Australian Government
Australian Bureau of Statistics
Australian Taxation Office
Department of Education
Department of Health and Aged Care
Department of Home Affairs
Department of Social Services
Services Australia

PERSON LEVEL **INTEGRATED DATA** ASSET

RESPONSE TO 2025 Personal Level Integrated Data Asset - Privacy Impact Assessment Update - Detailed Justice Data

Background

The PLIDA Board[1] welcomes the findings and best practice recommendations of the Privacy Impact Assessment (PIA) Update for the inclusion of Detailed Justice Data in the Person Level Integrated Data Asset (PLIDA). This supplementary PIA builds on the 2025 PLIDA PIA, which considered the inclusion of high-level flags that indicate interactions with the justice system.

The PLIDA Board provides strategic oversight of PLIDA, a cross-portfolio initiative involving seven Commonwealth agencies. The Australian Bureau of Statistics (ABS), as the accredited integrating authority, is responsible for data linkage, secure access, and ensuring that research outputs do not identify individuals.

The ABS applies a privacy-by-design approach to all PLIDA activities, supported by robust governance and technical safeguards. The Board notes that no compliance issues were identified in this PIA and welcomes the recommendations aimed at strengthening ethical oversight, transparency, and support for Data Custodians.

The PIA report and this response, can be accessed on the ABS website: Privacy Impact Assessments | Australian Bureau of Statistics

The PLIDA Board agrees with all recommendations and will incorporate them into ongoing governance and operational improvements. This document sets out the Board's response to each recommendation.

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[1] The PLIDA Board member agencies are Australian Bureau of Statistics, Australian Tax Office, Department of Education, Department of Health and Aged Care, Department of Home Affairs, Department of Social Services and Services Australia.

Response to Recommendations

Recommendation 1: Data ethics consideration for projects analysing detailed justice data

Response

Agreed.

The PLIDA Board acknowledges the privacy risks associated with the use of Detailed Justice Data, particularly the potential for unintended bias, damaging research narratives, and the overrepresentation of certain populations. These risks highlight the importance of ensuring ethical considerations are consistently and meaningfully applied to PLIDA research projects involving this type of data.

Ethical oversight is already embedded within PLIDA governance. Projects involving sensitive data may require approval from Human Research Ethics Committees (HRECs), and Data Custodians play a key role in determining when such approvals are necessary. The ABS also conducts cultural safety assessments for projects involving Aboriginal and/or Torres Strait Islander data.

The ABS is currently developing a Data Ethics Framework to support consistent and transparent ethical decision-making across PLIDA activities. This recommendation will inform that work, ensuring ethical considerations specific to Detailed Justice Data are clearly reflected in the Framework and associated guidance. The PLIDA Board supports these enhancements as part of its commitment to privacy by design and best practice governance.

Timing – March 2026

Recommendation 2: Accompanying information for datasets

Response

Agreed.

The PLIDA Board acknowledges the privacy risks associated with the use of datasets that may have inherent limitations, including risks of misinterpretation or inappropriate conclusions that could affect individuals or communities. These risks are particularly relevant for Detailed Justice Data, where factors such as the level of geographic detail, reporting methods, and known biases may influence research outcomes.

PLIDA governance includes processes to assess data quality prior to inclusion. In response to this recommendation, the ABS will strengthen transparency by ensuring that information about dataset quality and utility is clearly documented and accessible to Researchers and Data Custodians. This will include enhancements to data submission processes, improvements to the visibility of quality notes during data discovery, and updates to project proposal templates to support responsible use and interpretation.

The PLIDA Board supports these measures as part of its commitment to informed decision-making, ethical research design, and best practice data governance.

Timing – June 2026

Recommendation 3: Guidance for Data Custodians

Response

Agreed.

The PLIDA Board acknowledges the privacy risks associated with the use of Detailed Justice Data, particularly the potential for reidentification in small populations or through unique data combinations. These risks underscore the importance of strong governance and clear guidance for those responsible for approving and managing PLIDA projects.

PLIDA governance already includes safeguards to minimise re-identification risk, such as robust de-identification processes, application of the Five Safes Framework, and oversight by the ABS Disclosure Review Committee where appropriate. Data Custodians play a central role in managing these risks through project approval processes, and it is essential that they are equipped with the tools and information needed to perform this role effectively.

In response to this recommendation, the ABS will review and, where necessary, update the PLIDA Governance Guide to ensure it provides clear, practical, and accessible information to support Data Custodians in identifying and managing privacy risks associated with Detailed Justice Data. This will include guidance on assessing reidentification risks, understanding PLIDA safeguards, and navigating approval processes.

The PLIDA Board supports this work as part of its commitment to privacy by design, continuous improvement, and best practice data governance.

Timing – July 2026