

2 November 2020

Ms Linda Fardell
Acting General Manager, Social Statistics Division
Australian Bureau of Statistics
ABS House 45 Benjamin Way,
Belconnen ACT 2617

Dear Ms Fardell

Privacy Impact Assessment – Using linked data to investigate the role of sociodemographic factors in people with cancer in New South Wales

In October 2019, the Australia Bureau of Statistics (ABS) engaged Privcore as an external privacy advisor to provide guidance and an independent review of the ABS' privacy impact assessment (PIA) of a pilot project with the Cancer Institute of New South Wales (Institute) to create a non-enduring linkage from three Institute datasets to the Multi-Agency Data Integration Project (MADIP).

Stages of review

The review was a lengthy process conducted in three stages over a period of just over a year. In the first stage, Privcore provided ABS with advice pertaining to early identification of key issues and questions on receipt of an early stage draft of ABS' PIA in October 2019. Subsequently, as a result of that advice, ABS recommenced its PIA and substantially redrafted its PIA. In March 2020, at stage 2, Privcore conducted a review of ABS' updated PIA and provided further detailed comments.

In September 2020, the ABS provided a further updated PIA to Privcore for a final review. As a result of that final review, ABS made further changes to structure, including addressing community expectations and providing detailed information in Appendices. The final PIA was thus completed in November 2020. It is a result of extensive consultation by the ABS with stakeholders and attempts to move beyond the tick box compliance approach in line with the OAIC's guidance on conducting PIAs.

Over the course of each stage, ABS has been receptive in addressing Privcore's comprehensive feedback and guidance. This was a complex PIA, as state and federal

privacy laws were involved and two of the three Institute data sets had been transferred from NSW to Commonwealth jurisdiction.

Qualifications and assumptions

The PIA report and recommendations were prepared internally by ABS with guidance from Privcore. Whilst Privcore reviewed and commented on several versions of the PIA throughout the process, ABS determined whether and the extent it would address those comments.

Privcore would like to thank the ABS for the opportunity to work with it on this PIA, and its openness to robust and challenging feedback.

Yours sincerely,

Annelies Moens

Annelies Moens
Managing Director
Privcore