# Application for accreditation as an Integrating Authority against the interim accreditation scheme

## Summary version

<table>
<thead>
<tr>
<th>Applicant:</th>
<th>Queensland Government Statistician’s Office</th>
</tr>
</thead>
<tbody>
<tr>
<td>Auditor:</td>
<td>PricewaterhouseCoopers</td>
</tr>
<tr>
<td>Date accredited:</td>
<td>5 October 2018</td>
</tr>
</tbody>
</table>

The Queensland Government Statistician’s Office (QGSO) is Queensland Government’s lead statistical authority, providing trusted statistical and demographic research services, information and advice for Queensland and the Queensland Government. QGSO has a long history of providing information to inform and support decisions of importance to Queensland. The enactment of the *Statistical Returns Act (Qld)* (SRA)\(^1\) in 1896 created the position of Government Statistician for Queensland and authorised that person to collect, compile and disseminate statistical information. Throughout its history, QGSO has evolved and expanded. Since 1988 QGSO has been located in Queensland Treasury. Queensland Treasury works collaboratively with other local, state and commonwealth government agencies and consults with private sector organisations to provide the government with the best possible information to support the government’s policy and service delivery priorities. Within this context, QGSO’s vision is to support better decision making to advance Queensland - it is committed to sharing knowledge, enabling access to information products and services and providing statistics and information to government, business and the community in accordance with its service charter. QGSO also has an important co-ordination function with respect to the statistical needs of the Queensland Government.

Important note: Responses to the following criteria refer to QGSO’s data integration practices, processes and environment at the time of applying for Integrating Authority accreditation. Responses relating to future high risk data integration projects involving Commonwealth data are referred to as *Integrating Authority Projects (IAPs)*.

The summarised application can be found on the following pages of this file. For further information about the application contact:

---

Secretariat
Phone (02) 6252 7198
Email: statistical.data.integration@abs.gov.au
Criterion I – Ability to ensure secure data management

Auditor rating against criterion I – compliant

I(a) How does your agency adhere to the separation principle? Provide details of how only that information, from datasets to be linked, that is required to perform specific tasks is made available to those people performing the tasks. Specifically:

- linking separation (where those people performing the linking of the datasets can only access those parts of the datasets to be linked that are required to complete the linkage).
- analysis separation (where those people performing analysis of the linked datasets can only access those parts of the datasets required for the analysis).

QGSO recognises the importance of separating identifying data and content information to protect the privacy of individuals and other entities. We broadly apply the separation principle to linkage projects and have experience applying the full separation principle where agreed with data custodians. QGSO will apply the full separation principal to IAPs.

Current practice – partial separation principle

Most Queensland government data custodians prefer providing one complete dataset (including both linkage and content data) to the QGSO Data Integration team as:

- this reduces the workload for data custodians - only one extract is required; and
- de-identified content data (together with linkage keys) can then be released by QGSO to approved users for analysis with terms and conditions set by the Government Statistician under the SRA.

An added advantage is that linkage quality is maximised when the linkage team have access to content data. This is similar to the data linkage approach used by the Statistics New Zealand Integrated Data Infrastructure.

Where partial separation is applied, it is done so via role separation. QGSO restricts data access to the linkage team using secure folders (data linkers may access both identifying linkage and de-identified content data). The separation principle is applied for analysis in that the identifying linkage data are not released to analysts, who can access de-identified content data and linkage keys for analysis.

Current practice – full separation principle

QGSO applies the full separation principle when agreed with a data custodian by using external (or custodian) based separation. As an example, the Mental Illness and Offending project required linking of health, criminal justice and other administrative data, provided by data custodians in Queensland Health (QH) and other Queensland Government agencies. The full external separation was applied to Queensland Health (QH) data however not to all custodians’ data. QH sent QGSO the identifying health linkage data only. QGSO linked this data to the criminal justice and other datasets and provided the linkage keys back to QH to enable the selection of the content data relevant to the project. De-identified health data and linkage keys were sent directly from QH to the external university researchers. QGSO accessed the health linkage data only and the researchers accessed the health content data and linkage keys only. Nobody outside of QH was able to access both the identifying health linkage data and content data.

Integrating Authority Projects (IAPs)

Full external (custodian) separation will be implemented for high risk data integration projects. This means that linkage and content data will be separated at source so that no person other than the data custodian will have access to both.
# Integrating Authority Projects (IAPs) – governance model

QGSO is committed to the principles of good governance and project management across its work program. As such, all IAPs will be managed and supported via an overarching governance and project management framework based on QGSO’s current practices. Project management principles will be applied throughout an IAP's lifecycle. QGSO’s project management is role-based and applied via the Project Team Model.

IAPs will be conducted in the QGSO’s Statistical Collection Integration and Analysis (SCIA) group – a work area that operates using a project and quality model containing up to 14 project team roles and internationally certified project stages and processes.

I(b) How does your agency's audit program (internal and external) ensure the continued security of data?

**NOTE:** If your agency complies with the *Australian Government Protective Security Policy Framework* (and can demonstrate this to the auditor) the remaining questions under criterion I do not need to be answered so proceed to question Ila. Otherwise, please complete the following questions.

The QGSO’s Statistical Collection Integration and Analysis (SCIA) group applies a range of information security controls, maintains secure ICT systems and conducts an internal audit program informed by its Risk Management Plan to regularly check access to secure drives and folders, including those used for secure data linkage projects, which contain confidential and sensitive information.

SCIA proactively applies security classifications to published and unpublished information and conducts an annual audit of the Queensland Government’s Open Data site.

QGSO can audit data recipients and users through a clause in its standard *Data Transfer and Use Agreement* and has a program of annual review of data released under the SRA. The review includes checking whether data access is still required and that lists of authorised data recipients are current, i.e. the appropriate people have signed a *QGSO Deed Poll* or *Conditions of Disclosure*. If access is no longer required recipients are required to delete, and if appropriate return the data. If additional users of the data are requested additional approval processes are enacted.

I(c) Do employees (including contractors) undergo police checks upon employment?

Yes. Criminal history screening must be undertaken for all prospective employees prior to appointment. Further to this, disclosure of serious disciplinary action taken against a potential appointee in the Queensland public sector must be disclosed. The Queensland Treasury area responsible for ICT delivery undertakes police checks for direct contractor engagements and Queensland Government whole-of-Government panel arrangements also place this requirement on service providers.

I(d) How is access to the agency’s premises controlled? Provide details.
QGSO’s data integration activities are undertaken in a secured area on Level 22 at 1 William Street (1WS), Brisbane. Access to this building is monitored and controlled via building access cards which must be used to enter and exit the building and security guards are on site 24/7. All staff are required to wear their Government identification cards at all times when in the building. Visitors are escorted at all times and must wear a ‘Visitor’ pass. The QGSO physical secure work area on level 22 is only accessible by QGSO staff and corporate areas that support QGSO’s work. This is controlled and monitored via access card and security.

Staff working on high risk data integration projects involving Commonwealth data will work in separate spaces with additional privacy screening.

I(e) How is your agency’s Internet gateway secured?

Data integration projects are undertaken within the secure QGSO environment within the Queensland Treasury network and further secured with approved access to secure folders determined by role. Secure transfer of data for IAPs will be via the Queensland Treasury Secure File Sharing system on the Kiteworks platform.

QGSO uses a Queensland Government managed Gateway. Internet connectivity for Queensland Treasury is provided from behind the Queensland Government service provider (CITEC) firewall. It connects to the internet via CITEC’s managed internet service and the Queensland Treasury Next-Generation Firewall. Queensland Treasury manages its Next-Generation Firewall and an Application Security Manager as primary security perimeter defence.

Internet traffic passes via the Queensland Government Network (also managed by CITEC) to the Queensland Treasury IaaS provider. The IaaS Private Cloud provider was procured under a panel arrangement and assessed by DSITI to be suitable to host IN-CONFIDENCE data and workloads for the Queensland Government.

Queensland Treasury manages virtual networking as part of the IaaS Private Cloud and basic network segmentation is in place. Delegated access to servers is provided to a small number of administrators and servers are patched monthly as are security appliances. Critical vulnerabilities for security appliances are patched within 24 hours. Access to most Queensland Treasury systems is secured using Active Directory integrated authentication including the systems used by QGSO for data linkage. With the LinxMart application, users must be authorised to access the LinxMart web portal; the application monitors the account user that is active within the application; and maintains a record of which user created, modified or deleted data within the application.

The IaaS provider, CITEC and 1WS building integrator manage physical network appliances for Queensland Treasury such as routers and switches under separate contractual agreements. These networks have been assessed as suitable for IN-CONFIDENCE data.

I(f) Does your agency have an Information Security Policy and procedural plan (including protective control of data, secure ICT access and documented procedures)? Please specify key elements of your Information Security protocols.

Yes. In keeping with requirements of Information Standard – IS 18, the Queensland Treasury Information Security policy describes the mandatory requirements to be met by Queensland Treasury when establishing, implementing and maintaining information security.

The policy applies to all persons (‘users’) who use Queensland Treasury’s information, ICT facilities and devices. The policy states in Key Principle 1 that Queensland Treasury management must annually endorse an Information Security Plan that is based on the mandatory clauses of IS18 and aligns with agency business planning, general security plans and risk assessment findings. The policy also states in Key Principle 2 that Queensland Treasury must implement procedures for the classification of protective control of information assets to classify information assets and assign appropriate controls in accordance with the Queensland Government information security classification framework.
Criterion II – IAs must demonstrate that information that is likely to enable identification of individuals or organisations is not disclosed to external users

Auditor rating against criterion II – compliant

II(a) How will safe data access be provided?

Please provide details of the proposed method. For example:
- providing access to data that are not likely to enable identification of individuals or organisations via on site data laboratories
- providing access to data that are not likely to enable identification of individuals or organisations via secure remote access facilities
- review of data by appropriately skilled internal staff to ensure data is appropriately confidentialised before release
- provision of only confidentialised files to users (e.g. using formal algorithms to apply confidentiality)
- other - specify.

As an extra protection, in addition to one of the methods above, IAs may also restrict access to endorsed applicants (similar to the restrictions placed on access to Confidentialised Unit Record Files by the ABS, for example).

NOTE: Any of these options is acceptable provided the applicant can demonstrate safe practices. The application will need to include details of how the IA confidentialises data.

QGSO operates under the Information Privacy Act 2009 (QLD) and Statistical Returns Act 1896 (QLD), protecting the privacy, secrecy and confidentiality of information according to these Acts and employing systems and processes to ensure that information that is likely to enable the identification of individuals or organisations is not disclosed to external users. These systems and processes are further supported by the culture and values of QGSO staff.

The Government Statistician may release linked data in a number of ways in accordance with legislation and policy, including de-identified but not confidentialised; or de-identified and confidentialised. Data of a confidential or personal nature which is de-identified but not confidentialised prior to release is controlled by the terms and conditions specified in a Data Transfer and Use Agreement or other agreement and the relevant Deed Poll or Conditions of Disclosure which each recipient is required to sign prior to accessing the data. These documents include, among other things, clauses prohibiting:
- the unauthorised release of data to a third party;
- attempts to ascertain the identity of an individual or organisation; and
- publication of data which may allow an individual or organisation to be identified.

It is a condition of access that researchers provide QGSO with an opportunity to review publications based on linked data prior to release to ensure that this last condition is met.

QGSO has expertise in confidentialising data such as survey unit record files for release. The confidentialisation techniques most commonly used by QGSO are:
- aggregating data, for example by collapsing categories; and
- suppressing data, for example by removing selected variables.

These techniques will be applied to IAP outputs where confidentialisation is required by data custodians.

For Integrating Authority projects a final approval clearance document will be created which will summarise the data to be released including how it was created, confidentialised and quality assured. This document will be provided to the Government Statistician for final approval before any IAP data is released.

Confidential or sensitive data is transferred electronically via the Treasury Secure File Sharing system which encrypts data using Secure Socket Layer (SSL) SHA256 encryption and uses two-factor authentication.
### Criterion III – Availability of appropriate skills

**Auditor rating against criterion III – compliant**

#### III(a) What expertise and experience does the agency have to undertake high risk data integration projects?

If your agency does not have this expertise or experience, what strategies are in place to acquire the necessary expertise to undertake a high-risk integration project?

**NOTE:** Relevant skills to consider include: expertise in linkage and merging functions; expertise in privacy; expertise in confidentiality; information management skills; ability to provide useful metadata to data users; and appreciation of data quality issues.

QGSO has a long history of conducting high quality research, data analytics and statistical projects for the Queensland Government, and at the national level. The office has a great deal of experience in the areas of confidentiality, privacy, information management, metadata and data quality developed and demonstrated over many years of conducting surveys, managing administrative datasets on behalf of other agencies and analysing and disseminating data to a range of clients (see QGSO website).

QGSO’s expertise in managing confidential information is well recognised and Queensland Government agencies seek QGSO advice and assistance with these matters.

QGSO has conducted data linkage and de-duplication for many years in support of statistical activities including preparing and maintaining survey frames and management of large administrative datasets such as the Queensland Courts database. Since 2013 QGSO has undertaken probabilistic and deterministic data linkage to directly inform research and evaluation projects for Queensland Government clients.

More recently the office has expanded its data integration activities to conduct data linkage for university based researchers. The largest and most complex of these projects has been a large scale linkage for the project *Understanding the relationship between mental illness and offending: Implications for crime prevention and the management of mentally ill offenders*. QGSO linked over 3 million records from a range of datasets for this project which involved collaboration with a range of researchers, data custodians and the Queensland Health Statistical Analysis and Linkage team. Data was managed via a range of mechanisms including data agreements and deed polls, secure folders, and meticulous record keeping including data management spreadsheets. A comprehensive data linkage report was prepared for the researchers including a description of the linkage methodology, results and quality measures.

All code used to prepare, link, merge or analyse data is quality assured and a random sample of groups are manually reviewed to ensure linkage quality. LinXmart produces 32-character alpha numeric linkage keys unique to each export request to provide additional security.

#### III(b) What documentation and training is available to ensure staff have the appropriate skills and knowledge required in high risk data integration projects?

All staff in QGSO’s Statistical Collection Integration and Analysis (SCIA) group undertake annual in-house training in a range of areas including privacy and project management and a range of procedures, templates and guidelines under the QMS. QGSO staff will also undertake training in the Commonwealth *Privacy Act*. Documentation for data linkage specifically includes:

- Data linkage guideline (broad principles)
- Agreement and Deed Poll templates (which manage data access and use)
- Data Linkage Application (specifying information required to assess potential linkage projects)
- Costing template
• QA checklist
• Data Linkage Report template
• Spreadsheets and calendars managing data request and release under the SRA.

QGSO highly regards relevant qualifications. The most critical core capabilities for success in a role in SCIA and thus the Data Integration team are:

• Analysis and use of evidence – ability to identify and analyse situations and issues, gather appropriate evidence, consider options and make sound decisions;
• Professional excellence – has a commitment to personal and professional/technical growth. Shows initiative, innovation and self-awareness and are willing to learn and share knowledge;
• Influential communication – listens, interprets and conveys information in the best way, selecting the most appropriate and influential method of communication;
• Managing relationships – achieves outcomes because of ability to collaborate and cultivate productive working relationships;
• Achieving results – excellent outcomes are achieved because of ability to be solutions focused and methodical, ability to manage risks and issues and drive intended results.

QGSO data linkage and integration expertise is largely developed on the job with new team members being mentored by more experienced staff.

As data integration is such a rapidly evolving field relevant QGSO staff attend a range of forums designed to share knowledge and expertise with other linkage bodies and linked data users. SCIA are members of the Queensland Health Data Linkage Reference Group and attend and present to this group’s annual data linkage symposium. Although not a member of the Population Health Research Network (PHRN), SCIA participates in the PHRN Technical Forums to maintain close ties with key members of the PHRN such as the Curtin University of Technology’s Centre for Data Linkage. SCIA keeps up to date with emerging issues and priorities in this area through participation in a range of national and Queensland committees and working groups.
<table>
<thead>
<tr>
<th>Criterion IV – Appropriate technical capability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Auditor rating against criterion IV – compliant</td>
</tr>
</tbody>
</table>

**IV(a)** Does your agency have secure IT infrastructure, including hardware and software systems, and the capacity to support the potentially large and/or complex files associated with high risk data integration projects? Give a brief evidentiary statement.

As a statistical office, QGSO’s core business involves collecting, storing and disseminating large amounts of data. The existing technical infrastructure combined with QGSO’s data management experience provide it with the capacity to support the potentially large and/or complex files associated with high risk integration projects. In addition to linkage project data, QGSO deals with a range of large and complex files, such as survey population frames and Australian Gambling Statistics (AGS) and Queensland Regional Profiles (QRP) datasets. For the project *Understanding the relationship between mental illness and offending: Implications for crime prevention and the management of mentally ill offenders*, QGSO managed and linked over 3 million records from a range of datasets, including highly sensitive and complex data such as child protection and domestic violence. Data for this project were stored in secure folders accessible only by the project team. Data access within QGSO was authorised by the Assistant Government Statistician with real time alerts used to monitor and manage access changes.

QGSO uses a range of software and tools to facilitate data integration. This includes
- LinXmart (developed by Curtin University Centre for Data Linkage) for large scale multiple dataset linkages.
- In-house developed rLink for de-duplication of datasets or linkage of smaller numbers of datasets
- Febrl for data standardisation
- Excel and SAS to manipulate data inputs and outputs, and track data requests and releases
- Kiteworks for secure data transfer via the Queensland Treasury Secure File Sharing system.

**IV(b)** How does the system track access and changes to data to allow audits by date and user identification? Does the system ‘footprint’ inspection of records and provide an audit trail?

All access to QGSO information is controlled on a need to know basis and access to folders containing confidential data is restricted to authorised project team members via Active Directory security. All Statistical Collection Integration and Analysis group team leaders are alerted in real time to changes to secure folder access and access lists are audited six-monthly.

With the LinXmart application, users must be authorised to access the LinXmart web portal; the application monitors the account user that is active within the application; and maintains a record of which user created, modified or deleted data within the application. Data within the LinXmart database tables can only be viewed by a small team of authorised LinXmart users. Only data required for linkage is stored within the application.

**IV(c)** What IT support is in place for staff?

QGSO is comprehensively supported by an IT Desk between the hours of 7.30am and 5pm, Monday to Friday, supported by a range of infrastructure and network specialists, Database Administrators and data managers. Online self-help guides are available on specific ICT issues, such as resetting passwords. The LinXmart licence agreement with Curtin University of Technology includes telephone support and email enquiries.
<table>
<thead>
<tr>
<th>Criterion V – Lack of conflict of interest</th>
</tr>
</thead>
<tbody>
<tr>
<td>Auditor rating against criterion V – compliant</td>
</tr>
</tbody>
</table>

V(a) Does the agency have a compliance monitoring or regulatory function? If yes, describe how this function will be separated from integration projects undertaken for statistical and research purposes to avoid this conflict of interest.

No. The QGSO operates under *Statistical Returns Act* (SRA) (QLD). Any information collected by QGSO under the SRA is bound by the secrecy provisions of the Act. This prohibits any person divulging or communicating any information obtained under the Act except in accordance with a direction from the Queensland Government Statistician.
Criterion VI – Culture and values that ensure protection of confidential information and support the use of data as a strategic resource

Auditor rating against criterion VI – compliant

<table>
<thead>
<tr>
<th>VI(a) How is an appropriate culture and values embedded in the agency’s corporate plan/mission statement/policies etc?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Like all statistical organisations, privacy is a foundation of QGSO – protecting privacy is a priority for QGSO staff, thus setting the culture of the organisation. As Queensland Government employees, QGSO employees are bound by the PSE Act, the principle Act governing the establishment, operation of, and employment in the Queensland public sector. The code of conduct for the Queensland Public Service (the code) forms a guide to the ethical standards of behaviour across QGSO and Queensland Treasury. All staff are required to complete an online training package which supports the sector-wide code of conduct every two to three years. The culture and values are re-enforced in the staff induction process and QGSO and Queensland Treasury policies and procedures further support this culture.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>VI(b) How have staff been trained in requirements for protecting personal information and how are they made aware of policies regarding breaches of security or confidentiality?</th>
</tr>
</thead>
<tbody>
<tr>
<td>QGSO ensures that all staff are made aware of and comply with, the organisation’s privacy requirements. Staff are initially made aware of the confidentiality and privacy requirements as part of the recruitment process and then further upon engagement, at which time they are required to sign a Deed of confidentiality (see 6c) which outlines their legislative obligations and responsibilities relating to privacy and confidentiality. All staff in the Statistical Collection Integration and Analysis group undertake annual in-house training in a range of areas including privacy and information security. All training is approved, recorded and reported in the quarterly Management Review reports in the Quality Management System.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>VI(c) Do staff sign undertakings related to secrecy and fidelity?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes. QGSO staff sign a Deed of Confidentiality upon engagement with the organisation. This Deed places a lifelong obligation on all QGSO employees, contractors and consultants to maintain the secrecy of the information collected under the Statistical Returns Act (SRA). Penalties including fines and imprisonment apply to breaches of the SRA. In addition, as a Queensland government body, QGSO complies with the Information Privacy Act and handles personal information in accordance with this legislation.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>VI(d) What mechanisms are in place to engage with stakeholders to maximise the usefulness of the data holdings?</th>
</tr>
</thead>
<tbody>
<tr>
<td>QGSO have a number of mechanisms in place, both technical and procedural, to assist stakeholders in maximising the usefulness of data. QGSO provides data user support, i.e. documentation (e.g. Data Dictionary and Explanatory Notes) and responds to client queries. QGSO keeps up to date with emerging trends and liaises with stakeholders about data availability and research questions the data may be able to answer. QGSO acts as a data broker using the provisions of the SRA to acquire data. QGSO actively engages with researchers, custodians and data users to ensure that a balance is maintained.</td>
</tr>
</tbody>
</table>
between maximising the use of government data while promoting data quality and protecting individuals' privacy and confidentiality. One way in which QGSO actively engages is via the coordination of a range of interest groups including the Births and Deaths Working Group, the Indigenous Statistics Network and more general Statistics Networks including federal, local and state government participants. The office participates in a wide range of other committees and working groups including project specific groups like the ARC Steering Committee for Understanding the relationship between mental illness and offending and more general forums.

<table>
<thead>
<tr>
<th>VI(e) How does your agency provide for valuable use of the data i.e. how does it maximise the value of data for users by providing them with access to as much data as possible while still protecting confidentiality?</th>
</tr>
</thead>
<tbody>
<tr>
<td>QGSO actively engages with researchers and custodians to ensure that a balance is maintained between maximising the use of data while protecting confidentiality. Data are generally de-identified but not confidentialised prior to release for approved projects to ensure maximum usefulness of the data for detailed analyses. Confidentiality and privacy are managed through the terms and conditions set out in the Data Transfer and Use Agreement signed by the research entity and the Deed Polls signed by each individual researcher under the provisions of the SRA. QGSO has the following process for managing multi-user, multi-data set projects in a useful and safe way:</td>
</tr>
<tr>
<td>• One overarching agreement signed with data custodians and users, with each new project added as a separate signed schedule.</td>
</tr>
<tr>
<td>• Deed Polls tailored for each project and signed by each data recipient.</td>
</tr>
<tr>
<td>• Approvals (custodian and relevant ethics or research committees) are required for each new project.</td>
</tr>
<tr>
<td>• All data is protected under the Statistical Returns Act.</td>
</tr>
<tr>
<td>• QGSO is monitoring data access for each project through annual reviews, and ongoing participation in a Steering/project Committee.</td>
</tr>
<tr>
<td>QGSO has experience providing confidentialised data where appropriate, for example in the form of survey Confidentialised Unit Record Files (CURFs) – see Criteria 2.</td>
</tr>
</tbody>
</table>
## Criterion VII – Transparency of operation

**Auditor rating against criterion VII – compliant**

<table>
<thead>
<tr>
<th><strong>VII(a)</strong> Are data retention and data disposal statements publicly available? Provide details.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes. QGSO’s policies and procedures that apply to records management also apply to the management of data. As a Queensland Government Agency, QGSO adheres to the <em>Public Records Act 2002</em> in relation to the lawful retention and destruction of State records. With reference to Commonwealth data, QGSO would adhere to Section 24 of the <em>Archives Act 1983</em> and in accordance with arrangements agreed with the data custodian(s) in relation to the lawful destruction of Commonwealth records. QGSO does not routinely destroy linkage data or other data at the conclusion of data integration projects. At the conclusion of a project data recipients are reminded of their obligations under the terms of their Deed Poll or Conditions of Disclosure including the need to delete and if appropriate return the information. CDs or other hard copies of data which are due to be destroyed can be shredded under supervision by QGSO staff.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>VII(b)</strong> Are details of governance arrangements publicly available? Provide details.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes. QGSO is part of Queensland Treasury and details of the Department’s and QGSO’s structure and governance are publicly available via the Queensland Treasury website and the Queensland Treasury Annual Report. Appointment of the Government Statistician is published in the Queensland Government Gazettes. The Queensland Treasury Service Delivery Statements detail the key service areas and key priorities for the department and including QGSO for each financial year. QGSO’s <em>Data Transfer and Use Agreement</em>, <em>Deed Polls and Conditions of Disclosure</em> which govern linkage projects and access to linked data are not publicly available.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>VII(c)</strong> Where are details of data integration projects published?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Linkage projects involving Commonwealth data will be made available on the Data Integration section of the Open Data Toolkit (Data.gov.au) Public Register of Data Integration Projects (Project Register).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>VII(d)</strong> What other relevant material is published? Examples include data protocols such as microdata access protocols, confidentiality protocols, protocols for linking and protecting privacy; and data integration manuals.</th>
</tr>
</thead>
<tbody>
<tr>
<td>QGSO makes available a range of information on the QGSO website, including: our service charter, our services, our legislative framework and our history as well as more technical information on topics such as presenting statistical information, and statistical standards and classifications. Queensland Treasury also publishes a range of corporate information including strategic plans, annual reports, right to information, privacy policy and complaints reporting.</td>
</tr>
</tbody>
</table>
Criterion VIII – Existence of an appropriate governance and institutional framework

Auditor rating against criterion VIII – compliant

VIII(a) What are the institutional and project-specific governance arrangements for data integration? (Provide attachment or link to where published.)

QGSO’s governance and administrative framework comprises enabling and protective legislation relevant to the collection and publication of statistics for Queensland (the SRA). It also includes a range of laws and policies that guide the conduct of the Queensland public service in general as well as internal arrangements within Queensland Treasury and QGSO to ensure good governance and processes to ensure quality outputs and advice.

Within this context, QGSO’s vision is to support better decision making to advance Queensland - it is committed to sharing knowledge, enabling access to information products and services and providing statistics and information to government, business and the community in accordance with its Service Charter (QGSO website).

QGSO has an established governance and administrative framework to support its current data integration and linkage activities, including a written application. All applications for data linkage projects are considered and approved by the Queensland Government Statistician. This process will be continued for IAPs, but will be adapted to suit IAPs and the additional requirements for high risk projects involving Commonwealth data, including the high level principles for data integration. Outputs for IAPs will also be approved by the Government Statistician. QGSO has a phased approach to Data Integration and Linkage approvals, including initial approval.

The Government Statistician is accountable for all work undertaken by QGSO and is responsible and accountable for the collection and dissemination of statistics with due regard to legislative requirements. An important feature of QGSO corporate governance is the role played by QGSO’s Office Management Team (OMT). OMT advises the Government Statistician. OMT is responsible for overseeing all work undertaken by QGSO including managing the efficient and effective delivery of the QGSO work program, strategic client engagement, project resourcing and prioritisation and dissemination matters. OMT also address issues such as risk management, human resource management, financial management, priority setting and statistical and corporate policy.

The Statistical Collection Integration and Analysis (SCIA) group’s client funded survey processes are accredited with AS/NZS ISO 9001:2008 Quality management systems – Requirements, and SCIA is moving towards accreditation with AS/NZS ISO 9001:2015 by 2018. Under its QMS, SCIA undertakes business and resource planning, quality improvements, risk assessment and management, internal audits based on risk assessment and performance reporting. As SCIA’s project team structure draw on any staff member across the Group to participate in a statistical or research projects all staff are required to be knowledgeable of, and to apply SCIA QMS policies and procedures to ensure processes comply with the international standard. The Data Integration and Research Collaboration (DIRC) team within the SCIA Group, works within the SCIA QMS environment and applies relevant procedures from the QMS to data integration activities. The SCIA DIRC team will be responsible for all data integration activities to be undertaken as an Integrating Authority.

QGSO complies with the IS 18 and the QGISC which sets the minimum requirements for information asset security classification and management for Queensland Government agencies. This framework provides a standard process to allow agencies to evaluate their information assets and determine the appropriate level of security classification that must be applied, addressing the need for a consistent approach to dealing with the sensitivity and confidentiality of information assets across the Queensland Government.

VIII(b) What framework is in place to conduct investigations and handle complaints?

The QGSO Service Charter explains the office’s role, services, service commitment, and how feedback can be provided in relation to any contact with the office. The Queensland Treasury Complaints Management Policy and...
Guidelines (compliant with Directive 13/06 and 08/10 issued by the Queensland Public Service Commission) outlines how Queensland Treasury receives and deals with complaints in a fair, prompt, efficient and confidential manner. It also outlines the complaints management process. The Complaints Management Policy applies to all Queensland Treasury staff, as well as contractors and consultants working with the public on behalf of the department.

The Queensland Treasury complaints management framework is consistent with the requirements of the Australian Standard, Customer Satisfaction – Guidelines to Complaints Handling in Organisations (AS ISO 10002-2006). Complaints in relation to the QAIA would be referred in the first instance to the Assistant Government Statistician (SCIA) for investigation.