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The Members of the Board
Multi-Agency Data Integration Project (MADIP)
c/o Ms Celia Moss
Australian Bureau of Statistics

By email: dipa@abs.gov.au

Dear Celia

MADIP Privacy Impact Assessment Update – Assurance Report

In August 2019, Maddocks was engaged by the Australian Bureau of Statistics (**ABS**) to provide the ABS with independent advice, review and assurance on the process being undertaken by the ABS to update the Multi-Agency Data Integration Project (**MADIP**) Privacy Impact Assessment (**PIA**) and report (**PIA Update**).

This Assurance Report is provided for the benefit of the MADIP Board, to assist the Board in determining the robustness of the PIA Update and in considering the ongoing management of the MADIP from a privacy perspective.

1. Findings

- 1.1 We confirm that, based on the information provided to us, the process for the PIA Update appears to have been undertaken consistently with the 10 steps set out in the Office of the Australian Information Commissioner's (**OAIC**) *Guide to undertaking privacy impact assessments (Guide)*.
- 1.2 In particular, we note the extensive consultation undertaken by the ABS with a wide range of stakeholders to inform the PIA Update, particularly for the assessment of actual and perceived privacy risks involved in the new developments for MADIP and whether the current mitigation strategies that have been implemented for MADIP are appropriate and sufficient to address those risks.
- 1.3 From our perspective, the ABS, and other MADIP data custodians that are Commonwealth government agencies, have in conducting the PIA Update acted consistently with the spirit of the requirements set out *Privacy (Australian Government Agencies – Governance) APP Code 2017* (noting that the update to the MADIP PIA was undertaken as part of general governance of MADIP, and not necessarily due to an assessment that MADIP developments would likely have a significant impact on the privacy of individuals).
- 1.4 The PIA Update appears to provide a robust analysis of a complex ongoing project that is MADIP and provides a framework for considering privacy impacts on an ongoing basis. The recommendations and the best practice suggestions seem to us to be practical, and we consider they will assist in further enhancing data handling practices for MADIP, addressing potential privacy issues, and meeting community expectations in relation to transparency of practices associated with the handling of personal information.

2. Completed work

- 2.1 Our findings above are based on the following work which was undertaken in relation to the PIA Update, from our engagement until to the date of this Assurance Report:
- 2.1.1 We have advised on ABS's proposed process to update the MADIP PIA, including reviewing and commenting on relevant documentation, including:
- (a) the "MADIP PIA Update Project Plan August 2019"; and
 - (b) the "MADIP PIA Update – Our approach" presentation slides developed for the MADIP Board and stakeholder consultations.
- 2.1.2 We advised on the structure of, and issues to be covered in, the PIA Update.
- 2.1.3 We attended a stakeholder consultation session in Canberra.
- 2.1.4 On request, we attended meetings with data custodians.
- 2.1.5 We attended a MADIP Board meeting to discuss the PIA Update, and draft recommendations.
- 2.1.6 We reviewed and commented on drafts of the PIA Update on 11 November 2019, 14 November 2019 and 27 November 2019.
- 2.1.7 We reviewed and commented on drafts of the MADIP Board response dated 13 November 2019 and 27 November 2019.

3. Qualifications and Assumptions

- 3.1 In preparing the above work, we have assumed that any factual matters in the PIA Update are complete and accurate.
- 3.2 The analysis, findings and recommendations in the PIA Update are those of the ABS. While Maddocks has reviewed drafts of the PIA Update and provided comments to the ABS (including on recommendations and approaches to drafting), it was a matter for ABS and the MADIP Board as to whether or how those comments were addressed, after consideration of all relevant matters.
4. Maddocks would like to thank the ABS and MADIP Board for the opportunity to work on this matter, and on their preparedness to consider our advice in relation to the PIA Update.

Yours sincerely



Katherine Armytage
Partner