



Submission on the Australian Data Strategy

24 June 2022

The Academy of the Social Sciences in Australia (www.socialsciences.org.au) makes **five key recommendations** to the Australian Data Strategy. These have been developed in consultation with Academy Fellows with expertise on data policy and governance.

If it would be helpful to the Department to expand on these recommendations or to provide further expert feedback, the Academy would be pleased to assist (please contact the Academy's Policy Manager Andrea Verdich; andrea.verdich@socialsciences.org.au if desired).

The Australian Data Strategy is a potentially valuable framework for a whole-of-Government approach to the effective, safe, ethical and secure use of data for the benefit of Australian society.

Noting that the current Strategy will evolve, the Academy has identified five recommendations that would enhance its comprehensiveness and utility.

1. **Stronger emphasis on the social value of data.** The Strategy makes a comprehensive case for the economic and – to a lesser extent – the health and environmental uses and benefits of data. In places it makes high-level reference to the *economic and social value of data*. However, the Academy suggests that the *social* value of data is less clearly articulated in the Strategy than the economic. This is despite the fact that the much of the data in question is inherently social in nature; data about social behaviours, structures and institutions that ultimately affects decisions about people individually and collectively. **The Academy recommends that Section One of the Strategy more comprehensively articulate the social nature and value of data, including through case studies that showcase the transformative impact of data on peoples' lives.** Such examples could include school education, migration policy, NDIS or aged-care service provision.
2. **Coordination of data across jurisdictions and sectors.** The Strategy articulates a strong national data ecosystem characterised, among other things, by data assets and infrastructure shared between the Commonwealth and States and Territories, and between government and the private sector. The Strategy notes that achieving such sharing will depend on the implementation of the Data Availability and Transparency scheme. **In addition to that implementation, the Academy recommends that substantial additional effort will be required in:**
 - a. Explicit incentives to encourage open and collaborative behaviour between data generators and custodians.
 - b. Resources to prepare for and undertake linkage of jurisdictional and sectoral data sets that in many cases will be inconsistent, incomplete, or asynchronous.
 - c. Updates to Commonwealth and State and Territory policies and regulation to harmonise approaches and remove barriers.
 - d. A stronger emphasis on articulating the benefits of linked jurisdictional data.

As an example of this final point, if State and Territory education departments were able to access ATO data on parental income, then it would be possible to implement much more

precise and effective school funding formulas. This would likely result in significant educational benefits for Australian students from lower socio-economic backgrounds.

3. **Governance, trust, and integrity.** The Strategy highlights the importance of data custodians being held accountable. However, with exception of comment on the Privacy Act, the Privacy Code and the Notifiable Data Breaches scheme, the Strategy is largely silent on proactive or responsive mechanisms for dealing with the inadvertent or deliberate misuse of data. The Academy considers that such integrity mechanisms will be critical to ensure public trust and confidence in the National Data Strategy; both with respect to Australians' own data, and in the effective provision of data-informed public goods and services. **The Academy recommends that an effective and streamlined accreditation scheme for data users will be required, with sanctions for breaches.** In this respect, the framework for accreditation of data users under the Data Availability and Transparency Scheme could likely be expanded for this purpose.
4. **Special provisions for Indigenous and cultural data.** The Strategy notes the importance of a whole-of-Government approach to data under the 2020 National Agreement on Closing the Gap and of improving outcomes for Aboriginal and Torres Strait Islander people. However, the Strategy does not consider Indigenous Data Sovereignty (i.e., the right of Indigenous Peoples to govern the collection, management, access, interpretation, dissemination, and reuse of data related to them¹). Neither does it consider the preparedness of some data custodians to share data. This is particularly pertinent in the case of multicultural data (in particular data assets in languages other than English), and with respect to cultural data held by collecting institutions that in many cases have been subject to resource constraints that have significantly reduced capacity for digitisation and other linkage-oriented activities. **In these respects, the Academy recommends that substantial additional effort will be required for:**
 - a. A clear definition of Indigenous Data, and explicit inclusion of Indigenous Data Sovereignty principles. These principles should be developed in partnership with Aboriginal and Torres Strait Islander stakeholders.
 - b. Consideration of approaches to ensuring effective engagement with and inclusion of cultural data custodians.
5. **Data literacy.** The Strategy emphasises the importance of building Australian data capabilities through education and training. This is as a critical foundation for Australia's future and to ensure increased access to nationally important data for research and other bona-fide purposes.

The Academy notes the important focus on data capacity investments in cybersecurity, Artificial Intelligence, next-generation technologies and STEM-graduates (as in Figure 13 of the Strategy). To be effective, data has to be not only collected and analysed properly, but also interpreted, communicated, and understood appropriately. **Accordingly, the Academy recommends that the Strategy is expanded to include focused and interdisciplinary capacity building.** Such capacity building would be essential in areas such as data ethics and data-informed communication, as well as on the general and specific capabilities required to access, work with, and understand a diverse range of valuable social, cultural, and economic data.

¹ Kukutai and Taylor 2016, <http://doi.org/10.22459/CAEPR38.11.2016>; Snipp 2016, <http://doi.org/10.22459/CAEPR38.11.2016.03>