

Response to the independent Privacy Impact Assessment for the National Health Survey Linkage Project

August 2018

In 2018, the ABS commissioned an independent Privacy Impact Assessment (PIA) for a project to link the ABS 2014/15 National Health Survey (NHS) to the Multi-Agency Data Integration Project (MADIP) datasets. The PIA examines the privacy considerations of the project and outlines strategies to mitigate any residual privacy risks before the project moves into an operational phase.

The NHS is an important source of information about the health of Australians including self-assessed health status, prevalence of long-term health conditions, health risk factors such as smoking, overweight and obesity, alcohol consumption and exercise, and use of health services.

There has been a long standing interest from policy-makers and researchers in linking the NHS dataset to key government datasets such as health, education, and social services, to better understand the impact of health status and health conditions, on participation in social and economic life.

Linking the NHS dataset to the MADIP provides a significant opportunity to look at the interaction between lifestyles, risk factors and health conditions, and the government services that are being provided and the benefits that are being paid. This project could provide more detailed insights into the effectiveness of government policies, services and programs, by taking health, wellbeing, and socio-economic characteristics into account.

The PIA acknowledges there are strong measures in place to protect privacy for the NHS Linkage Project, including legislative safeguards, application of the separation principle, and restricting the use of data to research and statistical purposes which benefit the Australian community.

The PIA makes four recommendations to manage residual risks, and optimise compliance with the Australian Privacy Principles. The ABS agrees to the recommendations in the PIA, and is taking actions to further strengthen the privacy management of this project.

ABS is committed to upholding the privacy, secrecy and security of personal information, and to being transparent and open about the project.

RECOMMENDATIONS

Recommendation 1: Minimisation of data collection

The NHS Data Linkage Project should require the minimisation of personal data collection at both the initial data linking stage and the research access stage

Agreed.

Data minimisation (including data categorisation such as grouping information into yes/no responses or bands such as age ranges) is a key feature of the NHS Linkage Project. MADIP governance arrangements – which will govern the linkage project – ensure that only data which are necessary for an approved purpose (such as linkage or analysis) are shared, and that access is only provided to data needed for authorised research and statistical purposes. These arrangements are consistent with the [High Level Principles for Commonwealth Data Integration](#) under which the project is conducted.

Where appropriate the ABS will aim to use data categorisation rather than specific data fields. However, in some cases, researchers will require detailed data fields when making use of the analytical data available. Where access is provided to detailed data fields, ABS is committed to providing access to this data in a secure and safe way to ensure that the privacy, secrecy, and security of that data is maintained.

Recommendation 2: Amend privacy notices to clarify the role of data integration

NHS privacy notices to be reviewed and amended to clarify the role of data integration.

Agreed.

The ABS is reviewing the approach materials provided to persons selected in surveys, to ensure materials give clear information about how the data may be used, including for data integration purposes. This will assist in increasing transparency about the ABS activities associated with data integration.

Recommendation 3: Assess data quality benefits and risks

The NHS Linkage Project should be subject to an initial evaluation/assessment regarding the potential data quality benefits and risks.

Agreed.

The ABS is undertaking a feasibility study into the quality of NHS data linking. We will publish the results and methodology, and discuss how the data can be used. We will also provide information about quality to researchers to inform use of the data.

Recommendation 4: Strengthen and enhance NHS Linkage Project governance arrangements

The ABS needs to continually review, strengthen and enhance the NHS Linkage Project governance framework.

Agreed.

The NHS Linkage Project will be managed according to existing [MADIP governance arrangements](#). As the accredited Integrating Authority for the project, the ABS manages all data in the MADIP (including the NHS) in accordance with legal and best practice requirements for managing personal information. Aspects such as data minimisation and security are reviewed on an ongoing basis. Assessment and compliance audits will be undertaken regularly.