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The Members of the Board
Multi-Agency Data Integration Project (MADIP)
c/o Ms Celia Moss
Australian Bureau of Statistics

By email: dipa@abs.gov.au

Dear Celia

MADIP Privacy Impact Assessment Update – Assurance Report

In August 2019, Maddocks was engaged by the Australian Bureau of Statistics (**ABS**) to provide the ABS with independent advice, review and assurance on the process being undertaken by the ABS to update the Multi-Agency Data Integration Project (**MADIP**) Privacy Impact Assessment (**PIA**) and report (**PIA Update**).

This Assurance Report is provided for the benefit of the MADIP Board, to assist the Board in determining the robustness of the PIA Update and in considering the ongoing management of the MADIP from a privacy perspective.

1. Findings

- 1.1 We confirm that, based on the information provided to us, the process for the PIA Update appears to have been undertaken consistently with the 10 steps set out in the Office of the Australian Information Commissioner's (**OAIC**) *Guide to undertaking privacy impact assessments* (**Guide**).
- 1.2 In particular, we note the extensive consultation undertaken by the ABS with a wide range of stakeholders to inform the PIA Update, particularly for the assessment of actual and perceived privacy risks involved in the new developments for MADIP and whether the current mitigation strategies that have been implemented for MADIP are appropriate and sufficient to address those risks.
- 1.3 From our perspective, the ABS, and other MADIP data custodians that are Commonwealth government agencies, have in conducting the PIA Update acted consistently with the spirit of the requirements set out *Privacy (Australian Government Agencies – Governance) APP Code 2017* (noting that that the update to the MADIP PIA was undertaken as part of general governance of MADIP, and not necessarily due to an assessment that MADIP developments would likely have a significant impact on the privacy of individuals).
- 1.4 The PIA Update appears to provide a robust analysis of a complex ongoing project that is MADIP and provides a framework for considering privacy impacts on an ongoing basis. The recommendations and the best practice suggestions seem to us to be practical, and we consider they will assist in further enhancing data handling practices for MADIP, addressing potential privacy issues, and meeting community expectations in relation to transparency of practices associated with the handling of personal information.

