



ABS RESPONSE AND IMPLEMENTATION REPORT

SEAD Privacy Impact Assessment

December 2023





OVERVIEW

In December 2022, the Australian Bureau of Statistics (ABS) published the Privacy Impact Assessment (PIA) for the Secure Environment for Analysing Data (SEAD). The [SEAD PIA](#) builds on the related privacy risks assessed in the 2020 [Cloud DataLab PIA](#) and the 2022 Multi-Agency Data Integration Project PIA Update ([MADIP PIA Update](#)).

This Implementation Report presents the progress since the publication of the SEAD PIA towards each of the recommendations for compliance with the [Australian Privacy Principles \(APPs\)](#), and suggestions to enhance privacy best practice for SEAD.

The five recommendations in the SEAD PIA have been addressed in full. The ABS has taken steps to ensure privacy is protected and data is kept safe and secure in responding to and implementing the best practice recommendations.





1. SUMMARY OF RECOMMENDED ACTIONS

The SEAD PIA identified five areas of improvement to further enhance compliance and/or privacy protections for individuals. The recommendations are summarised along with the APPs in Table 1 below.

Table 1: Summary of best practice recommendations

For more information on the APPs, see [Australian Privacy Principles quick reference | OAIC](#)

RECOMMENDATION	DETAILS	APPs
RECOMMENDATION 1	ABS to be open and transparent about the handling of personal information for the SEAD project, including requirements to:	APP1
		APP3
	1A Publish information about the SEAD to increase public awareness about the service and how data is safely handled within the SEAD.	APP10
	1B Review and update ABS policies (including the DataLab user deletion and retention policy) and practices related to handling of personal information to include the SEAD service.	APP12
		APP13
RECOMMENDATION 2	ABS to review and update internal processes, including for assessment, approval, and data handling practices for ABS use of the SEAD service.	APP11
RECOMMENDATION 3	ABS to develop standardised user agreements and guidance material about the intended application of the SEAD, with specific mention of ABS and partner roles and responsibilities.	APP1
		APP10
		APP12
RECOMMENDATION 4	Partners are responsible to ensure their data use requirements are adhered to by all authorised users in their SEADpod, including partner administrators and partner analysts.	APP11
RECOMMENDATION 5	Partners are responsible to ensure user access is conducted in accordance with relevant training and guidance material in relation to use of the system.	APP11



2. ABS RESPONSE AND IMPLEMENTATION REPORT

Outcomes to address all the recommendations have been delivered. In discussing the recommendations below, the ABS has noted:

- the ABS' acknowledgement and commitment to the recommendations; and
- actions taken in the past 12 months to achieve recommendation outcomes.

Recommendation 1

ABS to be open and transparent about the handling of personal information for the SEAD project, including requirements to:

- A) Publish information about the SEAD to increase public awareness about the service and how data is safely handled within the SEAD.*
- B) Review and update ABS policies (including the DataLab user deletion and retention policy) and practices related to handling of personal information to include the SEAD service.*

ABS' response

Agreed – The ABS will enhance SEAD's transparency by releasing public information about the service. The ABS will also review and revise policies, including the DataLab user deletion and retention policy, to ensure strict compliance with privacy and security standards.

Action – Complete

To address the recommendation, the ABS has taken several actions in line with its commitment to transparency and accountability. The ABS has developed [web content](#) for SEAD to inform the public and raise awareness about the service. Additionally, the ABS has released a [SEAD privacy notice](#) to enhance transparency and user awareness of how personal information is handled as part of the SEAD service. The ABS has also reviewed and updated the DataLab user deletion and retention policy to ensure that it aligns with the latest industry standards and best practices.

Next steps

The ABS will continue to update and expand web content for SEAD. The ABS will also maintain regular and thorough communication channels with SEAD partners, ensuring feedback is appropriately considered and relevant changes are understood and transparent.

Recommendation 2

ABS to review and update internal processes, including for assessment, approval, and data handling practices for ABS use of the SEAD service.

ABS' response

Agreed – The ABS will review and update internal processes, including for assessment, approval and data handling practices for ABS use of the SEAD service.

Action – Complete

In alignment with the ABS' commitment to privacy and security, a comprehensive uplift of processes and procedures surrounding internal ABS use of the SEAD service has been conducted. To ensure that reasonable steps are taken to protect personal information gathered as part of administering and using the SEAD service, the ABS has undertaken the following key improvements:

- Development of Service Level Agreements.
- Development of training and onboarding materials, outlining the roles and responsibilities of SEAD users and the appropriate application of the Five Safes Framework.

The ABS has also taken several actions to improve the technical elements of the SEAD service, based on the recommendations of the recent Information Security Registered Assessors Program (IRAP) certification. These actions include:

- Enhanced reporting and monitoring capabilities.
- Segregated administrator roles.
- Revisions to retention and storage lifecycle policies.

All of these improvements are underpinned by the newly developed SEAD specific privacy notice and [Conditions of Use](#) (CoU), which is aligned with the ABS' commitment to robust security measures and ensures continuous internal compliance with regulatory standards.

Next steps

The ABS will conduct comprehensive reviews of the onboarding process and other internal procedures on a bi-annual basis to monitor their implementation. This periodic assessment, scheduled every six months, will involve gathering feedback from ABS staff and stakeholders, analysing performance metrics and identifying areas for refinement. Leveraging this information, the ABS will implement strategic adjustments to ensure the continuous optimisation of organisational processes and the achievement of operational excellence.

Recommendation 3

ABS to develop standardised user agreements and guidance material about the intended application of the SEAD, with specific mention of ABS and partner roles and responsibilities.

ABS' response

Agreed – The ABS acknowledges the importance of providing clear guidelines for users and partners regarding the intended application of the SEAD. Standardised service usage agreements and guidance materials will be developed and will include specific mention of ABS and partner roles and responsibilities.

Action – Complete

The ABS has developed a standardised Memorandum of Understanding (MoU) and CoU for the SEAD. These documents serve as guidelines, outlining the terms and conditions for accessing the SEAD. The documents provide explicit details regarding the intended application of the SEAD, specifying the authorised and appropriate use of the system in alignment with its designated purpose and objectives.

The comprehensive development process, conducted in consultation with internal stakeholders, ensures that the MoU and CoU offer clarity on the expectations of both the ABS and SEAD partners. The documents define the scope of activities and guide users and partners towards responsible and purposeful engagement with the SEAD service.

The SEAD Requirements Form, along with the other documents, provides a comprehensive framework for implementing the SEAD service. It covers aspects such as partner business cases and user behaviour. The SEAD service also offers a 30-day trial period, which enables partners to evaluate its functionality, verify its compliance with the requirements and ensure smooth operations before moving on from the trial to the complete service.

Next steps

The ABS will regularly review and update materials, including the MoU, CoU and Requirements Form to ensure ongoing relevance and effectiveness.

Recommendation 4

Partners are responsible to ensure their data use requirements are adhered to by all authorised users in their SEADpod, including partner administrators and partner analysts.

ABS' response

Agreed – The ABS understands the need to strengthen partner responsibilities for ensuring their users and administrators adherence to data use policies. The ABS will provide clear information outlining these responsibilities in line with Recommendation 4.

Action – Complete

The ABS has integrated explicit provisions into the SEAD MoU outlining that partners are responsible for ensuring that their authorised administrators, users and other stakeholders utilise the SEAD service in compliance with their legal requirements, rules and obligations extending to any data ingress and egress.

The SEAD privacy notice also outlines the responsibility of partners to ensure authorised users are aware of their obligations under the relevant legislation. The SEAD web content strategically communicates these responsibilities against the [Five Safes Framework](#), providing a structured and accessible guide for partners and users to understand and implement responsible data management practices.

Additionally, the ABS has developed a comprehensive [User Guide](#) and Administrators Instruction Guide which have helped to foster a culture of responsible and compliant user access practices within the SEAD system. Regular partner briefings and catch-ups further enhance communication and understanding of these resources, ensuring continuous support for our partners and users.

Next steps

While primary responsibility moves to the adopting agency for safely managing data holdings within their SEADpod, the ABS will ensure instructional and procedural materials are kept up to date with evolving data use standards and practices. This ongoing effort aims to strengthen partner capabilities in managing their user's and administrator's adherence to their relevant responsibilities for safe data use and management.

Recommendation 5

Partners are responsible to ensure user access is conducted in accordance with relevant training and guidance material in relation to use of the system.

ABS' response

Agreed – The ABS recognises the critical importance of aligning partner actions with established usage guidelines of the SEAD system. The ABS will develop instruction guides tailored towards both users and administrators to assist partners in managing their users in strict accordance with the specified standards.

Action – Complete

The ABS has developed a comprehensive [User guide](#) and Administrators Instruction Guide in line with the commitment to improve user access practices. These guides cover a range of topics including user authentication, appropriate code and software request procedures, and access permissions. These guides are designed to be user-friendly, providing clear step-by-step instructions accompanied by illustrative examples. These guides have helped to foster a culture of responsible and compliant user access practices within the SEAD system. Additionally, thorough communication of system updates is consistently employed to keep partners informed of changes.

Next steps

To maintain the effectiveness of these instruction guides, the ABS will update the guides regularly as system and procedural changes occur. Additionally, the ABS is committed to updating the instruction guides, and exploring avenues to enhance accessibility. A notable example of this, is the User Guide which has been made available online, ensuring easy access for partner users. Efforts are underway to transform the Administrators Instruction Guide into a wiki format, providing a dynamic and collaborative resource for ongoing support and information.

3. ONGOING COMMITMENT TO SEAD TRANSPARENCY AND COMPLIANCE

The ABS has successfully addressed and implemented actions for each recommendation within the past 12 months. Acknowledging the significance of transparency, data privacy and responsible use of the SEAD system, the ABS has demonstrated commitment and undertaken tangible measures to enhance its operations.

The ABS commits to the following:

1. Continued enhancement of SEAD transparency and compliance

- Sustain efforts to update and expand web content for SEAD, ensuring ongoing transparency and public awareness about the service.
- Maintain regular and thorough communication channels with SEAD partners, ensuring feedback is appropriately considered, and relevant changes are understood and transparent.

2. Optimising internal processes for data security and privacy

- Conduct monitoring and periodic reviews to evaluate the effectiveness of the recently implemented SEAD onboarding process and other procedures.
- Implement further system and process enhancements based on feedback and emerging best practices.
- Engage internal System Development and IT security teams, to ensure data security best practice methods and procedures are upheld over time.

3. Regular review and update of standardised user agreements

- Regularly review and update key documents, including but not limited to the standardised MoU and CoU to ensure ongoing relevance and effectiveness.
- Engage in consultations with internal stakeholders to adapt the MoU and CoU to the dynamic nature of data usage and technology.

4. Continuous alignment with evolving data use standards

- Remain vigilant in ensuring continuous alignment with evolving data use standards and practices.
- Provide updates to stipulated partner responsibilities as needed, strengthening partner capabilities in managing user adherence to relevant data use policies.

5. Sustainable improvement of user access practices

- Regularly update the User Guide and Administrators Instruction Guide to reflect system and procedural changes.
- Explore avenues to enhance accessibility, exemplified by making the User Guide available online and transforming the Administrators Instruction Guide into a collaborative wiki format.

6. Further privacy analysis

- As noted in the [SEAD PIA](#), the ABS has committed to conduct further privacy updates where any changes to the SEAD service are expected to significantly impact the privacy of individuals. This may include any new operating models considered for the SEAD service.