

16 February 2018

Louise Lilley
Macroeconomic Modelling and Policy Division
The Treasury
Langton Crescent
PARKES ACT 2600
Email: statsdetermination@treasury.gov.au

Re: Automatic sunseting of legislative instruments—Proposal to remake the *Statistics Determination 1983*—Consultation paper

Thank you for the opportunity to lodge a written submission in response to the proposed changes to the *Statistics Determination 1983* (the Determination) as outlined in the abovementioned paper.

Defence Housing Australia (DHA) understands that the Determination is needed to:

- enable the Australian Bureau of Statistics (ABS) to produce detailed statistical outputs in response to demand from policy makers and the wider research community
- ensure the ABS continues to deliver its existing suite of statistical information.

DHA is broadly supportive of the proposed changes. A detailed response against each proposed change is provided at **Attachment 1**.

DHA gives permission for this submission to be published on the Treasury website in its entirety, without change.

Yours sincerely

Mr Ross Jordan
General Manager, Governance
T. 02 6217 8401
E. ross.jordan@dha.gov.au

Attachment

1. Defence Housing Australia's (DHA) response to the proposed changes to the *Statistics Determination 1983*.



Defence Housing Australia's (DHA) response to the proposed changes to the *Statistics Determination 1983*

Proposed change	DHA response
a) Release of information already available to the public (Clause 3)	DHA supports the change.
bi) Release a greater range of business characteristics to a broader range of recipients in the form of a list of businesses (Clause 6)	DHA supports the change.
bii) Simplify the current notification process (Clause 6)	DHA supports the change.
c) Release of information about government businesses (Clause 2)	<p>DHA supports the change, noting that the ABS has a strong reputation for employing best practice methods in order to ensure statistical outputs are released in a manner that is not likely to enable identification.</p> <p>Further, in accordance with the 'five safes' model outlined in the consultation paper (p7):</p> <p><i>'...whether identification is likely or not, is managed by considering the actual data and outputs. For detailed unit record information, this includes considering whether the data to be released has been de-identified to manage risks of spontaneous recognition⁵. For aggregate outputs, consideration includes whether the information has been appropriately confidentialised and whether it can be re-identified if released. For example, are there sufficient numbers of business contributing to a statistic that the identity of a particular business cannot be deduced from that statistic.'</i></p> <p>⁵ Spontaneous recognition is where a user inadvertently recognises a business or organisation in a dataset, without deliberately attempting to identify them.</p>
di) Release of detailed business information with consent (Clause 5(1)(b))	DHA supports the change.
dii) Access to an increased range of de-identified unit record level business information (Clause (7)(1)(b))	DHA supports the change.

