



PRIVACY IMPACT ASSESSMENT RESPONSE

2021 Census Administrative Data Privacy Impact
Assessment
July 2020



ABS RESPONSE TO THE INDEPENDENT PRIVACY IMPACT ASSESSMENT ON THE PROPOSED USE OF ADMINISTRATIVE DATA FOR THE 2021 CENSUS OF POPULATION AND HOUSING

Introduction

This independent PIA focuses on the proposed use of integrated administrative data for the 2021 Census and complements the 2021 Census PIA¹. The release of these PIAs reflects the ABS's enduring commitment to protecting peoples' privacy. It also aligns with recommendations made by two inquiries into the 2016 Census², to undertake an independent PIA a year out from the 2021 Census.

This PIA has been conducted by Information Integrity Solutions (IIS) and examines the potential use of administrative data for three 'use cases':

1. **Help maximise Census response** by identifying areas where people may need extra support to complete the Census, and having strategies in place to deliver this support – for example, ABS may endeavour to provide more hard copy forms to an area with a high proportion of older Australians.
2. **Help improve the Census count** by refining our methods to estimate the number of households unoccupied on Census night, and to make adjustments where necessary to ensure the Census count is accurate.
3. **Help us prepare for any unexpected events** that could impact the Census response. The recent COVID-19 pandemic and extreme bushfire season have reinforced our need to be prepared for difficulties outside of our control when conducting the Census. Identifying other data sources is a key way to be prepared, in case there is a need to fill in gaps where information has been difficult to collect.

In conducting this PIA there was a series of consultation sessions with a range of stakeholders, including government data custodians, privacy advocates, data users, researchers and privacy regulators. The ABS extends its appreciation to all of these contributors.

The ABS agrees with all of the recommendations in the PIA. Recommendations are being implemented as Census preparations continue.

¹<https://www.abs.gov.au/websitedbs/D3310114.nsf/home/ABS+Privacy+Impact+Assessments>

²<https://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id:%22publications/tabledpapers/a41f4f25-a08e-49a7-9b5f-d2c8af94f5c5%22>

and

https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Economics/2016Census/Report

The ABS particularly welcomes the findings of this PIA which recognises the robust governance arrangements in place for ABS data integration activities. The ABS is committed to upholding the privacy, confidentiality and security of the personal information it collects, and to transparency in its use of administrative data and data integration activities.

The PIA process has been iterative and the ABS reviewed the approach to various use cases as the assessment proceeded. For instance, ABS decided not to proceed with the use of electricity data at a dwelling level after stakeholders raised privacy concerns during the consultation.

Response to Recommendations

Recommendation 1

Ensure that expansions to admin data use in connection with the Census are reviewed at a sufficiently high level within the agency and are subject to scrutiny on cumulative privacy impact.

Agreed.

The ABS has robust arrangements in place to ensure privacy is considered throughout the organisation at all levels. The ABS has a Privacy Officer and Privacy Champion. Strong governance arrangements are in place to consider all data integration activities.

Privacy Threshold Assessments are undertaken for activities that change or are new, to help determine their privacy implications and whether a PIA is required. The Census Program is committed to ensuring appropriate privacy assessments are undertaken for all activities that meet this threshold. The 2021 Census Senior Responsible Officer and Census General Manager are both taking a strong interest in privacy for the 2021 Census.

The ABS is considering establishing a data ethics advisory committee with external expert membership to advise the Australian Statistician on ethical considerations concerning innovative ABS data use initiatives.

Recommendation 2

Facilitate participation of groups representing the interests of civil society in consultations about data sharing and admin data use.

Agreed.

The ABS is committed to consulting with the community on issues relating to data sharing, and administrative data use. The ABS is investigating a model to enhance and facilitate community engagement for innovative data uses to help build community trust and understanding of data use.

Recommendation 3

Establish a threshold test for pursuing use case 3 in a case of localised low response.

Agreed.

The ABS will develop and publish a set of principles which will guide if and how administrative data is used to improve data quality in the case of localised low response.

Consistent with our commitment to transparency around the use of data, updates will be published on the [Using administrative data for the 2021 Census](#) page.

Recommendation 4

Set a low response rate trigger point for use case 3 in a case of ‘across-the-board’ or widespread low response.

Agreed.

The ABS will be transparent about management of any low response scenarios and will publish the principles used to address these. Potential response rate trigger points will form part of this approach. It will also be informed by recent international experiences.

Consistent with our commitment to transparency around the use of data, updates will be published on the [Using administrative data for the 2021 Census](#) page.

Recommendation 5

Update privacy policy to reflect changes associated with this project.

Agreed.

In addition to the ABS Privacy Policy, there is a 2021 Census Privacy Statement and 2021 Census Collection Notices covering how personal information and administrative data are handled. These documents will be available on the ABS website (www.abs.gov.au/privacy) and the 2021 Census website.

Recommendation 6

Work with data custodians to meet APP 5 requirements.

Agreed.

The ABS acknowledges the value in working with data custodians to more consistently notify individuals about the collection and uses of personal information by the ABS. As noted in the [Response to the Multi-Agency Data Integration Project \(MADIP\) PIA Update](#), the ABS will encourage data custodians to enhance transparency about how they share data with the ABS. The ABS will provide data custodians a link to an ABS web page explaining its administrative data use. This could be included in privacy notices or other information materials.

Recommendation 7

Develop and deploy a communications plan and identify additional methods for informing individuals about admin data use.

Agreed.

The ABS is committed to openness and transparency about its use of administrative data. An Administrative Data Communication Plan is being developed.

Recommendation 8

Use meaningful, plain-English terms in communications to individuals.

Agreed.

The ABS understands the value of using meaningful, plain-English terms in all communication with individuals. The Administrative Data Communication Plan includes a review of all website information to ensure it is clear, in simple language and easy to understand.

Recommendation 9

Clarify that admin data will not be used for enforcement.

Agreed.

The ABS does not collect, use or release administrative data for compliance or enforcement purposes. Like other data collected by the ABS, administrative data is collected under the [Census and Statistics Act 1905](#) and is used for statistical purposes only. The data remains secure and confidential.

The 2021 Census Privacy Statement outlines how administrative data is used and retained and the statement reinforces that these purposes are excluded.

Recommendation 10

Conduct and publish further in-depth analysis of the level of improvement to Census data the use of electricity data would bring about before proceeding with any future uses.

Agreed.

The ABS will not use electricity data at the dwelling level for the 2021 Census, it will only be used at an area level and will not identify individuals.

The ABS is committed to openness and transparency about its use of administrative data. Information on how administrative data can be used to benefit the Census will be published and updated on the [Using administrative data for the 2021 Census](#) page.

Recommendation 11

Explore options to reduce the amount of data collected in the event that ABS pursues use case 3 (data repair for reduced response across the board or from a natural disaster).

Agreed.

If the ABS pursues use case 3, the ABS will consider the extent of data required and if needed an additional PIA will be undertaken. It is not possible or intended that administrative data replace all of the comprehensive data collected from the Census.