and made three recommendations to mitigate these risks. The ABS agrees with all of these 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 DIBP and DHS, 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

ABS is committed to the transparency of its statistical data integration activities.

It is intended that the National Statistical Service (NSS) website will be discontinued in the near future. As a result, the placement of the content currently on the NSS Data Integration Project Register is under review.

The ABS will include information on the project on the ABS web site and on the NSS register (or its replacement). Detailed information will also be included in the publications that contain the statistical outputs that will be produced using the new methodology.





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 MEDB data from DIBP and DHS, and the use of that information in data integration processes.

Agreed

The ABS is currently reviewing its outwardly facing Privacy Policy to ensure the community remains informed about the collection and use of personal information by the ABS. As part of this review, the ABS will consider how best to include information about the collection and use of the MEDB and TRIPS information described in this PIA, given the need to ensure the information in the policy is easily accessible and understandable.





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 MEDB 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

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. Any changes to the Project will require an assessment of the privacy impact of these changes and be subject to approval.

ABS will ensure that the TRIPS and MEDB data collected for the purposes of this project is retained only for the minimum period required, consistent with current data retention policy.

Due to the application of statistical business rules around the compilation of Net Overseas Migration (NOM), it is expected data will need to be retained for a minimum of 22 months. However, as the methodology is new, it is unknown at this time whether there will be a need to re-process or revise historical data. Therefore it is proposed that data be retained for the life of the Project (up to three years) This need will be further assessed during the initial three year Project period.

If during this three year period it becomes apparent that the data can be deleted earlier than the end of this project, the ABS will act to delete the TRIPS and MEDB information at this time.

Verification of deletion will be subject to existing internal assurance mechanisms.

