# Draft CDR Privacy Safeguard Guidelines

# Feedback from the National Archives of Australia

# 20th November 2019

*Are there any topics that you believe the draft guidelines should cover that have not been covered, or should be covered in greater detail?* Are there *any other ways in which the draft guide could be enhanced?*

**Re: 1.22 “**Good CDR data management stems from good privacy governance. Entities should ensure leadership and governance arrangements create a culture of privacy that respects and protects CDR data” (p. 50).

The National Archives agrees with this point, however we suggest that you consider the broader role of information governance and its multidisciplinary approach to managing information and data across an entire organisation. Good CDR data management would stem from good data or information governance encompassing privacy governance.

We also suggest you consider a risk assessment that is broader than *security risk* suggested as a Privacy tip under 12.26. A broader risk assessment (eg that may identify other risks such as data mismanagement, poor quality etc) would help assign the appropriate level of governance and contribute to a CDR data management plan.

*Are there any topics that you believe the draft guidelines should cover that have not been covered, or should be covered in greater detail? Are there any other ways in which the draft guide could be enhanced?*

**Re: 11.12 – 11.28** (pp. 5-8).

The CDR data quality considerations are all valid and considered good practice. Reasonable steps could be strengthened by other considerations such as entities embedding good information and data governance and practices to ensure accurate, up to date and complete data is achieved for the purpose required.

As an example, there are strong linkages between managing data quality and having good practices to describe data. Good description is supported by the National Archives of Australia’s Information Management Standard Principle 3*: Business information is adequately described*. Metadata is essential in understanding and assessing the quality of your data. Data quality assessments can be used to determine if an entities’ data meets the expectations of its consumers, and metadata plays a key role in clarifying those expectations.

Metadata can also be used to record data quality assessments. This means metadata repositories can be used for storing and sharing data quality assessment results across an organisation. Metadata and data quality teams should work closely together to develop these processes. Their combined expertise can ensure that business rules, measurements or issues related to data quality are documented, developed and managed as part of an entities’ data strategy/plan or similar.

*Are there any topics that you believe would benefit from visual aids such as flow charts or diagrams?*

**Re: 11.7 – 11.11** (p. 4).

The Summary of application of Privacy Safeguard 11 could be strengthened by use of a visual aid (instead of a table) to differentiate the application of the Privacy Safeguard.