Brotherhood
of St Laurence
Working for an Australia free of poverty

Submission to the

Productivity Commission inquiry into data availability and use

Brotherhood of St Laurence

August 2016

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Summary

The Brotherhood of St Laurence urges the Australian Government to take steps to:

1. Support the not-for-profit sector to develop with government a shared approach to undertake impact evaluation research and to make these evaluations publicly available for the purposes of meta-analyses.

2. Encourage data sharing across the human services sector to foster innovation in an increasingly marketised environment.

3. Expand the role of the Australian Bureau of Statistics (ABS) in data custodianship to drive value from data sets at federal and state levels and ensure minimum standards are adhered to.

4. Address harmonisation of data capture and move towards a single identifier to allow for data linkage across the many domains of human services. This needs to be balanced with appropriate safeguards and privacy such that the person has reasonable control of what will be shared and what will not be shared with service providers and departments.

5. Streamline administrative processes to access public data sets.

1 Introduction

The Brotherhood of St Laurence is an independent non-government organisation with strong community links that has been working to reduce poverty in Australia since the 1930s. Based in Melbourne, but with a national profile, the Brotherhood continues to work for an Australia free of poverty. We undertake research, service development and delivery, and advocacy with the objective of addressing unmet needs and translating the understandings gained into new policies, new programs and practices for implementation by government and others.

The Brotherhood of St Laurence has experience working with diverse public data sets including:

- Longitudinal Study of Australian Children (LSAC)
- Australian Early Development Census (AEDC)
- HILDA
- ABS datasets
- AIHS
- court data
- police data
- Department of Health and Human Services data.

In addition to working with these data sets, we also enter and access data within government propriety systems across human services areas including employment, education, training, family and youth services, settlement services, aged care and disability services.

2 What is the value of public data for social services?

The Brotherhood believes that public data is critical to ensuring transparent, evidence-based policy and program design. As a delivery partner for government social services, the not-for-profit sector should be involved in discussions regarding policy and program implementation that is informed by data. This ensures that decisions are based upon rigorous evidence rather than anecdotal evidence. Further, making data public could provide a longitudinal narrative over time so that precious resources can be focused on the areas where little impact has been made. For this to work effectively, the sharing of data and data sets needs to flow both ways. Too often, not-for-profit agencies are required to provide substantial amounts of data to federal or state governments (often directly entered into their proprietary systems) but have limited or no ability to influence the data capture requirements or use the information submitted.

Access to the information contained in government-backed datasets and the ability to link data sets might also offset the prohibitive costs and time of doing research, and ensure a more equitable way for small and not-for-profit organisations to build their evidence base and direct their own funds to the community or other research efforts. As recognised by the Productivity Commission's report (2010) into the contribution of the not-for-profit sector, government has a role to play in supporting the sector to develop a shared approach to undertaking impact evaluation research and making these evaluations available for the purposes of meta-analyses.

This may also include funding the development of data 'experts' and resources within the not-for-profit sector to support this.

3 What are the current challenges with public data?

Barriers to access

Unfortunately, very few of the data sets identified above are available in the public domain without complex administrative processes; and many require knowledge of how they are constructed. Our experience with the Education First Youth Foyers program has seen eight separate application processes to be completed, including the use of a data intermediary to ensure anonymity. This process is administratively burdensome and costly for not-for-profits. In one case of a national data set, approval was still needed from each state to release the information, creating unnecessary delays and risking a situation where data was not shared at all. Federal and state governments should review the administrative processes for data access requests and consider how they can be streamlined, particularly for not-for-profit agencies with limited resources.

Variable data quality

Also in our experience, the quality of the public data itself is variable and data sets cannot always be used to help build an evidence base for a service or program. Without data dictionaries and an independent assessment of the quality of the data itself, requests may be submitted for data that then proves to be worthless because the data is incomplete or incorrect. This experience highlights the need for government to play a strong role in data custodianship to drive value from data sets and ensure minimum standards are adhered to.

Data storage

As public data sets expand, there will be significant data storage and linkage requirements. If profit-driven data intermediaries are engaged for these purposes, there is a danger that data may be used for commercial gain (which would be difficult to regulate) rather than for public value and high quality service provision. For this reason government should be involved in data stewardship rather than rely on third party intermediaries.

4 Where could public data provide value?

Limiting data repetition, within privacy safeguards

Within human services, many people have complex stories that are retold to countless agencies, researchers and providers with whom they interact in the system. Without a central, integrated data system, this practice will continue to be both administratively inefficient and potentially traumatic for the person. It also does not assist each agency and service provider involved to understand the nature and extent of the support an individual client receives over the life course. Although a single record would be ideal, any initiatives would need to balance efficiency with privacy, such that the person had control of what would be shared and what would not be shared with various service providers and departments.

Making eligibility assessments more transparent

As human services are moved towards individualised funding, consumers are required to undergo assessments that determine the level of support that they are offered, such as the community aged care packages provided under the Commonwealth Home Support Programme. In many cases, assessments are done by government teams and neither consumers nor providers are provided the background information regarding the decision about their eligibility and level of access to support packages. Without this data, the aged care providers are often unable to identify if the consumer has been incorrectly assessed, affecting the person's level of support.

Encouraging data sharing

Also, as human services are increasingly marketised, both for-profit and not-for-profit service providers may not share data and/or service experience directly as they will be competing against each other. This is likely to significantly impact on the existing networks and integrated service delivery arrangements that governments have invested in, resulting in service duplication and/or limited innovation within human services. For this reason, public data needs to be available and used to understand which programs and services work and where new or more targeted services are needed.

5 What data or data sets would we like access to?

As both an innovator of demonstration projects and an agent of service delivery, the Brotherhood has a multi-sector service and research focus. There are a number of data sets and/or data linkages that would substantially improve the ability to understand and find service responses to the complex problems that exist and intersect with human services. These include (for clients who agree for their data to be provided):

- detailed Centrelink payment and administrative data

- detailed *jobactive* administrative and outcomes data

- detailed vocational education and training (VET) administrative and outcomes data

- detailed localised school data about attendance, graduation rates, results, teacher turnover

- Australian Institute of Criminology data and service-specific police, court and justice data

- AIHW housing data at local government area (LGA) level

- healthcare and hospital discharge data, particularly in relation to aged care

- maternal and child health data at LGA level

- AEDC data at suburb and LGA level and over time

- NAPLAN data on school outcomes at the LGA and suburb level

- Australian Department of Social Services, Department of Human Services, National Disability Insurance Agency and similar state/territory datasets relating to human services

- datasets used in reports such as Closing the Gap

- detailed information regarding rural assistance and Aboriginal and Torres Strait Islander affairs.

Regardless of what data sets might be made accessible in the future, much effort needs to be placed on upskilling the not-for-profit sector to use and understand data sets and on harmonisation of data capture. Ideally, the government should consider moving towards a common identifier to allow for data linkage across the many domains of human services. The approach to this could build on the learnings from the implementation of the My Health Record and other overseas experiences, such as with the Personal Identification Number in Denmark.

6 Public data and the need for data custodianship

Data custodianship is a clear role that government(s) should play in relation to public data. This function needs to be independent of data collection and include oversight of collection and integrity at both state and federal levels. It is possible that with appropriate funding the Australian Bureau of Statistics could play such a role. We note this role was previously articulated in the Productivity Commission's report (2010), *Contribution of the not-for-profit sector*, under recommendation 5.1. The ABS has the expertise to manage complex data sets and documentation of how data sets are being developed over time. This expertise could be harnessed for a regulatory role, providing guidance and assessing the quality of all state and federal public data. This would also ensure that public data was treated in an apolitical way and survived changes to departments where responsibility and accountability can be lost.

The ABS could also play a centralised role as a data linkage agency. This would ensure that for-profit data intermediaries do not control this space and personal data is not sold or used for commercial purposes that may result in discrimination against disadvantaged communities. Further, it would consolidate the knowledge of data linkages within a single agency and assist in fostering efforts to harmonise public data collection across state and federal departments.

Reference

Productivity Commission 2010, *Contribution of the not-for-profit sector*, research report, Productivity Commission, Canberra.