

Response to the 2023 Privacy Impact Assessment

National Disability Data Asset and Australian National Data Integration Infrastructure



This document is in Easy Read.

Background

The National Disability Data Asset is a new way to bring together data about all Australians.

In this document we call it the data asset.

The data will come from different parts of the government.

Data is:

- facts
- information
- records.



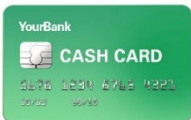
The data asset will help show how people with disability live.



The information in the data asset will not have private information. This means the data asset will not have a person's:



- name
- where they live
- their phone number
- email address
- bank details.



The data asset is being made by the:



- Department of Social Services (DSS)
- Australian Bureau of Statistics (ABS)
- Australian Institute of Health and Welfare (AIHW).

These Australian government agencies are called 'Commonwealth Partners'.



Partners means that they work together.

When you see the word 'we' or 'us' it means the Commonwealth Partners.

What is this summary about?



This document says what we thought about the recommendations from the 2023 Privacy Impact Assessment (PIA).

Recommendations are ideas on how to fix or make things better.

We worked with a company called Maddocks to do the PIA. Maddocks are not part of the government. They are a business that is very good at helping to make or keep data private.

Maddocks did a report on the PIA.

A report is a written document to say what was learned.

You can get a summary of the PIA report on the webpage [Privacy for the National Disability Data Asset](http://www.ndda.gov.au/privacy-policy) (www.ndda.gov.au/privacy-policy).





The PIA looked at privacy of the data asset and how the Australian National Data Integration Infrastructure supports it to work.



In this document we will call the Australian National Data Integration Infrastructure the 'computer system'.

The computer system lets us look at the data and link information that is the same or similar.



A PIA is done to make sure that any risks to privacy are understood. It looks at how there can be less risks to privacy.

Summary of recommendations and responses

Recommendation 1.

Adding datasets into the data asset in the future



A dataset is a way to put data together so that it can be looked at in groups to see what the information says.



Principles should be made to help the government choose what new data to add to the data asset.

Principles are a set of rules that say how things should be done.

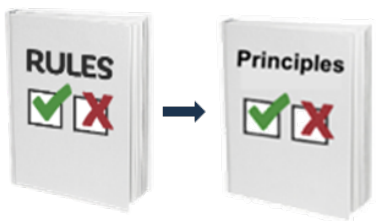


Everyone should be able to see these rules on the [National Disability Data Asset website](http://www.ndda.gov.au) (www.ndda.gov.au).

Response



We agree.



We will make a set of rules. We will call these rules principles. The principles will be about what should be checked before new datasets are added to the data asset.

These principles will be about:



- if adding the dataset is right for people with disability
- how the new data will help the data asset
- if there are limits on using the data.



We will add these principles on the National Disability Data Asset website. We will tell you about the data we will be using.



State and territory governments, people from the disability community and researchers will all have a say about what the principles for adding datasets will be. A researcher is a person whose job it is to study or look at information and report what they have learned.



The National Disability Data Asset Council (the Council) will need to agree to the principles that say how new datasets can be added.



The Council includes people from the government and the disability community. They will look at how the data asset is used and make sure it is used in the right way.



This is to be done by December 2024.

Recommendation 2.

Collection notices for data providers



People should know about the rules for privacy, like how information about them will be collected and used.

A collection notice will be given to people to say what data will be collected and how it will be used.



All data providers should use the same words on forms, documents and websites when they collect data for the data asset.

Data providers are government agencies that provide data to be included in the data asset.



The Australian National Data Integration Infrastructure Board (the Board) will need to say yes to the new words data providers will use. The Council will also be asked to check these words.



The Board is a group of people from different parts of government. They make sure that the support system for the data asset is working well and all the people who use it follow the rules.

Response



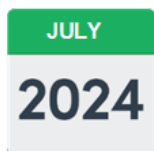
We agree.



We will ask data providers to make sure their forms, documents and websites are up to date. This should include the new words to add to collection notices.



We will ask the groups who are part of the data asset to find out what they think of the new words for collection notices.



We will ask the Board to say it is okay to use the words they have chosen for the collection notices.

This is to be done by July 2024.

Recommendation 3.

Managing the risk of re-identifying data – review of processes



Rules about privacy and security should include ways to stop people finding people's names or knowing who the information is about.



These rules for the data asset and computer system should be checked every year. This can help to make sure that the data on computer systems is kept private and safe.



Response

We agree.



The Board will be asked to agree to a review that looks at extra ways to stop people's names being known or information being linked back to people.



A review is a way to look at how things are being done and make changes if needed.

The review could look at:



- the ways we keep data safe and private
- other things we can do.



The review should be done every year when there is new data or when things are found not to be safe.



A report will be written about this and given to all the groups who need it, including the Board and the Council.



The first review is to be done by July 2025.

Recommendation 4.

Managing the risk of re-identifying the data – rules for what is shared



The policy about de-identifying data and keeping information private should:



- look at things that can go wrong and how to fix them
- make sure that people cannot be known from the information in the data asset.



This means that before data from a project leaves a safe computer system it is checked to make sure people cannot be re-identified.



Response

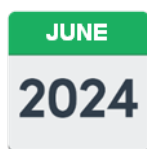
We agree.

We will write two documents called:

- the De-identification Strategy
- the Data Access, Use and Release Protocol.



Managing the data in line with these documents will help keep information about people safe.



This should be done by June 2024.

Recommendation 5.

Managing data breaches



A data breach is when data or private information is shared when it should not be or is stolen from a secure computer system.



The same set of rules should be for all parts of the government that work on the data asset. The rules should be clear so that all people that use the data know what they must do.

The rules should be clear on who should be told when data is used the wrong way like:



- the Office of the Australian Information Commissioner
- the Office of the National Data Commissioner
- any other people who need to know.

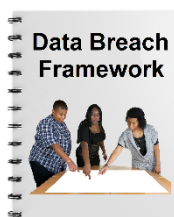
The rules should also say who will tell people when data is used in the wrong way.



Response

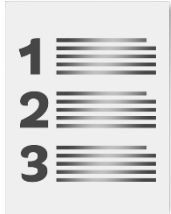
We agree.

We will consider this recommendation when we make a document called the Data Breach and Incident Response Framework.



A framework is a plan for how things should work.

The framework will say:



- what needs to be done if there is a data breach
- who needs to do things in the plan, like looking at what happened and letting others know what happened.



All organisations who share data must have:

- their own rules
- ways to fix things if there is a data breach.

They need to follow rules in the *Data Availability and Transparency Act 2022*.



The Office of the National Data Commissioner could also do checks to make sure things are being done to meet the laws and rules.



The framework should be done by June 2024.

Recommendation 6.

Develop a Compliance Framework



The Board should make a way to check if the rules are being followed, like a report that is done every year.



The report could check rules are being followed about:

- collection notices
- security
- how things are done.



The report would be given to responsible officers at the ABS. They check to make sure the data asset and the computer system are being used in a safe way and follow the laws.

Response

We agree.

A Compliance Framework needs to be made for the data asset and computer system. The framework will say how



we will check if people are following the rules and keeping information private and safe.



This should be done by October 2024.

Learn more

If you want to find out more on the [National Disability Data Asset website](http://www.ndda.gov.au) (www.ndda.gov.au).



This includes [Privacy for the National Disability Data Asset](http://www.ndda.gov.au/privacy-policy) (www.ndda.gov.au/privacy-policy).

You can send us a question about privacy at ndda@abs.gov.au

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