ABS Response

2026 Census (Phase 2) Privacy Impact Assessment

November 2024

Contents

Introduction

Privacy considerations are integral to all aspects of the Census. The *Census Privacy Strategy: 2021 to 2028* outlines how privacy will be considered at every Census stage. This strategy will help us build and maintain community confidence that the measures we use to protect privacy are comprehensive and effective. The Strategy includes a strong commitment to risk management, comprehensive stakeholder engagement, and public consultation.

The Strategy spans from the 2021 Census through to the start of the 2031 Census to ensure privacy impact assessments (PIAs) are coordinated and integrated with the design and development across the Census cycle. The development of this strategy was in line with Structural Recommendation 1 from the 2021 Census Privacy Impact Assessment conducted prior to the 2021 Census: The ABS should develop and implement a 7-8 year Census Privacy Strategy that covers more than one Census.

The Strategy has four goals to enable the ABS to ensure privacy obligations are met and information is collected and used consistent with community expectations:

1. **Design:** Embed a culture of privacy that promotes and enables best practice.
2. **Engage:** Open and transparent engagement, consultation, and communication.
3. **Safeguard:** Robust practices, procedures, and systems to ensure continued effectiveness.
4. **Maintain:** Evaluation of privacy practices, procedures, and systems for ongoing improvement.

During the 2021 Census program, the ABS undertook two PIAs: the 2021 Census PIA and the 2021 Census Administrative Data PIA. Both were published on 21 July 2020, along with the ABS' response to the recommendations. The 2021 Census PIAs provide a baseline for the 2026 Census PIA.

The ABS has decided to undertake a phased approach to the PIA for the 2026 Census. A phased approach provides the opportunity for recommendations from early phases to be adopted in the design and build of the Census, and to be evaluated in the final phase.

The 2026 Census PIA consists of three phases:

- Phase 1: Preparation, Planning and Development (2023) (PIA and ABS Response, Published February 2024)
- Phase 2: Build & Design (2024) (Completed November 2024)
- Phase 3: Testing operational readiness (2025)

Phase 2 of the 2026 Census PIA was conducted between March and November 2024. The ABS contracted external consultants, IIS Partners, to conduct the PIA. The ABS has provided a response to the recommendations from the report below.

Recommendation 1: Train relevant staff members in appropriate handling of candidate personal information and use of the recruitment system

Response: Agreed

The ABS acknowledges and agrees with the need to train relevant staff members in the appropriate handling of candidate personal information and the use of the recruitment system.

The ABS will:

- Develop and implement a training program for all relevant staff, including field managers, focusing on the appropriate handling of candidate personal information and the use of the recruitment system.
- Test the recruitment system arrangements, including field manager access control, during the 2025 Operational Readiness Exercise.

Recommendation 2: Ensure myGov privacy information makes clear possible additional uses by the ABS beyond the Census

Response: Agreed

The ABS acknowledges the importance of transparency in the use of myGov as a pathway for completing the 2026 Census and engaging with the ABS. The ABS will be transparent in the collection and use of the nominated Census night address and meaningless but unique identifier number (MBUN) linked to the nominated address for the purposes of communicating via myGov.

Since completion the of the PIA, the ABS has made the decision that the myGov subscription service will be used only for the 2026 Census and the associated 2025 Operational Readiness Exercise.

The ABS will:

- Ensure the myGov sign-up notice (terms of use) clearly outline how the subscription service will be used; and
- Ensure the sign-up notice informs individuals of their right to opt-out at any time.

At the completion of the 2025 Operational Readiness Exercise and the 2026 Census main event, all active subscriptions will be bulk unsubscribed with a communication message sent advising of the completion of the subscription.

If the ABS decides to explore the use of myGov beyond Census, a separate privacy assessment will be undertaken.

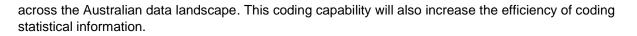**Recommendation 3:** Publish explanatory information about Census coding on the ABS website

Response: Agreed

The ABS is developing a coding capability using machine learning technology to code text to statistical classifications. This capability will be deployed as a whole of government facility and be used by 2026 Census across a number of classifications, enabling data coding to be consistent

across the Australian data landscape. This coding capability will also increase the efficiency of coding statistical information.

To support transparency, the ABS will develop and publish detailed explanatory information on the ABS website regarding the ABS's approach to coding Census data and the Whole-of-Australian-Government (WoAG) Coder. This information will be accessible and easy to understand to enhance transparency and public trust.

Recommendation 4: Include information about administrative data collection and use in the 2026 Census Privacy Statement

Response: Agreed

The ABS will ensure the 2026 Census Privacy Statement includes information about the types of administrative data collected and its uses, and publish it on the ABS and Census website.

The ABS published information on how administrative data improved the quality of the 2021 Census and will continue to publish articles on the use of administrative data for the 2026 Census on the ABS and Census Website.

Recommendation 5: Test the effectiveness of awareness-raising activities in relation to administrative data use in the Census

Response: Agreed

As part of the ABS' preparations for the 2026 Census, communication activities will be undertaken to build public awareness regarding ABS administrative data use. The communication activities will be aligned with the ABS' broader approach to administrative data use.

Targeted communication approaches will support education and awareness activities about how administrative data will be used in the 2026 Census. The effectiveness of communication activities will be assessed and adjusted as necessary.

Recommendation 6: Restrict use of non-PLIDA administrative data collected for determining Census night occupancy

Response: Agreed in principle

ABS is committed to openness and transparency on the ways it will use administrative data for the 2026 Census. Where data is sourced only for the purpose of 2026 occupancy determination and future Census occupancy research, it will only be used for that purpose.

The ABS has a leadership role in maximising the use of public data for statistical purposes as well as a responsibility to use public funds efficiently and effectively. We continue to look for ways to use administrative data to reduce Census cost, create efficiency and improve data quality.

If additional purposes for the data are identified or pursued, ABS will be open and transparent about how administrative data will be used, and these purposes will be considered in a separate privacy and data ethics assessment.

Recommendation 7: Remove administrative data used for determining Census night occupancy from Census systems five years after Census 2026

Response: Agreed

The ABS will establish and enforce a clear timeline for the destruction of administrative data containing addresses, in accordance with ABS's Records Authorities. The data destruction process will be documented internally to ensure timely and secure disposal.

Recommendation 8: Take a structured approach to data ethics oversight of proposed administrative data uses in the 2026 Census

Response: Agreed

The ABS will take a structured approach to data ethics oversight for the proposed administrative data uses in the 2026 Census.

A whole-of-government Data Ethics Framework is being developed as part of the Data and Digital Government Strategy. Once available, the ABS will consider how to best apply the whole-of-government Data Ethics Framework to the proposed administrative data uses in the 2026 Census.

Recommendation 9: Clarify the ABS's use and retention of address information (including use for BLA related processing) in the 2026 Census Privacy Statement

Response: Agreed

The proposed use of Census data for the Business Location Asset (BLA) project depends on securing funding for the next financial year. If funding is obtained, the ABS will test the usefulness of Census data for the BLA using data from the 2025 Operational Readiness Exercise.

If testing is successful, the ABS will update the 2026 Census Privacy Statement to clarify the use and retention of address information for BLA-related processing. Detailed information about the BLA, including its purpose and privacy safeguards, will also be published and linked to the 2026 Census Privacy Statement.

Recommendation 10: Test that BLA-related privacy arrangements are fit for purpose during the 2025 Operational Readiness Exercise

Response: Agreed

The proposed use of Census data for the Business Location Asset (BLA) project is dependent on funding for next financial year. If funding is secured, the ABS will use the 2025 Operational Readiness Exercise to test the privacy arrangements identified in the PIA and document any unforeseen privacy risks. Further controls will be developed and implemented if additional risks are identified.