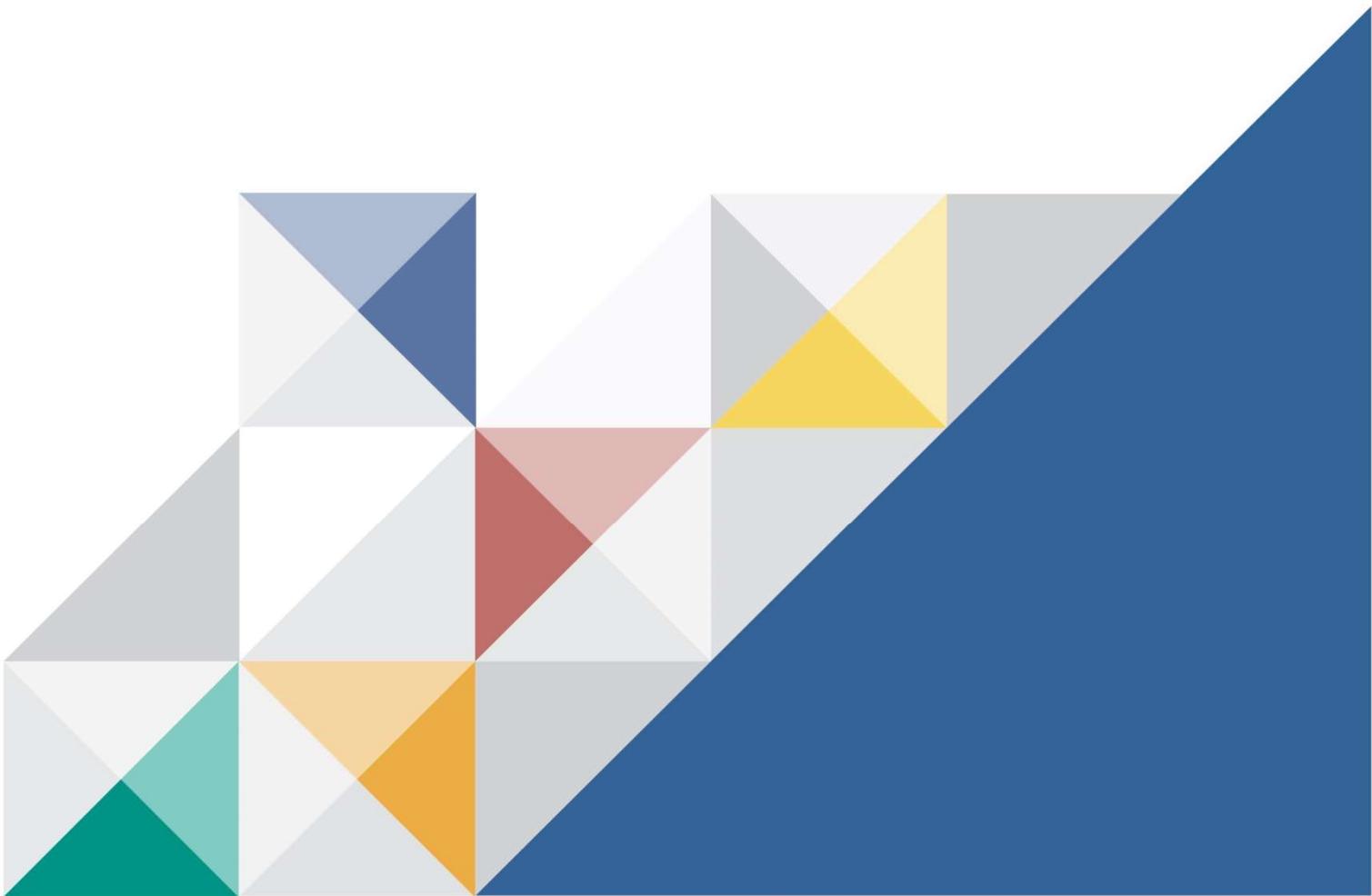




PRIVACY IMPACT ASSESSMENT RESPONSE

Cloud DataLab

June 2020



BACKGROUND

The ABS plans to improve its secure data access and analytics environment, the DataLab, by moving it to a cloud hosted platform to meet future research demand. Once operational, the new Cloud DataLab will provide safe access to authorised researchers for approved projects so they can conduct research across a wide range of areas.

In 2019, the ABS conducted an update to the Privacy Impact Assessment (PIA) for the Multi-Agency Data Integration Project (MADIP) on behalf of the MADIP Board. The MADIP PIA Update was independently assured by the law firm Maddocks, who also provided privacy advice throughout the PIA process. The PIA report, assurance report and consultation report are published on the ABS website¹.

As part of the MADIP PIA Update processes, the ABS consulted with a broad range of stakeholders about MADIP future plans, including the possible move to store and provide access to MADIP microdata in a cloud environment. However, while the MADIP PIA Update analysed processes for storage and access of microdata in the existing secure DataLab environment, it did not specifically cover storage of microdata in a cloud environment.

The Cloud DataLab PIA analyses the privacy impacts of moving the DataLab to a cloud environment. The PIA acknowledges the privacy by design approach to ABS operations and the strong framework of protections that preserve privacy and ensure data security. It also articulates the ABS's ongoing commitment to protect privacy and ensure data security when providing access to microdata and handling the personal information of Users.

This document outlines the ABS's response to the recommendations in the Cloud DataLab PIA.

PIA RECOMMENDATIONS AND ABS RESPONSE

The Cloud DataLab PIA has made a number of recommendations to improve compliance with the Australian Privacy Principles (APPs) and several suggestions to advance privacy best practice. The 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.

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.

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.

¹ [MADIP Privacy Impact Assessment](#)

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

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.

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.

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.

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.

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.

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.

Agreed.

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

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

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.

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

Agreed.

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

NEXT STEPS

The ABS will implement all PIA recommendations before the Cloud DataLab becomes fully operational.

The ABS will publish a progress report for the Cloud DataLab PIA on its website within one year of this report being published, to inform on progress of implementing APP recommendations. It may also update the PIA if further developments require a privacy impact reassessment.