

Basics

Privacy WDB

20/12/2019 01:19 PM

Sent by [REDACTED]

Send	To [REDACTED] <[REDACTED]> cc privacy@abs.gov.au bcc
Subject	ABS response to your Privacy Complaint and request to perform a PIA [DLM=For-Official-Use-Only]
Protective Mark	For-Official-Use-Only
Categories	Complaints\2019\12. December 2019

Dear [REDACTED],

I refer to your email (forwarded below) dated 8 December 2019 where you have made a complaint that the ABS has not conducted a Privacy Impact Assessment (PIA) for the ongoing Monthly Population Survey (MPS), and requested that a PIA be conducted as a matter of urgency. I am responding on behalf of the ABS Privacy Officer.

As outlined in prior correspondence, the ABS has an active PIA program focusing on new projects and/or significant changes to existing practices involving the handling of personal information. This is in line with the requirements of the Privacy (Australian Government Agencies - Governance) APP Code 2017, which requires the ABS to conduct a PIA for all high privacy risk projects. For the purpose of this requirement, a project may be a high privacy risks if the ABS reasonably considers that the project involves any new or changed ways of handling personal information that are likely to have a significant impact on the privacy of individuals.

The MPS is a rolling collection which was in place prior to the introduction in July 2018 of the Code. The collection has not undergone any significant changes to the handling of personal information since commencement of the Code and has not had a PIA conducted to date. I am satisfied that the ABS has not breached its privacy obligations.

The MPS will undergo changes in the way personal information is collected and handled in late 2020. In line with these changes, the ABS will undertake a PIA for the MPS during 2020 and publish this on the ABS website in line with our current practice.

Thank you for raising your privacy concerns with the ABS privacy team. Please do not hesitate to contact me, or the ABS privacy team, for any further information or clarification. I will be on leave from today through to the 13th January, however the Privacy@abs.gov.au

email address will continue to be monitored by the ABS Privacy team in my absence.

Regards,

[Redacted]

Director

Policy and Legislation Section | Risk, Planning and Policy Branch | **Australian Bureau of Statistics**

(P) [Redacted] (W) www.abs.gov.au (E) [Redacted]

Please direct all emails to the [Policy & Legislation Section WDB](#)

[Redacted] Complaint and request to perform a PIA [DL... 08/12/2019 07:46:16 PM

Complaint and request to perform a PIA [DLM=For-Official-Use-Only]
Privacy WDB [Redacted] 08/12/2019 07:46 PM

Basics

[Redacted] 08/12/2019 07:46 PM
[Redacted]

Send	To [Redacted] cc privacy@abs.gov.au
Subject	Complaint and request to perform a PIA [DLM=For-Official-Use-Only]
Protective Mark	
Categories	Queries\2019\11.November2019
Visibility	Limited Readers
Editors	[Wkgroup], Privacy WDB
Readers	
Document Usage	Information Management - determines recordkeeping action
Document Id	DCOO-BJNCCT

CAUTION: External email. Do not click links or open attachments unless you recognise the sender

know the content is safe.

Dear 22

I refer to your email of 14 November 2019, below. I wish to make a complaint that the ABS has not conducted a Privacy Impact Assessment (PIA) for the ongoing Monthly Population Survey (MPS).

You state in your email:

'With regard to your query on whether the ABS has a Privacy Impact Assessment (PIA) in place for the Monthly Population Survey (MPS), this collection is a rolling collection which was in place prior to the introduction in July 2018 of the Code. The collection has not undergone any significant changes to the handling of personal information since commencement of the Code and has not had a PIA conducted to date.'

As the ABS' own information on the MPS states, you are collecting the personal information of 52,000 Australians including their names, addresses and contact details. I presume with each new survey, new personal information is collected. To not have performed a PIA for the volume and nature of this personal information is, to be frank, incredulous.

The OAIC publicly available advice states, inter alia:

'1. Threshold assessment

Ask if any personal information will be collected, stored, used or disclosed in the project. If the answer is yes, a PIA is usually necessary. Keep a record of this threshold assessment.'

and:

'The OAIC strongly encourages entities to conduct PIAs as a matter of course for projects that involve personal information.'

I request that a PIA be conducted and posted on your website as a matter of urgency please

Thanks

22

Begin forwarded message:

From: 22 <22>

Subject: Re: Seeking information please [DLM=For-Official-Use-Only]

Date: 14 November 2019 at 8:03:27 am AEDT

To: 22

Cc: 22

Dear 22

Thank you for your email.

Before the commencement of the NDB scheme, the ABS followed best practice of the day and voluntarily reported personal information breaches to the OAIC, irrespective of the impact of the breach. As such between 2013 and 2016, the ABS reported 14 data breaches to the OAIC and all of these breaches were due to administrative error. None of the breaches related to disclosure of statistical data collected under the Census and Statistics Act or malicious exposure of information.

The OAIC notifications helped to inform the ABS' continual review of processes to strengthen our data handling policies, procedures and notification practices. The ABS has not notified any privacy breaches to the OAIC since 2016.

The ABS actively assesses new projects and/or any significant changes to existing practices involving the handling of personal information, and undertakes Privacy Impact Assessments, pursuant to the Privacy (Australian Government Agencies - Governance) APP Code 2017. Our [website](#) as you are aware publishes Privacy Impact Assessments which are intended to demonstrate transparency and outline the process we follow for privacy compliance.

With regard to your query on whether the ABS has a Privacy Impact Assessment (PIA) in place for the Monthly Population Survey (MPS), this collection is a rolling collection which was in place prior to the introduction in July 2018 of the Code. The collection has not undergone any significant changes to the handling of personal information since commencement of the Code and has not had a PIA conducted to date.

The ABS takes privacy very seriously and I appreciate you taking the time to contact us with your questions.

Kind regards,

22

Director and Head of ABS Privacy Team

Policy and Legislation Section | Risk, Planning and Policy Branch | **Australian Bureau of Statistics**

(P) 22 (E) 22

" 22 " ---07/11/2019 09:01:32 PM---Seeking information please
[DLM=For-Official-Use-Only]

Seeking information please [DLM=For-Official-Use-Only]

Privacy WDB

" 22 " 07/11/2019 09:01 PM

For-Official-Use-Only

*

Basics

" 22 "
22

07/11/2019 09:01 PM

Send	To	privacy@abs.gov.au
	cc	

Subject	Seeking information please [DLM=For-Official-Use-Only]
Protective Mark	For-Official-Use-Only
Categories	A- [REDACTED]
Visibility	Limited Readers
Editors	" [REDACTED] " < [REDACTED] >, [Wkgroup], Privacy WDB
Readers	" [REDACTED] " < [REDACTED] >, Policy and Legislation
Document Usage	Information Management - determines recordkeeping action
Document Id	DCOO-BHPDTL

CAUTION: External email. Do not click links or open attachments unless you recognise the and know the content is safe.

Dear ABS Privacy

On 6 October 2019, I emailed Mr David Waymouth, ABS Program Manager National Data Acquisition Centre, with some questions about privacy. I emailed him again on 3 November 2019. He has not responded to either of my emails.

Consequently, I am now seeking your assistance with a number of requests:

- I would like to know how many times (since 2013) the ABS has reported breaches of privacy to the OAIC and what were they?
- I would like the ABS' Privacy Impact Assessment on its Monthly Population Survey process. There is not one provided, as far as I can see, on the relevant page of your website which is disappointing given the personal nature of the information collected and the number of respondents (approximately 52,00 according to the ABS' own information). Guidance on the OAIC website states : 'The OAIC strongly encourages entities to conduct PIAs as a matter of course for projects that involve personal information.'

Thanks

[REDACTED]

Basics

Privacy WDB

06/01/2020 12:15 PM

Sent by 22

Send	To cc bcc
Subject	Re: Seeking information please Your query to the ABS dated 7th November 2019 📎
Protective Mark	
Categories	Complaints\2019\12. December 2019

Dear 22

Thank you for your email ~~and I appreciate your patience in this matter.~~

~~need to address this~~ <<

<https://www.theguardian.com/australia-news/2016/jul/29/australian-bureau-of-statistics-reports-14-data-breaches-since-2013>>>

~~Since 2013, the ABS has reported 14 data breaches to the OIAC. All of these breaches were administrative errors such as email addresses into the to: or cc: fields of emails. Of the 14 reported, there was no breaches of statistical data collected under the Census and Statistics Act. The ABS followed best practice of the day, by reporting any breaches regardless of the impact of the breach.~~

~~Since the commencement of the Notifiable Data Breaches scheme on 22nd February 2018, the ABS has not had any privacy breaches which met the threshold of notification to report the Office of the Australian Information Commissioner (OAIC). The ABS has embedded processes for assessing and responding to privacy incidences which are reported or made known to the Privacy Officer. A critical part of this process is to identify ongoing improvements that can be made to ABS processes and procedures to safeguard the personal information held.~~

The ABS actively assesses new projects and/or any significant changes to existing practices involving the handling of personal information, and undertakes Privacy Impact Assessments, pursuant to the Privacy (Australian Government Agencies - Governance) APP Code 2017. Our [website](#) as you are aware publishes Privacy Impact Assessments which are intended to demonstrate transparency and outline the process we follow for privacy compliance.

With regard to your query on whether the ABS has a Privacy Impact Assessment (PIA) in place for the Monthly Population Survey (MPS), this collection is a rolling collection which was in place prior to the introduction in July 2018 of the Code. It has not undergone any significant changes to the handling of personal information since the Code commenced and has not had a PIA conducted to date.

The ABS takes privacy very seriously and has and I appreciate you taking the time to contact me,

Kind regards

Michael Meagher
 ABS Privacy Officer
 Program Manager
 Risk, Planning and Policy | Finance, Risk and Planning Division | **Australian Bureau of Statistics**
 (E) privacy@abs.gov.au (W) www.abs.gov.au
Executive Sponsor for the ABS Pride Network

" 22 " Seeking information please [DLM=For-Offici... 07/11/2019 09:01:32 PM

Seeking information please [DLM=For-Official-Use-Only]
 Privacy WDB " 22 " 07/11/2019 09:01 PM

For-Official-Use-Only

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Thanks

Basics

Privacy WDB

11/11/2019 12:37 PM

Sent by [REDACTED]

Send	To [REDACTED]/Staff/ABS@ABS cc [REDACTED]/Staff/ABS@ABS bcc
Subject	Re: Seeking information please [DLM=For-Official-Use-Only]📎
Protective Mark	For-Official-Use-Only
Categories	Complaints\2019\12. December 2019

DRAFT - for your ok [REDACTED] and I will then send off .

Dear [REDACTED]

Thank you for your email and I appreciate your patience in this matter.

I can let you know that the since the commencement of the Notifiable Data Breaches scheme on 22nd February 2018, the ABS has not had any privacy breaches which met the threshold of notification to the Office of the Australian Information Commissioner (OAIC). The ABS has embedded processes for assessing and responding to privacy incidences which are reported or made known to the Privacy Officer. A critical part of this process is to identify what else we can do to minimise or prevent harm in the event of a privacy incident and to ensure we take steps to secure the personal information we hold.

With regard to your query on whether the ABS has a Privacy Impact Assessment (PIA) in place for the Monthly Population Survey, this collection is a rolling collection which has been in place for a time well before the introduction in July 2018 of the Privacy (Australian Government Agencies - Governance) APP Code 2017. The ABS actively assesses any new project or ones which have changed practices for handling of personal information and pursuant to The Code, undertake privacy impact assessments. Our [website](#) as you are aware does include the published Privacy Impact Assessments which are intended to demonstrate transparency and outline the process we follow for privacy compliance.

We endeavour to review and update as required our procedures and systems for compliance of the Australian Privacy Principles (APPs) and to build a better understanding how ABS embeds a 'privacy by design' approach in the way personal information is managed as part

of our business.

Kind regards

22

" 22 " Seeking information please 07/11/2019 09:01:32 PM

Seeking information please
Privacy WDB

" 22 " 07/11/2019 09:01 PM

Basics

" 22 " 07/11/2019 09:01 PM
22

Send	To privacy@abs.gov.au cc
Subject	Seeking information please
Protective Mark	
Categories	
Visibility	Public
Editors	" 22 " < 22 >, [Wkgroup]
Document Usage	General Operations - determines recordkeeping action
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Thanks

MPS PIA mtg

Bjorn
Michael M

18/12

MPS

DR May / June

2020 metrics
implementing
new data
architecture
infrastructure...

- ① where are the holdups
- ② changes for process

information slow still being resolved..

internal PIA
for domains

basic
steps

{ info data
integration
plan --

IF / MARCH
LUNGE