



PERSON LEVEL **INTEGRATED DATA** ASSET

RESPONSE TO 2024-25 PLIDA PRIVACY IMPACT ASSESSMENT UPDATE

Background

The Person Level Integrated Data Asset (PLIDA) is a secure, person-based research data asset that combines diverse information about Australian populations. PLIDA provides a comprehensive view of Australian residents over time, facilitating the use and re-use of public data for research and statistical analysis.

The PLIDA Board¹ is responsible for the strategic direction and oversight of PLIDA and its members represent the cross-portfolio government partnership of seven Commonwealth agencies enabling PLIDA. The Australian Bureau of Statistics (ABS) is the accredited integrating authority for PLIDA, responsible for combining datasets, providing access to authorised users, ensuring data security, and preventing the identification of individuals in research outputs.

The ABS has conducted three major privacy impact assessments (PIAs) for PLIDA (in 2018, 2019, and 2022), each addressing changes or updates to PLIDA. Various project-specific PIAs have also been conducted, including for new dataset linkages.

In 2024-25, the ABS engaged Maddocks for a further PIA update to:

- Consolidate privacy impacts of changes since 2022.
- Consider future updates to ensure compliance with the Privacy Act and best practices.
- Continue a 'privacy by design' approach.

This PIA Update covers:

- Inclusion of new or expanded data, including justice system interactions and data from NFP organisations.
- New data handling practices, such as combining internal ABS roles and using the ANDII ICT system.
- Mechanisms for reusing PLIDA data for the NDDA.
- Expanded outputs, including new modules for researchers and data to support ABS surveys.

The PIA report, including the Consultation Report and this response, can be accessed on the ABS website: [Privacy Impact Assessments | Australian Bureau of Statistics](#)

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

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.



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Response to Recommendations

Recommendation 1: Not for Profit (NFP) organisations as Data Custodians

That the ABS build upon its existing processes that are used to consider whether new datasets should be included in PLIDA, so that consideration is given to the level of benefit in obtaining the data directly from the NFP and whether it is appropriate for the NFP to be and exercise the rights and responsibilities of a Data Custodian in the PLIDA context.

Response

Agreed.

The PLIDA Board notes the existing process to consider whether new datasets should be added to PLIDA. The PLIDA Board and ABS are committed to ensuring that this process continues to be effective.

The ABS will enhance its processes for including new datasets from NFP organisations in PLIDA. This will involve evaluating the benefit of obtaining data directly from NFP organisations, assessing their privacy maturity, reviewing their technical expertise, evaluating their data governance framework, and ensuring secure ICT arrangements for data transfer. These activities will ensure that NFP organisations are well-prepared to act as Data Custodians for PLIDA, maintaining the integrity and security of the data.

Timing – December 2025

Recommendation 2: Approach to determining ‘inherently sensitive survey data’

That the ABS continue the existing PLIDA process of undertaking a separate PIA for proposed handling of data which was originally collected by a Data Custodian via a survey mechanism, and which contains ‘sensitive information’ (as defined in the Privacy Act) or ‘inherently sensitive survey data’.

That the ABS develop guidance to assist in determining whether survey data should be considered as ‘inherently sensitive’.

Response

Agreed.

The PLIDA Board and ABS agree that sensitive or inherently sensitive information collected via surveys can have a higher privacy risk.

The ABS will continue its existing processes for handling sensitive survey data and develop guidance for determining inherently sensitive survey data. This will include documenting and publishing the process for handling such data and providing guidance on factors to consider when assessing data sensitivity. This approach will help ensure that sensitive survey data is appropriately protected.

Timing – December 2025



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Recommendation 3: Justifying combination of the Linker and Librarian roles within the ABS

That ABS prepare and publish information that explains the reasons for the change, how it represents best practice, and how the Five Safes Framework and the separation principle will continue to be implemented.

Response

Agreed.

The PLIDA Board and ABS are committed to being transparent about PLIDA.

The ABS will provide information about the rationale for combining the Linker and Librarian roles. This will include historical context, best practice examples, and assurances that privacy frameworks and principles will remain in place. By clearly communicating these changes, the ABS aims to maintain stakeholder confidence in the continued protection of data privacy.

Timing – May 2025

Recommendation 4: Use of ANDII ICT solution for PLIDA processing and to 're-use' PLIDA data for the NDDA

4.1 That ABS develop information that:

- explains the nature and benefits of the change to use the ANDII ICT solution
- explains that all PLIDA data will remain within the ABS-controlled ICT environment
- clarifies that any PLIDA data within the ANDII ICT solution will be stored and handled separately to NDDA data and will remain subject to PLIDA governance
- explains the security provisions that will apply to the ANDII ICT solution
- clarifies that there will be no change to the mechanisms currently used to authorise the collection and use of PLIDA data.

4.2 That ABS develop information that explains how PLIDA data can be re-used for the NDDA, including that:

- the PLIDA Data Custodian must approve the use of PLIDA for the NDDA
- there will effectively be two copies of the same analytical data
- the NDDA governance arrangements will only apply to the NDDA copy of the data.

Response

Agreed.

The PLIDA Board notes the importance of clear documentation and communication around the use of the ANDII ICT solution and the re-use of PLIDA data for the NDDA.

The ABS will develop written information around the ANDII ICT Solution, including its benefits, security measures, and the separation of data used for PLIDA and NDDA projects. This will be provided to ANDII and PLIDA stakeholders. Additionally, the ABS will provide clear information on the re-use of PLIDA data for the NDDA, ensuring transparency about the approval process and governance arrangements. This will help build and maintain public trust in the handling of PLIDA data.

Timing 4.1 – TBC (pending funding arrangements)



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Timing 4.2 – June 2025

Recommendation 5: Governance arrangement for the Core Modules and the LCDI

5.1 That ABS develop information that explains:

- that Safe Data Risk Assessments have considered the reidentification risks associated with the creation and use of the Core Modules.
- how Authorised Users can use the Core Modules in a way that is appropriate for their research project.

5.2 That ABS, in relation to the LCDI:

- consider undertaking Safe Data Risk Assessments and arranging for the Disclosure Review Committee to assess reidentification risks associated with the creation and use of the family and household structures.
- consider developing information that explains –
 - how reidentification risk has been assessed in the LCDI and that there is no increased reidentification risk
 - how Authorised Users can use the family and household structures in a way appropriate to their research
 - clarifies that the initiative will not result in a single integrated dataset being maintained by the ABS.

Response

Agreed.

The PLIDA Board agrees that transparency about the Core Modules and the LCDI will support understanding of these data resources and their public benefit, as well as mitigate any perception of privacy risk.

The ABS will develop information that outlines how reidentification risk has been considered, how the new Core Modules will be accessed and used and how the Life Course Dataset draws on PLIDA and other datasets. This will help the public and data users understand the range of controls in place that enable safe access to this data.

Timing 5.1 – December 2025

Timing 5.2 – July 2025

Recommendation 6: Additional measures for approved research projects to support surveys

That ABS work with Data Custodians to design survey processes to increase the likelihood of data subjects understanding how their survey answers may be supplemented by other data.

That ABS continue to publish information about approved PLIDA projects, as an openness and transparency measure.

Response

Agreed.



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



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The PLIDA Board notes that ABS publishes information on every project accessing PLIDA, to support continuing public trust in the management of the data asset.

The ABS will collaborate with Data Custodians (including external Data Custodians) to enhance survey processes and ensure transparency for data subjects. These measures will help ensure that data subjects are aware of how their survey answers may be used in connection with other data, enhancing privacy protections.

Timing – October 2025