



ABS RESPONSE TO THE INDEPENDENT PRIVACY IMPACT ASSESSMENT ON THE VULNERABLE AND DISADVANTAGED CHILDREN RESEARCH DATA INTEGRATION PROJECT



SUMMARY

The Australian Bureau of Statistics (ABS) on behalf of Australian Education Senior Officials Committee (AESOC) undertook this project with endorsement from the Australian, State and Territory Governments. The Vulnerable and Disadvantaged Children (VDC) project is a proof of concept project which seeks to demonstrate that the:

- National Early Childhood Education and Care data;
- Australian Education Data Collection;
- Census of Population and Housing;
- Social Security and Related Information data;
- Child Care Management System data; and
- National Assessment Program – Literacy and Numeracy data from each jurisdiction (Government, Catholic and Independent)

were able to be linked together to provide a data set of appropriate quality for research that would allow a deeper understanding of the characteristics of vulnerable and disadvantaged children, and how factors such as family characteristics and early childhood educational and formal care experiences influence educational outcomes. The project continues to be a proof of concept as no decision has yet been made for the data set to become enduring.

The ABS commissioned an independent Privacy Impact Assessment (PIA) for this project to obtain input from independent experts outside the organisation to ensure the ABS complied with its obligations under the Privacy Act 1988 and the Australian Privacy Principles (APPs); and to identify and recommend options for managing, reducing or eliminating any negative privacy impacts that have been identified in the PIA to ensure the greatest possible community confidence in the outcome of the PIA and the project itself.

The 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 regularly collects, handles and analyses information that is especially sensitive in nature and in these situations takes additional precautions to respect and protect the privacy of these individuals.

The ABS also acknowledges that the constituent datasets integrated into the VDC dataset has many custodians who allowed access to their data to allow this proof of concept exercise to be undertaken.

The ABS welcomes the recognition in the PIA that the ABS has a number of strong privacy enhancing measures in place including the application of functional separation, anonymisation and confidentialisation of data as part of the integration process, requirement upon authorised users to sign a legally binding undertaking, and dataset access in the secure ABS DataLab where any outputs are scrutinised.

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

recommendations and is taking the action appropriate to the proof of concept nature of this dataset. Additional actions would be taken if the dataset was to become enduring.

RECOMMENDATION 1

To promote transparency and public debate about the benefits of, or any privacy concerns relating to, the Project:

- **its communication strategy reaches as much of the Australian community as possible, and particularly parents with children; and**
- **easily accessible information is made available which covers the following matters:**
 - **why the project is important;**
 - **what information will be collected and used;**
 - **the scope of the statistical and research purposes for which the integrated VDC data may be used;**
 - **an explanation of the legislative authority relied upon by the ABS to collect and use data (including the use of 2011 Population Census Data) for the purposes of the Project;**
 - **how the data linkage will occur; and**
 - **how information will be protected.**

Agreed in Principle

The ABS is committed to the transparency of its statistical data integration activities. The Independent PIA for the VDC project is available on the ABS website for this purpose and provides easy access to the recommended information.

The ABS has taken advice from the Australian, State and Territory Education departments about the potential for additional communications. It has been concluded that publication of the Independent PIA is sufficient given the nature of the project as a proof of concept.

In the event that agreement is reached for the dataset to be retained beyond the current project, the ABS will develop a more extensive public communications strategy in consultation with stakeholders from the Australia, State and Territory Education departments.



RECOMMENDATION 2

Further to Recommendation 1:

- the project description on the National Statistical Service (NSS) Data Integration Project Register (or its replacement) should include information about the nature of the information that will be collected and used by the ABS; and
- the ABS website should include prominent and clear information about the Project, including a link to the NSS Data Integration Project Register (or its replacement).

Agreed in Principle

The VDC project has been listed on the Public Register of Data Integration Projects and on the Data Integration Projects page on the ABS website.

The publication of the Independent PIA on the ABS website provides prominent and clear information about the project. This information and the way it is presented is appropriate given the nature of this project as a proof of concept.

In the event that agreement is reached for the dataset to be retained beyond the current project, the ABS would reassess how information about the dataset and project is presented on its website.

RECOMMENDATION 3

As part of the review of the ABS Privacy Policy, consideration should be given to including information about the collection of data from Commonwealth, State and Territory government bodies, and the use of that information in data integration projects.

Agreed

The ABS is reviewing its privacy policy and processes to meet the new legislative requirements and improve our practices, including improving engagement with the public about the collection and use of personal information by the ABS. We are looking at how best to include information about the collection and use of Commonwealth, State and Territory data (described in this PIA) for data integration projects, given the need to ensure the information in the policy is easily accessible and understandable.

