THE UNIVERSITY OF
SYDNEY

Duncan Ivison
Deputy Vice-Chancellor (Research)

6 August 2021

Mr Andrew Lalor
Assistant Secretary
Data and Digital Branch
Policy, Innovation and Projects Division
Department of Prime Minister and Cabinet

By email: AustralianDataStrategy@pmc.gov.au

Dear Mr Lalor,

Australian Data Strategy discussion paper

The University of Sydney welcomes the opportunity to contribute to the development of a national data strategy, released for initial consultation on 20 July 2021.

As a leading educational and research institution, we recognise the importance of creating a national data landscape that will facilitate the responsible sharing of data across and between government and non-government sectors for the benefit of all Australians. We also understand that universities have a vital role to play in continuing to develop the innovative and transformative technologies, processes, skills and workforce capability that will be integral to designing and executing the strategy.

Since 2016, the University has participated extensively in the Department of Prime Minister and Cabinet (PM&C) consultations to develop a coherent national legislative framework to govern and facilitate the safe sharing of data held by Commonwealth agencies for research and other purposes that deliver benefits for the community. We have made multiple submissions and attended numerous workshops and inquiries convened by the Productivity Commission and PM&C through the Office of the National Data Commissioner (ONDC). In 2018, we hosted a successful roundtable for the ONDC with expert researchers drawn from across our disciplines; while in 2021, we offered our strong support for the Government's Data Availability and Transparency Bill 2020 in a submission and through an appearance before the Senate Finance and Public Administration Legislation Committee's inquiry into the legislation.

Our previous advice covered topics including the public benefit of sharing data for research purposes, protection of privacy (particularly in linking of datasets), economic benefits of improved data governance, innovation potential in harnessing data with emerging techniques and technologies (for example, artificial intelligence, digital health) and operational issues relating to data custodians and the accreditation of institutional and individual data users.

Creating a national data strategy presents the Australian Government and invested sectors with a rare opportunity to align our national priorities and legislation with international standards. The coinciding review of our Commonwealth Privacy legislation, combined with the passage of the Data Availability and Transparency Bill, will lay the foundation for a national data strategy that harmonises our data sharing and protection laws with those overseas. The European Union's General Data Protection Regulation (GDPR) has set the standard for data and privacy governance across Europe and the UK, with its principles now

being adopted outside of Europe. Recent data legislation introduced in California and New Zealand - which aligns with the GDPR controls - will result in significant benefits for international research, innovation and economic development.

Australia now has the opportunity to align our national data strategy with these leading international approaches, and is well placed to collaborate with New Zealand to lead the establishment of uniform data and privacy standards across the Asia Pacific.

We recognise that developing a national data strategy is a complex undertaking, which will require extensive consultation with a diverse range of stakeholders. However, we note that this initial request for comment is open for a very short time, limiting our capacity to seek the views of our experts on the PM&C discussion paper.

We are nevertheless very keen for the University and our interested academic experts to contribute to PM&C's development of the national data strategy. We would be delighted, for example, to convene further roundtables with our researchers (whether virtually, or face-to-face when permitted), or to otherwise assist the Department to tap into this considerable resource.

We trust this initial feedback has been helpful and look forward to working with PM&C and other stakeholders to develop an outstanding data strategy in the national interest.

Yours sincerely,

(signature removed)

Professor Duncan Ivison
Deputy Vice-Chancellor, Research