**Attachment 1: Proforma for applicants to complete**

Applicants wishing to apply for interim accreditation to undertake data integration projects involving Commonwealth data will need to complete the following template.[[1]](#footnote-1) They will need to attach additional supporting information (e.g. copies of relevant policies and procedures, a copy of the corporate plan, evidence of compliance with the Australian Government Protective Security Policy Framework) to help the Oversight Board and auditor make an assessment.

When making a decision about whether or not to apply for accreditation, integrating authorities will need to consider whether they are likely to have the authorisation required for projects they are contemplating. This will involve discussing obligations and requirements with the data custodian(s).

**Applications must be signed off by the head of the agency[[2]](#footnote-2) or they will not be considered.**

**Contact officer details**

|  |
| --- |
| **This assessment has been completed by:**  **Name:**  **Organisation:**  **Contact telephone:**  **Signature:**  **Date:** |

**Sign-off by the head of the agency**

I have undertaken sufficient review and investigation to ensure in my opinion that the answers and information provided are accurate, and that my organisation has the necessary values, skills and infrastructure to ensure data integration involving Commonwealth data for high risk statistical and/or research projects is carried out in a safe and effective way.

**Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Name** (block letters)**: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Email this form to the data integration secretariat:** [**statistical.data.integration@nss.gov.au**](mailto:statistical.data.integration@nss.gov.au)

|  |
| --- |
| **Criterion I – Ability to ensure secure data management** |
| 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). |
| 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***](http://www.ag.gov.au/pspf) ***(and can demonstrate this to the auditor) the remaining questions under criterion 1 do not need to be answered. Go to question IIa. Otherwise, please complete the following questions.*** |
| I(c)Do employees (including contractors) undergo police checks upon employment? |
| I(d) How is access to your agency’s premises controlled? |
| I(e) How is your agency’s Internet gateway secured? |
| 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. |
| **Criterion II – Integrating authorities must demonstrate that information that is likely to enable identification of individuals or organisations is not disclosed to external users** |
| 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, integrating authorities may also restrict access to endorsed applicants (similar to the [restrictions placed on access to Confidentialised Unit Record Files by the ABS](http://www.abs.gov.au/websitedbs/D3310114.nsf/home/CURF:+Applying+for+CURF+Microdata), 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 integrating authority* *confidentialises data.*** |
| **Criterion III – Availability of appropriate skills** |
| 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.*** |
| III(b) What documentation and training is available to ensure staff have the appropriate skills and knowledge required in high risk data integration projects? |

|  |
| --- |
| **Criterion IV – Appropriate technical capability** |
| 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. |
| 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? |
| IV(c) What IT support is in place for staff? |
| **Criterion V – Lack of conflict of interest** |
| 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. |
| **Criterion VI – Culture and values that ensure protection of confidential information and support the use of data as a strategic resource** |
| VI(a) How is an appropriate culture and values embedded in the agency’s corporate plan/mission statement/policies etc? |
| 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? |
| VI(c) Do staff sign undertakings related to secrecy and fidelity? |
| VI(d) What mechanisms are in place to engage with stakeholders to maximise the usefulness of the data holdings? |
| 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? |
| **Criterion VII – Transparency of operation** |
| VII(a) Are data retention and data disposal statements publicly available? Provide details. |
| VII(b) Are details of governance arrangements publicly available? Provide details. |
| VII(c) Where are details of data integration projects published? |
| VII(d) 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. |
| **Criterion VIII – Existence of an appropriate governance and administrative framework** |
| VIII(a) What are the institutional and project-specific governance arrangements for data integration? (Provide attachment or link to where published.) |
| VIII(b) What framework is in place to conduct investigations and handle complaints for data integration projects? |

1. The interim accreditation arrangements will be tested on Commonwealth government agencies first. The Cross Portfolio Data Integration Oversight Board will not be in a position to consider finalising and extending the arrangements beyond the Commonwealth government until it has reviewed this testing phase. [↑](#footnote-ref-1)
2. The ‘head of the agency’ is the person legally accountable for the activities of the organisation, and those of its staff and affiliates. [↑](#footnote-ref-2)