



Implementation Report for the 2021 Census Privacy Impact Assessments

May 2025



Contents

Introduction 3

2021 Census PIA Structural Recommendations 4

2021 Census PIA Specific Recommendations 4

2021 Census Administrative Data PIA Recommendations 8

Introduction

The Australian Bureau of Statistics (ABS) is committed to protecting the privacy of individuals and ensuring the confidentiality and security of data we collect. We understand that privacy is a fundamental right and take our responsibility to safeguard personal information very seriously. The ABS has implemented robust privacy measures and follows strict protocols to ensure that all data is handled with the utmost care and security. Our commitment to privacy is reflected in our comprehensive privacy policies and practices, which are designed to protect the information entrusted to us by the Australian public and to be transparent about how we manage personal information.

The Australian Census is a vital tool that provides a comprehensive snapshot of the nation. Conducted every five years, the Census collects data on the economic, social and cultural makeup of the country. This data is crucial for planning and decision-making by governments, businesses and community organizations. It informs the allocation of resources for schools, healthcare, transport and infrastructure and helps to plan local services for individuals, families, and communities^[1]. The Census is not just a count of the population; it tells the story of how Australia is changing and helps us understand what we need now and into the future.

In response to recommendations from the 2016 Senate Inquiry into Issues of Trust and the Review into the events surrounding the 2016 eCensus by Alistair MacGibbon, the ABS commissioned Galexia Pty Ltd to undertake a Privacy Impact Assessment (PIA) on the 2021 Census. The PIA and the ABS response were published on 21 July 2020 on the ABS website.

In addition to the 2021 Census PIA, the ABS also undertook a PIA into the proposed use of integrated administrative data for the 2021 Census. This PIA complements the 2021 Census PIA. The PIA and ABS response were published on 21 July 2020 on the ABS website.

This report outlines how the ABS has implemented the recommendations from these two PIAs. The ABS has actioned all agreed recommendations to enhance privacy protections for the 2021 Census and will continue to apply these protections for future Censuses where applicable.

2021 Census PIA Structural Recommendations

Structural Recommendation 1: Develop a Census Privacy Strategy that covers more than one Census cycle.

Response: Agreed

The ABS developed a comprehensive Census Privacy Strategy for the period 2021 to 2028. The strategy outlined the ABS' goals and actions across multiple Census cycles, ensuring a long term, consistent and robust approach to privacy management. The strategy included a strong commitment to risk management, open and transparent engagement and communication and enabling privacy best practice, providing a clear framework for strengthening privacy standards over an extended period.

Structural Recommendation 2: Develop a principles-based approach to name encoding for data linkage.

Response: Agreed

The ABS established a set of principles for name encoding specifically for data linkage purposes. These principles were designed to ensure that name encoding processes protect individuals' privacy while enabling accurate and efficient data linkage. The principles fall under the ABS Data Integration (DI) governance framework, which outlines responsibilities for the implementation and adherence to these standards.

Structural Recommendation 3: Develop a principles-based approach to managing re-identification risk.

Response: Agreed

The ABS developed a set of principles for managing statistical disclosure risk of microdata to help guide internal practices and processes. This approach ensured that the risk of re-identification is minimised through the application of strict privacy controls and regular assessments. The ABS also published detailed information on the ABS website about re-identification risks and the ABS' approach to managing these risks, to improve transparency and aid in the community's understanding of this issue.

2021 Census PIA Specific Recommendations

Recommendation 1: Develop and maintain separate Census privacy policy sections

Response: Agreed

The ABS maintained an archive of privacy policies from previous Census cycles, including those from 2016 and 2021. These policies were made available on the ABS Privacy page on the ABS website, ensuring transparency and continuity in privacy practices. Additionally, 2021 Census Collection Notices were made available on the ABS Privacy page, providing clear and detailed information on how personal information was managed during the 2021 Census.

Recommendation 2: Promote alternatives to third-party collection

Response: Agreed

The ABS promoted alternatives to third-party data collection by enhancing self-service channels and improving access to individual paper and online Census forms. These channels included clear steps for individuals to obtain separate Census forms if needed. Both the paper and online versions of the 2021 Census form provided options for completing an individual form, ensuring that respondents had the

flexibility to submit their information separately from their household. This approach was supported by information on the Census website, the 2021 Census Privacy Statement and the 2021 Census Collection Notices.

Recommendation 3: Clarify privacy notice information on the potential consequences for not providing information

Response: Agreed

The ABS ensured all privacy notices, including the 2021 Census Privacy Statement and 2021 Census Collection Notices, contained consistent and clear information regarding the potential consequences of not providing information in the Census. Clear messaging extended to all Census communication materials, ensuring respondents were fully informed about the implications of not completing the Census. The messaging was clear and consistent across various platforms to reinforce the importance of providing accurate information.

Recommendation 4: Conduct independent security risk assessments for key 2021 Census components

Response: Agreed

For the 2021 Census, the ABS conducted extensive independent testing and assurance to ensure the delivery of a safe and secure Census as part of the 2021 Census Security Strategy. Security testing included 20 independent security risk assessments to cover all our 2021 Census systems. These were conducted by certified third-party assessors through the Australian Cyber Security Centre [Information Security Registered Assessors Program](#) (IRAP).

Recommendation 5: Shorten data retention periods for names

Response: Agreed in principle

A formal decision by the ABS was made in 2020 to shorten the data retention period for names collected in the 2021 Census. The ABS committed to an 18-month maximum retention period for names. All records of names were documented in the 2021 Census Personal Information Holdings Register to ensure appropriate management of this data. All names collected in the 2021 Census were deleted over February 2023 and the process was finalised on 3 March 2023. Internal quality assurance was undertaken to ensure the deletion of names from all ABS data stores.

Recommendation 6: Shorten data retention periods for addresses

Response: Agreed

A formal decision by the ABS was made in 2020 to shorten the data retention period for addresses collected in the 2021 Census. The ABS committed to a 36-month maximum retention period for addresses. All records of addresses were documented in the 2021 Census Personal Information Holdings Register to ensure appropriate management of this data. All addresses collected in the 2021 Census were deleted by August 2024.

Recommendation 7: Clarify access rules for different categories of data

Response: Agreed

The ABS clarified access rules for different categories of data in the ABS Privacy Policy, the 2021 Census Privacy Statement, and the Collection Notices. These documents were made available on the ABS Privacy page and provided clear guidelines on who could access various types of data and under what conditions. This ensured data access was controlled and transparent, protecting the privacy of respondents.

Recommendation 8: Clarify and strengthen access restrictions to data held in the Time Capsule

Response: Agreed

The ABS provided clear messaging on the access restrictions for data held in the Time Capsule. This information was made available on the ABS website and was also included in the Census Privacy Statement and Collection Notices on the ABS Privacy page. The messaging ensured stakeholders understood the strict access controls in place to protect the data stored in the Time Capsule.

Recommendation 9: Conduct additional independent PIAs for activities that are 'renewed' for each Census

Response: Agreed

The ABS has implemented a process to conduct additional independent Privacy Impact Assessments (PIAs) for activities that are renewed as part of each Census cycle. For the 2021 Census, Privacy Threshold Assessments were undertaken for any new or changed activities, and a PIA was conducted if the threshold was met. This process was outlined in the ABS PIA decision tree and detailed in the Census Privacy Strategy 2021-2028, ensuring that privacy risks were assessed and managed appropriately.

Recommendation 10: Clarify the prohibition on using multiple Census collections in MADIP

Response: Agreed

The ABS clarified the prohibition on using multiple Census collections in the Person Level Integrated Data Asset (PLIDA) formerly known as the Multi-Agency Data Integration Project (MADIP). This policy was explained on the ABS website and detailed in the Census Privacy Statement, which outlined how Census data was used. The statement was made available on the ABS Privacy page and PLIDA Data and Legislation section on ABS website, ensuring transparency and compliance with privacy principles.

Recommendation 11: Establish and maintain a register of third-party agreements

Response: Agreed

The ABS established and maintained a register of all third-party agreements related to 2021 Census procurement arrangements. The register ensured that all agreements are documented and monitored, providing transparency and accountability in the management of third-party relationships.

Recommendation 12: Clarify ABS legislation to set out permitted and precluded purposes for use of Census data

Response: Agreed

The ABS clarified the legislation regarding the permitted and precluded purposes for the use of Census data. This information was detailed in the 2020 Census Test and the 2021 Census Privacy Statement, specifically in the "How we use your personal information" section. The Census Privacy Statement and Collection Notices were made available on the ABS Privacy page, ensuring that respondents were fully informed about the use of their data.

Recommendation 13: Clarify the relationship between Census data and the proposed Data Availability and Transparency Framework

Response: Agreed

The ABS committed to clarifying the relationship between Census data and the proposed Data Availability and Transparency Framework. It published information on how to request ABS data under the Data Scheme, including guidance for Accredited Users making requests through Dataplace. The ABS outlined that data sharing under the DATA Scheme would only occur if legally permitted, aligned with ABS's role and commitments to respondents, and approved by other data custodians where applicable. This ensured that all stakeholders were informed about the changes and their implications.

<https://www.abs.gov.au/about/data-services/requesting-abs-data-under-data-availability-and-transparency-act-data-scheme>

Recommendation 14: Seek an exemption from the DATA Framework for the Time Capsule

Response: Agreed in Principle

The ABS did not seek an exemption as the Census Time Capsule is subject to strict access restrictions under the *Archives Act 1983* and is not eligible for sharing through the DATA Scheme. This was communicated on the ABS website.

Recommendation 15: Remove the new health data collected in the 2021 Census from data submitted to the Time Capsule.

Response: Not Agreed

The recommendation to exclude new health data collected in the 2021 Census from the Time Capsule was not accepted. The ABS clarified that respondents' agreement to store their data in the Census Time Capsule includes their health condition responses. This decision aligned with the voluntary nature of the agreement and the provisions of the *Archives Act 1983*, which allowed for the withholding of sensitive information if its release would unreasonably disclose personal affairs. Access to Time Capsule records requires a legitimate reason, and sensitive information can still be exempted from release even after 99 years.

Recommendation 16: Review the consequences for refusing to complete the Census

Response: Agreed

The ABS documented its referrals process in an internal policy, *Referral for Prosecution for Collection Non-compliance policy*, which aligned with the Commonwealth Director of Public Prosecutions' (CDPP) Prosecution Policy of the Commonwealth to ensure consistency and compliance with legal standards.

Recommendation 17: Conduct an independent security review for the MyWork App

Response: Agreed

The 2021 Census Security Strategy was developed to guide the protection of Census systems, data, premises, and personnel. It included provisions for independent security reviews such as IRAP assessments, penetration testing, and code security reviews. As part of this process, the MyWork App underwent an IRAP assessment and penetration testing to support its use in the 2021 Census.

2021 Census Administrative Data PIA Recommendations

Recommendation 1: Ensure that expansions to admin data use are reviewed at a sufficiently high level within the agency and are subject to scrutiny on cumulative privacy impact

Response: Agreed

The ABS applied its risk-based privacy policy to ensure that expansions to administrative data use were reviewed at a sufficiently high level and subject to cumulative privacy impact scrutiny. New or changed initiatives involving personal information underwent Privacy Threshold Assessments, with oversight and approvals scaled to the assessed risk level. High-risk proposals required full Privacy Impact Assessments, endorsed by the ABS Privacy Officer and approved by senior leadership, with sensitive initiatives supported by public consultation and published outcomes.

Recommendation 2: Facilitate participation of groups representing the interests of civil society in consultations about admin data use and remove barriers to participation.

Response: Agreed

The ABS investigated models to enhance and facilitate community engagement for innovative data uses. This included efforts to build community trust and understanding of how data was used. By consulting with the community on issues related to data sharing and administrative data use, the ABS sought to ensure that the interests of civil society were represented and that barriers to participation were removed. This approach fostered a transparent and inclusive dialogue about data use.

Recommendation 3: Establish a threshold test for pursuing use case 3 in a case of localised low response.

Response: Agreed

The ABS developed and published a set of principles to guide the use of administrative data in cases of localised low response. These principles outlined the conditions under which administrative data could be used to improve data quality. By making these principles publicly available, the ABS ensured transparency and provided clear guidelines for when and how administrative data will be utilised in such scenarios. Updates on these principles were regularly published on the *Using administrative data for the 2021 Census* page.

Recommendation 4: In a case of across-the-board low response, set a specific low response threshold in advance that makes clear what response rate is low enough to trigger use case 3.

Response: Agreed

The ABS published the principles used to manage low response scenarios, including specific thresholds that would trigger the use of administrative data. By setting these thresholds in advance, the ABS provided clarity on what constituted a low enough response rate to warrant the use of administrative data. These principles and thresholds were made available to the public through updates on the *Using administrative data for the 2021 Census* page, ensuring transparency and preparedness for low response situations.

Recommendation 5: Update privacy policy to reflect changes associated with this project.

Response: Agreed

The ABS updated the 2021 Census Privacy Statement and the 2021 Census Collection Notices to reflect changes associated with the use of administrative data. These documents included references to the use of administrative data and provided links to the *Using administrative data for the 2021 Census* page. By updating these privacy documents, the ABS ensured that individuals were informed about how their data was used and the measures in place to protect their privacy.

Recommendation 6: Work with data custodians to meet APP 5 requirements.

Response: Agreed

The ABS established processes for data sharing arrangements with data custodians to ensure compliance with APP 5 requirements. This included updating the privacy policies and collection notices of data custodians to mention data sharing with the ABS. Additionally, the ABS provided information materials and advice to data custodians, including links to the ABS web page on administrative data use. These efforts ensured that data custodians were aware of and complied with privacy requirements when sharing data with the ABS.

Recommendation 7: Develop and deploy a communications plan and identify additional methods for informing individuals about admin data use.

Response: Agreed

The ABS developed an Administrative Data Communication Plan to inform individuals about the use of administrative data. This plan outlined various methods for communicating with the public, including traditional and digital channels. By deploying this plan, the ABS ensured that individuals were well-informed about how their data was used and the benefits of administrative data use. The plan also included strategies for addressing any concerns or questions from the public.

Recommendation 8: Use meaningful, plain-English terms in communications to individuals.

Response: Agreed

The ABS committed to using plain-English terms in all communications with individuals. This included developing an Administrative Data Communication Plan that ensured all website information was clear, simple, and easy to understand. By using plain language, the ABS made complex concepts more accessible to the public, helping to build trust and understanding of data use practices.

Recommendation 9: Clarify that admin data will not be used for enforcement.

Response: Agreed

The ABS clarified that administrative data would not be used for enforcement purposes. This clarification was included in the 2021 Census Privacy Statement, with a separate paragraph dedicated to the use of administrative data. Additionally, the Census Admin Data Research page had a clear section explaining that administrative data will not be used for compliance or enforcement. These measures ensured that individuals understood the limitations of administrative data use.

Recommendation 10: Conduct and publish further in-depth analysis of the level of improvement to Census data the use of electricity data would bring about, before proceeding.

Response: Agreed

As the ABS did not proceed with using dwelling level electricity data in the 2021 Census, this recommendation was not applicable. The use of electricity data in the 2026 Census is being considered in the 2026 Census Privacy Impact Assessment.

Recommendation 11: Explore options to reduce the amount of data collected in the event that ABS pursues use case 3.

Response: Agreed

Use Case 3 involved the potential use of administrative data to address gaps in the 2021 Census caused by unexpected events such as bushfires and floods. While the ABS did not ultimately need to apply this approach during the 2021 Census, it developed and published a set of principles outlining when and how administrative data would be used to supplement Census data if required.



www.abs.gov.au