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Department of the Prime Minister and Cabinet  
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## **Australian Data Strategy**

### ***Submission in response to discussion paper***

The University of Sydney welcomes the opportunity to contribute to the formulation of a national data strategy. As a premier research institution, we recognise the value of research data within the university and to the wider community. We are committed to the continuous improvement and maintenance of our data assets and ongoing investment in the systems and people that support them.

The implementation of an effective national data strategy that removes barriers and promotes safe sharing of information could bring enormous benefit to individuals, industry and government. From a research perspective, improved data accessibility would enable collaborative research across state and national jurisdictions and promote national and international research and industry partnerships. A connected and secure data ecosystem is vital to sharing and dissemination of research findings to a wide audience and the subsequent adoption and use of research for economic, societal and national benefit.

Taking a high-level view, we comment below on the strategy's proposed themes as they affect research:

#### **1. Maximising value of data**

We agree that there is much unrealised potential for public good research that could be unlocked by better access and governance of data for research purposes. A mature data sharing framework is needed that can enable secure data sharing (and dataset linking) across all sectors (private, government, research) without incurring considerable administrative burden. The Commonwealth's new *Data Availability and Transparency Act 2022* (DATA) access scheme is a large step in the right direction regarding data governance standards, but requests for data for research purposes seem likely to remain hampered by lengthy and costly administrative processes.

#### **2. Trust and protection**

We urge the development of overarching data privacy legislation that aligns with international best practice, such as the EU-GDPR (General Data Protection Rule). Implementation of 'best standards' legislation would have substantial benefit in international research collaborations, where harmonisation of data law will enable data to be shared across international borders, while protecting individuals' rights to privacy.

Moreover, alignment of state- and territory-based legislation with the Commonwealth would remove substantial administrative burden to researchers requesting access to data residing in different jurisdictions. Streamlining of privacy and data legislation should be prioritised.

Alignment of standardised data classifications, governance frameworks and processes across sectors and jurisdictions will simplify what is rapidly becoming an overly complex data landscape. Government entities are well placed to develop common, standardised approaches to metadata, data governance and security measures across different agencies, departments and institutions, so facilitating data flows and interoperability of systems.

### 3. Enabling use

We are supportive of continued funding being made available to develop digital capability and infrastructure in the research sector, delivered by the National Collaborative Research Infrastructure Strategy. We note that funding bodies (e.g. Australian Research Council, National Health and Medical Research Council) are asking that research data is made openly available. However, the infrastructure and administration costs required by universities to store rapidly increasing quantities of research data and maintain open research datasets are not included in these schemes. While the University supports making research data FAIR (findable, accessible, interoperable, reproducible) wherever possible, the cost of doing so is high. Alternative infrastructure options (e.g. national repositories, secure cloud options) need to be investigated.

Ensuring a supply of skilled data personnel is essential. Digital skills are in increasingly high demand and skills shortages are evident. We urge that a priority of any national data strategy be to recruit, train and retain data professionals (engineers, analysts, managers, custodians), to provide essential expertise and support to all sectors.

Finally, we urge a rationalisation of data initiatives by the Commonwealth government. Recently, we have [responded to the Department of Home Affairs' National Data Security Action Plan](#). We have also been involved in many consultations with the Department of Prime Minister and Cabinet and the Office of the National Data Commissioner around the [Data Availability and Transparency Act and associated data sharing scheme](#), and engaged extensively with the Department of Home Affairs around the higher education and research sector data and infrastructure security issues within scope of the [Security Legislation Amendment \(Critical Infrastructure\) Act 2022](#). This apparently fragmented approach to the development of data policies by different Commonwealth agencies does not appear to aid consistency and alignment in Australia's data policy and legislation.

We appreciate the opportunity to contribute to an Australian Data Strategy, and welcome future engagement over these important issues. Please do not hesitate to contact me should you wish to discuss further this submission. Alternatively, please liaise with Dr Adele Haythornthwaite ([adele.haythornthwaite@sydney.edu.au](mailto:adele.haythornthwaite@sydney.edu.au)), Manager, Research Data Governance.

Yours sincerely,

(signature removed)

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