

----- Forwarded by [REDACTED] on 17/12/2015 12:21 PM -----

From: [REDACTED]
To: timothy.pilgrim@oaic.gov.au,
Cc: [REDACTED]
Date: 17/12/2015 12:21 PM
Subject: ABS response to Privacy Impact Assessment [DLM=For-Official-Use-Only]

Timothy Pilgrim
Australian Privacy Commissioner

Dear Timothy

ABS response to Privacy Impact Assessment

On the 11 November 2015, the Australian Statistician wrote to you concerning the ABS' intention to conduct a Privacy Impact Assessment on the retention of names and addresses from responses to the 2016 Census of Population and Housing. Thank you for taking the time to consider the proposal, and give your time and that of your office to assist with the process.

I am writing to advise you that after consideration of the Privacy Impact Assessment, focus group testing and feedback from the public and the Australian Privacy Commissioner, as well as State and Territory Privacy and Information Commissioners, the ABS has made the decision to retain names and addresses from the 2016 Census.

The ABS intends to announce its decision to the public via the ABS Website on **Friday 18th December at 11.30am**. I would appreciate your support in keeping this announcement out of the public domain until the ABS releases it at 11.30am on Friday.

I have attached an advanced copy of the Privacy Impact Assessment and ABS Response to the Privacy Impact Assessment for your information. The documents will be accompanied by a Media Release.

The retention of names and addresses from responses to the 2016 Census will support ABS' ability to provide a richer and dynamic statistical picture of Australia through the integration of Census data with other survey and administrative data, the geospatial enablement of that data, and improvements to our household surveys. The retention of names and addresses will also reduce the cost to taxpayers and the burden on Australian households through more efficient ABS survey operations.

The Privacy Impact Assessment assessed the level of risk to personal privacy, considering the protections in place, as very low. The ABS is confident that the risks identified are effectively mitigated by storing names and addresses separately from other Census data as well as separately from each other. The risks are further mitigated by governance and security arrangements the ABS already has in place. These arrangements were found to robustly manage data, protect privacy and guard against misuse of information.

The retention of names and addresses collected in the 2016 Census is consistent with the functions of the ABS prescribed in the *Australian Bureau of Statistics Act 1975* and compliant with all the provisions in the *Census and Statistics Act 1905* and the *Privacy Act 1988*, including the Australian Privacy Principles.

Please do not hesitate to contact me on the details below. Alternatively, you may wish to contact [REDACTED]

Regards

[REDACTED]

[REDACTED]
Strategic Partnerships and Projects Division | Australian Bureau of Statistics

(P) [REDACTED] (M) [REDACTED] (F) [REDACTED]

(E) [REDACTED] (W) www.abs.gov.au

[REDACTED]

----- Forwarded by [REDACTED] on 09/04/2016 04:58 PM -----

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Date: 09/04/2016 04:51 PM
Subject: Further update from ABS re 2016 Census of Population and Housing and retention of names and addresses

Dear Information Commissioners, Privacy Commissioners, Ombudsmen

Update on ABS response to issues regarding 2016 Census of Population and Housing and retention of names and addresses

Further to my email of 11 March, last Thursday (7th April) the ABS published an update to the Census Security, Privacy and Confidentiality [document](#) on the ABS Website to provide great clarity and certainty around the period of time for which names and addresses will be retained from the 2016 Census.

The relevant change is highlighted in the following extract.

When should the ABS destroy names and addresses?

In recent Censuses names and addresses have been destroyed at the end of Census data processing, approximately eighteen months after the Census. This has reduced the value of the Census data and the ability for it to be used to inform future planning and decisions.

Recent public consultation and engagement has revealed that Australians expect the ABS to keep their information secure and to use their data for the benefit of them, their community and Australia.

There is also an expectation that the ABS should retain and use the information collected in the Census for as long as there is a benefit for the community to do so. Consistent with the Australian Privacy Principles, the information should be destroyed once this need no longer exists.

For the 2016 Census, the ABS will destroy names and addresses when there is no longer any community benefit to their retention or four years after collection (i.e. August 2020), whichever is earliest.

The ABS has and will always ensure that sufficient safeguards are in place to protect the privacy and confidentiality of the information it collects in the Census, including names and addresses.

Please do not hesitate to contact me on the details below if you have any questions. Alternatively, you may wish to contact [REDACTED].

Kind regards, [REDACTED]

[REDACTED]
[REDACTED]
Strategic Partnerships and Projects Division | Australian Bureau of Statistics

(P) [REDACTED] (M) [REDACTED] (F) [REDACTED]
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----- Forwarded by [REDACTED] on 09/04/2016 04:45 PM -----

From: [REDACTED]
Date: 11/03/2016 05:59 PM
Subject: ABS response to media coverage regarding 2016 Census of Population and Housing

Dear Information Commissioners, Privacy Commissioners, Ombudsmen

ABS response to media coverage regarding 2016 Census of Population and Housing and retention of names and addresses

On the 18 December 2015, I wrote to you advising of the ABS' decision to retain names and addresses from responses to the 2016 Census of Population and Housing following the completion a Privacy Impact Assessment.

Yesterday, 10th March, you may have noted that the Australian Financial Review published several articles reflecting concerns expressed by the Australian Privacy Foundation, along with the ABS's response to the concerns.

In response to this coverage, the Australian Statistician issued a statement correcting the false information reported by the journalist, as well as reinforcing the commitment to the protection of privacy and the engagement process that underpinned the ABS's decision. The response can be found [here](#).

I would like to thank you for your support of the ABS on this topic and will keep you informed of any further developments in relation to this matter.

Please do not hesitate to contact me on the details below. Alternatively, you may wish to contact [REDACTED]
[REDACTED]

Kind regards, [REDACTED]
[REDACTED]
[REDACTED]

Strategic Partnerships and Projects Division | Australian Bureau of Statistics

(P) [REDACTED] (M) [REDACTED] (F) [REDACTED]
(E) [REDACTED] (W) www.abs.gov.au



ABS House
45 Benjamin Way
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Locked Bag 10
Belconnen ACT 2616
Telephone: (02) 6252 6705



Australian Statistician

Ms Brenda Monaghan
Office of the Information Commissioner

Dear Ms Monaghan

I am writing to advise you and your office of the ABS' intention to conduct a Privacy Impact Assessment on the proposed retention of names and addresses from responses to the 2016 Census of Population and Housing.

Community trust in the confidentiality of Census information given to the ABS is vital to the conduct of a good Census. The ABS has an excellent track record in this regard and we are committed to maintaining it. In the past we have promoted trust in the confidentiality of Census returns by promising to destroy names and addresses.

The ABS intends to explore the retention of names and addresses from the 2016 Census to provide a benefit to the ABS and wider community by:

- enabling higher quality and more efficient linkage of high value survey and administrative datasets with the Census, particularly for small or highly mobile population sub groups of policy interest;
- supporting a range of organisational efficiencies, such as the development of an address register, improving sampling, imputation and provider management; and
- supporting more flexible geospatial outputs.

For the 2016 Census, the ABS proposes to apply well established, internationally recognised separation principles to protect privacy by storing both name and address separately and securely from other household and personal data collected in the Census. Under this proposed approach, names will never be brought together with other Census data. Only anonymised versions of name will be used for approved statistical data integration projects. Addresses will only be used for approved data integration, operational and geospatial purposes.

Feedback from focus group testing has been generally supportive of this approach. Focus Group feedback also highlighted the importance of transparency in this area.

To inform both our decision and the approach, the ABS will undertake a Privacy Impact Assessment of the retention of names and addresses collected by the 2016 Census.

The ABS will also publicise its intention to conduct the PIA by publishing a Statement of Intent (Attachment A) on the ABS website, supported by a media release (Attachment B) on Wednesday 11 November at 11:30am. The decision will take into account the PIA as well as feedback from stakeholders and the general public.



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Australian Statistician

If you or your office requires further information, please contact [REDACTED] in the first instance on [REDACTED], or written submissions can be sent to privacy@abs.gov.au.

Yours sincerely



David W. Kalisch
Australian Statistician

11 November 2015



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Telephone: (02) 6252 6705

Australian Statistician

Mr Timothy Pilgrim PSM
Australian Privacy Commissioner
Acting Australian Information Commissioner

Dear Mr Pilgrim

I am writing to advise you and your office of the ABS' intention to conduct a Privacy Impact Assessment on the proposed retention of names and addresses from responses to the 2016 Census of Population and Housing.

Community trust in the confidentiality of Census information given to the ABS is vital to the conduct of a good Census. The ABS has an excellent track record in this regard and we are committed to maintaining it. In the past we have promoted trust in the confidentiality of Census returns by promising to destroy names and addresses.

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Feedback from focus group testing has been generally supportive of this approach. Focus Group feedback also highlighted the importance of transparency in this area.

To inform both our decision and the approach, the ABS will undertake a Privacy Impact Assessment of the retention of names and addresses collected by the 2016 Census.

The ABS will also publicise its intention to conduct the PIA by publishing a Statement of Intent (Attachment A) on the ABS website, supported by a media release (Attachment B) on



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Australian Statistician

Wednesday 11 November at 11:30am. The decision will take into account the PIA as well as feedback from stakeholders and the general public.

I will try to call you in the morning before this is released. I will also be notifying State and Territory Information/Privacy Commissioners of the intention to conduct a PIA and invite them to provide feedback.

If you or your office requires further information, please contact [REDACTED], in the first instance on [REDACTED]

Yours sincerely

[REDACTED]

David W. Kalisch
Australian Statistician

10 November 2015



Australian Statistician

ABS Minute No. M15/83

The Hon Alex Hawke MP
Assistant Minister to the Treasurer

cc: The Hon Scott Morrison MP, Treasurer
John Fraser, Secretary to the Treasury

ABS decision to retain names and addresses from responses to the 2016 Census of Population and Housing

Timing: By 16 December, 2015

Recommendation:

That you note the ABS decision to retain names and addresses from responses to the 2016 Census of Population and Housing following a public consultation period and Privacy Impact Assessment.

Noted

.....
Signature

.../.../...
Date

1. As foreshadowed in Minute M15/69 (at Attachment 1), the ABS actively seeks to get maximum value from the significant Government investment with each Census of approximately \$450m. Aside from the key population benchmarks and the small area information derived directly from the Census questions, there are more opportunities to get value from the Census data by bringing it together with other data sources and ensuring it is spatially enabled for significant public policy and research purposes. This is consistent with the [Australian Government Public Data Policy Statement](#) released on Monday 7 December by the Prime Minister.

2. Following a public consultation period and a Privacy Impact Assessment conducted by the ABS, the ABS has decided to retain names and addresses from responses to the 2016 Census.

3. There are a number of benefits from this decision:

- The retention of addresses contributes significantly to a high quality address register - a key enabler of more efficient household surveys, reduced burden on householders, and contribution to managing the increasing costs of running surveys.
- The retention of names enables the bringing together of survey and Census data with administrative data to provide a richer and dynamic statistical picture of Australia. These efforts respond to demand from policy makers (e.g. Departments of Immigration and Border Protection and Social Services) and researchers for data that can provide insight into some of the biggest challenges facing the nation, for example:
 - What are the long term payment histories of individuals and families and what interventions can be designed to encourage greater self-reliance?



- Does the type of service provider and the type of assistance received make a difference for short term employment or education outcomes?
- What are the outcomes for individuals and families who receive assistance from a range of social services – child care, housing and homelessness services, child protection services, disability services, etc ?
- What impact does participation in education and training have on labour force participation for young people?
- What factors matter for targeting health services for those most in need, including mental health services?

4. The outcome of the Privacy Impact Assessment and consultation process has provided reassurance that the ABS complies with all regulations and can effectively manage privacy. We will emphasise our very robust legislative provisions that safeguard personal information, our strong internal culture and practice supporting our legislation, our strong protections against cyber-attacks, the separation of names and addresses from any Census content material, and our extensive track record with safe data linkage that produces aggregated trends rather than information on individuals.

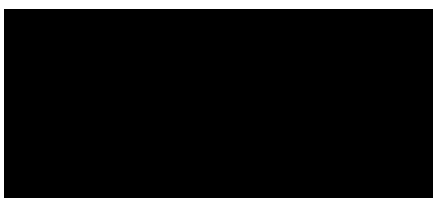
5. In addition, the outcomes from previous focus group testing as well as limited media attention or responses to the public consultation process (only three submissions were received) indicates that a decision to retain names and addresses is consistent with general community attitudes.

6. The ABS consulted with the Australian Privacy Commissioner throughout the process and has reflected their advice in ensuring the Privacy Impact Assessment reflects best practice and addresses areas of current community concern around data security. The ABS received responses from NSW and Victorian Privacy Commissioners which did not raise any concerns. A response was also received from WA noting that they do not have privacy legislation but that they were comfortable with the process being undertaken.

7. I am confident that in implementing this decision the ABS can effectively manage the trust of the Australian public. Training and support materials will be developed for Census field officers and responses to 'frequently asked questions' will be published on the ABS website, along with an updated Census Privacy Statement.

8. The ABS will publicise its decision to retain names and addresses on Friday 18 December 2015. This enables the ABS to concentrate efforts in 2016 on engaging with the Australian community to make the digital-first 2016 Census a success.

9. The Privacy Impact Assessment and ABS response to the Privacy Impact Assessment will accompany the ABS release of its decision on Friday 18 December. These documents, along with our media release, will be provided to your office prior to release. Any significant media attention will be advised to your office.



David W. Kalisch

9 December 2015



Australian Statistician

ABS Minute No. 15/M69

The Hon Alex Hawke MP
Assistant Minister to the Treasurer

cc: The Hon Scott Morrison MP, Treasurer
John Fraser, Secretary to the Treasury

ABS to conduct a Privacy Impact Assessment on retention of names and addresses from responses to the 2016 Census

Timing: By 10 November, 2015

Recommendation:

That you note this briefing on the ABS intention to publicly announce it will conduct a Privacy Impact Assessment on the retention of names and addresses from responses to the 2016 Census.

Noted

.....
Signature

.../.../...
Date

1. Community trust in the confidentiality of Census information given to the ABS is vital to the conduct of a good census. The ABS has an excellent track record in this regard and we are committed to maintaining it.
2. In the past we have promoted trust in the confidentiality of census returns by promising to destroy the names and addresses.
3. For the 2016 Census we believe that a change in approach is needed.
4. Retention of addresses is necessary to build and maintain a high quality address register that will be a key enabler of improved household surveys.
5. Retention of names would support our efforts to integrate survey and Census data with administrative data to provide a richer and dynamic statistical picture of Australia. For further details on the benefits and considerations of retention of names and addresses, see Attachment A - Statement of Intent - ABS to conduct a Privacy Impact Assessment on retention of names and addresses from responses to the 2016 Census.
6. For the 2016 Census, we think it will be sufficient to commit to ensuring that names and addresses are well separated from the Census records. Feedback from focus group testing has been generally supportive of this approach. Focus Group feedback also highlighted the importance of transparency in this area.
7. To inform both our decision and the approach, the ABS will undertake a Privacy Impact Assessment of the retention of names and addresses collected by the Census.



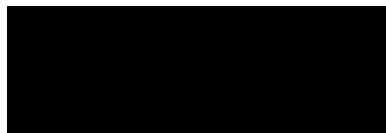
8. The following stakeholders will be directly notified of the intention to conduct a PIA, and invited to provide feedback. These stakeholders include:

- a. Office of the Australian Information Commissioner;
- b. State and Territory Information and/or Privacy Commissioners; and
- c. Australian Statistical Advisory Council.

9. The ABS will also publicise its intention to conduct the PIA by publishing a Statement of Intent (Attachment A) on the ABS website, as well as a media release (Attachment B). Any media attention will be advised to your office.

10. The decision will take into account the PIA as well as feedback from stakeholders and the general public.

11. Feedback is requested by 02 December so the ABS can make a final decision by the end of 2015.



David W. Kalisch

3 November 2015