



## MULTI-AGENCY DATA INTEGRATION PROJECT

### RESPONSE TO 2022 MADIP PIA UPDATE

#### Background

The Multi-Agency Data Integration Project (MADIP) is a secure, person-based, research data asset that combines broad sets of information about Australian citizens, to facilitate the use and re-use of public data for research purposes. The MADIP Board<sup>1</sup> is responsible for the strategic direction of MADIP and its members represent the cross-portfolio government partnership of seven Commonwealth agencies enabling MADIP. The Australian Bureau of Statistics (ABS) is the accredited Integrating Authority for MADIP responsible for collecting and combining data, providing access to authorised researchers, protecting privacy and keeping information secure at all times.

The ABS engaged independent privacy consultant Maddocks to conduct a Privacy Impact Assessment (PIA) update for MADIP on behalf of the MADIP Board. Maddocks has conducted the 2022 PIA Update to consolidate the findings from PIA processes undertaken since the last PIA Update published in November 2019 and consider several additional planned changes.

The ABS and Maddocks consulted with a broad range of stakeholders to inform this PIA Update, including 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. The MADIP Board and the ABS thank stakeholders for their valuable contributions to the 2022 PIA Update.

Maddocks developed the PIA report and recommendations which were informed by outcomes from the consultation sessions. Maddocks has made six recommendations to advance privacy best practice and enhance compliance with the Australian Privacy Principles. The 2022 PIA Update Report and the PIA Consultation Report can be accessed via the ABS website.

The MADIP Board welcomes the findings of the 2022 PIA Update which recognise the Board and the ABS commitment to upholding the privacy, confidentiality, and security of information in MADIP and the robust protections currently in place. The MADIP Board agrees with the recommendations in the PIA Update Report and this document outlines the MADIP Board's response to the recommendations.

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<sup>1</sup> The MADIP Board member agencies are the ABS, Australian Taxation Office, Department of Education, Skills and Employment, Department of Health, Department of Home Affairs, Department of Social Services and Services Australia.



## MULTI-AGENCY DATA INTEGRATION PROJECT

### Response to Recommendations

#### Recommendation 1: Transparency and implementation of recommendations from previous PIA processes

##### Recommendation 1 (a)

That the MADIP Board consider whether it could take any additional steps to ensure that it has implemented the recommendations from previous PIA processes, when it has indicated that it will do so in its response to that recommendation.

##### Response

Agreed.

The MADIP Board recognises the importance of effective oversight to advancing privacy best practice. The ABS, as the accredited Integrating Authority for MADIP, leads MADIP PIA processes on behalf of the MADIP Board. This includes developing PIAs, progressing and reporting on the implementation of PIA recommendations to the MADIP Board and publishing individual PIAs and PIA implementation reports to the ABS website. The MADIP Board regularly reviews the implementation status of all PIA recommendations.

The ABS will develop a consolidated view of recommendations from MADIP related PIA processes for the MADIP Board to further inform and enhance privacy best practice.

Timing – 6 months (end of 2022).

##### Recommendation 1 (b)

That the MADIP Board take steps to ensure that there is transparency about the inclusion of new types or categories of data within MADIP, including:

- providing notice to the public that the MADIP Board is considering including new types or categories of data within MADIP, and calling for input from stakeholders about the impacts of any such inclusion (either through PIA processes or other consultations processes); and
- following publication of the notice, publication of the reasons for including or not including new types or categories of data.

##### Response

Agreed.

The MADIP Board and the ABS remain committed to transparency and engagement with stakeholders. The ABS will continue to refine and enhance online materials to increase transparency for MADIP. Where possible, advance notification of the consideration of new categories of data or new data handling practices in MADIP as well as reasons for including/not including data in MADIP will be provided in on-line materials.

Timing – 6 months (end of 2022).



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### **Recommendation 2: Criteria for including datasets in MADIP**

#### **Develop criteria for including datasets in MADIP - Recommendation 2 (a)**

That the MADIP Board consider developing and publishing criteria that will be used by the MADIP Board to assess whether a new dataset should be included within MADIP. This could be part of a broader framework or ‘guiding principles’ document, published on the MADIP website.

Those criteria should include consideration of:

- the public benefit of including the dataset within MADIP;
- the utility of including the dataset within MADIP;
- the types of information within the dataset and restrictions on use; and
- the impact of including the dataset on the size and nature of the overall MADIP asset.

#### **Response**

Agreed.

The MADIP Board is supported by robust governance frameworks and processes for assessing new dataset linkages and research projects. The MADIP Board has commenced a review and update of the MADIP Operating Model which will further document assessment criteria for new dataset linkages and projects.

The MADIP Board and the ABS remain committed to being open and transparent about the criteria for including datasets in MADIP. The ABS will work collaboratively with the MADIP Board to update criteria (including details such as the public benefit, utility, type, and impact) for datasets to be included in MADIP. The ABS will continue to refine and enhance online materials to include information on the criteria for inclusion of data in MADIP.

Timing – 12 months (end June 2023).

#### **Recommendation 2 (b)**

That relevant stakeholders (such as consumer groups and/or groups representing Aboriginal and Torres Strait Islander peoples) be consulted prior to finalising the criteria.

#### **Response**

Agreed.

Timing – 12 months (end June 2023).



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### **Recommendation 3: Including new types or categories of data in MADIP**

#### **Recommendation 3 (a)**

In addition to the criteria for including datasets in MADIP which would be developed under Recommendation 2, for any new type or category of data, (for example, property insurance data) **that the MADIP Board** consider whether there should be additional governance or restrictions imposed for linking and use of that specific type or category of data within MADIP. For example: that a particular type or category of data would not be permitted to be linked to particular other datasets within MADIP.

#### **Response**

Agreed.

MADIP Board and the ABS acknowledge the community perceptions that some categories of data are more sensitive than others. When updating the criteria under recommendation 2, the MADIP Board will consider whether there are any further restrictions or governance appropriate for specific categories of data. The broad uses of data and any restrictions on use will be documented in data sharing agreements for data integration projects.

Timing – 12 months (end June 2023).

#### **Recommendation 3 (b)**

In addition to the above, before including a new type or category of data the MADIP Board should consider whether it is appropriate to seek input from relevant stakeholders, including from consumer groups.

#### **Response**

Agreed.

The Australian Government Agencies Privacy Code requires all Government agencies that are subject to the Privacy Act 1988 to conduct a PIA for all 'high risk' projects that involve new or changed ways of handling personal information. As has been done to inform the PIA, the ABS generally consults with a broad range of stakeholders, including consumer groups, to understand stakeholder concerns relating to changes to MADIP.

Timing – 12 months (end June 2023).



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### **Recommendation 4: Data governance of data relating to Aboriginal and Torres Strait Islander peoples**

#### **Recommendation 4 (a)**

That the MADIP Board work to ensure there is clear governance surrounding use of data about<sup>2</sup> Aboriginal and Torres Strait Islander peoples, to provide certainty for Aboriginal or Torres Strait Islander people, but also clarity for data custodians and researchers seeking to use such data in MADIP for research projects; and that the MADIP Board continue to work with relevant stakeholder groups to develop that governance framework.

#### **Response**

Agreed.

As part of the work to review and update the MADIP Operating Model, the MADIP Board will consider data governance of use of data about Aboriginal and Torres Strait Islander peoples in MADIP. Standard processes for considering project proposals will be updated to ensure the impacts on Aboriginal and Torres Strait Islander peoples are appropriately considered.

Timing – dependent on outcomes from the Deputy Secretaries Data Group Sub-Committee on the Governance of Indigenous Data

#### **Recommendation 4 (b)**

That as an interim option, the MADIP Board consider:

- engaging an advisory body or individual to assist with the Aboriginal and Torres Strait Islander data issues; and
- working with that body or individual in respect of one or more specific proposed research projects that will involve the use of Aboriginal and Torres Strait Islander data, to co design in consultation with key Aboriginal and Torres Strait Islander stakeholders and then trial models of engagement or other approval processes for that specific project.

#### **Response**

Agreed.

The MADIP Board and the ABS are committed to improving data governance and support the development of a governance framework for use of data about Aboriginal and Torres Strait Islander peoples. The MADIP Board and the ABS will take the opportunity to learn from various Indigenous data governance initiatives to inform new approaches and best practice. The MADIP Board considers the Deputy Secretaries Data Group Sub-Committee on Governance of Indigenous Data may be well-placed to both learn from and support this work.

Timing – 12 months (end June 2023).

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<sup>2</sup> Use of data about Aboriginal and Torres Strait Islander peoples refers to information which is about and may affect Indigenous peoples both collectively or individually. See <https://www.maiamnayriwingara.org/key-principles>



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### **Recommendation 5: Additional strategies for research projects proposal and approval stages**

#### **Recommendation 5 (a)**

That the MADIP Board reconsider and reiterate the intended purposes of MADIP, to provide further clarity about ‘research purposes’ and whether this can include, for example, ABS operational use, and/or use to supplement surveys.

#### **Response**

Agreed.

The MADIP Board is responsible for the strategic direction of MADIP, and regularly considers priorities for expansion of the MADIP asset and how it can be accessed and used. As part of the current review of the MADIP Operating Model, the purpose statement for MADIP will be updated to provide clarity about intended uses.

Timing – 6 months (end of 2022).

#### **Recommendation 5 (b)**

That the MADIP Board ensure that, in addition to existing processes (including those that ensure the proposed linked datasets will be able to be de-identified before being included in the DataLab), the consideration and approval processes for research projects include:

- consideration about whether, and if so how, relevant stakeholders should be involved in the project approval process;
- if any access to the linked datasets is proposed to occur outside of the DataLab, a requirement for evidence that environment is secure, the linked datasets are appropriately protected, and access arrangements are appropriately restricted;
- consideration of data quality for information in the MADIP datasets to be linked for the project; and
- if any access to the linked datasets is proposed to be given to individuals who will be physically located outside of Australia, ensuring that the risks associated with that access are formally considered and assessed as part of the project approval process and assurance that appropriate additional mitigation strategies (such as additional contractual, technical or security protections) are put in place to address those risks.

#### **Response**

Agreed.

The ABS has strong protections in place to safeguard MADIP data.

As MADIP continues to evolve in response to Australia’s information needs, the ABS regularly reviews MADIP access arrangements and considers new or changed data handling practices to better meet researcher needs. As part of standard practice, the ABS will:

- consider the types of projects that could benefit from enhanced stakeholder engagement in project approval process;
- ensure all environments MADIP data is stored in are secure; and



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- document additional mitigation strategies to be considered for projects that involve researcher access outside of Australia.

Timing – 6 months (end of 2022).

### **Recommendation 6: Implementation of User Portal for the DataLab**

That the MADIP Board take steps to ensure that appropriate collection notices continue to be reviewed and updated as necessary and continue to be displayed to users when they apply for access to, and use, the user portal, so that users are aware about how the ABS handles their personal information.

#### **Response**

Agreed.

The ABS will continue to ensure appropriate privacy notices are in place and report progress to the MADIP Board.

Timing – dependent on when the User Portal becomes operational.