



27 July 2018

The Department of Prime Minister and Cabinet
PO Box 6500
Canberra ACT 2600

New Australian Government Data Sharing and Release Legislation

Thank you for the opportunity to comment on the consultation paper discussing the New Australian Government Data Sharing and Release Legislation.

ABA members recognise that expanding access to public sector data for departments and researchers can facilitate better-informed decision-making and more targeted and efficient government service provision.

ABA members are interested in commenting on this consultation paper for two reasons. Firstly, banks are significant providers of data to the Government and regulators including taxation and lending data. Secondly, banks have a stake in the success of government data sharing given any breaches could undermine Australians' confidence in data sharing initiatives more broadly like open banking.

The consultation paper outlines a risk framework that seeks to ensure that data is used appropriately and for the public good. ABA members would note that strong protections around privacy and data security, together with a solid liability and dispute resolution framework are critical to successful implementation. Data sharing must take place within a secure framework where privacy is respected, and adequate dispute resolution is in place.

Privacy is paramount to ensure that Australians remain confident that the Government is appropriately using their data. Special care must be taken to ensure that data thought de-identified cannot be easily identified through relatively simple manipulation and analysis.

In the case of banking data, we would ask that data is provided at a sufficiently aggregated level that ensures that a customer's identity could not be deduced. For example, insufficient aggregation for post code level data could reveal borrowers' information in areas of low population.

Data users should be periodically audited to ensure that they continue to meet a strong accreditation framework that ensures that data is not misused or insecurely stored. Data sharing agreements should contain consistent requirements that ensure that data providers and users understand their responsibilities.

Thank you again for the opportunity to provide a few observations on the consultation paper. If you have any further queries, please don't hesitate to contact me on the details below.

Yours faithfully

Pip Freebairn
Policy Director