


**Submission to the Federal
Senate Standing Committees on Finance and Public
Administration**

ARRANGEMENTS FOR THE POSTAL SURVEY

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Senate Standing Committees on Finance and Public Administration

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Table of Contents

Recommendations	1
1 Author Background	2
2 Observer Application	2
3 Transparency.....	3
4 Reporting Lines	4

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Recommendations

The author commends the following recommendations for the Committee's consideration.

Recommendation 1

The committee recommend to the government that the ABS to provide immediately to any person who requests to be an Observer, for the ABS's survey on same sex marriage, the appropriate forms and related documentation.

Recommendation 2

The committee recommend to the government that the ABS procedures related to observers allows them complete access to all information about the operation of the survey including the following:

- a) ABS program risk registers, operational procedures and other documentation provided to parliament and suitable for the public.*
- b) Be provided regularly updated performance metrics on the operation of the survey including statistics on exceptions and complaints.*
- c) Observe example processes related to each channel for dissemination and data capture.*
- d) Observe call centre and other exception handling operations.*

Recommendation 3

The committee recommend to the government that the ABS procedures related to observers, allow the observer to provide their final report, not only to the Australian Statistician but also their nominating parliamentarian and any parliamentary committee which may wish to review the conduct of the survey prior to the 15th of November 2017. The report should then be available to the public after that date with comments from the ABS appended.

1 Author Background

I am a consultant and experienced CIO. He helps clients better manage and utilise their technology investments. He specialises in program and portfolio management and technology governance with a particular focus on information security. In addition to postgraduate qualifications in information systems and management he is Certified by ISACA¹ in the Governance of Enterprise IT (CGEIT) and a trained Gateway Reviewer for NSW ICT programs.

I provide advice to organisations on how to improve their technology and program governance. I am a gateway reviewer for government providing program assurance advice. I also provide executive advice on how organisations can effectively and efficiently improve their security posture.

I was CIO and Director of IT at the New South Wales (NSW) Electoral Commission in Australia. My role was responsible for the provision of all IT infrastructure and information security for the Commission and led NSW electronic voting initiative (iVote) at the 2011 and 2015 elections.

NSW's award-winning iVote system supported the NSW technology assisted voting legislation. NSW is one of the few jurisdictions in the world with on-going requirement for remote internet and phone voting at parliamentary elections. This technically complex project was the largest internet based voting system in the world for a public election. In 2015 election iVote took 283,669 votes.

More details can be found at <https://www.linkedin.com/in/ian-brightwell-a038573/>

2 Observer Application

The ABS have identified in its procedures² for the coming "Australian Marriage Law Postal Survey" that it will allow observers. The below is extracted from procedures for the survey.

Assurance of Integrity and Quality

The Australian Statistician will ensure that the collection of the statistical information is undertaken with a high level of transparency, integrity and assurance in the accuracy of the data.

Observers will be nominated by Commonwealth parliamentarians to observe key steps in the survey process in order to provide an outside view to the Australian Statistician on the integrity of the survey process.

The Australian Statistician will publish a statement on the quality and integrity of the survey on 15 November 2017.

Further details of this process will be released as they are finalised.

I contacted the ABS call centre number provided (1800 572 113) for the Australian Marriage Law Postal Survey on both Monday the 14/8/17 (Calle Reference AET996) and Friday the 18/8/17 and

¹ Information Systems Audit and Control Association, ISACA

<http://www.isaca.org/about-isaca/Pages/default.aspx>

² Process for Australian Marriage Law Postal Survey

<http://www.abs.gov.au/websitedbs/D3310114.nsf/home/AMLPS+-+Process>

was told by operators on both occasions that they did not believe there were any procedures available and did not know when they would be available. On Monday, I was advised I would receive a call back but none came.

3 Transparency

The role of Observer is very important as it provides additional assurance for the public in the integrity of the electoral styled survey the ABS has been directed to undertake.

It is important that observers be engaged as early as possible in the process and be privy to as much information as possible about the process. This approach will ensure that observer reports will be informed and balanced.

Observers should be allowed complete access to all information about the operation of the survey including the following:

- a) ABS program risk registers, operational procedures and other documentation provided to parliament and suitable for the public.
- b) Be provided regularly updated performance metrics on the operation of the survey including statistics on exceptions and complaints. The observing of a complex multi-channel survey is not just about the procedures related to opening and counting of survey documents. If the observer is to be effective they need to have access to operational statistics related to the performance of the overall operation of the survey. It is only by analysing this data that an observer can form an opinion as to the integrity of the process outcome.
- c) Observe example processes related to each channel for dissemination and data capture. It is understood at the time of writing that several channels will be used to both disseminate and return surveys. It is even understood that some surveys will be returned electronically which has its own special issues. Each channel will have its own risks and needs to be examined for error and faults.
- d) Observe call centre and other exception handling operations. This is probably the least important part of the observation process but still is necessary.

It is noted that in a recent submissions by the ABS to the committee they suggested that the observer arrangements would be similar to those adopted for the Census. The submission said:

4.4 EXTERNAL OBSERVERS

*The ABS has committed to inviting external observers to observe a number of stages in the receipt and processing of survey responses. Observers will be nominated by Commonwealth parliamentarians **to observe key steps in the survey process in order to provide an outside view to the Australian Statistician** on the integrity of the survey process. This will be done in a way that maintains the secrecy of the survey responses. Processes are currently being developed to support this.*

*The ABS has previously sought external assurance to assure high quality processes and outputs. For example, the **ABS established the 2016 Census Independent Assurance Panel** to*

provide an independent view of the quality of statistical outputs from the 2016 Census of Population and Housing.

The report provided by the independent committee identified above was collectively authored and provided nearly a year after the event. The panel comprised persons appointed by the Australian Statistician with a narrow term of reference. I do not believe this is a suitable model to follow for the proposed survey, as the survey is more like an election and needs the observers to report before the ABS reports results on the 15th of November.

It is also not appropriate the observers only be allowed to “observe key steps in the survey process”. As stated above observers must be able to observe ALL data and processes related to the operation of the survey.

4 Reporting Lines

The current procedures suggest that observers will only be able to provide a report to the Australian Statistician. This is not a suitable arrangement from a transparency perspective. The procedures should allow the observer to provide their interim and final report to their nominating parliamentarian and any interested parliamentary committee as well as the Australian Statistician.

It is also recommended that the report from the observer be made available to the public after the 15th November 2017, with any requested comments from the Australian Statistician appended.