



PRIVACY IMPACT ASSESSMENT

ABS Business Reporting: Enabling use of accounting software to
prepare information for the ABS
August 2023



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PART 1 – INTRODUCTION

The ABS has conducted a Privacy Impact Assessment (PIA) to consider potential privacy impacts of a new web application, ABS Business Reporting, on the privacy of individuals whose personal information would be collected through the application.

This document describes the conduct, outcomes and recommendations resulting from this PIA.

1.1 Background

ABS Business Reporting

ABS Business Reporting is a web application developed by the ABS to collect data for statistical purposes from small and medium businesses.

Timely data from business is critical for the range of economic indicators the ABS produces, but current reporting processes can be difficult and time consuming, particularly for small and medium businesses. ABS Business Reporting has been co-designed with accountants, bookkeepers, and businesses to make it easier for small and medium businesses to provide the financial information required to produce key statistics.

The Australian Government's [Data and Digital Government Strategy](#) ensures that regulation is designed and implemented in the most efficient and timely way, with the smallest cost on businesses. ABS Business Reporting demonstrates how the ABS is aligned to the government's approach to become a modern, data-driven society by 2030.

ABS Business Reporting provides an alternative to completing an online or paper form. The application streamlines reporting for small and medium businesses by allowing users to connect securely to their accounting software to prepare a report to submit to the ABS. Once they authorise a connection, businesses will see information from their accounts and use that to prepare and submit a report for the ABS.

By making better use of their existing data and systems, ABS Business Reporting allows businesses to report more quickly and easily.

How does it work?

ABS Business Reporting uses Application Programming Interfaces (APIs) to draw information from a business' accounting software for use in preparing a report for the ABS. When using ABS Business Reporting for the first time, users will be asked to confirm their identity and to authorise the application's access to information held in their accounting software. Once a connection is authorised, users can view accounts from their accounting software within ABS Business Reporting, and associate specific accounts with report items. ABS Business Reporting uses these associations and information drawn from accounting software to calculate totals for each report item and prepare a summary that can be reviewed and submitted to the ABS in place of a traditional web or paper survey form.

ABS Business Reporting will also store a record of which accounts were associated with each report item. When a user returns to the app for a subsequent period, this association is then used to generate a report without having to repeat the process, making it significantly quicker and easier.

1.2 Purpose, scope and approach for the PIA

Purpose

The purpose of this PIA was to:

- consider the potential privacy impacts on people whose personal information is collected and used by the ABS through ABS Business Reporting
- identify privacy risks in relation to the Australian Privacy Principles (APPs) and community expectations
- identify, assess and outline risk mitigation strategies to manage privacy impacts.

Scope

The scope of the PIA conducted was the collection of information within the ABS Business Reporting application. Specifically, the PIA has considered the flow of information into, within and out of ABS Business Reporting, and processes and protections in place to manage personal information collected within ABS Business Reporting. Further detail about the flow of information is provided in Part 2 of this report.

This PIA does not cover the processing of data within the ABS Client Management System or the ABS Data Processing Environment, where information is retained and may be used to support statistical functions under the *Census and Statistics Act 1905*.

Approach

The ABS followed the Office for Australian Information Commissioner's (OAIC) [Guide to undertaking privacy impact assessments](#) in completing this PIA. The process included:

- undertaking a Privacy Threshold Assessment (PTA) to determine the need for the PIA based on a shortlist of risk criteria
- mapping information flows
- undertaking a PIA analysis and compliance check
- addressing risks
- preparing this report
- publishing the PIA on the ABS website.

1.3 Collection of information in ABS Business Reporting

To ensure ABS Business Reporting is able to successfully function and deliver expected benefits to its users, the ABS collects personal, business, and statistical information within the application. This section provides further detail on the information collected by ABS Business Reporting.

Personal Information

The *Privacy Act 1988 (Cth)*¹ defines personal information as “...information or an opinion about an identified individual, or an individual who is reasonably identifiable...”².

Collection of Personal Information within ABS Business Reporting

Personal information of a user is collected within ABS Business Reporting for the purpose of authenticating identity and future contact by the ABS to support statistical activity. This contact information includes a person’s:

- first Name
- last Name
- email address
- mobile number.

In the case of sole traders, a business’ financial information may also be considered personal information. Financial information for a business is also collected in ABS Business Reporting, and includes a business’ Australian Business Number (ABN) and information from a business’:

- Chart of accounts
- Profit and loss statement
- Trial balance/Balance sheet.

This information is collected for statistical purposes under the *Census and Statistics Act 1905*³.

Personal information is collected within the application via:

- direct entry by users into the application
- authorised connection to a users’ accounting software.

Sensitive Information

The Privacy Act defines ‘sensitive data’ as information or an opinion about an individual’s:

- Racial or ethnic origin
- Political opinions
- Health information
- Religious affiliation
- Sexuality
- Criminal record.

Sensitive information as defined in the Privacy Act is not collected within ABS Business Reporting and is therefore not considered in this PIA.

¹ <https://www.oaic.gov.au/privacy/the-privacy-act/>

² <https://www.oaic.gov.au/privacy/guidance-and-advice/what-is-personal-information/>

³ <https://www.legislation.gov.au/Details/C2020C00296>

1.4 Legislation

As a Commonwealth organisation, the ABS is also bound by the *Privacy Act 1988 (Cth) (the Act)*, including the Australian Privacy Principles (APPs).

Contact information is collected by the ABS in accordance with the *Privacy Act 1988 (Cth)* to support ABS to collect, compile, analyse and disseminate statistical information.

The statistical (financial) information collected through ABS Business Reporting is collected by the ABS under the *Census and Statistics Act 1905*⁴. Subsection 9.1 of the Act provide the ABS with the legislative authority to collect data in relation to topics outlined in the Census and Statistics Regulation 2016 for statistical purposes. Where the statistical information relates to a Sole trader, this information is also collected and handled in accordance with the *Privacy Act 1988 (Cth)*.

Compliance with the APPs is assessed in Part 3 of this PIA.

1.5 Addressing community expectations

While the collection, use or disclosure of personal information may be authorised by legislation, this does not necessarily mean it meets community expectations. A key privacy consideration is the right for individuals to be aware of how their personal information is being used. A PIA should therefore consider community attitudes and expectations regarding the project's privacy implications and risks. This supports building and maintaining public trust.

The OAIC's [Australian Community Attitudes to Privacy Survey 2023](#) is a good indication of expectations held by those whose privacy may be impacted by the project. According to the report: '*privacy is a major concern for 62% of Australians, and 84% of Australians want more choice and control over their personal information*'. Misuse of information which doesn't seem relevant to the collection purpose is another primary concern. The ABS applies several security controls for the project to mitigate these concerns. These controls are detailed in Part 2 and 3.

Public trust is critical to the ABS' reputation and to people's willingness to participate in ABS and government projects. Important steps in building public trust in ABS Business Reporting include:

- Undertaking research and testing with small and medium enterprises, as well as accountants and bookkeepers working with small and medium businesses, to understand attitudes and expectations for ABS to use a web application to collect information.
- Consultation with a Project Advisory Board throughout the development and implementation of ABS Business Reporting. The Advisory Board comprises representatives across the small business and accountant/bookkeeper community, as well government stakeholders with experience with similar projects.

This research and consultation have indicated that potential users are predominantly supportive of ABS' use of a web application to allow users to draw on their accounting software to prepare a report. Demonstrations and testing of ABS Business Reporting has also received positive feedback

⁴ <https://www.legislation.gov.au/Details/C2020C00296>

about the experience. Feedback indicates that the personal information collected through ABS Business Reporting is consistent with expectations, and consistent with information collected in other applications used within the business accounting community.

The use of ABS Business reporting is optional for businesses. Where a business has a reporting obligation, ABS Business Reporting is offered as one possible way to report. A user can elect not to use ABS Business Reporting and will instead be able to report through alternate channels, such as entering data through a web form.

PART 2. DATA USE AND INFORMATION FLOWS

The ABS is responsible for receiving, storing and using the information that is collected through ABS Business Reporting.

2.1 Data flow and use of personal information

Personal information coming into ABS Business Reporting

A description of personal information flowing into and out of ABS Business Reporting is shown in Figure 1 and described.

Information entered within ABS Business Reporting

When respondents first use ABS Business Reporting, they are asked to sign up to create an account. To do this, they will either enter their personal information directly within the application or choose to log in with single sign on using their Xero credentials.

Users who enter information directly into the application are asked to provide their first name, last name, email and phone number.

Xero

In choosing to use Xero credentials to sign up to ABS Business Reporting, the user authorises ABS Business Reporting to access the first name, last name, email address and user profile associated with their Xero account. Users who sign up using Xero are also asked to enter their phone number within ABS Business Reporting, as this information is not sourced from Xero.

MYOB

Personal information does not flow from MYOB into ABS Business Reporting.

MYOB APIs do allow the ABS to access to personal information, but this information is not used by the ABS in any way. For users who connect with their MYOB accounting software, personal information is entered directly into the application, as described above.

When a user connects ABS Business Reporting to MYOB accounting software, MYOB APIs grant access to any and all company files the user has access to. Company files in MYOB contain information about the business, such as the business name, address, phone number, contact email and ABN. Company files may also contain details of employees, customers, suppliers, personal

contacts that the business has added, and could include names, addresses, email and phone numbers if these have been added to a company file.

While MYOB allow ABS access to this information, the ABS restricts ABS Business Reporting to only access information required to help the user to complete a report for a selected business. This does not include any personal information contained within MYOB.

Use of Personal information provided through ABS Business Reporting

Authentication

Personal information provided through ABS Business Reporting, either via direct entry or Xero accounting software, is used by the ABS to authenticate a user's identity.

ABS Business Reporting uses authentication services provided by Okta to authenticate a user's identity and protect information accessible within ABS Business Reporting. The ABS does not share users' personal information with Okta. Authentication is managed by the ABS and Okta cannot access personal information used in authentication.

Okta is a third party trusted provider for the Australian Government and many other organisations. An Independent Security Registered Assessors Program (IRAP) assessment of Okta has evaluated the implementation, appropriateness and effectiveness of Okta Identity Cloud, to ensure the most appropriate risk management approach for the data and information that the ABS is responsible for.

All personal information is strongly encrypted in-transit and at-rest and it is stored in an encrypted ABS environment.

ABS data collection activity

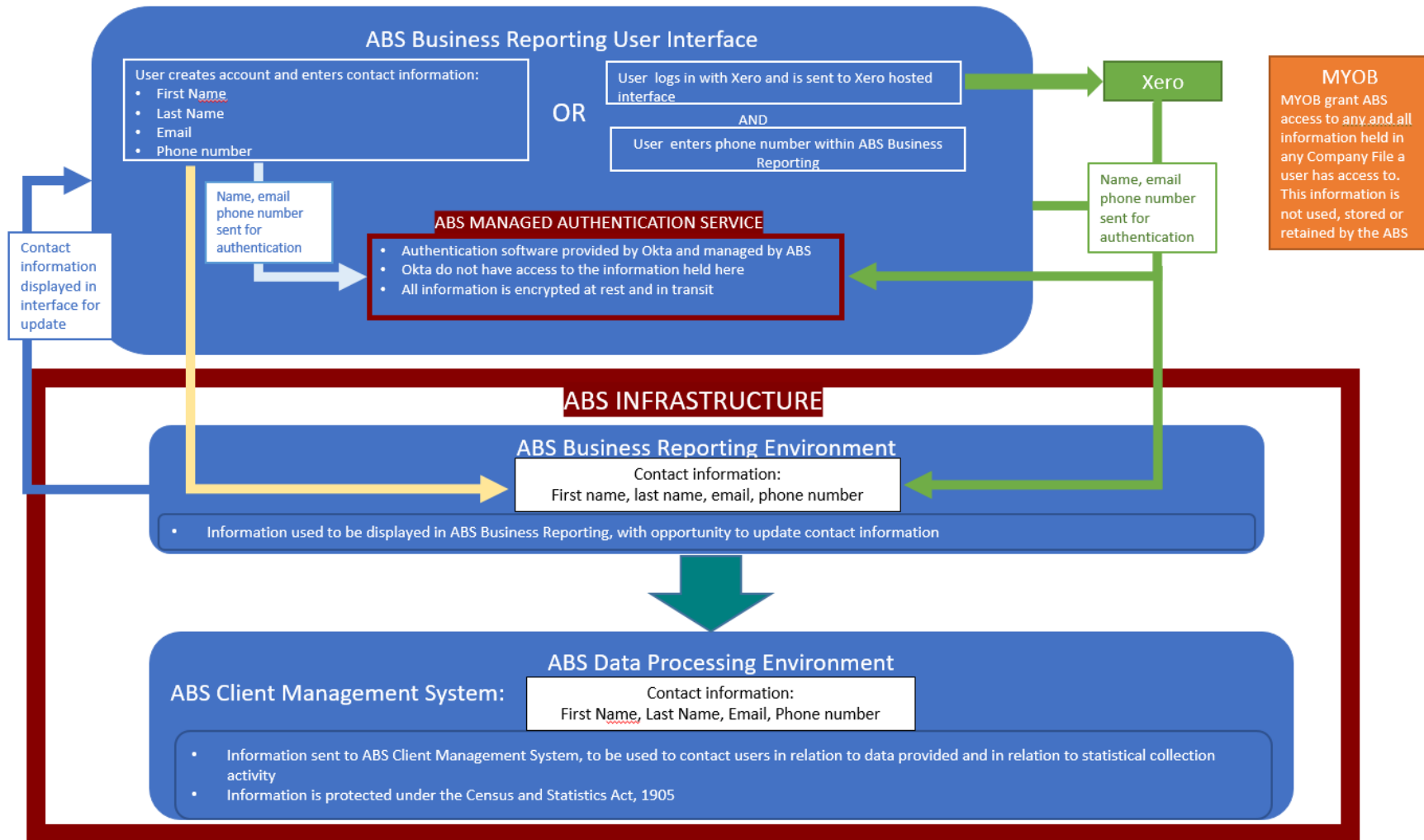
Whether entered directly or sent from Xero, a users' contact information is sent to ABS infrastructure where it is used and retained to support ABS' statistical activity.

Contact information is stored within the ABS Business Reporting environment for the purpose of displaying in the application interface for future updates by that user.

If a business engages a new user to complete the report they will be asked to create a new account and authenticate using the same process outlined above. If the new user is authorised to access their ABS Business Reporting account and the contact details are different, the information stored in ABS Business Reporting environment interface is updated. A new user will not see contact information provided by a previous user.

Contact information is also sent to the ABS' Client Management System, within the ABS Data Processing Environment. It is stored there and may be used to contact users with queries about values reported, or to contact users as part of ABS data collection activities.

Figure 1 Data flow diagram – Flow of personal information into and out of ABS Business Reporting



2.2 Data flow and use of financial information

Financial information coming into ABS Business Reporting is considered personal information where it relates to a sole trader.

The sources and flow of financial information is described below and is shown in Figure 2.

Financial information coming into ABS Business Reporting

From accounting software

Xero

When authorising a Xero business with ABS Business Reporting, users will be asked to select a specific business and grant ABS Business Reporting read-only access to that business':

- Chart of accounts
- Profit and loss report
- Trial balance report
- Australian Business Number (ABN).

MYOB

When ABS Business Reporting is connected to a MYOB account, MYOB grants ABS Business Reporting access to any and all business ledgers associated with the account. The ABS restricts ABS Business Reporting to only access information required to complete your report for a selected business. The user is asked to select a specific business, which allows access to that business':

- Chart of accounts
- Profit and loss report
- Balance sheet report
- Australian Business Number (ABN).

The ABS can only view information from accounting software as long as a business has been authorised to be viewed by ABS Business Reporting, and access has not been revoked by the user. Access can be revoked at any time.

Manual entry

Financial information can also be entered by a user directly into ABS Business Reporting. This may be either as adjustments to values drawn from accounting software, or as comments to describe or explain data reported.

Statistical information created in ABS Business Reporting

Within ABS Business Reporting, account name and value sourced from accounting software are displayed to help a user to generate a mapping of accounts with the questions asked in an ABS Business Survey.

This mapping, combined with values from accounting software, are used to generate a report to be submitted to the ABS. Only the total for each report item will be processed by the ABS. This is equivalent to what would have been written as an answer to a question on a traditional ABS survey.

The report also includes information entered directly by a user, which may include financial information not in accounting software at the time of reporting, as well as comments.

Mappings and reports are retained within ABS Business Reporting to assist the user with future reporting. Mappings are retained within ABS Business Reporting for re-use in generating subsequent reports. When reporting for subsequent cycles, mappings are available for re-use in generating a report make it even quicker and easier for the reporter. Users will be able to see previous reports, along with any manual adjustment added.

If a business engages a new reporter, they will be able to see reports submitted by previous reporters, including any information entered manually.

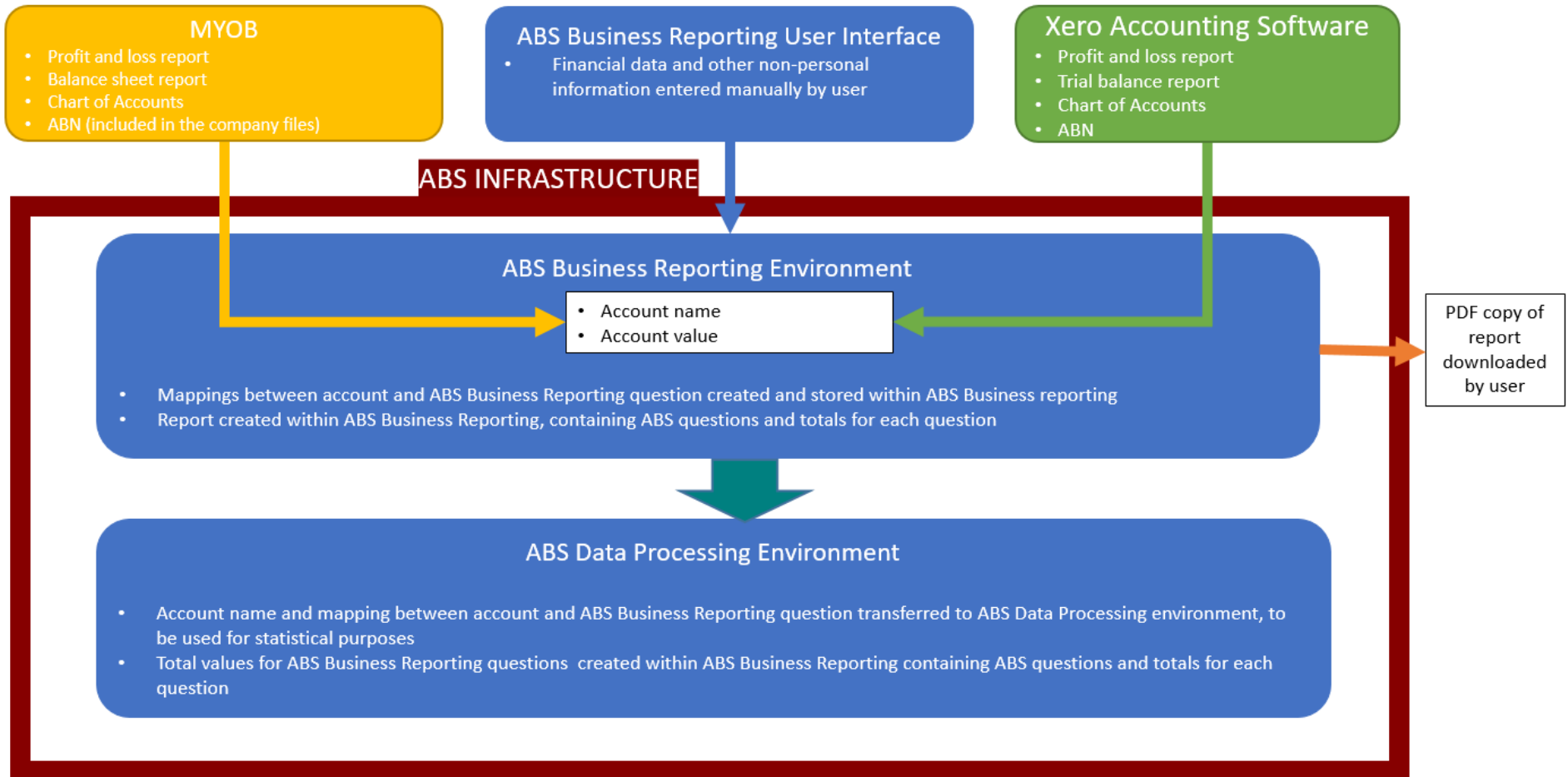
Use of statistical information

Both the mappings and report created within ABS Business Reporting are sent to the ABS Data Processing Environment, where they are used to support statistical functions under the *Census and Statistics Act 1905*⁵.

Additionally, a user can save and export a PDF copy of the report generated within ABS Business Reporting, which they can save and share outside of the ABS environment. Information within a pdf copy of a report is not considered within this PIA.

⁵ <https://www.legislation.gov.au/Details/C2020C00296>

Figure 2 Data flow diagram – Flow of financial and statistical information into and out of ABS Business Reporting



2.3 Retention of information

The ABS recognises that retaining data when it is no longer needed presents security risks. Information collected through ABS Business Reporting is retained only for as long as required to support the purpose for which the information is collected.

Contact information (name, email address, phone number) entered within ABS Business Reporting or coming from Xero, as well as statistical information (mappings, report generated) is stored in the ABS Business Reporting environment to make it accessible to the user in future instances of use.

Retention of this information is to make it easier for the user to meet future reporting obligations. This information is retained for a period no longer than three years. This retention period will be reviewed as the implementation of ABS Business Reporting is developed.

Information within the ABS Data Processing environment is protected in accordance with the *Census and Statistics Act 1905*⁶.

PART 3. AUSTRALIAN PRIVACY PRINCIPLES

APP 1 – Open and transparent management of personal information

APP 1 requires that an entity manages personal information in an open and transparent way, including having a clear, up to date privacy policy that is publicly available. APP 1 also requires that an APP entity takes reasonable steps to implement practices, procedures and systems that ensure it complies with the APPs.

Compliant

The key policies for ABS management of personal information - [ABS Privacy Policy for Statistical Information](#) and [ABS Privacy Policy for Managing and Operating our Business](#) are compliant with APP 1.

The [ABS Privacy Policy for Statistical Information](#) describes how the ABS handles personal information that is collected for producing official statistics. This includes information in datasets like the NSW HSDS that will be linked with MADIP for the TFM project. The Policy outlines:

- the kinds of personal information collected and held by the ABS
- how we collect data and keep personal information safe
- how personal information is used
- accessing and correcting personal information
- our legislative responsibilities
- how privacy complaints and enquiries can be raised and managed.

⁶ <https://www.legislation.gov.au/Details/C2020C00296>

The [ABS Privacy Policy for Managing and Operating our Business](#) describes how we handle personal information that is collected for managing and operating within the ABS, consistent with the *Privacy Act 1988* (Privacy Act) and the Australian Privacy Principles. This policy covers personal information that may be collected if you use an ABS product or service, provide a product or service to us, lodge a query or complaint, work for us, or apply for a job with us.

APP 2 – Anonymity and pseudonymity

APP 2 requires that APP entities give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.

Compliant

It is not practicable for the ABS to deal with individuals who have not identified themselves or who have used a pseudonym as the ABS requires identified information to maintain contact with the respondent to facilitate collection of information for the production of official statistics.

APP 3 – Collection of solicited personal information

APP 3 covers the collection of both personal and sensitive information, the means of collections, and solicited personal information.

Compliant

Personal information other than sensitive information

APP 3.1 and 3.2 requires that any personal information collected by agency or organisation must be reasonably necessary for one of more of the collection APP entity's functions or activities.

As required by APP 3.1, all data collected by ABS for this project is reasonably necessary for the ABS to perform its function to collect, compile, analyse and disseminate statistics and related information (subsection 6(1)(b) Australian Bureau of Statistics Act 1975).

Sensitive information

APP 3.3 specifies that sensitive information about an individual must not be collected by an APP entity unless:

- a. The individual consents to the collection of information and:
 - i. The information is reasonably necessary for, or directly related to, on or more of the agency's functions or activities; or
 - ii. The information is reasonably necessary for one of more of the organisation's functions or activities; or
- b. Subclause 3.4 applies in relation to the information.

Sensitive information is not collected by the accounting software web application.

Means of collection

APP 3.5 requires that personal information may only be collected by lawful and fair means.

APP 3.6 specifies that personal information about an individual must be collected from the individual unless an exception applies:

- a) the individual consents to the collection of the information from someone other than the individual; or
- b) the entity is required or authorised by or under an Australian law to collect the information from someone other than the individual; or
- c) it is unreasonable or impracticable for the entity to collect personal information only from the individual.

Compliant

The ABS complies with APP 3.5 because personal information is collected from individuals with their consent, following notification of why the ABS is collecting the information and how it will be used.

The ABS complies with APP 3.6 because personal information is only collected either directly from the individual or via the user's digital service provider (through user authorisation).

APP 4 – Dealing with unsolicited personal information

APP 4 requires that where an APP entity receives unsolicited personal information, it must determine whether it would have been permitted to collect information under APP 3. If APP 4.3 applies to the personal information, then the entity must destroy the information or ensure that it is de-identified as soon as possible, but only if it is lawful and reasonable to do so. If [subclause 4.3](#) does not apply in relation to the personal information, APPs 5 to 13 will apply to that information.

Compliant

ABS has appropriate measures in place to manage the receipt of unsolicited information.

If unsolicited information was provided to the ABS, this information will be handled in accordance with the ABS' usual policies for handling of unsolicited information and destroyed.

APP 5 – Notification of the collection of personal information

APP 5 requires that where an APP entity collects personal information about an individual, it must take reasonable steps to notify the individual, or otherwise ensure the individual is aware of certain matters, which are outlined in APP 5.2.

Compliant

Before creating an account and signing into ABS Business Reporting, a user is provided with information on:

- what ABS Business Reporting does

- the authority under which ABS is collecting the information
- how the ABS uses the data
- the ABS' Data Privacy and Security policy
- how data from accounting software is used by the ABS.

APP 6 – Use or disclosure of personal information

APP 6 requires that an APP entity only use or disclose personal information for the particular purpose for which it was collected (the 'primary purpose'), or for a secondary purpose if the person has consented or if an exception applies, such as where the secondary use or disclosure is required or authorised by or under an Australian law.

Compliant

The ABS will use the information for the primary purpose it was collected for – to maintain contact with the survey respondent and, in the case of personal information relating to sole traders, for the production of official statistics.

APP 7 – Direct marketing

APP 7 requires that organisations must not use or disclose personal information for the purpose of direct marketing unless an exception applies, such as where the individual has consented.

Not applicable

The ABS does not use or disclose personal information for direct marketing purposes.

APP 8 – Cross-border disclosure of personal information

APP 8 requires that before an APP entity discloses personal information to an overseas recipient, the APP entity must take reasonable steps to ensure that the overseas recipient does not breach the APPs (other than APP 1) in relation to the information, unless an exception applies, such as the individual has given informed consent.

Compliant

No data stored in ABS Business Reporting, or ABS data processing environment are accessed or transferred out of Australia.

APP 9 – Adoption, use or disclosure of Government Related identifiers

APP 9 requires that certain classes of APP entities must not adopt, use, or disclose a person's government related identifier as its own identifier of the individual unless an exception applies.

Not applicable

APP 9 does not generally apply to government agencies apart from some prescribed commercial activities.

APP 10 – Quality of personal information

An entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete.

Compliant

Personal and business information collected within ABS Business Reporting is shown on a review screen prior to submission to the ABS, and users can update their contact details and financial information before submitting it. Information about contacting the ABS to update information after submission is also provided.

APP 11 – Security of personal information

APP 11 requires that an APP entity must take reasonable steps to protect personal information it holds from misuse, interference, and loss, as well as unauthorised access, modification, or disclosure. It must also take reasonable steps to ensure personal information is destroyed or deidentified once it is no longer needed.

Compliant

All personal information collected by the ABS is protected in accordance with the Australian Government [Protective Security Policy Framework](#) and with the Australian Government records management regime. When no longer required, personal information is destroyed or deleted according to the National Archives of Australia's [Administrative Functions Disposal Authority](#) and our records authorities ([2001/00000540](#) and [2007/00105946](#)).

ABS Business Reporting is built on the Amazon Web Services secure cloud platform using services covered by the 2022 Independent Registered Assessors Program (IRAP). ABS Business Reporting was architected and built with 'secure by design' principles and has undergone security assessment, penetration testing and its own IRAP assessment.

ABS Business Reporting uses encryption between all interfaces where Personal Identifiable Information is transmitted, and all data stored is encrypted at rest. Provider access is authenticated and authorised using authentication services provided by a third-party digital identity provider (Okta).

ABS Business Reporting is administered using network segregated jumpbox workstations, multifactor authentication, and strictly limited access to only approved and AGSVA security clear staff.

From the perspective of data destruction/disposal, ABS Business Reporting advises providers (through the data collection and privacy statement) that their data will be retained securely for the purpose of delivering the core functionality and providing value-add (Historical reports on business activity, sectoral analysis/performance).

APP 12 – Access to personal information; APP 13 – Correction of personal information

APP 12 requires that an APP entity that holds personal information about an individual must give the individual access to that information on request unless an exemption applies.

APP 13 requires that an APP entity must take reasonable steps to correct personal information to ensure that, having regard to the purpose for which it is held, is accurate.

Compliant

ABS Business Reporting allows its users to see and update personal information collected through the application. The ABS [Privacy Policy for Statistical Information](#) also provides details of how an individual can contact the ABS to update any information provided.

PART 4. CONCLUSION

This PIA has considered the privacy risks associated with the project. Analysis against the APPs (Section 3) has found that this project is compliant. Three recommendations are presented to further enhance ABS privacy practices as use of ABS Business Reporting matures.

Recommendations

Recommendation 1: As of August 2023, ABS Business Reporting enables connections to MYOB and Xero Accounting Software. This PIA only addresses the information flows relating to integration with these accounting software products. As additional accounting software is integrated, this PIA will be reviewed and updated to consider processes relating to each Accounting Software.

Recommendation 2: Retention of information collected within ABS business reporting will be reviewed as the implementation of ABS Business Reporting is developed. Currently, retention of information is aligned with a quarterly collection cycle. Implementation of the application is due to be expanded to include annual data collection from August 2024. Retention of information within ABS Business Reporting will be reviewed at that time.

Recommendation 3: ABS has consulted with a range of users and stakeholders throughout the design and development of ABS Business Reporting. While ABS Business Reporting is still in development (until 2026), an annual review of those stakeholders and users consulted will be conducted to ensure a balance of views and expectations can be heard and considered.

Appendix A – Acronyms

Acronym	Term
ABS	Australian Bureau of Statistics < www.abs.gov.au >
OAIC	Office of the Australian Information Commissioner < www.oaic.gov.au >
IRAP	Independent Security Registered Assessors Program
PIA	Privacy Impact Assessment

Appendix B – Glossary

Term	Description
Australian Privacy Principles	Principles contained in the <i>Privacy Act 1988</i> that regulate the way we collect, store, provide access to, use, and disclose personal information.
Personal Information	As defined in section 6(1) of the Privacy Act 1988 .
Privacy Impact Assessment	A systematic assessment of a project that identifies the impact that it might have on the privacy of individuals, and sets out recommendations for managing, minimising, or eliminating that impact.
Re-identification	The act of determining the identity of a person or organisation even though directly identifying information has been removed.
Sensitive data	Data that would be considered sensitive information under the <i>Privacy Act 1988 (Cth)</i> if the data included personal information.
Sensitive information	As defined in section 6(1) of the Privacy Act 1988 .

Appendix C – Documents consulted for PIA

Legislation

Commonwealth

Privacy Act 1988

Other documents:

[Australian Community Attitudes to Privacy Survey 2023 \(oaic.gov.au\)](https://www.oaic.gov.au/australian-community-attitudes-to-privacy-survey-2023)