2022 MADIP PIA Update

Consultation Report

25 May 2022

Contents

1.   Introduction

1.1   The Australian Bureau of Statistics (**ABS**) has engaged Maddocks to conduct a privacy impact assessment (**PIA**) which considers the privacy implications of updates, as well as planned changes, to the Multi-Agency Data Integration (**MADIP**) since the 2019 MADIP PIA Update report was published in November 2019. There have been a number of updates that have already been made to MADIP since the 2019 PIA Update report, which were subject to separate privacy impact threshold assessments or PIAs. The intention of the 2022 MADIP PIA Update is to consolidate these updates and any planned changes to MADIP.

1.2   Undertaking consultation with stakeholders is an essential part of conducting this PIA. It was an opportunity to inform stakeholders about the updates and proposed changes to MADIP and the data integration infrastructure in ABS, and to listen to stakeholder views on the proposed updates and ABS's privacy management arrangements. Outcomes from consultation are being used to inform the risk analysis and recommendations for the 2022 MADIP PIA Update.

1.3   This report presents the feedback and concerns of targeted consultation sessions that ABS held with a range of stakeholders during February 2022 to inform the 2022 MADIP PIA Update.

2.   Our approach to consulting with stakeholders

2.1   **The objectives of the consultation process were to:**

2.1.1   inform stakeholders about:

(a)   MADIP, including its current privacy practices and protections; and

(b)   the proposed updates and changes to MADIP; and

2.1.2   listen to issues and concerns stakeholders may have about the updates and changes, and the existing privacy arrangements, in relation to MADIP.

2.2   The consultation sessions aimed to identify and discuss stakeholder views on the following topics:

2.2.1   Potential for linking new categories of data. For example:

(a)   expanded linkage with business data;

(b)   property insurance data (to identify the levels of insurance coverage of the Australian population and improve the information base for managing natural hazards and climate risks)[1]; and

(c)   expanded linkage and use of Aboriginal and Torres Strait Islander peoples' data to MADIP;

2.2.2   the increased volume of data to be linked as part of MADIP;

2.2.3   the expanded outputs that may be derived from MADIP data and linkages;

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[1] ABS noted during consultations that the MADIP Board does not have any specific proposals to link private sector data to MADIP under consideration. The concept had been included in the stakeholder consultation for this PIA to start identifying what additional privacy steps would be necessary or desirable for this type of data if it were to be considered for linking in the future.

2.2.4 changed or new data handling practices, including:

(a) data custodians potentially providing data for MADIP under the authority of the Data Availability and Transparency (**DAT**) Bill (if passed);

(b) international researchers being permitted to access the MADIP DataLab;

(c) change to data flows and use of cloud storage;

(d) changes to the data custodian approval model to streamline the approval process and reduce burden on data custodians; and

(e) change in MADIP information flow to facilitate ABS internal operational use or MADIP data in statistical collections; and

2.2.5 ABS's existing governance, privacy and security protections for data integration projects.

2.3 Stakeholders consulted included peak bodies, privacy advocates, consumer advocates, universities and research institutions, Aboriginal and Torres Strait Islander stakeholder groups, the Office of the Australian Information Commissioner (**OAIC**), and State and Territory counterparts, and select Commonwealth agencies, including those that have experience in research with specific potentially vulnerable groups (such, as the Australian Institute of Aboriginal and Torres Strait Islander Studies). See **Appendix - Stakeholders consulted for the 2022 MADIP PIA Update** for full list of stakeholders who participated in consultation sessions.

2.4 Stakeholder groups were invited to participate based on:

2.4.1 consumer expertise;

2.4.2 involvement in and/or knowledge of Commonwealth data integration activities and projects;

2.4.3 special interest or expertise such as advocacy; and

2.4.4 representation of a key sector of Australian society.

2.5 The consultation sessions were conducted virtually in five two-hour sessions involving mixed groups of stakeholders. A suite of background materials including a consultation paper was circulated to participants at least one week prior to sessions. The paper provided information about MADIP and the range of data protections in place, as well as a high level outline of the scope of changes to MADIP to be covered in the 2022 MADIP PIA Update.

2.6 At some sessions, stakeholders were requested to respond to online poll questions to capture their initial attitude about each of the proposed updates and invited to respond to ABS initiated questions and provide more detailed feedback on the proposed updates to MADIP.

2.7 Stakeholders were also invited to provide further feedback to ABS following the consultation sessions.

2.8 Several stakeholders who attended had been involved in previous consultations on government data integration.

3. Summary of stakeholder concerns

3.1 We have provided thematic summaries of concerns expressed by stakeholders throughout the stakeholder consultation process in February 2022 below. We have prepared the summaries:

    3.1.1 without attributing any particular concern to an individual or stakeholder. However, we have noted in parts where a concern was raised by a particular type of stakeholder (e.g. education or research organisation); and

    3.1.2 with responses that ABS provided during the consultations ABS provided during the consultations. In some cases, ABS simply indicated that it had heard the relevant concern but did not provide any further information, explanation or indication of future approach. In such cases, we have not included any "ABS comment at workshops".

3.2 We have also included the results of the polling questions, where, prior to discussion about each update with ABS, stakeholders could respond based on the following scale from 1 to 4 about how concerned they were about each of the proposed MADIP updates or changes:

    3.2.1 a response of '1' indicated the stakeholder had no concern at all;

    3.2.2 a response of '2' indicated the stakeholder was somewhat concerned;

    3.2.3 a response of '3' indicated the stakeholder was very concerned; and

    3.2.4 a response of '4' indicated that the stakeholder did not support the proposed update at all.

3.3 In sessions where polling was undertaken, we note that stakeholders provided their responses to the polling questions prior to the opportunity to clarify the proposed changes with ABS and hear any planned additional data protections. The subsequent clarification and discussion alleviated stakeholder concerns in some cases (which is also outlined below).

3.4 The following is a summary of concerns, opinions and key discussion points and should be read in conjunction with the Consultation Paper distributed prior to the consultation sessions.

4. New Data Linkages

4.1 At the beginning of the discussion on these updates and proposed changes, the stakeholders were asked to respond to the poll question: *"How concerned are you about the new types of data proposed to be linked by MADIP?"*

4.2 The majority of stakeholders noted that they were either not concerned or somewhat concerned. However, some stakeholders noted that they were very concerned.

4.3 During discussion, one stakeholder who indicated they were not concerned about the new data linkages indicated that they were not concerned due to the number of safety measures in place within MADIP (including the Five Safes framework).

Concern 1: Granularity of information about businesses

4.4 Stakeholders raised a concern that data collected about sole traders could be identifiable and suggested that this is a particular concern amongst participants in the agricultural industry.

    ABS comment at workshops: ABS noted that where data about businesses included in the Business Longitudinal Data Access Environment (**BLADE**) datasets is considered sensitive or identifiable, ABS may remove those records in the analytical data that is accessed in the

ABS DataLab. ABS further noted output data from research projects is at the grouped, organisational levels, where personal information is protected through aggregation. ABS further noted that MADIP and BLADE data is collected under the *Census and Statistics Act 1905* (Cth) (**Census Act**) and that it cannot release information of a personal or domestic nature in a manner that is likely to enable the identification of that person.

Concern 2: Lack of consent and consumer representation

4.5   Stakeholders expressed a concern that data linkages were occurring without individuals' specific consent.

4.6   Stakeholders questioned how MADIP processes took the concerns of consumers into account.

4.7   Stakeholders suggested:

   4.7.1   implementing independent external audits to ensure processes took into account consumer concerns over privacy, security and ethical use of data;

   4.7.2   including ethics governance within the MADIP governance framework, including representation from members of the public; and

   4.7.3   reconsidering constituency of MADIP Board (or governance arrangements) to be more representative of stakeholder groups. For example, if private sector data were to be linked to MADIP in the future, governance arrangements should include private sector data representatives.

4.8   **ABS comment at workshops:** ABS noted that it ensures that the use of collected data for linkages is permitted under the statutory framework under which it operates. ABS further noted the difficulties in requesting consent for data linkages. ABS noted where consent to link data was sought, but not given, this could lead to the risk of resulting data being biased. ABS noted the suggestions provided by stakeholders.

Concern 3: Insurance sector receiving detailed information about individuals

4.9   ABS set out an example of property insurance data that could be used to inform natural disaster planning.

4.10   Stakeholders questioned whether additional transparency measures need to be put in place if the inclusion of such data also involved access to MADIP data by the private sector, for example, the insurance sector.

4.11   One stakeholder noted a concern that the inclusion of geographical data could allow the insurance sector to make determinations about insurance pricing or planning.

4.12   **ABS comment at workshops:** ABS noted that access to MADIP data is limited to approved researchers, including from government agencies, researchers, academic organisations and public policy institutes. ABS stated that opening up access to private sector organisations is not currently under consideration. If it were to be considered in future, it would be a significant change to existing data handling practices and so would need to be subject to consultation and Privacy Impact Assessment. If the private sector were to be provided with access to MADIP data, ABS would need to consider additional steps to ensure MADIP data remained safe and that the private sector access demonstrated sufficient public benefits.

Concern 4: Safeguards for use of private sector data

4.13   Stakeholders queried what private sector data could be linked as part of MADIP and raised the concern that there would not be sufficient restrictions around the inclusion of private sector data into MADIP.

4.14   Stakeholders noted that there are some private sector datasets which are considered particularly sensitive (such as bank data) and that ABS should proceed cautiously with

appropriate consultation, and transparency, to ensure trust is maintained with the community. One stakeholder suggested that private sector data needs to be considered on a case-by-case basis rather than a framework based approach.

4.15   One stakeholder noted particular concerns with internet usage data for marginalised areas.

4.16   One stakeholder questioned who assessed whether something was for public benefit and suggested that the MADIP vision and strategy be underpinned with agreed principles/protocols to help inform the inclusion of new datasets, particularly to ensure that proposed linkages and analyses are in the public interest.

4.17   Stakeholders queried the role of private sector data custodians, who may be more concerned with commercial impacts.

4.18   **ABS comment at workshops:** ABS noted that the consultation paper provides some examples of the private sector data that could potentially be linked to MADIP. However, there are no specific proposals to link private sector categories of data to MADIP at this time. The concept was included in the stakeholder consultation for this PIA to start identifying what additional privacy steps would be necessary or desirable for this type of data if it were considered in the future.

4.19   ABS noted that the participants concerns are specific to the type of private sector data to be integrated and noted particular concerns around the sensitivity of bank data. ABS also responded that as part of standard practice it would consider the privacy implications, and the risks and benefits of new data prior to integrating it. ABS noted that there must be a clear business need and public benefit to bringing data into MADIP (which needs to be outlined as part of the project proposal).

Concern 5: Use of MADIP for enforcement purposes

4.20   Stakeholders were concerned about the possible use of MADIP for compliance or enforcement purposes against individuals and queried what measures were in place to address this.

4.21   **ABS comment at workshops:** The ABS noted that projects that seek to use data for compliance purposes would not be allowed under the safe projects test in the Five Safes assessment. The linking and outputs from MADIP data is covered by the Census Act and under that Act ABS cannot release data in a manner that is likely to identify an individual. On that basis any use or outputs from linking MADIP data are not likely to be able to be used for enforcement or compliance purposes as they do not identify individuals.

Concern 6: Identification of organisations and companies

4.22   Stakeholders queried whether the inclusion of private sector data would identify organisations and companies and questioned whether and how company or service provider details would be effectively anonymised.

4.23   **ABS comment at workshops:** ABS noted that collection, use and disclosure of data for research and statistical purposed is governed by the Census Act. The ABS manages disclosure risk through its legislative framework and by applying the principles of the internationally recognised Five Safes framework. These frameworks are used to support safe and effective access to microdata (i.e., unit record/person level data) for authorised researcher use.

5.   Proposed linkages of Aboriginal and Torres Strait Islander data

5.1   A dedicated session was held to discuss the expanded use of Aboriginal and Torres Strait Islander data. Polling was not used during this session.

Concern 7: Self-governance for Aboriginal and Torres Strait Islander data

5.2   Stakeholders expressed that the Aboriginal and Torres Strait Islander population want to have a greater say over their data and want to ensure there is proper community consultation around using that data. Stakeholders supported autonomy and self-determination around Aboriginal and Torres Strait Islander data in line with the principles of Indigenous Data Governance as defined by Maiam nayri Wingara and the Australian Indigenous Governance Institute[2].

5.3   One stakeholder noted that Aboriginal and Torres Strait Islander people have broader concerns about the way in which data about them both as individuals and as communities has been, and is being, used and noted the history of data about Aboriginal and Torres Strait Islander people being used to tell stories that can be negative, disempowering and distressing for Aboriginal and Torres Strait Islander people.

5.4   Stakeholders questioned how Indigenous Data Governance is planned to be embedded within MADIP projects and noted that there were no Aboriginal or Torres Strait Islander representatives on the MADIP Board or in other governance structures.

5.5   Stakeholders suggested that:

    5.5.1   the Deputy Secretaries Data Group Sub-Committee on Governance of Indigenous Data may be well-placed to support these considerations;

    5.5.1   as part of considering a project proposal, data custodians and ABS consider the perspectives of Aboriginal and Torres Strait Islanders;

    5.5.2   the ABS consider the adoption of a parallel governance framework such as the New Zealand the Ngā Tikanga Paiheri IDI[3] or embedding cultural safety into the existing Five Safes framework;

    5.5.3   the ABS put in place the data governance toolkit developed by Dr Kalinda Griffiths that will shortly be released by the Lowitja Institute; and

    5.5.4   in recognition of the significance and complexity of the issues, that one or more models of data governance be 'trialled' through an individual project or projects to identify the barriers to community access and inform the development of a broader data governance framework for Aboriginal and Torres Strait Islander data.

5.6   **ABS comment at workshops:** ABS noted its commitment to improving data governance. The ABS will take the opportunity to learn from various Indigenous data governance initiatives to inform new approaches and best practice.

Concern 8: Privacy at the community level

5.7   Stakeholders noted that privacy at a community level is also a concern, and that this is especially true of projects in specific remote areas where the use of an Indigenous identifier is the equivalent of identifying a specific Aboriginal and Torres Strait Islander community.

5.8   Some stakeholders also believed that an Indigenous identifier is not required for a project to be considered an Indigenous data project, especially if it relates to a specific geographic region such as a remote area.

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[2] Indigenous Data Governance refers to the right of Indigenous peoples to autonomously decide what, how and why Indigenous Data are collected, accessed and used. It ensures that data on or about Indigenous peoples reflects our priorities, values, cultures, worldview. See https://www.maiamnayriwingara.org/key-principles
[3] The stakeholder provided the following link to Ngā Tikanga Paihere Guidelines prepared by Statistics New Zealand for ABS consideration: https://www.data.govt.nz/assets/data-ethics/Nga-Tikanga/Nga-Tikanga-Paihere-Guidelines-December-2020.pdf

Concern 9: Data quality issues involving Aboriginal and Torres Strait Islander peoples

5.9   One stakeholder identified difficulties in using datasets which contain data about Aboriginal and Torres Strait Islander peoples, given that there may be different reasons for, and types of, identification at different times and across datasets for Aboriginal and Torres Strait Islander peoples.

5.10   **ABS comment at workshops:** ABS acknowledged these challenges, and noted that data custodians carefully review the proposed use of MADIP data at the project proposal stage, including consideration of what is trying to be achieved, the various datasets proposed to be used and dataset quality. ABS researches the quality of the data (including Indigenous identifiers) and considers whether the quality of the data is fit for the proposed research purpose.

Concern 10: Ethical culturally-safe use of Aboriginal and Torres Strait Islander data

5.11   Stakeholders noted the responsibility to go beyond strict privacy considerations in relation to Aboriginal and Torres Strait Islander data, and to consider how to implement practices that promote ethical culturally-safe use of the data.

5.12   One stakeholder asked whether international approaches to handling Indigenous data would be implemented in MADIP, similar to the Ngā Tikanga Paiheri[4] processes in Aotearoa. The stakeholder noted the concern that the Five Safes framework is about protecting individual privacy rather than protecting collectives that the data is about from harm. They suggested the cultural safety framework be used alongside the Five Safes framework.

5.13   One stakeholder suggested building into the project design phase an ethical review of how the data is intended to be used. One government stakeholder was supportive of a separate new Aboriginal and Torres Strait Islander ethics committee.

5.14   In response, another stakeholder suggested that not every research proposal may require ethical review, but that if the proposal met a particular threshold it could be subject to review. It was most important that all research align with the AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research[5] which doesn't mean it necessarily has to be approved by an ethics committee.

5.15   One researcher noted that there is a balance between access to data and ensuring that data is used ethically, and that if the process is too onerous then it may discourage researchers from undertaking Indigenous data projects.

5.16   One stakeholder from an Aboriginal and Torres Strait Islander organisation specifically mentioned how ethics is the only control for Aboriginal and Torres Strait Islander people to protect how their communities are researched and how data has been historically used in deficit narratives for their communities. There was a shared view by other Aboriginal and Torres Strait Islander stakeholders that Aboriginal and Torres Strait Islander people are over-researched with no control of how data is collected, used and accessed.

5.17   **ABS comment at workshops:** ABS noted its commitment to improving data governance. ABS noted that they will consider national and international best practice processes when implementing proposed updates to MADIP. The ABS is taking an active role in the current

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[4] The stakeholder provided the following link to Ngā Tikanga Paihere Guidelines prepared by Statistics New Zealand for ABS consideration: https://www.data.govt.nz/assets/data-ethics/Nga-Tikanga/Nga-Tikanga-Paihere-Guidelines-December-2020.pdf
[5] AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research

whole-of-government consideration of embedding Indigenous Data Sovereignty into the governance of Aboriginal and Torres Strait Islander data in Australia.

Concern 11: Access to data on Aboriginal and Torres Strait Islander peoples

5.18   Stakeholders from Aboriginal and Torres Strait Islander communities were concerned that communities from which the data is sourced are not able to access that data for analysis purposes due to lack of technology and/or data capability.

5.19   One government stakeholder indicated that it is important to ensure Aboriginal and Torres Strait Islander people have ownership and control over data collection, access, management and their right to self-determination and this is in line with their jurisdictional Indigenous Data Governance and Data Sovereignty policy and frameworks. An example shared for consideration in MADIP governance was how the Victorian State Government is working in partnership with their First Nation's Assembly of Victoria to establish a framework to commence treaty negotiations.

5.20   One government stakeholder, involved in research, suggested that existing ABS practices provide protections for Aboriginal and Torres Strait Islander data, and expressed concerns that if further practices were embedded it would be difficult to access the data for research.

5.21   Stakeholders discussed the necessity of having controlled, safe use of data that is also easier to access, noting that where data is difficult to access, it may not be used to inform important decisions.

5.22   **ABS comment at workshops:** The ABS noted the need to balance approved researcher access to MADIP data whilst ensuring data is kept safe and secure. The ABS has additional review processes in place for projects that seek to use Aboriginal and Torres Strait Islander data.

6.   Increased volume of data

6.1   At the beginning of the discussion on these updates and proposed changes, the stakeholders were asked to respond to the poll question: "How concerned are you about the increased volume of data proposed to be linked to MADIP?"

6.2   The majority of stakeholders noted that they were not concerned. Some stakeholders noted they were somewhat concerned and a small number noted that they were very concerned.

Concern 12: The lags in updating administrative datasets

6.3   One stakeholder noted a general concern about the lag between the updating of administrative datasets and linkage to MADIP and consequently the accuracy of data.

6.4   One stakeholder expressed a concern about inaccuracies in MADIP data. One stakeholder, a MADIP data user, noted that it took a long time to clean the data they accessed from MADIP.

Concern 13: Increased scope of identification

6.5   Stakeholders expressed concern that the increased volume of data would increase risks that the data is identifiable. Stakeholders queried whether there would be any changes made to the current disclosure and vetting arrangements to deal with re-identification risks.

6.6   **ABS comment at workshops:** ABS noted that it has extensive risk mitigation measures in applying the Five Safes framework to the MADIP data to provide effective data protections.

Existing measures for researchers accessing the MADIP data include training about rules of access in DataLab, as well as auditing of DataLab sessions.

7. Expanded outputs

7.1 At the beginning of the discussion on these updates and proposed changes, the stakeholders were asked to respond to the poll question: "How concerned are you about the expanded outputs to be derived from MADIP Data and linkages?"

7.2 Most stakeholders identified that they were not concerned or somewhat concerned. However, some stakeholders noted that they were very concerned.

Concern 14: Consent over expanded outputs

7.3 One stakeholder asked if there would be an opportunity to provide consent around the expanded outputs of MADIP data.

7.4 Another stakeholder noted that it was impractical to request consent in these circumstances.

7.5 **ABS comment at workshops:** ABS noted that it does not ask for consent from individuals about the use of the data for expanded outputs but that it is transparent about such uses, with information about data integrated and projects accessing data published on the ABS website.

8. Changed or new data handling practices

8.1 At the beginning of the discussion on these updates and proposed changes, the stakeholders were asked to respond to the poll question: "How concerned are you about acquiring data under the DAT Bill for use in MADIP?

8.2 Most stakeholders identified that they were not concerned and some identified that they were somewhat concerned.

Concern 15: On-sharing of State and Territory data under Data Availability and Transparency (DAT) Bill

8.3 One stakeholder asked whether State and Territory data will be on-shared by the Commonwealth under the DAT Bill without the original data custodian's permission.

8.4 While sharing State and Territory data is not currently enabled under the DAT Bill, stakeholders queried if State and Territory data is to be shared with ABS under other legislation and how ABS would deal with State and Territory legislative provisions (e.g. Human Rights Acts) in relation to State and Territory data.

8.5 **ABS comment at workshops**: ABS noted that information cannot be "on-shared" to others through MADIP but that data could be accessed by authorised researchers for approved projects in the ABS DataLab. ABS also clarified that while sharing State and Territory data is not currently enabled under the DAT Bill[6], ABS would collaborate with data custodians and

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[6] The DAT Bill was passed following the consultation sessions. Further information on the *Data Availability and Transparency Act 2022* (Cth) is available on the Office of the National Data Commissioner's website.

take additional steps where necessary to ensure State and Territory data integrated in MADIP adheres to relevant legislative provisions on a case-by-case basis.

9. International researchers

9.1 The stakeholders were asked to respond to the poll question: How concerned are you about international researchers being permitted access to DataLab?

9.2 Most stakeholders were not concerned and a small number of participants were somewhat concerned.

Concern 16: International researchers not covered by Australian jurisdiction

9.3 Stakeholders raised concerns over how ABS intends to govern the use of MADIP data by international researchers, and queried the effectiveness of relying on reputational risk to researchers if they inappropriately use or access MADIP data.

9.4 One stakeholder queried the purpose and benefit of allowing international access to Australian public data and suggested that ABS balance that against public expectations of how their data will be used.

9.5 One stakeholder suggested that it would be sensible to start by restricting international researchers to those based in OECD countries, and suggested that other countries require sponsorship by Australian organisations that can be held legally responsible (e.g. Statistics Denmark).

9.6 Stakeholders did not raise any specific concerns or feedback in relation to the other three changed or new data handling practices as described in section 2.2.4.

9.7 **ABS comment at workshops:** ABS noted that it already has a suite of protections in place for all researcher access to MADIP data. For international researcher access, ABS could undertake a greater level of audit/scrutiny of researcher access and activity and also rely on reputational risk for international researchers and their organisations if they do not abide by rules of access. Further, ABS will provide additional/modified training for international researchers to ensure they understand the rules and consequences for not abiding by them.

Appendix - Stakeholders consulted for the 2022 MADIP PIA Update

Several organisations were invited to participate in the consultation sessions but were not able to attend. These organisations are not represented in the list below.

1. ARC Centre of Excellence for Children and Families over the Life Course (The Life Course Centre)
2. Australian Bureau of Agricultural and Resource Economics and Sciences
3. Australian Climate Service
4. Australian Institute of Aboriginal and Torres Strait Islander Studies
5. Australian Institute of Health and Welfare
6. Australian National University
7. Australian Taxation Office
8. Barang Regional Alliance
9. Binarri Binyja Yarrawoo Empowered community
10. Cancer Council Australia
11. Cancer Institute of New South Wales
12. Centre for Big Data Research in Health, University of New South Wales
13. Commonwealth Scientific and Industrial Research Organisation / Data61
14. Consumers Health Forum of Australia
15. Department of Education, Skills and Employment
16. Department of Health
17. Department of Prime Minister and Cabinet
18. Department of Social Services
19. Empowered Communities (independent)
20. Grattan Institute
21. Healing Foundation
22. Information and Privacy Commission New South Wales
23. Kaiela Institute
24. Kimberley Aboriginal Medical Services
25. Maiam Nayri Wingara Indigenous Data Sovereignty Collective
26. Menzies School of Health Research
27. Monash University
28. National Health and Medical Research Council
29. National Indigenous Australians Agency
30. Notitia Consulting (aligned to Empowered Communities)
31. Ngaanyatjarra Pitjantjatjara Yankunytjatjara Empowered Community
32. Office of the Australian Information Commissioner
33. Office of the Information Commissioner Northern Territory
34. Office of the Victorian Information Commissioner
35. Pama Futures (Far North Queensland Empowered Communities)
36. Privacy Committee of South Australia
37. Queensland Government Statistician's Office
38. Queensland Department of Health
39. Services Australia

40. South Australian Chief Data Officer
41. South Australian Department of Premier and Cabinet
42. Universities Australia
43. University of Sydney
44. Victorian Aboriginal Community Controlled Health Organisation
45. Victorian Centre for Data Insights
46. Victorian Department of Jobs, Precincts and Regions
47. Victorian Department of Premier and Cabinet
48. Western Australia Department of Communities
49. Western Australia Department of Premier and Cabinet Aboriginal Engagement Unit
50. Winnunga Nimmityjah Aboriginal Health Service