**25 July 2023**

**AIIA Submission to**

**The Data and Digital Government Strategy Consultation**

**About the AIIA**

The Australian Information Industry Association (AIIA) is Australia's peak representative body and advocacy group for those in the digital ecosystem. We are a not-for-profit organisation to benefit members.

Since 1978, the AIIA has pursued activities to stimulate and grow the digital ecosystem, to create a favourable business environment for our members and to contribute to Australia's economic prosperity. We do this by delivering outstanding member value by:
• providing a strong voice of influence
• building a sense of community through events and education
• enabling a network for collaboration and inspiration; and
• developing compelling content and relevant and interesting information.

We are unique in that we represent the diversity of the tech ecosystem from small and medium businesses, start-ups, universities and digital incubators through to large Australian companies, multinational software and hardware companies, data centres, telecommunications companies and technology consulting companies.

**Introduction**

The AIIA is pleased to have the opportunity to respond to the draft Data and Digital Government Strategy ('the Strategy').[1] The AIIA also thanks the Digital Transformation Agency (**'the DTA'**) for engaging AIIA members in a senior roundtable in mid-July for the purposes of providing feedback on the Strategy and commend the DTA's ongoing commitment to consultation.

Australia becoming a leading digital government is fundamental to becoming a truly digital economy, with all the citizen service delivery, data utilisation and productivity benefits that result. From digital identity solutions to modern data analytics, artificial intelligence (AI) and machine learning (ML), the Internet of Things (IoT), and digital twins, 21st century digital architecture has a powerful role to play in government from policy, to planning, operations, service delivery and citizen engagement. When data drives these interactions and processes, particularly where data is shared and activated interoperably within a trusted framework, silos are broken-down and governments become more responsive, efficient and citizen-centred. Achieving these benefits for the sake of Australian citizens to serve the long-term national interest and articulating this motivation must be the driving force behind the Strategy.

**Cabinet-level Ministerial mandate and responsibility**

The AIIA is in full support of the Strategy and believe it outlines a sound vision for the greater unlocking, sharing and secure stewardship of data throughout the public

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[1] https://www.dataanddigital.gov.au/sites/default/files/2023-05/Data%20and%20Digital%20Government%20Strategy.pdf

service. The AIIA sees a robust political mandate for the achievement of the Strategy as crucial to its success. Given the differing approaches taken to data and digital architecture across government agencies, a strong Ministerial mandate will help the Strategy to be implemented with authority and cut-through, given the considerable nature of this whole-of-government undertaking. Therefore, the championing of and responsibility for the Strategy by the Honourable Katy Gallagher MP as Minister for Finance at the Cabinet level, as well as support of the Prime Minister and the Cabinet, will be fundamental. Further, the establishment and time-bound tracking of tangible metrics, as will be contained in the forthcoming Implementation Plan, will be essential for success.

**Definitions**

The AIIA believes that articulating the government's understanding of the definition of data and the conceptual aspects of the character of data – for instance, that data is not meaningfully 'owned', despite often *pertaining* to individuals, but rather is analysed, used, re-used, processed, shared and controlled – would be useful for grounding the Strategy. A common definition and understanding of data by those who control or share it within government will ensure a congruent approach. For reference, the *Data Availability and Transparency Act* defines data as "*any information in a form capable of being communicated, analysed or processed (whether by an individual or by computer or other automated means).*"[2] This definition is also adopted by the Department of Home Affairs.[3]

**Prioritising security and interoperability**

The Standards Australia Data and Digital Standards Landscape Report of July 2022 named interoperability and security as the two most important considerations for data in the 21st century.[4] In a multi-agency model, in which legacy systems and data practices differ from department to department, achieving interoperability is a distinct need. In a governmental context, where sensitive citizen data has been entrusted to government across multiple levels and agencies, data security is similarly an acute requirement. The second recommendation of the aforementioned Data and Digital Standards Landscape Report is that "*Standards Australia, the Australian Government and the ICT community must continue to work together to provide practical guidance for the uptake of data and digital standards*" – therefore, collaboration with the ICT industry through peak bodies such as the AIIA and the government-facing data committees of Standards Australia will be important in achieving the aims of the Strategy.

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[2] https://www.legislation.gov.au/Details/C2022A00011

[3] https://www.homeaffairs.gov.au/reports-and-publications/submissions-and-discussion-papers/data-security#:~:text=throughout%20these%20processes.-,Data%20definition,computer%20or%20other%20automated%20means).

[4] https://www.standards.org.au/documents/data-digital-standards-landscape

**Working towards common languages, standards and platforms**

The Strategy should drive the greater implementation of sophisticated data visualisation and activation platforms across agencies and the retirement of legacy systems that produce fragmented or hampered approaches to data utilisation.

Working towards a common analytics platform that increases visibility and accessibility of data by a range of users across government – which would necessarily be a multi-vendor and cloud-agnostic proposition – should be considered by the Implementation Plan. The better integration and visibility of data will drive value creation and enable the Strategy Mission 'Simple and Seamless Services'.

**Citizen Service Delivery Considerations and the National Interest**

The AIIA applauds the Strategy's intention to align to the Australian Government Architecture and Digital and ICT Investment Oversight Framework. Investing in digital architecture is pivotal to realising the Australian Government's strategic capability and delivering for citizens to meet 21st-century expectations, many of which derive from their customer experience (CX) in private domains.

The AIIA appreciates the commitment of the Strategy to a digital-by-design approach and tethering citizen service delivery to a life events model, with a consideration for the end-to-end customer experience. The Strategy and its Implementation Plan must, in this vein, dovetail with the implementation of the findings of the myGov user audit.

Cooperation with the States in terms of data-driven service delivery should be grounded in the omnichannel or no-wrong-door approach, noting that citizens care more about outcomes and ease of use than the identity of the government agency or the organisation achieving service delivery. The Data and Digital Ministers' Meeting (DDMM) will also be an important vehicle for the ownership and realisation of the Strategy.

The AIIA commends that the Strategy's vision is a joined-up, interoperable approach with citizen benefits at the centre. A driving vision of the national interest and what can be achieved for Australia as a country from the better stewardship and activation of data, with this vision reflected in key performance indicators and metrics, will be important for the Strategy's realisation. This will ground the following element of Action Mission 1: "*identify opportunities to access, integrate, and share data to inform matters of importance at a local and national level*".

**Alignment to other data-driven reform initiatives, the *DATA* Scheme and other government Strategies**

The alignment of Action Mission 1 ('Delivering for All People and Business') to the findings of the myGov user audit and the ongoing work on digital ID and Trusted Digital Identity Framework will be crucial. The connection between the former and the latter will be strengthened if the realisation of this Strategy invests in best-

practice data and digital foundations that sit behind both myGov and digital identity; and indeed, the summary of the myGov user audit recommended that government "*accelerate development of Australia's national digital identity ecosystem, prioritising the protection of security, privacy, safety and other human rights with a view to government digital identity being safe, easy to use and secure*".[5] The confident and secure stewardship of data – which grounds citizens' identity – across agencies will form an important building block of this acceleration. The ways in which this Strategy is encompassed by and connects to the Cyber Security Strategy 2030, the same year that the Strategy's Vision calls out as its own anchor, will be pivotal.

Activating government-held data and the enablement of data-sharing between agencies and from the public to the private sector for research purposes and the public good will be pivotal to the success of the Strategy and its missions. Giving leaders and data stewards within agencies confidence and clarity about their ability to share data, and the enabling parameters, will be an important education piece. Furthermore, there should be central budgets to enable cross-agency data-sharing projects.

The linkage between the Strategy and the *Data Availability and Transparency Act* (*DATA*) Scheme needs to be articulated and similarly the link between the Strategy and the role of National Data Commissioner and the associated Office, which administers the *DATA* Scheme, has not been sufficiently articulated. The implementation of the Strategy should also encompass data-centric initiatives within government such as the data.gov.au project, the Australian Government Public Data Policy Statement and the data-focused work of IP Australia.

Given the stated focus of the *DATA* Scheme is to "[increase] the availability and use of Australian Government data to deliver government services that are simple, effective and respectful, inform better government policies and programs, and support world-leading research and development",[6] this goes directly to Action Mission 1: Delivering for all People and Businesses. Aligning to the ongoing work of the ONDC makes sense for the implementation of the Strategy.

As Action Mission 1 refers to "harnessing analytical tools and techniques (including machine learning and artificial intelligence) to predict service needs, gain efficiencies in agency operations, support evidence-based decisions and improve user experience", it is important that the Strategy encompass and consider the Interim Guidance published on Generative AI for Government Agencies.[7]

**Achieving data-driven sustainability**

The AIIA believes that data-driven decision-making within government should extend to unlocking the value of data as it pertains to the carbon footprint of particular

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[5] https://my.gov.au/content/dam/mygov/documents/audit/mygov-useraudit-jan2023-report-summary.pdf
[6] https://www.datacommissioner.gov.au/the-data-scheme
[7] https://www.dta.gov.au/blogs/interim-guidance-generative-ai-government-agencies

systems or technologies, including to inform procurement decisions. The AIIA recommends that the Strategy considers the data available for making such assessments to enable data-driven progress on achieving net-zero goals set by the government by 2050.

Where the Strategy involves the commitment of the Australian Government to a particular outcome, such as under Action Mission 1, where the language is the Government 'committing to' seven outcomes, there should be detailed key performance indicators with timeframes and responsible personnel or bodies indicated in the forthcoming Implementation Plan.

## Accountability and Responsibility for Implementation; enabling metrics

More broadly, given the DTA will not have direct control over all intended outcomes of the Strategy, an analysis of the mechanisms of control against each of the outcomes under the Action Missions should be undertaken as part of the Implementation Plan with a view to assigning each firm commitment of the Strategy to a real person or group with real control over the outcome. Implementing a visualised understanding of the data lifecycle, given the Strategy includes commitments to make non-sensitive data open-by-default and design data for use and re-use, would be helpful. Further, a data stocktake or audit to produce a lay of the land across agencies would assist in achieving visibility and anchor-points for applying implementation metrics.

## Skills and Capability

Finally, skills and capability are rightly called out by the Strategy as indispensable for the Strategy's success. The digital capability aims of the Strategy's Foundation Mission 5 (Data and Digital Foundations) should be embedded into Job Descriptions and hiring practices for all agencies. Through the Building Digital Capability arm of the APS Digital Profession program, whole-of-government workforce or strategic capability planning based on forecast skills needs and skills mapping using internationally recognised digital skills can provide a point-in-time analysis of current skills profiles against future strategic needs.

The AIIA appreciates the opportunity to have input on this important Strategy. Should you have any questions about the content of this submission, please contact Rachel Bailes, Head of Policy, via rachel@aiia.com.au.

Yours sincerely

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