



Overview

The Australian Bureau of Statistics (ABS) is committed to transparency and openness about data.

The ABS recently considered a proposal to integrate the National Insurance Dataset including home building, contents and strata insurance policy data collected by private organisations (insurance companies) with the Person Level Integrated Data Asset (PLIDA). The addition of private sector insurance data considered in line with a recommendation from the 2022 MADIP PIA Update to conduct additional transparency measures before including new types of data in PLIDA.¹

This proposed integration is an initiative of the [Hazards Insurance Partnership](#), led by the National Emergency Management Agency (NEMA). ABS is leading this project in collaboration with NEMA and the Australian Climate Service (ACS). ABS is a partner agency in the ACS.

This report summarises feedback received during consultation with relevant stakeholders on the privacy aspects of this project. Based on this feedback, in December 2024 the ABS decided to proceed with the project. This project is the second instance of private sector data being linked to PLIDA, following the integration of private sector health data in 2022.

In November and December 2024, the ABS consulted with small groups of targeted stakeholders to consider privacy issues with linking this new type of data. The ABS also sought views on whether the current protections and safeguards in place for PLIDA data are sufficient.

The targeted stakeholders were selected based on:

- Their involvement in and perspectives on the project
- Understanding of research uses for household insurance data
- Privacy expertise

Stakeholders consulted included:

- Data custodians
- Project partners
- Consumer services (such as legal and financial support services)
- Privacy regulator (Office of the Australian Information Commissioner)

ABS conducted virtual consultation sessions and invited written feedback from stakeholders.

This summary report presents the feedback given to ABS about the proposed integration of private sector insurance data to PLIDA. The ABS considered this feedback to inform the decision on including this new type of data in PLIDA. The decision and rationale were published on the [PLIDA Data and Legislation webpage](#) of the ABS website in December 2024.

The PLIDA Board were informed about the proposal and no additional governance requirements or restrictions were identified. A summary of the consultation feedback is provided in Table 1.

¹ PLIDA was previously known as MADIP (Multi-Agency Data Integration Project).

Table 1: Feedback received from targeted stakeholder consultation

Question 1: Do you have any questions or comments about how the insurance data will be handled and used in this proposal?

Summary of stakeholder comments

General feedback:

- Several stakeholders noted their support for the project and the value of the research the data would enable.
- Stakeholders did not raise significant concerns about this new type of data being linked to PLIDA.

Clarifications sought:

- The nature of the data and data handling for this proposal.
- Confirmation about the nature of this project, including linkage of the insurance data to PLIDA.
- Details about the type of analysis that would be conducted, including the suggestion that insurance affordability measures would have a gap if insurance quotes were not included in the data.
- Whether the project would include longitudinal data.
- Whether insurance companies would be handling data beyond the provision of data to ABS.
- Plans to include other insurers and another noted that the current contributing group would not provide complete coverage of all insurance policies across Australia.

ABS responses to stakeholder comments

Data linkage:

- ABS confirmed that the insurance data would be linked to PLIDA, for the purposes of the use cases that had been agreed for the project.

Data scope and data handling:

- ABS confirmed that the linked insurance data made available to researchers would not be longitudinal, however it was proposed to have 'snapshots' of data for different time periods.
- ABS confirmed that ABS would manage the handling of the data according to established and rigorous data handling practices. The insurance companies will not have access to the linked, deidentified data.

Coverage:

- ABS noted that including only written policies (policies in force) and not offered policies (quotes) would be a data gap initially.
- ABS stated that the current plan was to include data from insurance companies signed up to the Hazards Insurance Partnership only and confirmed that this meant that data coverage would be incomplete but estimate it would constitute around 70-80% of all household insurance policies.

Question 2: Do you have any questions or comments about how the insurance data will be handled and used in this proposal?

Summary of stakeholder comments

General feedback:

- Stakeholders confirmed they had no concerns about the standard PLIDA data protection processes.
- Some stakeholders sought clarification about these processes.

Clarifications sought and concerns:

- Whether researchers already approved to access PLIDA would have access to this data.
- Whether the data might be used by insurance companies to raise insurance premiums.

- Whether a Privacy Impact Assessment (PIA) had been conducted for this work and confirmation that address details would not be accessible. Clarification about how the risk of reidentification would be addressed.
- Whether insurance customers were notified that their data could be used in this way.
- Inquired about the process in case of a data breach and whether Aboriginal and Torres Strait Islander representatives had been consulted about this proposal.

ABS responses to stakeholder comments

Access to data:

- ABS noted that approved researchers are only given access to approved projects, for which they are part of the research team. They can only access the data specified and approved for their project.
- ABS noted that private businesses cannot access PLIDA data. Only government employees, government-sponsored researchers, university researchers, and researchers at public policy institutes can apply to access PLIDA data. They must belong to an approved project, which can only be for research and statistical purposes.

Privacy assessment:

- ABS advised that a Privacy Threshold Assessment had been conducted for the project. Additional transparency measures to test stakeholder sentiment were required for this assessment, in line with recommendations for privacy best practices in the 2022 PLIDA PIA Update.

Data handling and protection:

- The ABS confirmed that standard address data (e.g., house number and street) would not be available; rather, addresses would be coded.
- ABS explained that the *Census and Statistics Act 1905* prohibits the disclosure of identifiable information of a personal or domestic nature. Additionally, information can only be published in a manner that is not likely to enable the identification of a particular person or organisation. ABS has standard output vetting processes to assess this risk before any data can be output.

Notification and breach processes:

- ABS advised that insurance companies have collection notices in place which cover the sharing of this data.
- ABS advised that it has privacy obligations under various legislation and a mechanism for making a privacy complaint. This information is detailed on the ABS website. ABS processes work together to prevent the disclosure of personal information.

Consultation with Aboriginal and Torres Strait Islander representatives:

- ABS advised that general consumer service groups were part of this consultation and that for MADIP/PLIDA Privacy Impact Assessment Updates, Aboriginal and Torres Strait Islander representatives are involved.

Question 3: In addition to the privacy protection arrangements outlined, are there any additional governance measures or protections that should be considered?

Summary of stakeholder comments

General feedback:

- No concerns were raised about the standard PLIDA protections and processes around personal information.
- Several stakeholders confirmed that no additional measures were necessary for this proposal.
- One stakeholder confirmed that the standard PLIDA processes were well-established and provided comfort that privacy was being managed appropriately.