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Advisory Board Consolidated Review Report

Date:	1st November 2019
Paper:	Office of the National Data Commissioner - Discussion Paper and Privacy Impact Assessment[1]
Board/Committee(s):	ACS Data Sharing Committee (TAB)

Recommendation(s):	The ACS response makes reference to the 2018 ACS paper on Data Sharing[2,3] and notes a 2019 paper is soon to be released which will describe governance frameworks based on controls and considerations of Sensitivity of data and outputs, and the level of Personal Information in datasets and outputs. The ACS makes 4 additional recommendations to improve governance when delivering services based on people-centred data to aid trust building and understanding with the community.
	Recommendation 1:
	In addition to tracking and recording data sharing projects, each data provider (for example, government agency) provide metrics on datasets / records shared, and data quality measures.
	These metrics should be provided to a central scorecard maintained and shared by the National Data Commissioner. This will raise public awareness of what is been shared and supports building of a central register of all the datasets government holds and their use (which is a requirement of their Digital Continuity 2020 agenda[4]).
	The data quality aspect is an important factor for transparency, builds confidence in decisions made based on the data - especially with growing interest in data flows and automation in the immediate future - where quality is an issue. A version of this scorecard should be made publicly available.
	Recommendation 2:
	Extra consideration should be given to Indigenous data sovereignty and shared data for people under 18. This extra consideration should include moral and ethical aspects and these extra considerations made public
	Recommendation 3:
	Extra consideration should be given to appropriate use of data driven insights and data driven decisions including automated use of data driven decisions (including AI). Ethical consideration of AI and the associated access and use of big data requires specific attention.
	The development of the Ethical Framework for AI by Australian Government Department of Industry, Innovation and Science (DIIS) is important and strongly supported but, would benefit from broader engagement across industry and university research sectors.

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[1] https://www.datacommissioner.gov.au/

[2] ACS Data Sharing Frameworks (28 Sep 2017) https://www.acs.org.au/insightsandpublications/reports-publications/data-sharing-frameworks.html

[3] ACS Privacy in Data Sharing – A Guide for Business and Government (23 Nov 2018) - https://www.acs.org.au/insightsandpublications/reports-publications/privacy-in-data-sharing.html

[4] http://www.naa.gov.au/information-management/digital-transition-and-digital-continuity/information-is-interoperable/index.aspx

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Recommendation 4:

To demonstrate the value of data sharing and continue the support for an annual report of case studies to be provided where data sharing has realised the benefits of human services. This report should be publicly available and come from the Commissioner's office.

Key Points:	• Data sharing for real time authentication (the intention of a single identity for government services) is quite different to batch data sharing
	• The Right to Forget principle should be reconsidered in light of data being in more places than before.

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