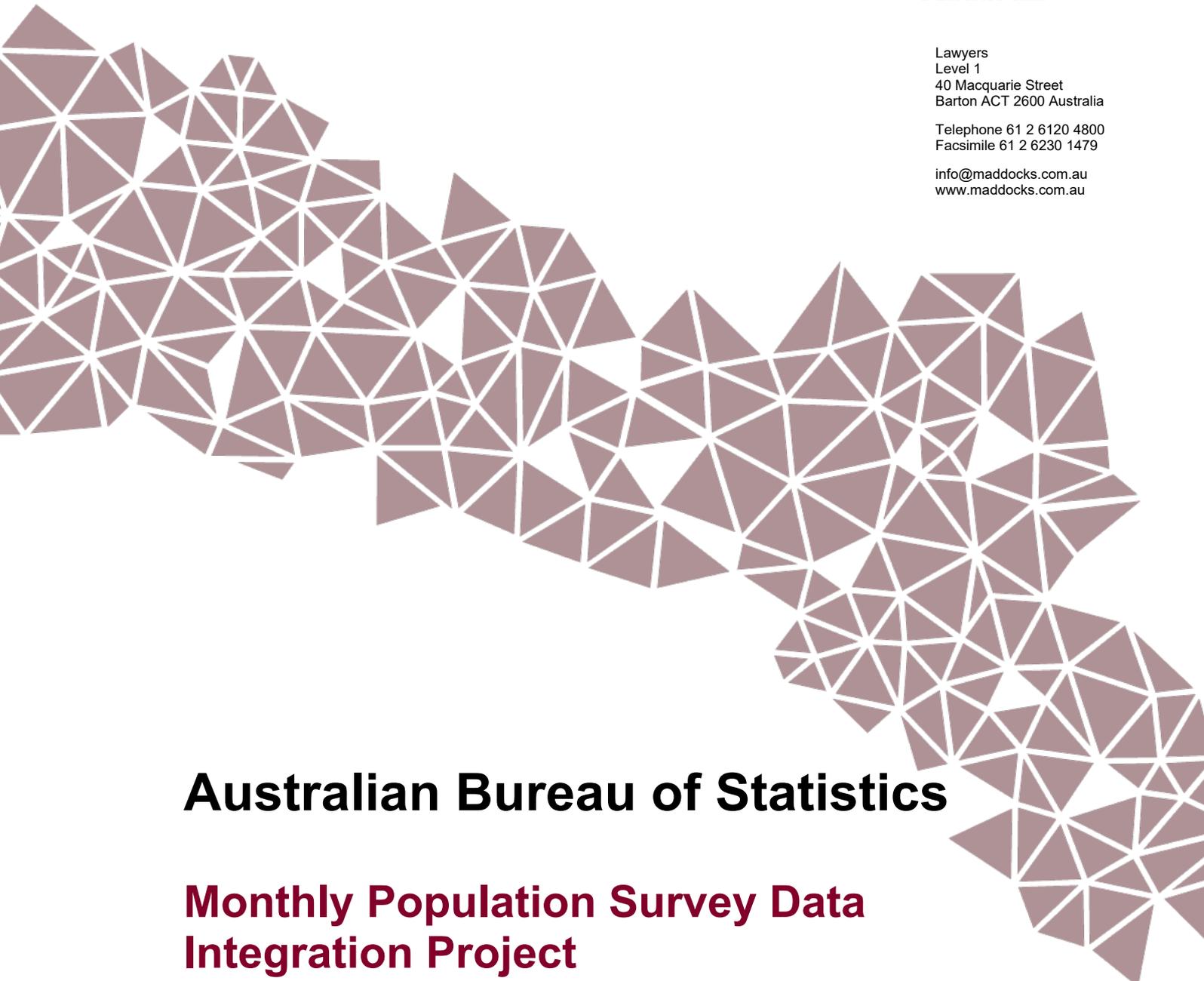




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Australian Bureau of Statistics

Monthly Population Survey Data Integration Project

Privacy Impact Assessment

Date of analysis: 18 June 2022

Report date: 30 August 2022

Contents

- Part A EXECUTIVE SUMMARY 3**
 - 1. Introduction 3
 - 2. This PIA process 3
 - 3. Summary of findings 4
 - 4. Recommendations 5

- Part B METHODOLOGY AND ASSUMPTIONS 6**
 - 5. Our methodology 6
 - 6. Assumptions and qualifications 7

- Part C PROJECT DESCRIPTION AND INFORMATION FLOWS 8**
 - 7. Monthly Population Survey 8
 - 8. Project 10
 - 9. Security 11

- Part D APP COMPLIANCE 12**

- Part E GLOSSARY 20**

- Attachment 1 Material reviewed 22**

Part A EXECUTIVE SUMMARY

1. Introduction

- 1.1 The Australian Bureau of Statistics (**ABS**) is implementing a project to include data collected from the Monthly Population Survey (**MPS**) conducted under the *Census and Statistics Act 1905* (Cth) (**C&S Act**) into the Multi-Agency Data Integration Project (**MADIP**) (**Project**).
- 1.2 The MPS collects information about the Australian population and workforce on a regular basis. Australia's employment and unemployment figures are produced from the MPS. The Project will involve the integration of data collected by the ABS from the MPS into the MADIP. The Project aims to provide benefits to:
- 1.2.1 the public, by supporting decisions by Governments, businesses, families and individuals that will help Australians live healthier, happier, and more independent lives which would be improved by integrated MPS data;
 - 1.2.2 data providers and custodians, by making better use of information that has already been collected, by facilitating MPS data being combined with MADIP administrative datasets, survey datasets, and the Census for approved research projects;
 - 1.2.3 researchers, by making a wider and deeper range of labour data available to inform research into the labour market, changes over time, and outcomes; and
 - 1.2.4 ABS, by:
 - (a) enabling the ABS to produce more labour statistics, improve the quality of existing labour statistics (through enhancing and augmenting data) and to be able to transform the Labour Force Survey in the future; and
 - (b) potentially enabling opportunities for reducing the amount of questions the ABS has to ask people in the MPS and other surveys and/or the number of people who need to be surveyed.
- 1.3 The Project does not involve any changes to the types of personal information that are currently collected by the ABS through the MPS, or how that personal information is collected. This Privacy Impact Assessment (**PIA**) considers the privacy implications of integrating longitudinal MPS information with MADIP (including other datasets in MADIP) through the Project. Notably, the PIA builds upon privacy impact assessments previously undertaken in relation to MADIP, specifically the 2019 MADIP PIA which considered linking survey data to the MADIP data asset.

2. This PIA process

- 2.1 Undertaking a PIA is consistent with the requirements of the *Privacy (Australian Government Agencies – Governance) APP Code 2017* (**APP Code**), which has applied since 1 July 2018. While the APP Code requires agencies to undertake a written PIA for all 'high privacy risk' projects or initiatives that involve new or changed ways of handling personal information, undertaking a PIA also represents privacy 'best practice' for other projects or initiatives.
- 2.2 This PIA:
- 2.2.1 considers compliance with the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**);

- 2.2.2 sets out the information flows, which helps to highlight privacy risks and areas for improvement in terms of risk mitigation;
- 2.2.3 is intended to help the ABS manage identified privacy risks and impacts in respect of the implementation of the Project, including by considering the safeguards that have been, or should be, put in place to secure personal information from misuse, interference or loss, or from unauthorised access, modification or disclosure; and
- 2.2.4 may serve to inform the ABS and other stakeholders about the privacy elements of the Project.

3. Summary of findings

- 3.1 In our view, the ABS's implementation of the Project does not raise any significant privacy risks that are not already addressed by the robust governance arrangements and other privacy protections of the MADIP framework.
- 3.2 However, we have identified that further work could be undertaken to address the following identified potential privacy risks:
 - 3.2.1 **Privacy Risk 1:** The need to ensure sufficient openness and transparency about how personal information will be handled in relation to the MPS.
 - 3.2.2 **Privacy Risk 2:** The desirability of ensuring that ABS considers potential privacy issues when considering specific research projects in accordance with the MADIP framework.
- 3.3 These risks have been considered throughout this PIA report. The recommendations set out in paragraph 4 of this **Part A [Executive Summary]** are designed to address the identified risks and further enhance privacy protections, and/or further strengthen the ABS's compliance with the APPs.

4. Recommendations

4.1 This PIA makes the following recommendations in relation to the Project:

<u>Recommendation 1</u> Review and update privacy information about MPS on ABS website	Relevant APPs
<p>Recommendation 1.1: We recommend that ABS consider updating the ‘Survey Participant Information’ available on its website in respect of the MPS, to reflect that the ABS intends to arrange for data collected as part of the MPS to be integrated with other datasets in the ABS’ secure MADIP environment, so that it can be included in de-identified data used for research projects to help better understand the Australian population and its needs.</p> <p>The ‘Survey Participant Information’ page could also provide links to the comprehensive information about MADIP already found on the ABS website.</p> <p>Recommendation 1.2: We recommend that the ABS consider the ease with which Participants will be able to locate the information on its website about the ABS’ handling of personal information for surveys, and whether there are additional ways that would assist Participants to more easily navigate to the ABS’ ‘Survey Participant Information’ page. For example, the ABS could consider whether it would assist Participants if they could be informed via the ‘Privacy at the ABS’ webpage that the ABS has made available its privacy arrangements in relation to each survey on the ABS website.</p>	APP 1, APP 5

<u>Recommendation 2</u> ABS exercise of MADIP data custodian role	Relevant APPs
<p>Current MADIP processes require data custodians to approve proposed research projects involving the use of MADIP data. When considering whether to grant such approval in relation to MPS Data, we recommend that the ABS, in its role as data custodian of the MPS Data, carefully consider and record:</p> <ul style="list-style-type: none">• the purpose(s) of the proposed research project, and whether these purpose(s) are consistent with the purposes for which the MPS Data was collected from the relevant individuals; and• the outcomes of the proposed research project, and whether these might have any unintended impacts for the individuals about which the MPS Data relates.	APP 6

Part B METHODOLOGY AND ASSUMPTIONS

5. Our methodology

- 5.1 This PIA has been conducted in accordance with the Privacy Impact Assessment Guide (**PIA Guide**) issued by the Office of the Australian Information Commissioner (**OAIC**), using the following methodology.
- 5.2 A glossary of defined terms and acronyms is at **Part E [Glossary]** of this PIA report.

Stage	Description of steps										
1.	<p>Plan for the PIA: We reviewed relevant background material provided by the ABS (listed in Attachment 1 – Material reviewed), and were provided a briefing by officers from the ABS.</p> <p>We also agreed that a formal stakeholder consultation process was not required for this process, but that when undertaking our analysis and forming our views about risks, we would take into account consultation processes in relation to other similar projects, (such as the MADIP PIA Update 2022), and our research about reasonable community expectations of privacy. For example, the <i>Australian Community Attitudes to Privacy Survey 2020</i> commissioned by the OAIC contains useful information regarding current community expectations.</p>										
2.	<p>Project Description: We prepared an initial draft Project Description, which described our understanding of the Project. This draft was refined and then finalised following feedback from the ABS.</p>										
3.	<p>Privacy impact analysis and compliance check: In this step we focussed on compliance against each relevant APP and privacy best practice. The analysis set out in this PIA applies the <i>Australian Privacy Principles Guidelines (APP Guidelines)</i> issued by the OAIC, which outline the mandatory requirements of the APPs, how the OAIC will interpret the APPs, and matters that may be taken into account when assessing the Gallery’s compliance with the Privacy Act.</p> <p>For each APP, we allocated a compliance rating that reflects our assessment based on the following descriptors:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #800040; color: white;">Compliance Rating</th> <th style="background-color: #800040; color: white;">Description of Compliance Rating</th> </tr> </thead> <tbody> <tr> <td style="background-color: #f08080;">Further work required</td> <td style="background-color: #f08080;"><i>This rating indicates that we consider that extensive work is required before the ABS will be able to be fully satisfied about compliance with the relevant APP and best privacy practice.</i></td> </tr> <tr> <td style="background-color: #ffcc00;">Compliance can be further enhanced</td> <td style="background-color: #ffcc00;"><i>This rating indicates that we have identified issues which we consider should be addressed in order to further enhance the privacy protections for individuals.</i></td> </tr> <tr> <td style="background-color: #ffff00;">Improvements to meet best practice</td> <td style="background-color: #ffff00;"><i>This rating indicates that we have identified measures that can be taken by the ABS to meet privacy best practices.</i></td> </tr> <tr> <td style="background-color: #90ee90;">Compliant</td> <td style="background-color: #90ee90;"><i>This rating indicates that the APP is either not relevant in the circumstances or that we have concluded that no further mitigation steps are required.</i></td> </tr> </tbody> </table>	Compliance Rating	Description of Compliance Rating	Further work required	<i>This rating indicates that we consider that extensive work is required before the ABS will be able to be fully satisfied about compliance with the relevant APP and best privacy practice.</i>	Compliance can be further enhanced	<i>This rating indicates that we have identified issues which we consider should be addressed in order to further enhance the privacy protections for individuals.</i>	Improvements to meet best practice	<i>This rating indicates that we have identified measures that can be taken by the ABS to meet privacy best practices.</i>	Compliant	<i>This rating indicates that the APP is either not relevant in the circumstances or that we have concluded that no further mitigation steps are required.</i>
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Stage	Description of steps
4.	Privacy management and addressing risks: We considered potential mitigation strategies that could reduce or remove the privacy impacts and risks identified during the previous step, and developed our recommendations.
5.	Draft report: We prepared a draft version of this PIA report.
6.	Further refinement of draft PIA report: Following review of the draft report by the ABS, we further refined our analysis and potential mitigation strategies as required to ensure that privacy risks were appropriately considered and addressed.
7.	Final Report: We finalised this PIA report. We understand that the ABS will separately respond to our recommendations.

6. Assumptions and qualifications

- 6.1 We have conducted our analysis on the basis that the factual information provided by the ABS (as set out in **Part C [Project Description and Information Flows]**) is up-to-date, correct and complete.
- 6.2 Our analysis is based upon the provisions of the Privacy Act, and associated case law and guidance material, as at the date of analysis on the cover page of this PIA report.
- 6.3 Our PIA has been undertaken from the perspective of the ABS and not any other entity.
- 6.4 Our PIA does not consider any future integration processes that would involve MPS Data being integrated outside of the MADIP framework. Should the ABS seek to share or integrate MPS Data outside of MADIP, we understand that the ABS intends to further consider any privacy implications, including by undertaking a separate privacy threshold assessment or PIA process as required.

Part C PROJECT DESCRIPTION AND INFORMATION FLOWS

7. Monthly Population Survey

- 7.1 The MPS is a monthly household survey, comprising of a Labour Force Survey (**LFS**) and supplementary surveys, that collects information about the Australian labour market over an eight month period, to provide longitudinal insight into the Australian labour market. Each month, approximately 4,000 new randomly selected households are approached to participate in the MPS for a duration of eight months. This equates to approximately 30,000 households being surveyed each month.
- 7.2 Notably, in the final month of the survey, households are required to participate in the Multi-Purpose Household Survey (**MPHS**) which is run in conjunction with the MPS, with topics changing on an annual basis. MPHS differs from supplementary topics in that it is a separate instrument and is only asked of one random person per household aged 15 years and over. Consideration of the MPHS is out of scope for this PIA as the ABS does not have any near-term plans to integrate MPHS data at this time.

ARA, Household Members and Respondents

- 7.3 The MPS is conducted using an “any responsible adult” (**ARA**) collection methodology, which means that a person is selected as the spokesperson on behalf of themselves and all other people living or residing (including visitors) in their household (**Household Members**). The ARA provides the ABS with demographic information about themselves and their Household Members. This includes key demographic information about Household Members, including their relationship to the ARA and other Household Members, age, year of birth, marital status, school attendance, country of birth and Indigenous status. This information is used to determine which Household Members will provide further information to the ABS as part of the MPS (**Respondents**).
- 7.4 Respondents include Household Members aged 15 years and over, excluding:
- 7.4.1 members of the permanent defence forces;
 - 7.4.2 certain diplomatic personnel of overseas governments;
 - 7.4.3 overseas residents in Australia; and
 - 7.4.4 members of non-Australian defence forces (and their dependants) stationed in Australia.
- 7.5 The ARA can change over the survey period of 8 months.
- 7.6 The ARA, in a household is approached by the ABS with a cover letter that provides them with information about the MPS, including their obligations under the C&S Act, and provides them with the following privacy statement:

The ABS privacy policy outlines how you can access and correct the personal details that you provide to us and our privacy complaints handling process. For the ABS privacy policy please see www.abs.gov.au/privacy.

- 7.7 If the ABS does not receive a survey response to the MPS from an ARA, an ABS interviewer will contact the ARA to complete the survey until they have done so. The ABS interviewer is trained to provide the following response to questions about how personal information is used through the MPS:

The answers you provide will be treated confidentially. The ABS is required by the Census and Statistics Act 1905 to maintain the secrecy of all information provided to it. No information will be released in a way that would enable an individual or household to be identified.

MPS Data

- 7.8 The ABS collects the following information about persons through the MPS:

7.8.1 monthly information about Household Members on:

- (a) socio-demographic information, including sex, age, social marital status, relationship in household, family type, participation in school and tertiary education, highest year of school completed, level of highest educational attainment, birthplace and year of arrival in Australia;
- (b) geography/region (of usual residence) – State or Territory, Capital City / Balance of State, and Labour Force Regions (Statistical Area Level 4 (SA4));
- (c) their labour force status (whether they are employed, unemployed or not in the labour force);
- (d) for employed persons, status in employment, full-time or part-time status, hours actually worked, hours usually worked, total monthly hours worked, duration of employment, expectations of future employment, underemployment, reason for working fewer hours than usual in the reference week;
- (e) for unemployed persons, whether looked for full-time and/or part-time work, duration of job search, and whether they have taken active steps to find work; and
- (f) for persons not in the labour force, reason not in the labour force and whether looking for work;

7.8.2 quarterly information about Respondents on:

- (a) for persons in the labour force, hours-based measures of underutilisation, and retrenchments in the previous quarter;
- (b) for employed persons, occupation, industry, sector (public/private), and whether casual (i.e. employee without paid leave entitlements);
- (c) for unemployed persons, whether looked for full-time and/or part-time work, reason for ceasing last job, and industry and occupation of last job;
- (d) for persons not in the labour force, retrenchments in the previous quarter; and
- (e) seasonally adjusted and trend data are available for selected series, including labour force status, unemployment, participation rate, industry, and long term unemployed; and

7.8.3 information about supplementary labour topics including participation, job search and mobility, survey of education and work and characteristics of employment, (collectively referred to as '**MPS Data**' in this PIA report).

7.9 Notably, Household Members and Respondents are able to provide pseudonyms instead of their actual names if they wish to, when interacting with the ABS.

7.10 Therefore, the ABS collects a range of information, which may include personal and sensitive information about ARAs, Household Members and Respondents as part of MPS Data, as well as about other persons. Some of the personal information collected from the ARA may relate to a person who is under 18 years of age (where this occurs the ARA will provide consent for the information about minors to be collected by the ABS).

8. Project

8.1 As discussed above, the Project does not involve any changes to the types of personal information that is currently collected by the ABS through MPS, or how that personal information is collected. This PIA does not reconsider the operation of the MPS, but focusses on the privacy implications of integrating MPS Data with MADIP through the Project.

8.2 Through the Project, the ABS intends to enable integration of MPS Data with the following datasets that are, or may in future be, included in MADIP:

8.2.1 census of population and housing data;

8.2.2 address register data;

8.2.3 personal income tax and payment summary data;

8.2.4 single touch payroll data;

8.2.5 job seeker and other labour market payment data; and

8.2.6 other administrative data with a labour market and/or education focus (if they are included within MADIP).

8.3 In the future, the ABS may seek to enable the integration of MPS Data with additional datasets that are included in MADIP.

8.4 The ABS is currently considering three high priority MPS Data use cases as a part of the Project, including to:

8.4.1 **include MPS Data as a new, enduring dataset within MADIP**, by integrating some of the MPS Data with MADIP and allowing authorised users to access integrated MPS-MADIP microdata¹ in the ABS DataLab for approved research projects;

8.4.2 **undertake specific integration of some MPS Data with other datasets within MADIP (as an approved research project)**, for example, by allowing the integrating of variables from other MADIP datasets to the existing Longitudinal LFS microdata product, and allowing access to the integrated dataset in the ABS DataLab; or

¹ Microdata is data in a unit record file that provides detailed information about people, households, businesses or other types of records.

- 8.4.3 **create a one-off integration of MPS Data with other datasets (as an approved research project under the MADIP framework) to help with collecting and analysing the MPS Data**, by enabling the ABS to use additional data in MADIP to enhance and augment MPS surveys, and replace some of the survey items with existing information available from administrative data. This could, to the extent allowed under the MADIP framework, involve data integration occurring outside the MADIP environment, but within the ABS IT environment.
- 8.5 To enable the longitudinal aspect of MPS to occur, the ABS identifies each individual by a 'Record ID', which is used for the purposes of matching people over the eight months of a MPS. The Record ID is derived from the identification number allocated by the ABS to the relevant household, and an identification number allocated to each person in that household.
- 8.6 However, the ABS intends to explore the use of address, date of birth and other demographic information to facilitate the linkage of MPS data in MADIP. This process would, in accordance the MADIP framework, follow the Separation Principle (discussed in paragraph 9.2 below), so that linking and analytical variables would never be combined. In this way, individual participants would not be identified in the MPS analytical data.

9. Security

- 9.1 The ABS has confirmed that collected MPS Data will only be handled by ABS staff and not by any third parties for the Project.
- 9.2 Once the Project is completed, the integrated datasets will be subject to the security and privacy protection measures in place under the MADIP governance framework, including:
- 9.2.1 the Separation Principle, whereby identifiable information used for integration is stored separately to de-identified analytics information, and access to the information is restricted so that no individual is able to access both sets of information; and
 - 9.2.2 the Five Safes Framework, an internationally recognised approach to managing disclosure risk associated with providing access to de-identified MADIP data. The framework is designed to facilitate safe data release using five elements (Safe People, Safe Projects, Safe Settings, Safe Data and Safe Outputs) which are all assessed independently, but also considered as a whole for each instance of data access.
- 9.3 The ABS will also handle the MPS Data in accordance with the secrecy provisions of the C&S Act, which protects all MPS Data and all the data in MADIP.
- 9.4 The ABS intends to exercise its rights as data custodian of the MPS Data so that, once integrated with MADIP (and any other datasets within MADIP), it may only be accessed by approved organisations and users, for approved MADIP research projects. However, international organisations wanting to access specific microdata files will be considered on a case-by-case basis (as discussed in the MADIP PIA Update 2022).

Part D APP COMPLIANCE

The table below provides a summary of our analysis of the APPs and identifies privacy risks in connection with the ABS' implementation of MPS. It allocates an 'APP Compliance Risk Rating' for each APP in accordance with the descriptors set out in the table in **Part B [Methodology and Assumptions]** of this PIA report.

This analysis does not address those elements of the APPs which reflect the ABS' broader compliance obligations, but only considers those elements that specifically relate to MPS.

APP	Summary of analysis against the requirements of the APPs, and recommendation(s) to enhance compliance with the APPs and/or reduce privacy risk(s)	Recommendation
<p>APP 1</p> <p>open and transparent management of personal information</p> <p>Improvements to meet best practice</p>	<p>APP 1 is intended to ensure that entities manage personal information in an open and transparent way. Undertaking PIAs such as this one supports the conclusion that the ABS is taking reasonable steps to implement practices, procedures and systems to comply with the APPs, as required under APP 1.2(a), and the APP Code (which requires agencies to undertake a written PIA for all "high privacy risk" projects or initiatives that involve new or changed ways of handling personal information).</p> <p>We note that the OAIC has contemplated the collection of information by the government, and considers that the Australian public generally trust the collection and handling of personal information by the government. However, they seek transparency in the way that the information is handled.</p> <p>We note that the 'Survey Participant Information – Monthly Population Survey' page on the ABS website² provides information to the general public about the MPS, including its purpose and the use of MPS Data by the ABS. We consider this is a privacy enhancing measure that assists in providing transparency to ARAs, Respondents and Household Members about how their information will be handled by the ABS. However, we note that this page does not provide information about how the ABS intends to integrate MPS Data into MADIP.</p>	<p>Recommendation 1</p>

² The ABS website can be found here: <https://www.abs.gov.au/websitedbs/D3310114.nsf/home/survey+participant+information+-+Monthly+Population+Survey>

APP	Summary of analysis against the requirements of the APPs, and recommendation(s) to enhance compliance with the APPs and/or reduce privacy risk(s)	Recommendation
	<p>We also reviewed ABS' Privacy Policy³ to ensure it contemplates the handling of personal information involve in the Project (as required by APP 1.3). We note that the Privacy Policy contains links to privacy statements for some of ABS projects that inform the public about how the ABS intends to handle their personal information in relation to those projects. However it does not currently contain a link to the 'Survey Participant Information – Monthly Population Survey' page.</p> <p>We see that the Project may involve the following risk:</p> <p>Privacy Risk 1: The need to ensure sufficient openness and transparency about how personal information will be handled in relation to the MPS.</p> <p>While we note that the ABS' 'Participating in a Survey' landing page includes links to FAQs (which includes Survey Participation Information), we consider that Recommendation 1.1 and Recommendation 1.2 are further steps that the ABS could consider taking, to ensure that ARAs, Respondents or Household Members can more easily find information about the proposed new handling of personal information as part of the Project.</p>	
<p>APP 2 anonymity and pseudonymity Compliant</p>	<p>APP 2.1 requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym, when dealing with the entity in relation to a particular matter, unless an exception under APP 2.2 applies. We note that the ABS already provides Household Members and Respondents the option to use a pseudonym rather than their own names when participating in the MPS. When an individual chooses not to disclose their own name to the ABS, the ABS can still link the individual's data by using other available identifiers for that individual. The ABS is therefore compliant with APP 2.</p>	<p>--</p>
<p>APP 3 collection of solicited personal information Compliant</p>	<p>APP 3.1 sets out the requirements for collection of solicited information by an agency. It states that an APP entity may only collect personal information (other than sensitive information) that is reasonably necessary for, or directly related to, one or more of the agency's functions or activities.</p> <p>There will be no new collection of information by the ABS as a result of the Project (we understand that the collection via the MPS is authorised under the C&S Act, and is therefore compliant with APP 3).</p> <p>We have considered the risk of 'collection by creation', which is always a risk in cases where data matching processes are used in relation to one or more different data sets, because this can lead to the creation of, and consequently, the collection of, additional personal information.</p>	<p>--</p>

³ The ABS' Privacy Policy can be found on the 'Privacy at the ABS' page at: <https://www.abs.gov.au/about/legislation-and-policy/privacy/privacy-abs#from-banner=GB>.

APP	Summary of analysis against the requirements of the APPs, and recommendation(s) to enhance compliance with the APPs and/or reduce privacy risk(s)	Recommendation
	<p>The OAIC provides the following explanation for this concept in its Guide to Data Analytics and the Australian Privacy Principles:</p> <p><i>‘The concept of ‘collects’ applies broadly, and includes gathering, acquiring or obtaining personal information from any source and by any means. This includes collection by ‘creation’ which may occur when information is created with reference to, or generated from, other information the entity holds. Data analytics can lead to the creation of personal information. For example, this can occur when an entity analyses a large variety of non-identifying information, and in the process of analysing the information it becomes identified or reasonably identifiable. Similarly, insights about an identified individual from data analytics may lead to the collection of new categories of personal information.</i></p> <p><i>The Information Accountability Foundation has described the generation of new personal information in three categories – observed, derived and inferred:</i></p> <ul style="list-style-type: none"> • <i>‘Observed data’ is recorded automatically, for example through online cookies or mobile apps.</i> • <i>‘Derived data’ is generated from an original dataset in a simple way, for example by calculating customer’s preferences based on the number of items in a store that they bought.</i> • <i>‘Inferred data’ is produced by using a more complex method of analytics to find correlations between datasets and using these to categorise or profile people, for example by predicting future health outcomes.’⁴</i> <p>In this case, the collection by the ABS, of any new data about an identified ARA, Respondent or other Household Member as a result of the proposed data integration process would need to be justified as being reasonably necessary for the ABS’ functions and activities in accordance with APP 3.1 (and, if the created personal information was also sensitive information, also be consistent with the requirements of APP 3.3).</p> <p>However, we note that the current MADIP processes apply to address this risk, including through its governance processes to ensure that identifying information used for linkage is stored separately from other analytical data, and through additional processes that are implemented to ensure that the outputs of any MADIP research projects will not provide information about any identified individual.</p> <p>We are therefore satisfied that the inherent risk of collection by creation (with its associated APP 3 risk) will be addressed to the extent that the Project involves MPS data being integrated using the MADIP framework.</p>	

⁴ OAIC Guide to Data Analytics and the Australian Privacy Principles, page 23.

APP	Summary of analysis against the requirements of the APPs, and recommendation(s) to enhance compliance with the APPs and/or reduce privacy risk(s)	Recommendation
<p>APP 4 dealing with unsolicited personal information Not applicable</p>	<p>APP 4 only applies where the ABS receives unsolicited information (i.e. information that it receives but has taken no active steps to solicit). We note that no unsolicited personal information is likely to be collected as part of the Project, and therefore it is not necessary to consider the ABS' compliance with APP 4.</p>	<p>--</p>
<p>APP 5 notification of the collection of personal information Compliance could be further enhanced</p>	<p>APP 5 requires an entity that collects personal information about an individual to take reasonable steps to notify the individual of certain matters (referred to as "APP 5 matters"), or otherwise ensure that the individual is aware of those matters. This notification must occur at or before the time of collection, or as soon as practicable afterwards.</p> <p>We note that the Project will not involve the ABS collecting any new personal information from ARAs, Respondents or Household Members.</p> <p>We note that the ABS provides ARAs with a privacy statement in a cover letter prior to an ARA completing the MPS, and has taken a 'layered approach' in the provision of the privacy statement, by providing the ARA with a link to the ABS' broader Privacy Policy. We consider that this is a privacy enhancing approach that ensures that individuals are provided with easy access to further, more detailed information about the handling of their personal information.</p> <p>However, as discussed in relation to APP 1, the Privacy Policy which is referenced in the collection notice does not link to the 'Survey Participant Information – Monthly Population Survey' page on the ABS website. In addition, the 'Survey Participant Information – Monthly Population Survey' page on the ABS website does not currently contain information about how the ABS will handle the collected personal information as a result of the new Project. This means that Privacy Risk 1 is also relevant here.</p> <p>We consider that implementation of Recommendation 1.1 and Recommendation 1.2 will enhance compliance with APP 5, by ensuring that ARAs are properly informed about how their personal information will be handled as part of the Project.</p> <p>Although not within the scope of this PIA, we observe that the ABS could consider refining the processes in the MPS for the provision of collection notices, so that the ARA is also referred directly to the 'Survey Participant Information – Monthly Population Survey' page; and by ensuring that the ARA is required to ensure that each adult Household Member is also provided with a copy of the collection notice.</p>	<p>Recommendation 1</p>

APP 6

use or disclosure of personal information

Compliance can be enhanced

We note that the information that is provided to the ABS as part of the MPS includes personal information that is 'sensitive information' of that otherwise has a degree of sensitivity, where improper use or disclosure in a way that would identify the individual may have serious impacts for that individual. These impacts could range from embarrassment or other emotional harm (for example, because they become known as being unemployed, particularly long term unemployment), to discrimination (for example, because it becomes known that they have, or have not, identified as having a particular racial or ethnic origin), to financial harm (for example, because it becomes known to persons who might do them harm that they have recently become employed or have lost employment), to physical or psychological harms (for example, if their address, or who the other members of their household are, becomes known to persons who might do them harm).

Accordingly, it is very important that the ABS takes steps to ensure that the Project will only involve proper use of the MPS Data, in accordance with the Privacy Act and the C&S Act.

APP 6 provides that an APP entity must not use or disclose personal information that was collected for a primary purpose for another purpose (a secondary purpose), unless the individual has consented to the use or disclosure of the information, or an exception in APP 6.2 (or APP 6.3, noting that none of these exceptions will be relevant for the Project) applies.

The 'Survey Participant Information – Monthly Population Survey' page indicates that the MPS Data was collected by the ABS for the purposes of producing statistics *about "matters that affect the whole community, including work, unemployment, training, retirement, looking after the family and home"*, to *"provide information about the Australian population and workforce on a regular basis"*. The page also references the use of the MPS Data by other Government departments to *"identify how and where they should be using public resources. They use this information to check how different groups of people in the Australian community are impacted by existing policies, and to inform future changes to policy"* and by industry, trade unions and academics *"for research and to inform important decisions about employment services, industry support and education"*.

On this basis, we consider that there is a reasonable argument that use of the MPS Data, by including it into the MADIP data asset, or allowing it to be combined with other datasets in accordance with the MADIP framework, to allow statistical research including for the matters specified above, falls within the primary purpose for collection.

However, even if such use is better analysed as being for a secondary purpose, APP 6.2(b) enables the ABS to use or disclose personal information for that secondary purpose if the use or disclosure is required or authorised by or under an Australian law or a court/tribunal order.

In accordance with the MADIP framework, the relevant ABS team responsible for the MPS Data will need to confirm the ABS' authorisation to make the MPS Data available for inclusion in MADIP.

Recommendation 2

APP	Summary of analysis against the requirements of the APPs, and recommendation(s) to enhance compliance with the APPs and/or reduce privacy risk(s)	Recommendation
	<p>We understand that the ABS is satisfied that it has the relevant legislative authority under the <i>Australian Bureau of Statistics 1975 (Cth) (ABS Act)</i> and the C&S Act, to use the MPS Data by incorporating it into the MADIP data asset as an enduring data set (where it will be available for use in a de-identified form as part of research projects approved by the ABS).</p> <p>Once within the MADIP data asset, the ABS as the integrating authority will implement the MADIP governance arrangements, which will mean that no researchers will obtain access to identified information when undertaking an approved research project (only to de-identified analytical data), and that all outputs of such research projects will be carefully checked to ensure that no individual can be identified as a result of the research project, in line with ABS obligations under the C&S Act.⁵ These mean that there will be no further disclosure of personal information by the ABS when it permits the enduring linked MPS Data to be available for specific research projects (which means there will be no breach of APP 6).</p> <p>Similarly, we understand that the ABS is satisfied that the ABS is authorised to compile, analyse and disseminate the data currently being considered for the specific research projects (described in paragraphs 8.4.2 and 8.4.3 in Part C [Project Description and Information Flows] under the C&S Act, so it is not necessary to rely on the consent of the ARA, Respondents or other Household Members for compliance with APP 6. Accordingly, we do not consider that the ABS needs to take further steps to ensure compliance with APP 6 for those research projects.</p> <p>We do note that the governance arrangements for MADIP mean that the ABS will need to consider its authority to make MPS Data available for each proposed research project. This raises the following privacy issue:</p> <p>Privacy Risk 2: The desirability of ensuring that ABS considers potential privacy issues when considering specific research projects in accordance with the MADIP framework.</p> <p>We suggest that implementation of Recommendation 2 will be an important measure to ensure that the ABS considers privacy issues as part of this process.</p>	
<p>APP 7 direct marketing Not applicable</p>	<p>APP 7 requires that an organisation must not use or disclose personal information it holds for the purpose of direct marketing unless an exception applies. APP 7 applies to “organisations” as defined in the Privacy Act (there are some exceptions where APP 7 does apply to some “agencies”, but these are not relevant to the ABS). Accordingly, this APP does not apply to the ABS. As no third parties (who could be “organisations”) will be involved in implementing the Project, APP 7 is not relevant for this PIA process.</p>	<p>--</p>

APP	Summary of analysis against the requirements of the APPs, and recommendation(s) to enhance compliance with the APPs and/or reduce privacy risk(s)	Recommendation
APP 8 cross-border disclosure of personal information Not applicable	<p>APP 8 requires APP entities to take particular steps if they intend on disclosing personal information to an overseas recipient. The Project will not involve any cross-border disclosures and accordingly APP 8 is not relevant for this PIA process.</p>	<p>--</p>
APP 9 adoption, use or disclosure of government related identifiers Not applicable	<p>APP 9 restricts the use, disclosure and adoption of government related identifiers by organisations. APP 9 applies to “organisations” as defined in the Privacy Act (there are some exceptions where APP 9 does apply to some “agencies”), but these are not relevant to the ABS. Although the Project will involve use of a government related identifier (the Record ID), because no third parties (who could be “organisations”) will be involved in implementing the Project, APP 9 is not relevant for this PIA process.</p>	<p>--</p>
APP 10 quality of personal information Compliant	<p>Under APP 10, the ABS needs to determine what steps (if any) are reasonable for it to take to be satisfied that personal information that is used and/or disclosed in the Project is accurate, up to date, complete and relevant (having regard to the purposes of the use or disclosure).</p> <p>Noting the purposes for which the MPS Data will be used (as part of a large dataset for statistical and research projects designed to better understand the Australian population), and that the personal information collected by MPS comes from an ARA who has been informed about the application of the C&S Act, we consider in the circumstances that personal information to be used to incorporate into the MADIP data asset is likely to be sufficiently accurate, up to date, complete and relevant.</p>	<p>--</p>

⁵ The MADIP framework, including the roles of the ABS and data custodians, and the introduction of additional datasets to the MADIP data asset, has been considered in various PIAs undertaken by the ABS. See <https://www.abs.gov.au/about/data-services/data-integration/integrated-data/multi-agency-data-integration-project-madip/madip-privacy-impact-assessment>

APP	Summary of analysis against the requirements of the APPs, and recommendation(s) to enhance compliance with the APPs and/or reduce privacy risk(s)	Recommendation
APP 11 security of personal information Compliant	<p>APP 11.1 requires an APP entity to take such steps as are reasonable to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure. What is reasonable depends on the circumstances.</p> <p>We note that the ABS intends to link some information to MADIP data . We do not consider there to be any additional risks in linking MPS data to MADIP, as we note that MADIP has data governance processes in place that ensure that linked data remains de-identified.</p>	<p>--</p>
APP 12 access to personal information Compliant	<p>Under APP 12, an APP entity is required to give an individual access to the personal information held by it unless particular exceptions apply (depending on whether the APP entity is an agency or organisation).</p> <p>We understand that the ABS has standard procedures and processes in place to comply with requests for correction made in accordance with APP 12. In our view, nothing in the implementation of the Project would prevent the ABS from applying its procedures and processes to comply with APP 12.</p>	<p>--</p>
APP 13 correction of personal information Compliant	<p>APP 13 requires an entity holding personal information to take such steps as are reasonable in the circumstances to permit correction of that information, except in limited circumstances.</p> <p>We understand that the ABS has standard procedures and processes in place to comply with requests for correction made in accordance with APP 13. In our view, nothing in the implementation of the Project would prevent the ABS from applying its procedures and processes to comply with APP 13.</p>	<p>--</p>

Part E GLOSSARY

Definitions	
ABS	means the Australian Bureau of Statistics.
ABS Act	means the <i>Australian Bureau of Statistics 1975</i> (Cth).
APP, or Australian Privacy Principle	has the meaning given to it in the Privacy Act.
APP Code	means the <i>Privacy (Australian Government Agencies – Governance) APP Code 2017</i> .
APP Guidelines	means the <i>Australian Privacy Principles Guidelines</i> issued by the OAIC
ARA	means ‘any responsible adult’, being a person is selected as the spokesperson on behalf of themselves and all other members of their household in relation to MPS.
Archives Act	means the <i>Archives Act 1983</i> (Cth).
C&S Act	means the <i>Census and Statistics Act 1905</i> (Cth).
Household Members	means the members of a household that the ABS collects information about via the MPS.
LFS	means the Labour Force Survey, which forms part of the MPS.
MADIP	means the Multi-Agency Data Integration Project.
MPHS	means the Multi-Purpose Household Survey, which is run in conjunction with the MPS, with topics changing on an annual basis. MPHS differs from supplementary topics in that it is a separate instrument and is only asked of one random person per household aged 15 years and over.
MPS	means the monthly household survey, comprising of a LFS and supplementary surveys, that collects information about the Australian labour market over an eight month period, to provide longitudinal insight into the Australian labour market.
MPS Data	means the information, including personal information, that ABS collects about persons through the MPS.
OAIC	means the Office of the Australian Information Commissioner.
personal information	has the meaning given in section 6 of the Privacy Act.
PIA	means this privacy impact assessment.
Privacy Act	means the <i>Privacy Act 1988</i> (Cth).

Definitions

Record ID	means the identification number used for the purposes of matching people over the eight months of a MPS, and derived from the identification number allocated by the ABS to the relevant household, and an identification number allocated to each person in that household.
Respondent	means the Household Members the ABS requires LFS information about.
sensitive information	has the meaning given in section 6 of the Privacy Act.

Attachment 1 Material reviewed

1. *D166-G D027-C_RITM0017687_Guide_Cover*
2. *RITM01817 46_MPS_Guide v2*
3. *D167-I RITM0181746 - MS_Invite- visual*
4. *D168-I RITM0181746_ MPS _leaflet*
5. *D029-I R1_ MPS _Reminder*
6. *D030-I R2_ MPS _Reminder 2*
7. *Microdata: Longitudinal Labour Force, Australia*
8. *Microdata user obligations*
9. *MADIP Report Template*
10. *Education and Work Australia, May 2021*
11. *Characteristics of Employment, August 2021*
12. *Participata, Job Search and Mobility Australia methodology, February 2021*
13. *Labour Force Survey Standard Products and Data Item Guide*
14. *Labour Force Australia methodology, January 2022*