



# Maddocks

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3 June 2020

Celia Moss  
Acting General Manager  
Statistical Data Integration Division  
Australian Bureau of Statistics

Dear Ms Moss

In April 2020, Maddocks was engaged by the Australian Bureau of Statistics (**ABS**) to provide the ABS with independent advice, review and assurance in relation to the ABS' conduct and content of the Privacy Impact Assessment for the ABS Cloud DataLab (**the PIA**).

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

## 1. Findings

- 1.1 We confirm that, based on the information provided to us, the ABS appears to have undertaken the PIA process consistently with the 10 steps set out in the Office of the Australian Information Commissioner's (**OAIC**) *Guide to undertaking privacy impact assessments (Guide)*. We also consider that the conduct of the PIA is consistent with the requirements of Australian Privacy Principle 1 in the *Privacy Act 1988* (Cth) and the *Privacy (Australian Government Agencies – Governance) APP Code 2017* (noting that that the PIA was conducted as the shift to a cloud-based platform represented a significant change to the way ABS delivered a current function).
- 1.2 We note that as part of the consultation process undertaken by the ABS in relation to the Update to the Multi-Agency Data Integration Project (MADIP) PIA in mid to late 2019, stakeholders were asked for their broad perceptions of the shift of the ABS DataLab to be hosted on a cloud services platform. We understand that the views of those stakeholders, particularly in relation to the security measures of a cloud-based solution, have informed the PIA.
- 1.3 Based in the information provided to us, the analysis in the PIA appears to be appropriate, and the recommendations in the PIA seem to us to be relevant and practical. We consider that the PIA will assist in addressing potential privacy issues with the ABS Cloud DataLab, and in meeting community expectations in relation to transparency of practices associated with the handling of personal information by the ABS.

## 2. Completed work

- 2.1 Our findings above are based on the following work which was undertaken in relation to the PIA, from our engagement until to the date of this Assurance Report:
  - 2.1.1 We workshopped issues with the ABS on 21 April 2020 and 5 May 2020.
  - 2.1.2 We reviewed and commented on drafts of the PIA on 21 April 2020, 10 May 2020 and 2 June 2020.



2.1.3 On request, we attended a meeting with a data custodian on 19 May 2020 to assist with the ABS' discussions about the draft PIA.

**3. Qualifications and Assumptions**

3.1 In preparing the above work, we have assumed that any factual matters in the PIA are complete and accurate. We have not independently verified or confirmed any of the information on which the ABS' analysis is based.

3.2 The analysis, findings and recommendations in the PIA are those of the ABS. While Maddocks has reviewed drafts of the PIA and provided comments to the ABS (including on recommendations and approaches to drafting), it was a matter for the ABS as to whether or how those comments were addressed, after consideration of all relevant matters.

Maddocks would like to thank the ABS for the opportunity to work with it on this matter, and on its preparedness to consider our advice in relation to the PIA.

Yours sincerely

Katherine Armytage  
Partner