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# Residential investment property loan 2021–22 to 2025–26 data-matching program protocol

This protocol contains information on the residential investment property loan (RIPL) data-matching program.

Last updated 6 April 2023

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## Residential investment property loan data-matching program

Find out about guidelines we follow and the purpose and objectives of this program.

Last updated 6 April 2023

#### **Program objectives**

Our data-matching programs help us fulfil our responsibility to protect public revenue and maintain community confidence in the integrity of the tax and superannuation systems.

The objectives of the residential investment property loan (RIPL) datamatching program are to:

 promote voluntary compliance and increase community confidence in the tax and superannuation systems

- identify and educate individuals who may be failing to meet their reporting or lodgment obligations and help them
  - lodge their income tax returns
  - correctly report rental property loan interest and borrowing expense deductions in rental property schedules and associated labels of the income tax return
  - correctly report net capital gains in income tax returns for properties used to derive income
- gain insights from the data that may help to develop and implement treatment strategies to improve voluntary compliance. This may include educational, behavioural or compliance activities for individuals and businesses that lease or let real property.

#### Why we look at this data

Sample audits across the individuals (not in business) population were conducted under the Random Enquiry Program. Findings from these sample audits informed the estimate of the net tax gap for the 2020 financial year as being \$9 billion, or 5.6%. A significant driver of the gap is the incorrect reporting of rental property income and expenses, with the net tax gap for rental property expenses contributing \$1 billion, or 14% of the total individuals gap. A common reason driving the incorrect reporting of rental expenses is individuals incorrectly apportioning loan interest costs where the loan was refinanced or redrawn for private purposes.

One of our **strategies** to reduce the tax gap is increasing the quantity and quality of the data we collect.

RIPL data provides us information about a rental property loan, like repayments, interest charged and borrowing expenses. We can use this information to identify, assess and treat several taxation risks, including:

- lodgment confirming taxpayers with a rental property are lodging a tax return and their rental property schedule on or before the relevant due date
- income tax confirming taxpayers with a rental property are correctly reporting interest on loan and borrowing expense

deductions in their rental property schedules and associated income tax return labels

 capital gains tax (CGT) – confirming the calculation of cost base elements used to determine the net capital gain or loss on a rental property used to generate income.

For more information on what you can and can't claim for interest charged on your rental property loan, see **Tax time toolkit for** investors.

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## Residential investment property loan data

Find out about residential investment property loan (RIPL) data and what we do with the data we collect.

Last updated 6 April 2023

## Residential investment property loan data overview

RIPL data will support the identification, assessment, and treatment of rental property expenses, and capital gains tax risks.

#### **Education and online services**

- RIPL data may be available to:
  - tax professionals through
    - pre-filling reports in Online services for agents
    - Practitioner Lodgment Service (PLS) through Standard Business Reporting (SBR) enabled software
  - Individual self-preparers through myTax, specifically
    - rental property schedule interest on loans and/or borrowing expense labels and

rental income tax return labels.

#### Data analytics and insights

We will use insights from the data to design ways to make it easier for taxpayers to interact with the system and get their affairs right.

RIPL data will be compared with claims a taxpayer makes in their rental property schedules and rental tax return labels.

The data will help us execute strategies to:

- identify relevant cases for administrative action including compliance activities and educational strategies
  - After you lodge a return, if we need to verify a discrepancy, we'll contact you by phone, letter or email
  - Before we take any administrative action, you'll be able to verify the accuracy of the information we hold. You have 28 days to respond before we take administrative action associated with RIPL data use.
- inform rental property owners of their tax obligations as part of an educative campaign including
  - sending emails or letters
  - social media posts
  - posters and toolkits on our website.
- avoid unnecessary contact with taxpayers who are correctly reporting and claiming rental property income or expenses.

#### **Previous related programs**

Each year we conduct a review of a random sample of individual tax returns to estimate the difference between the tax collected and the amount that should have been collected if they were fully compliant with the law.

For the 2019–2020 financial year, we estimate there is net tax gap of 5.6% or \$9 billion for individuals not in business. Rental property risks contribute 14% of this net tax gap.

Each year we undertake the property management data-matching program to allow us to identify and address a number of taxation risks in the investment property market.

#### **Data providers**

We are the matching agency and, in most cases the sole user of the data obtained during this data-matching program.

We may obtain data from financial institutions and their subsidiaries, including:

- Adelaide Bank
- ANZ
- · Bank of Queensland
- Bendigo Bank
- Commonwealth Bank
- Bankwest
- ING
- Macquarie Bank
- National Australia Bank
- Suncorp
- Westpac
- RAMS
- Ubank
- St George
- · Bank of South Australia
- · Bank of Melbourne
- ME Bank.

#### Eligibility as a data provider

We adopt a principles-based approach to ensure our selection of data providers is fair and transparent. Inclusion of a data provider is based on the following principles:

- Provider information allows us to materially increase (or sustain) our visibility over residential investment property loans in the Australian market.
- The cost to acquire data and the cost incurred by the owner or custodian to extract the data, is collectively less than the value the data provides to address program objectives.
- The data owner or its subsidiary operates a business in Australia that is governed by Australian law.
- The data owners provide residential investment property loans to individuals.
- The data owner undertook these activities in the years in focus.
- The data is integrated, centrally located and able to be extracted using database querying techniques.

If the client-base of a data provider does not present a risk, or the administrative or financial cost of collecting the data exceeds the benefit the data may provide, the data owner may be excluded from the program.

The data providers for this program will be reviewed annually against the eligibility principles.

#### Our formal information gathering powers

To ensure statutory requirements are met, we obtain data under our formal information gathering powers. These are contained in section 353-10 of Schedule 1 to the *Taxation Administration Act 1953*.

This is a coercive power, and data providers are obligated to provide the information requested.

We will use the data for tax and superannuation compliance purposes.

#### **Privacy Act**

Data will only be used within the limits prescribed by Australian Privacy Principle 6 (APP6) contained in Schedule 1 of the Privacy Act and in particular:

 APP6.2(b) – the use of the information is required or authorised by an Australian law  APP6.2(e) – the ATO reasonably believes that the use of the information is reasonably necessary for our enforcement-related activities.

#### Data elements we collect

Data of residential investment property loans held by individuals will be collected from financial institutions. We negotiate with the selected data providers to obtain the data in their systems. The collected data may contain all or a selection of the fields listed below, depending on what fields the data provider holds.

#### Loan account holder details

- Unique client ID
- First name, middle and surname(s)
- Addresses (residential, postal)
- Australian business number (if applicable)
- · Email address
- Contact phone numbers
- Date of birth

#### Loan account details

- Unique account ID
- Account number
- BSB
- Account name
- Loan type
- · Loan commencement date
- · Expected loan end date
- Term of the loan
- Opening balance (start of loan)
- Opening balance (start of financial year)

- Closing balance (end of financial year)
- Borrowing expenses

#### **Property details**

- Unique property ID
- Property address

#### Loan account transactions

- Unique account ID
- Transaction date
- Transaction type
- Transaction description
- Transaction amount
- · Credit or debit

#### Number of records

We expect to collect data on approximately 1.7 million individuals each financial year for this program.

#### **Data quality**

Sample data has informed our expectation that the data quality will be of a high standard. Financial institutions have sophisticated computer systems, and they have prudential and due diligence obligations to maintain the quality of their records.

#### **Data retention**

We collect data under this program for all financial years from 2021–22 to 2025–26. We collect this data annually following the end of each financial year.

Due to the number of data providers, we collect data periodically. We work with the data providers and aim to balance our requests against a data provider's competing business priorities.

We destroy data that is no longer required in accordance with the *Archives Act 1983*, and the records authorities issued by the National Archives of Australia, for both general and ATO-specific data.

We will retain each financial year's data for 7 years from receipt of the final instalment of verified data files from all data providers. We may extend the timeframe for retention of RIPL data, which will be reviewed on a rolling basis at intervals of no longer than 7 years. Each review will determine whether extending the data retention period is required.

The data is required for this period for the protection of public revenue:

- The discrepancy matching that occurs under parts of this program
  is iterative in nature. This includes the data being used to generate
  lodgment reviews with subsequent lodgments then being compared
  to the transactional data for accuracy. This process can typically
  occur over multiple financial years.
- Retaining data for 7 years does not change our general compliance approach of reviewing an assessment within the standard period of review, which also aligns with the requirements for taxpayers to keep their records.
- Sale of real estate, such as a rental property, potentially triggers a
  capital gains event. This can include a main residence that has been
  rented out for a period. A property may be retained for many years
  prior to disposal. Retaining the data is necessary to assess capital
  gains impacts for both rental and lifestyle properties, like holiday
  homes.
- The data is used in multiple risk models, including models that establish retrospective profiles over multiple years aligned with the period of review.
- The data enables us to conduct long term trend analysis and risk profiling of the accommodation market. Understanding the property lifecycle enables us to provide targeted and timely education, tailored to a taxpayer's individual circumstances.
- The data enhances our ability to identify taxpayers who may not be complying with their tax and super obligations.

While increased data-retention periods may increase the risk to privacy, we have a range of safeguards to manage and minimise this risk. ATO systems and controls are designed to ensure the privacy and security of the data we manage.

#### Notifying the public of the datamatching program

Find out how we notify the public about this program.

Last updated 6 April 2023

We notify the public of our intention to collect 2021–22 to 2025–26 data by:

- publishing a notice in the <u>Federal Register of Legislation</u> 
   ☐ gazette in the week starting 3rd April 2023
- publishing this data-matching program protocol on our website at ato.gov.au/dmprotocols
- advising the data providers that they
  - can notify their clients of their participation in this program
  - should update their privacy policies to note that personal information is disclosed to the ATO for data-matching purposes.

#### **Gazette notice content**

The following information about the data-matching program appears as a gazette notice in the Federal Register of Legislation.

Gazette notice: Commissioner of Taxation – Notice of a residential investment property loan (RIPL) data-matching program 3 April 2023

The Australian Taxation Office (ATO) will acquire residential investment property loan data from authorised financial institutions for 2021–22 through to 2025–26.

The data items include:

- client identification details (names, addresses, phone numbers, dates of birth, etc)
- account details (account numbers, BSB's, balances, commencement and end dates, etc)
- transaction details (transaction date, transaction amount etc).
- property details (addresses, etc)

We estimate that records relating to approximately 1.7 million individuals will be obtained each financial year.

The data will be acquired and matched against ATO records for:

- education and online services, RIPL data may be available to
  - tax professionals through
    - pre-filling reports in Online services for agents
    - Practitioner Lodgment Service (PLS) through Standard Business Reporting (SBR) enabled software
  - individual self-preparers through myTax, specifically
    - Rental property schedule interest on loans and/or borrowing expense labels and
    - Rental income tax return labels
- data analytics and insights
  - We will use insights from the data to design ways to make it easier for our clients to interact with the system and get their affairs right.
  - RIPL data will be compared with claims a taxpayer makes in their rental property schedules and rental tax return labels.

The data helps us execute strategies to:

- identify relevant cases for administrative action, including compliance activities and educational strategies
  - After a taxpayer lodges a return, if we need to verify a discrepancy, we'll contact them by phone, letter or email.
  - Before we take any administrative action, they will be able to verify the accuracy of the information we hold. They

have 28 days to respond before we take administrative action associated with RIPL data use.

- inform rental property owners of their taxation obligations as part of an educative campaign including, but not limited to:
  - sending emails or letters to clients
  - social media posts
  - posters and toolkits on our website
- avoid unnecessary contact to those that are correctly reporting and claiming rental property income or expenses.

The objectives of this program are to:

- promote voluntary compliance and increase community confidence in the tax and superannuation systems
- identify and educate individuals who may be failing to meet their reporting or lodgment obligations (or both) and assist them to comply with
  - lodgment of income tax returns
  - the correct reporting of rental property loan interest and borrowing expense deductions in rental property schedules, and associated labels of the income tax return
  - the correct reporting of net capital gains in income tax returns for properties used to derive income
- gain insights from the data that may help to develop and implement treatment strategies to improve voluntary compliance, which may include educational, behavioural or compliance activities for individuals and businesses that lease or let real property.

A document describing this program is available at ato.gov.au/dmprotocols.

This program follows the Office of the Australian Information Commissioner's *Guidelines on data matching in Australian Government administration* (2014) (the guidelines). The guidelines include standards for the use of data matching as an administrative tool in a way that:

- complies with the Australian Privacy Principles (APPs) and the Privacy Act 1988 (Privacy Act)
- is consistent with good privacy practice.

A full copy of the ATO's privacy policy can be accessed at ato.gov.au/privacy.

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#### Our lawful role

Find out what our legislated functions are.

Last updated 6 April 2023

#### Our powers of administration

The ATO is the Australian Government's principal revenue collection agency. The Commissioner of Taxation has responsibility for ensuring taxpayers meet their tax and superannuation obligations.

We follow the Office of the Australian Information Commissioner's (OAIC) Guidelines on data matching in Australia Government administration (2014) in our data-matching activities.

Our data-matching programs help to ensure that Australians are fulfilling their tax and superannuation obligations.

This information forms part of all data-matching program protocols.

We take our obligations seriously. Failure to address non-compliant behaviour has the potential to undermine community confidence in the integrity of the tax and superannuation systems and our capability to administer those systems.

We carry out our legislated functions through general powers of administration contained in but not limited to:

- section 3A of the Taxation Administration Act 1953
- section 8 of the Income Tax Assessment Act 1936

- section 1-7 of the Income Tax Assessment Act 1997
- section 43 of the Superannuation Guarantee (Administration) Act 1992
- section 356-5 in Schedule 1 of the *Taxation Administration Act*

Data matching is one of the strategies used to identify and deal with non-compliant behaviour. It helps provide assurance that taxpayers are meeting their obligations.

#### Data-matching guidelines we follow

Our data-matching programs follow the OAIC <u>Guidelines on data</u> matching in Australian Government administration  $\boxed{2}$  (2014).

These guidelines help us, and other government agencies use data matching as an administrative tool in a way that:

- complies with the Australian Privacy Principles ☐ (APPs)
- complies with the <u>Privacy Act 1988</u> 
   ☐ (Privacy Act)
- is consistent with good privacy practice.

#### **The Privacy Act**

The <u>Privacy Act 1988</u> [2] (Privacy Act) regulates how personal information is handled by certain entities, such as companies and government agencies.

Schedule 1 of the Privacy Act lists the 13 Australian Privacy Principles (APPs). The principles cover the collection, use, disclosure, storage and management of personal information.

Data will only be used within the limits prescribed by the APPs and the Privacy Act.

The <u>Australian Government Agencies Privacy Code</u> [2], embeds privacy in all government agency processes and procedures. It ensures that privacy compliance is a priority in the design of our systems, practices and culture.

We comply with the code's requirements, and we are transparent and open about what information we collect, hold and disclose. We train our staff to keep personal information safe, and all our systems and offices are protected and secure.

Our data stewardship model upholds our data governance practices and embeds 6 ethical standards that guide how we collect, manage, share and use your data:

- 1. Act in the public interest, be mindful of the individual.
- 2. Uphold privacy, security and legality.
- 3. Explain clearly and be transparent.
- 4. Engage in purposeful data activities.
- 5. Exercise human supervision.
- 6. Maintain data stewardship.

Find out more about how we protect your privacy.

#### How we protect your personal information

Our staff are subject to the strict confidentiality and disclosure provisions contained in Division 355 of Schedule 1 to the *Taxation Administration Act 1953*. Penalties include terms of imprisonment in cases of serious contravention of these provisions.

#### Keeping data safe

Data-matching programs are conducted on our secure systems that comply with the requirements of:

- the <u>Australian Government Information Security Manual</u> ☐ produced by the Australian Cyber Security Centre, which governs the security of government information and communication technology (ICT) systems
- the Australian Government Protective Security Policy Framework , which provides guidance on security governance, personnel security, physical security and information security.

All ATO computer systems are strictly controlled according to Australian Government security standards for government ICT systems, with features including:

system access controls and security groupings

- login identification codes and password protection
- full audit trails of data files and system accesses.

For more information, see Online security.

#### Data retention and destruction

All information and records are managed in accordance with the provisions of the Archives Act 1983 2.

The requirement to retain data is reviewed on an ongoing basis in accordance with the timeframes and requirements of the OAIC guidelines. We destroy data that is no longer required, in accordance with the *Archives Act 1983* and the records authorities issued by the National Archives of Australia, both general and ATO-specific.

Under section 24 of the Act, records can be disposed of where it is approved by the National Archives; required by another law, or a normal administrative practice that the Archives approves of.

Approval from National Archives is normally provided through records authorities, which are used in the process of sentencing to make decisions about keeping, destroying or transferring particular information and records.

General or ATO-specific records authorities issued by National Archives apply to our processes of verifying and assuring taxpayer compliance with tax, superannuation and other laws administered by the ATO.

Our record management practices allow us to satisfy the OAIC guidelines and Australian Privacy Principle 11 (APP 11) contained in Schedule 1 of the *Privacy Act 1988* and in particular:

- APP11.1 An APP entity must take reasonable steps to protect information from
  - misuse, interference and loss
  - unauthorised access, modification or disclosure
- APP11.2 APP entity must take reasonable steps to destroy or deidentify information it no longer needs.

#### **Our on-disclosure provisions**

In very limited and specific circumstances, we may be permitted by law to disclose individual records to other government agencies.

Division 355 of Schedule 1 to the *Taxation Administration Act 1953* sets out the government agencies we can disclose taxpayer information to, and the circumstances in which we are permitted to make those disclosures.

These include agencies responsible for:

- state and territory revenue laws
- payments of social welfare and health and safety programs for determining eligibility for certain types of benefits and rebates
- overseeing super funds, corporations and financial market operators to ensure compliance with prudential regulations
- determining entitlement to rehabilitation and compensation payments
- law enforcement activities to assist with specific types of investigations
- domestic and international partners under tax disclosure and tax treaty arrangements
- policy analysis, costing and effectiveness measurement.

Each request for information by other agencies will be assessed on its merits and must be for an admissible purpose allowed for by taxation laws. In specific permissible circumstances, on-disclosures may include de-identified datasets for statistical analysis.

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#### Why we undertake data matching

Learn why we have data-matching protocols and the costs and benefits of data matching.

Last updated 6 April 2023

#### Meeting our accountability

To effectively administer the tax and superannuation systems, we are required in accordance with the law to collect and analyse information concerning the financial affairs of taxpayers and other participants in the Australian economy.

In addition to our administrator responsibilities, the <u>Public Service Act</u> 1999 (PS Act) requires each agency head to ensure their agency complies with legislative and whole-of-government requirements.

Agency heads are required to ensure proper use and management of public resources as per the <a href="Public Governance">Public Governance</a>, <a href="Performance and Accountability Act 2013">Performance and Accountability Act 2013</a> <a href="#">III</a></a> (PGPA Act).

We consider and undertake a range of alternatives to data matching to ensure entities are complying with their tax and superannuation obligations. Relying only on data that we already hold is of limited value for the following reasons:

- The tax system operates on willing participation, so our data is derived from taxpayers that are correctly registered and meeting their lodgment obligations.
- The only other way of ensuring that taxpayers are reporting their obligations correctly would be to contact every taxpayer directly.

#### **Uses of data matching**

Data matching allows us to cross-reference suitable external data to identify taxpayers who may not be in full compliance with their obligations, as well as those that may be operating outside the tax and superannuation systems. It also reduces the likelihood of unnecessarily contacting taxpayers who are complying with their tax obligations.

Data matching is an effective method of examining the records of thousands of taxpayers. We do this to ensure compliance with lodgment and reporting obligations. This would otherwise be a resource-intensive exercise.

Data matching also assists us to effectively promote voluntary compliance by notifying the public of risk areas and activities under scrutiny.

#### **Costs and benefits analysis**

The <u>costs</u> of our data matching activities are more than offset by the benefits.

#### **Benefits**

The use of data is increasingly common across government agencies and the private sector. Data, data usage, computer power and storage continue to grow, which increases the benefits from data matching.

Data matching and the insights it provides help us:

- deliver tailored products and services, which underpins our culture of service
- make it easier for taxpayers and agents by providing tailored messages in our online services
- enable early intervention activities, as our goal is prevention rather than correction
- maintain community confidence in our ability to administer the tax and superannuation systems because we can
  - make better, faster and holistically smarter decisions with measurable results to deliver a level playing field for all
  - solve problems and shape what we do for the community
  - advise government and deliver outcomes with agility
- maintain the integrity of the tax and superannuation systems by
  - providing education to assist taxpayers to do the right thing
  - deterring behaviours so taxpayers adhere to their obligations
  - detecting taxpayers who are not complying with their obligations, targeting those that continue to deliberately abuse the tax and superannuation systems
  - enabling enforcement activity and recovery of tax revenue
  - directing compliance activities to assure that wider risks to revenue do not exist.

#### Costs

There are some incidental costs to us in the conduct of data-matching programs, but these are more than offset by the total revenue protected. These costs include:

- data analyst resources to identify potential instances of noncompliance
- compliance resources to manage casework and educational activities
- governance resources to ensure compliance with the guidelines and Privacy Act
- quality assurance processes to ensure the rigour of the work undertaken by analysts and compliance staff
- storage of the data.

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#### How we undertake data matching

Find out about the systems and processes we use in datamatching activities.

Last updated 6 April 2023

#### **Data matching process**

We use over 60 sophisticated identity-matching techniques to ensure we identify the correct taxpayer when we obtain data from third parties. These techniques use multiple identifiers to obtain an identity match. The identity-matching process appends matching information to the original reported transaction to include an ATO identifier number and a 3-character outcome code that indicates to the user the level of matching confidence for the transaction. For example, where a name, address and date of birth are available, all items are used in the

identity-matching process. Very high confidence matches will occur where all fields are matched.

Additional manual processes may be undertaken where high confidence identity matches do not occur, or a decision taken to destroy data no longer required. Our manual identity-matching process involves an ATO officer reviewing and comparing third-party data identity elements against ATO information on a one-on-one basis, seeking enough common indicators to allow confirmation (or not) of an individual's identity. We commonly call this process manual uplifting.

Data analysts use various models and techniques to detect potential discrepancies, such as under-reported income or over-reported deductions. Higher risk discrepancy matches will be loaded to our case management system and allocated to compliance staff for actioning. Lower risk discrepancy matches will be further analysed, and a decision made to take some form of compliance or educational activity, or to destroy the data.

To maintain integrity of the administration of the tax and superannuation systems, only staff with a direct and genuine 'need to know' can access the technical standards for our identity and discrepancy matching solutions.

Where administrative action is proposed, additional checks will take place to ensure the correct taxpayer has been identified. The taxpayers will be provided with the opportunity to verify the accuracy of the information before any administrative action is taken.

#### How we amend a return

We may use data to provide tailored messages for individual taxpayers in our online services. This will prompt taxpayers to check they are correctly meeting their reporting obligations.

In limited circumstances where we identify inadvertent mistakes, we may amend a tax return with the correct data that is available to us.

If you disagree with the decision we made about your information, you can request a review by lodging an objection.

After a return is lodged, where we identify a discrepancy that requires verification, we will contact the taxpayer usually by phone, letter or email. Taxpayers will have up to 28 days to verify the accuracy of the information and respond before we take administrative action.

For example, where discrepancy-matching identifies that a taxpayer may not be reporting all their income, but it appears they're reporting the income in another taxpayer's return, they will be given the opportunity to clarify the situation.

The data may also be used to ensure taxpayers are complying with their other tax and superannuation obligations, including registration requirements, lodgment obligations and payment responsibilities.

In cases where taxpayers fail to comply with these obligations, after being reminded of them, we may instigate prosecution action in appropriate circumstances.

Where a taxpayer has correctly met their obligations, the use of the data will reduce the likelihood of contact from us.

In limited circumstances we may use data from a data-matching program to correct mistakes without notifying individuals in advance. When we do so, we will seek an exemption from the Australian Information Commissioner.

#### Making a privacy complaint

Our **privacy policy** outlines how we collect, hold and disclose data and explains what you can do if you're not satisfied with the way your information has been treated.

If you're not satisfied with how we have collected, held, used or disclosed your personal information, you can make a formal complaint.

If you're not satisfied with the outcome of the privacy complaint, you can contact the Office of the Australian Information Commissioner.

More details are on the OAIC website at <a href="mailto:oaic.gov.au/privacy/making-a-privacy-complaint">oaic.gov.au/privacy/making-a-privacy-complaint</a> <a href="mailto:oaic.gov.au/privacy-complaint">oaic.gov.au/privacy-complaint</a> <a href="mailto:oaic.gov.au/privacy

For more information, see how we protect your privacy.

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#### **Data quality**

Learn about our quality assurance processes and how we assure data is fit for use.

#### **Quality assurance processes**

Quality assurance is integrated into our processes and computer systems and applied throughout the data-matching cycle.

These assurance processes include:

- registering the intention to undertake a data-matching program on an internal register
- risk assessment and approval from the data steward and relevant senior executive service (SES) officers prior to any data-matching program being undertaken
- conducting program pilots or obtaining sample data to ensure the data-matching program will achieve its objectives prior to full datasets being obtained
- notifying the OAIC of our intention to undertake the data-matching program and seek permission to vary from the data-matching guidelines (where applicable)
- restricting access to the data to approved users and access management logs record details of who has accessed the data
- quality assurance processes embedded into compliance activities, including
  - review of risk assessments, taxpayer profiles and case plans by senior officers prior to client contact
  - ongoing reviews of cases by subject matter technical experts at key points during the life cycle of a case
  - regular independent panel reviews of samples of case work to ensure our case work is accurate and consistent.

These processes ensure data is collected and used in accordance with our data-management policies and principles and complies with the OAIC's <u>Guidelines on data matching in Australian Government</u> <u>administration</u> □.

#### How we ensure data quality

The data is sourced from providers' systems and may not be available in a format that can be readily processed by our systems. We apply extra levels of scrutiny and analytics to verify the quality of the data.

This includes but is not limited to:

- meeting with data providers to understand their data holdings, including their data use, data currency, formats, compatibility and natural systems
- sampling data to ensure it is fit for purpose before fully engaging providers on task
- verification practices at receipt of data to check against confirming documentation; we then use algorithms and other analytical methods to refine the data.

Data is transformed into a standardised format and validated to ensure that it contains the required data elements prior to loading to our computer systems. We undertake program evaluations to measure effectiveness before determining whether to continue to collect future years of the data or to discontinue the program.

The ATO's enterprise data quality (DQ) approach champions 6 core DQ dimensions:

- Accuracy the degree to which the data correctly represents the actual value.
- Completeness if all expected data in a data set is present.
- Consistency whether data values in a data set are consistent with values elsewhere within the data set or in another data set.
- Validity data values are presented in the correct format and fall within a predefined set of values.
- Uniqueness if duplicated files or records are in the data set.
- Timeliness how quickly the data is available for use from the time of collection.

To assure data is fit for consumption and maintains integrity throughout the data-matching program, the following Data quality elements are also applied:

- Currency how recent the time period is that the data set covers.
- Precision the level of detail of a data element.

- Privacy access control and usage monitoring.
- Reasonableness reasonable data is within the bounds of common sense or specific operational context.
- Referential integrity when all intended references within a data set or with other data sets, are valid.

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#### Our commitment to you

We are committed to providing you with accurate, consistent and clear information to help you understand your rights and entitlements and meet your obligations.

If you follow our information and it turns out to be incorrect, or it is misleading and you make a mistake as a result, we will take that into account when determining what action, if any, we should take.

Some of the information on this website applies to a specific financial year. This is clearly marked. Make sure you have the information for the right year before making decisions based on that information.

If you feel that our information does not fully cover your circumstances, or you are unsure how it applies to you, contact us or seek professional advice.

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