



Australian Government
Office of the National Data Commissioner

ONDC

Annual Report

2024–2025

National Data Commissioner Annual Report 2024–25

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Annual Report 2024–25

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Australian Government

Office of the National Data Commissioner

**ONE CANBERRA AVENUE
FORREST**

Senator the Hon Katy Gallagher
Minister for Finance
Minister for the Public Service
Minister for Women
Minister for Government Services
Parliament House
CANBERRA ACT 2600

Dear Minister

I am pleased to present the annual report of the activities of the National Data Commissioner during the financial year 2024–25.

The report has been prepared for the purposes of section 138 of the *Data Availability and Transparency Act 2022*, which requires that I provide an annual report to you for presentation to the Parliament.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Andrew Taylor'.

Dr Andrew Taylor
Acting National Data Commissioner
22 September 2025

Commissioner's foreword



This year marked the third year of the *Data Availability and Transparency Act 2022* (the Act), which saw a steady flow of data sharing requests and newly accredited participants join the DATA Scheme. This growth is a testament to our foundational work over preceding years and our facilitative approach to supporting participants to join and use the data sharing scheme.

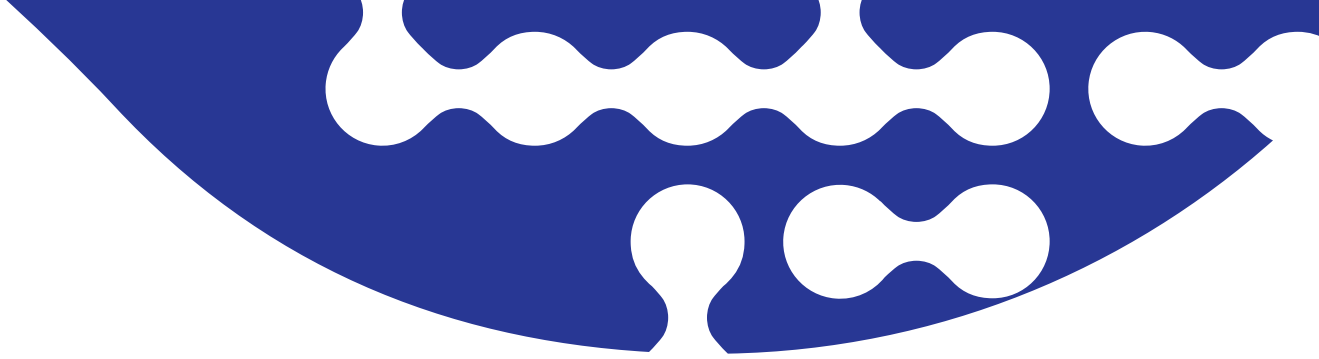
By the end of 2024–25, the trusted data sharing community had grown to 37 accredited entities comprising 17 Australian Government agencies, 10 state and territory government agencies, and 10 Australian universities.

Dataplace and the Australian Government Data Catalogue operated as central platforms for discovering, requesting and managing data sharing.

We enhanced Dataplace's functionality with the addition of the new streamlined data sharing agreement, notifications and improved reporting capability for Australian Government agencies and others. New search filters and features make it easier to find data assets on the Catalogue. By end June 2025 there were 122 organisations onboarded to Dataplace and 22 Australian Government agencies contributing records directly from their data inventory to the Catalogue.

Over 50 data requests have been made through Dataplace since the Scheme commenced, resulting in 26 data shares progressed on the platform – 11 under the Scheme and 15 general shares. These have included data sharing relating to education, social services, employment and research into online financial safety. We supported the build of and access to the National Disability Data Asset, a landmark initiative within the Australian data landscape, seeking to support improved outcomes for people with disability, their carers and communities.

We upheld the Scheme's safeguards, including through our robust accreditation framework, which was independently assessed by two reviews. Accreditation remains the cornerstone of the Scheme, uplifting data handling practices nationally, providing confidence and assurance to Scheme participants and the public that data held by Australian Government agencies is being handled safely and securely under Australia's best practice



framework. We maintained our service level standards for assessing accreditation applications as well as handling enquiries and complaints.

To foster transparency and trust in the use of Australian Government data, we maintained public registers of accredited entities and data sharing agreements. We held Scheme participants to account by stepping up our monitoring activities, focusing on the handling of data sharing requests by Australian Government agencies and the ongoing capability of accredited entities.

The Working Group involving Scheme participants established to identify key issues impeding uptake of the Scheme finalised its report in November 2024. We implemented 10 out of the 13 recommended actions. These included a streamlined data sharing agreement template, standing up the Commissioner's advice function so Scheme entities can seek regulatory advice on how the Scheme applies to them, or how it would apply in particular circumstances, and making the *Data Availability and Transparency Amendment (No. 1) Code 2025* to explicitly protect state and territory data rights when that data is shared under the Scheme.

We are working to increase recognition by data custodians of accreditation status to support more data sharing and to make it quicker and easier.

To better understand our performance as a regulator and foster a culture of continuous improvement, we also conducted interviews with Scheme participants. These executive-level reflections provided valuable insights into our facilitative posture and areas where we could continue to improve, helping shape our regulatory approach.

The first 3 years of the Scheme have been a tremendous learning opportunity for the Office of the National Data Commissioner (ONDC), Scheme participants and others. It has been challenging and there have been transitional costs. The feedback and advice provided by Scheme participants, the National Data Advisory Council and others have spurred improvements in ONDC's performance and the Scheme's operation and provided a solid evidence base to inform the independent statutory review of the Act which commenced in March 2025. I welcome the review and the opportunity to ensure the Act is operating as intended to improve the availability and use of Australian Government data for public benefit.

My submission to the review proposed a package of amendments to allow the DATA Scheme to achieve the vision of a step change in the use of Australian data for public benefit and to support the government's productivity agenda. Beyond legislative change, data sharing across all levels of government remains a challenge. I recommended a sustained focus and commitment across the Australian Government to instil a culture of data sharing, further strengthen the data capability of Australian Government agencies, and strategically allocate existing resources to better use data.

My thanks once again to members of the National Data Advisory Council for their valuable advice on implementing the Scheme. Special thanks to outgoing members Professor Sallie Pearson, Dr Joshua Meltzer, Dr Cathy Foley and Ms Angelene Falk who were all inaugural members of the Council. Professor Pearson, Dr Meltzer and Ms Falk also served on its precursor and played an important role advising on the Scheme's development. I also extend my thanks to Scheme participants and others from whose experience and expertise we have benefited so much. Finally, I thank the ONDC team for their dedication, adaptability and high-quality work.

Our top priority for 2025–26 is the statutory review of the Act and implementation of the Government's response. We will also continue to facilitate data sharing, build the trusted data sharing community through accreditation, hold Scheme participants to account to meet the Scheme's best practices, as well as guide and educate Australian Government agencies and others on best practice data handling and sharing.



Gayle Milnes

National Data Commissioner



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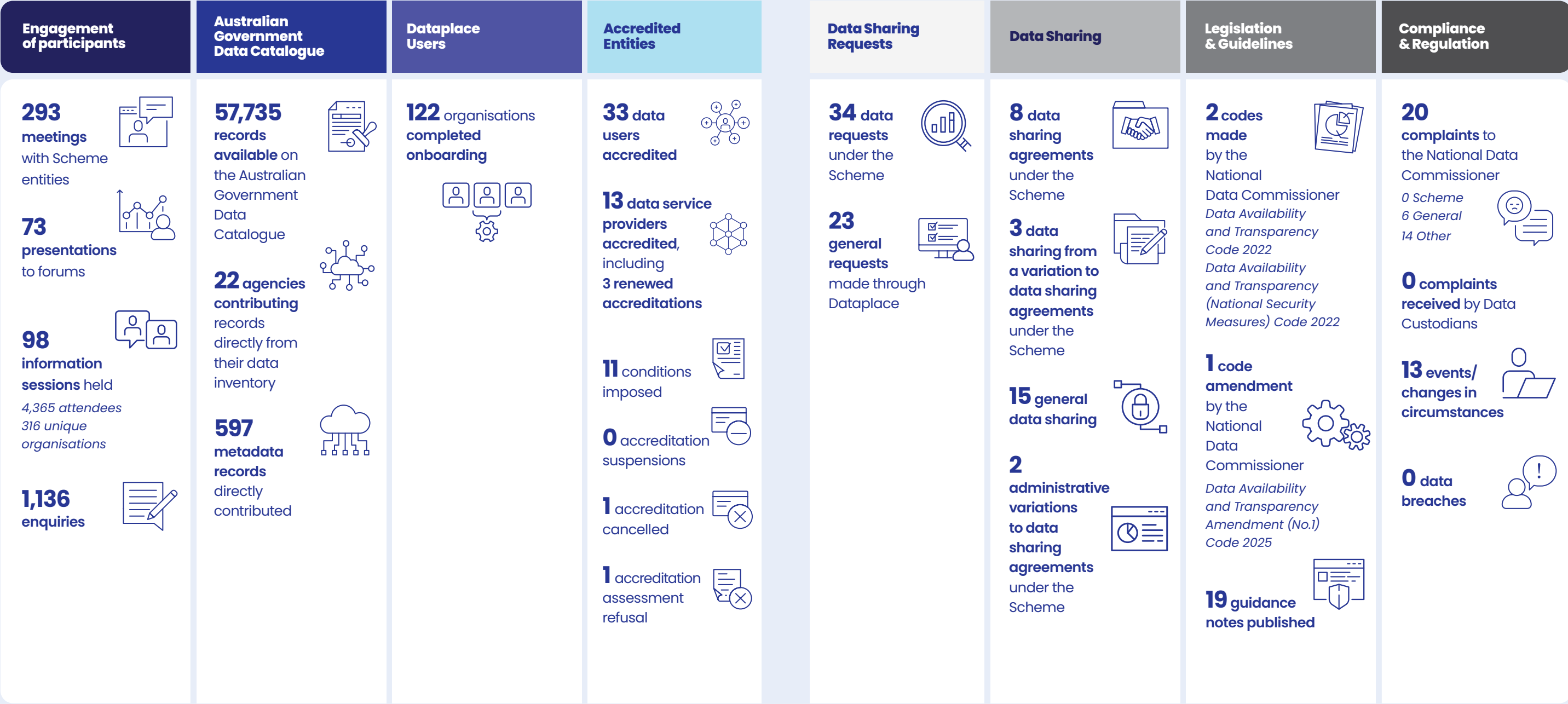
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At a glance

Figure 1. DATA Scheme Activity



Note 1 Figures are cumulative from the commencement of the Scheme to 30 June 2025. Figures for the 2024–25 financial year are presented in objectives 1–4.

Note 2 Complaints made to the National Data Commissioner fall within 3 categories:

- Scheme complaints – complaints by DATA Scheme participants relating to a suspected breach of the Act or a data sharing agreement
- general complaints – complaints by a person about the administration or operation of the DATA Scheme, and
- other complaints – any other complaint.

About us

The work we do

DATA Scheme

The *Data Availability and Transparency Act 2022* (the Act) establishes the DATA Scheme – a best practice scheme for sharing Australian Government data, underpinned by strong safeguards and consistent, efficient processes.

The Scheme exists to deliver public benefit through increased availability and use of Australian Government data by removing barriers to sharing and establishing best practice in data sharing.

Dataplace

Dataplace is a whole-of-government digital solution to facilitate and manage sharing of data held by Australian Government agencies. It brings together those wanting to access Australian Government data, with Australian Government agencies who are the custodians of the data.

For data users – government officials, researchers and others – the platform provides a single place to find and request access to Australian Government data.

Commonwealth agencies can use Dataplace to manage all their data sharing activities giving them line of sight over the data they share, who they share it with and the purpose for which they share the data.

By using Dataplace to manage their data sharing activities, Commonwealth agencies can be assured they are applying best data sharing practices.

For all parties, Dataplace standardises and streamlines data sharing.

The platform is used by the National Data Commissioner to regulate the data sharing scheme, supporting Scheme participants to comply with best practice data sharing.

Dataplace is managed by the Office of the National Data Commissioner (ONDC) and the Department of the Prime Minister and Cabinet on behalf of the Australian Government.

Australian Government Data Catalogue

The Australian Government Data Catalogue (the Catalogue) brings Australian Government data assets from multiple sources together into one place. It allows anyone, including researchers, to search one location to identify data assets held by Australian Government agencies.

Where the relevant data is publicly available, the data user can use the Catalogue to locate the public source of the data asset. Where the data asset is not publicly available, integration of the Catalogue with Dataplace allows users to request the data using Dataplace and manage the data sharing request.

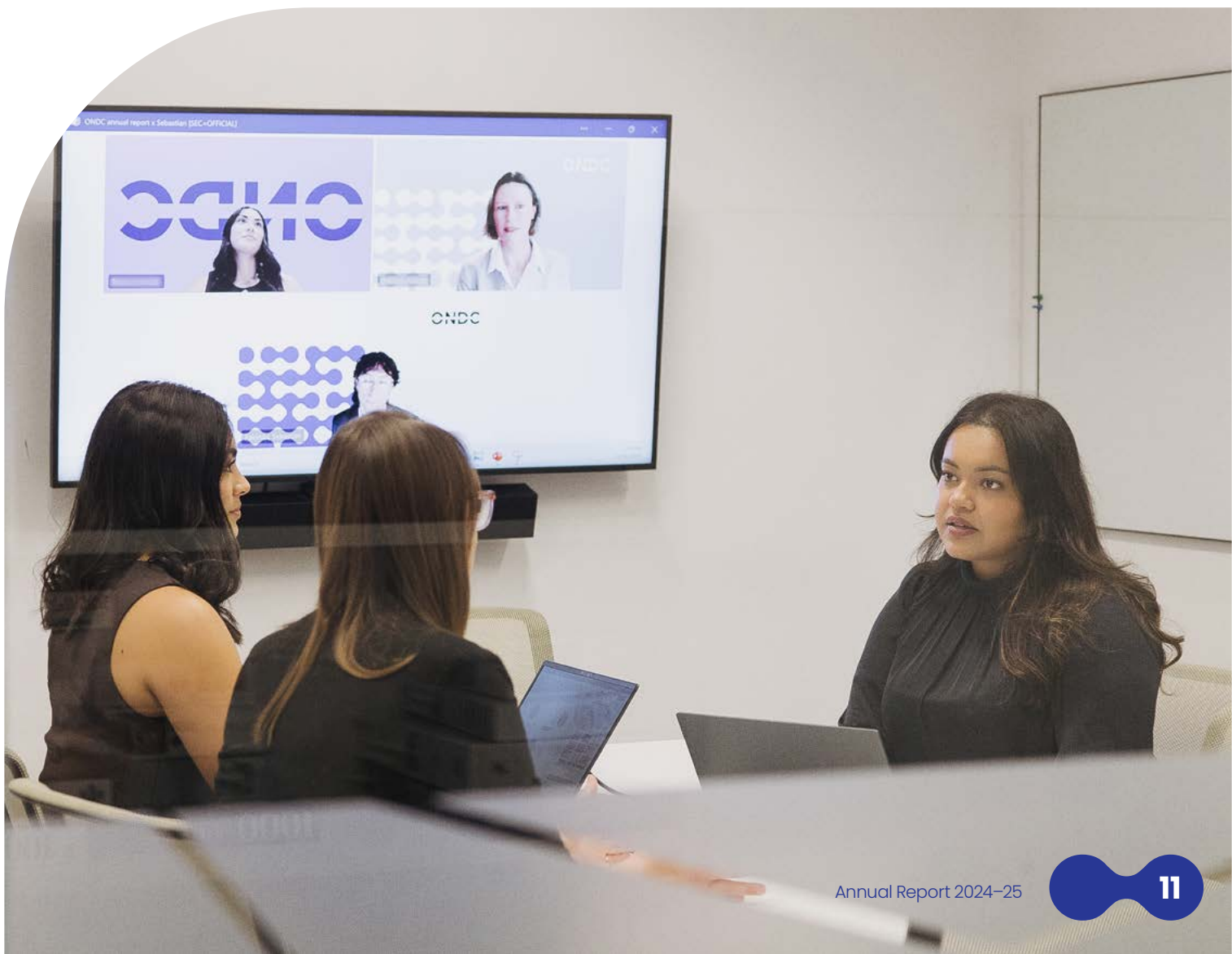
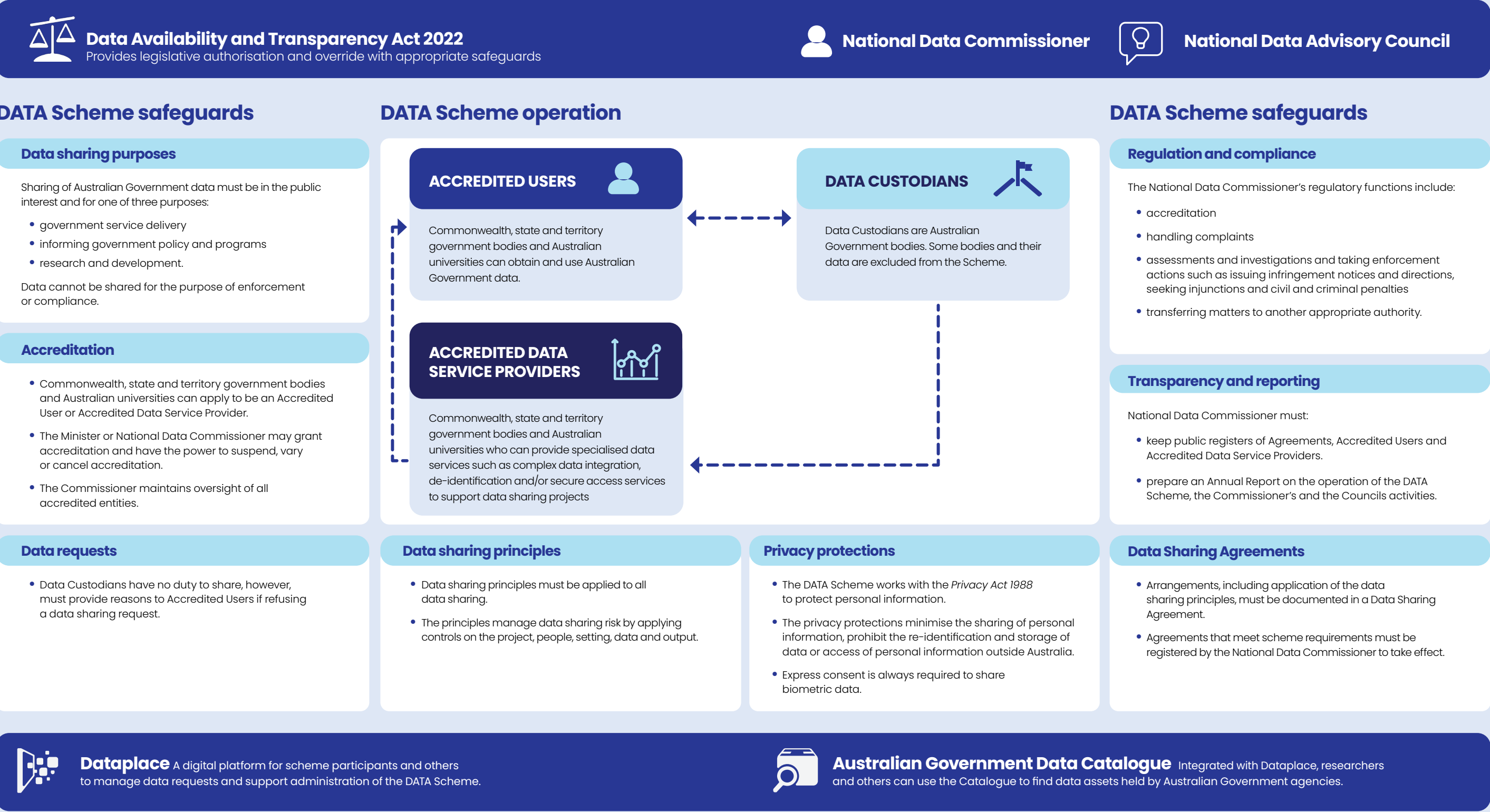
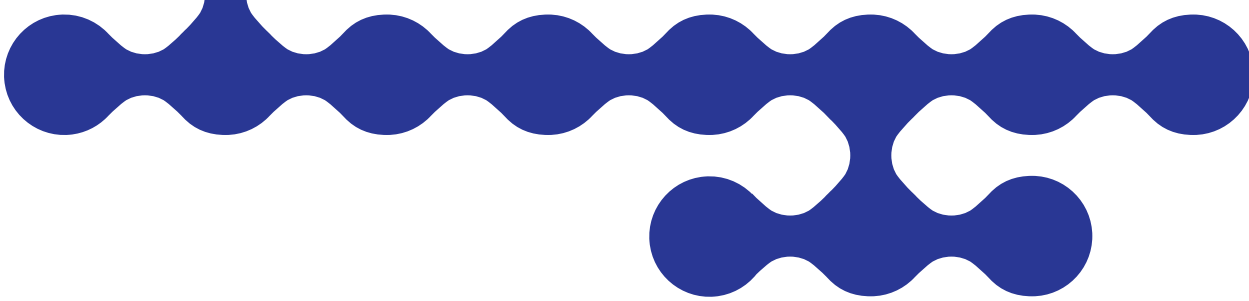


Figure 2. Data Availability and Transparency Act Scheme

Data Availability and Transparency Act Scheme





Who we are

The National Data Commissioner and the Office

The National Data Commissioner is an independent statutory officer responsible for overseeing the DATA Scheme to:

- serve the public interest by promoting better availability of public sector data
- enable the sharing of public sector data consistent with the *Privacy Act 1988* and appropriate security safeguards
- enhance integrity and transparency in sharing public sector data
- build confidence in the use of public sector data, and
- establish institutional arrangements for sharing public sector data.

The National Data Commissioner is the regulator of the Scheme and provides advice and guidance about its operation to the Minister, Scheme participants and others. The Commissioner also delivers education and tools to support best practice data handling and sharing.

Gayle Milnes was appointed as the inaugural National Data Commissioner in April 2022, having commenced in December 2021 as National Data Commissioner Designate.

The Commissioner is supported by the ONDC who are employees of the Department of Finance. The Department also provides corporate support services.

National Data Advisory Council

The Act establishes the National Data Advisory Council (the Council). The Council's role is to advise the National Data Commissioner on data sharing including on ethics, balancing data availability with privacy protection, trust and transparency, technical best practice, as well as industry and international developments.

The Council comprises the National Data Commissioner, the Australian Statistician, the Australian Information Commissioner, Australia's Chief Scientist, and other members appointed by the National Data Commissioner. Members serve for a period of up to 3 years. See [Appendix 3](#) for membership of the Council.

Participants in the DATA Scheme

There are 3 types of DATA Scheme participants:

- Australian Government agencies – Data Custodians, who hold public sector data;
- Accredited Users – these entities are authorised to request and receive data held by custodians;
- Accredited Data Service Providers –these are intermediaries who provide de-identification, data integration and secure access services.

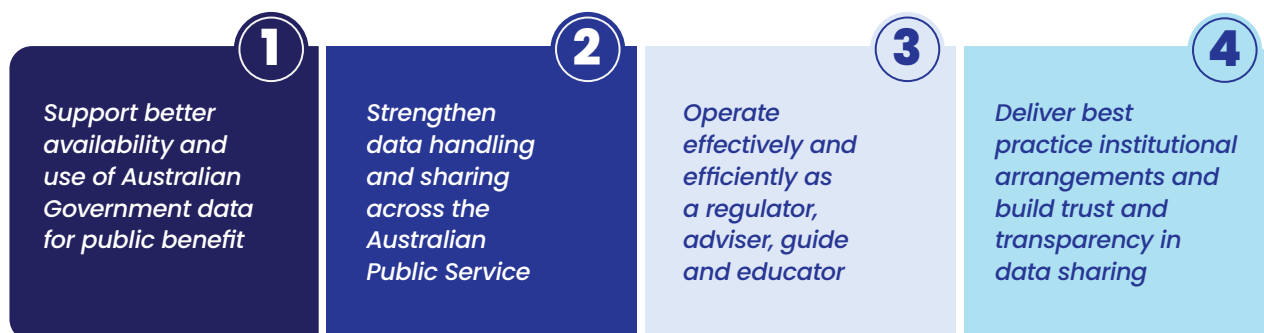
Under current legislative settings, only Australian Government agencies, state and territory government agencies and Australian universities are eligible to apply for accreditation as data users and data service providers.

Figure 3. Entities accredited to participate in the DATA Scheme

 Australian Government Agency	 State or Territory Government Agency	 Australian University
<div>  Attorney-General's Department ★ </div> <div>  Australian Bureau of Statistics </div> <div>  Australian Commission on Safety and Quality in Healthcare </div> <div>  Australian Institute of Family Studies </div> <div>  Australian Institute of Health and Welfare </div> <div>  Australian Securities and Investments Commission </div> <div>  Department of Education </div> <div>  Department of Employment and Workplace Relations </div> <div>  Department of Finance ★ </div> <div>  Department of Health, Disability and Ageing </div> <div>  Department of Industry, Science and Resources </div> <div>  Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts </div> <div>  Department of Social Services </div> <div>  Department of the Treasury </div> <div>  Digital Transformation Agency ★ </div> <div>  National Disability Insurance Agency ★ </div> <div>  Productivity Commission </div>	<div>  ACT Chief Minister, Treasury and Economic Development Directorate ★ </div> <div>  NSW Department of Customer Service </div> <div>  NSW Health Administration Corporation </div> <div>  NSW Ministry of Health </div> <div>  Queensland Health </div> <div>  Queensland Treasury ★ </div> <div>  South Australian Department of Treasury and Finance ★ </div> <div>  Victorian Department of Health </div> <div>  Western Australian Department of Health </div> <div>  Western Australian Department of the Premier and Cabinet ★ </div>	<div>  Monash University </div> <div>  Queensland University of Technology ★ </div> <div>  The University of Adelaide </div> <div>  The University of Melbourne </div> <div>  The University of New South Wales </div> <div>  The University of Queensland </div> <div>  The University of Sydney </div> <div>  The University of Tasmania ★ </div> <div>  The University of Technology Sydney ★ </div> <div>  The University of Western Australia </div>
<div> Key <div>  Accredited Data User Only  Accredited Data Service Provider Only  Accredited as a data user and a data service provider </div> <div>  Accredited as a data user in 2024–25  Accredited as a data service provider in 2024–25 </div> </div>		

Performance

The activities of the Commissioner and the ONDC for the year to end of June 2025 are reported against 4 objectives:



Performance against the specific requirements in the Act are captured in the sections below and referenced in [Appendix 2](#).

1 Support better availability and use of Australian Government data for public benefit

During 2024–25, activity in the DATA Scheme grew, both in terms of participants and data sharing activity. Our primary focus remained on facilitating data sharing.

We saw data sharing requests made through Dataplace increase from 24 in 2023–24 to 27 in 2024–25. All requests were made under the Scheme, except for one, which was submitted as a general request outside the Scheme ([Figure 4](#)).¹ The data sharing requests were made by 9 unique organisations looking to achieve a broad range of outcomes, for example:

- A Commonwealth agency requested data to support efficient government services.
- Another Commonwealth agency requested financial data to support policy analysis.
- A state government agency requested Commonwealth datasets to better understand health outcomes and impacts within their state.
- A state government is seeking to enhance a state dataset with holistic and complete whole-of-care provision data.

[Figure 5](#) and [Figure 6](#) show the range of user groups that have made requests and the Australian Government agencies (Data Custodians) that have received requests since the Scheme began until 30 June 2025. There were 11 pending data sharing requests at the end of the financial year.

¹ General data sharing requests are those that do not use the DAT Act to authorise data sharing. They also include requests made by entities not eligible to participate in the DATA Scheme.

Figure 4. Data sharing requests over the life of the Scheme to 30 June 2025

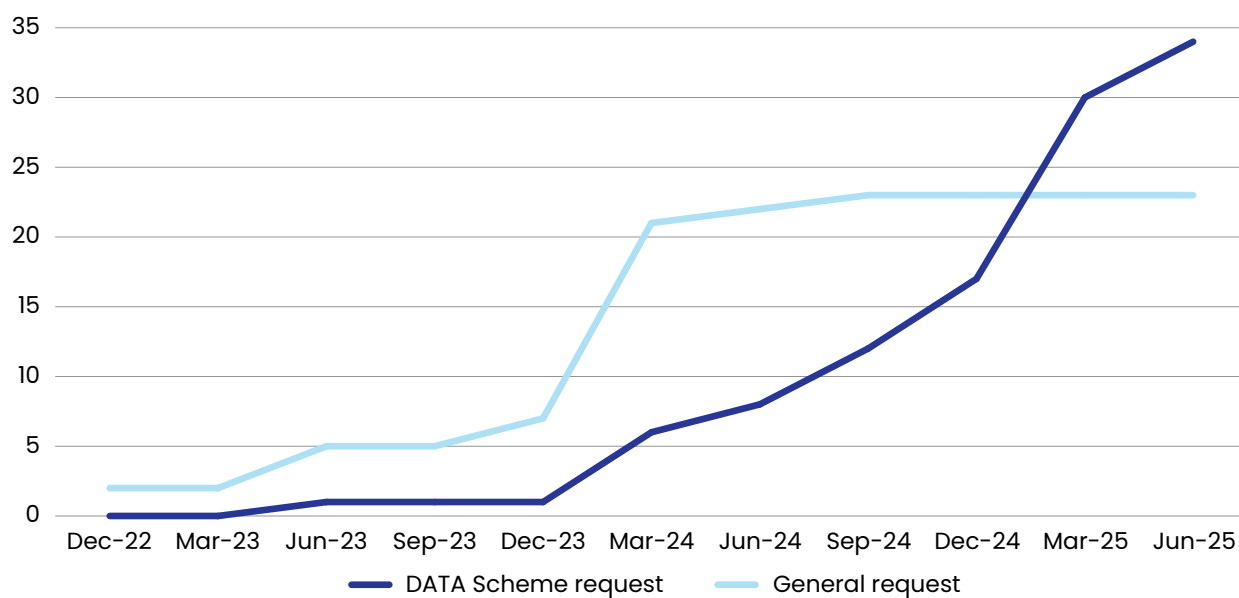


Figure 5. Data sharing requests made by user group over the life of the Scheme to 30 June 2025

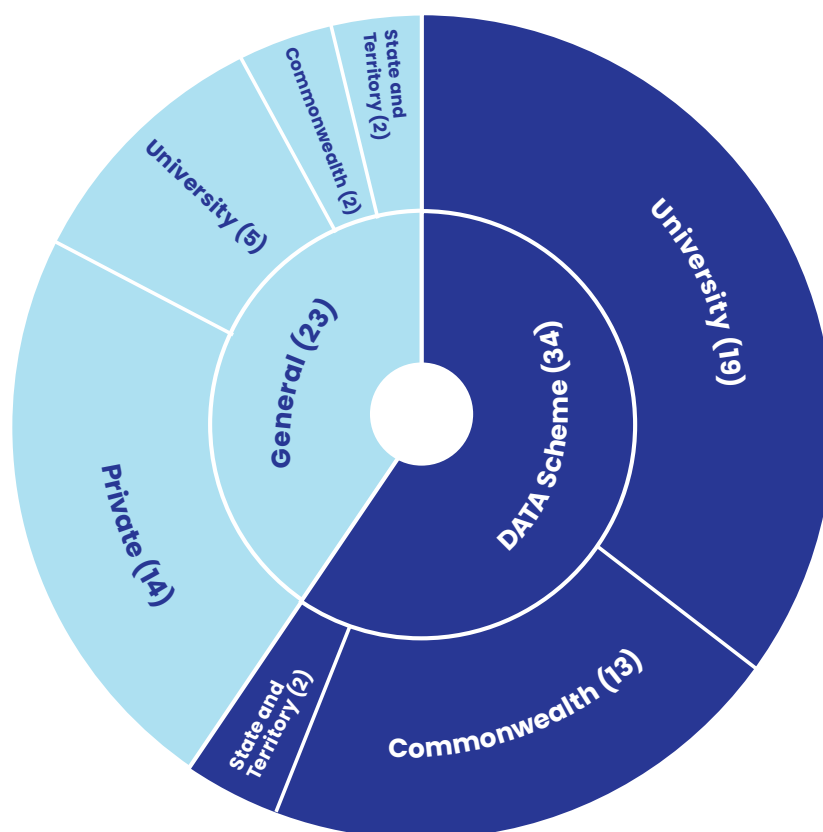
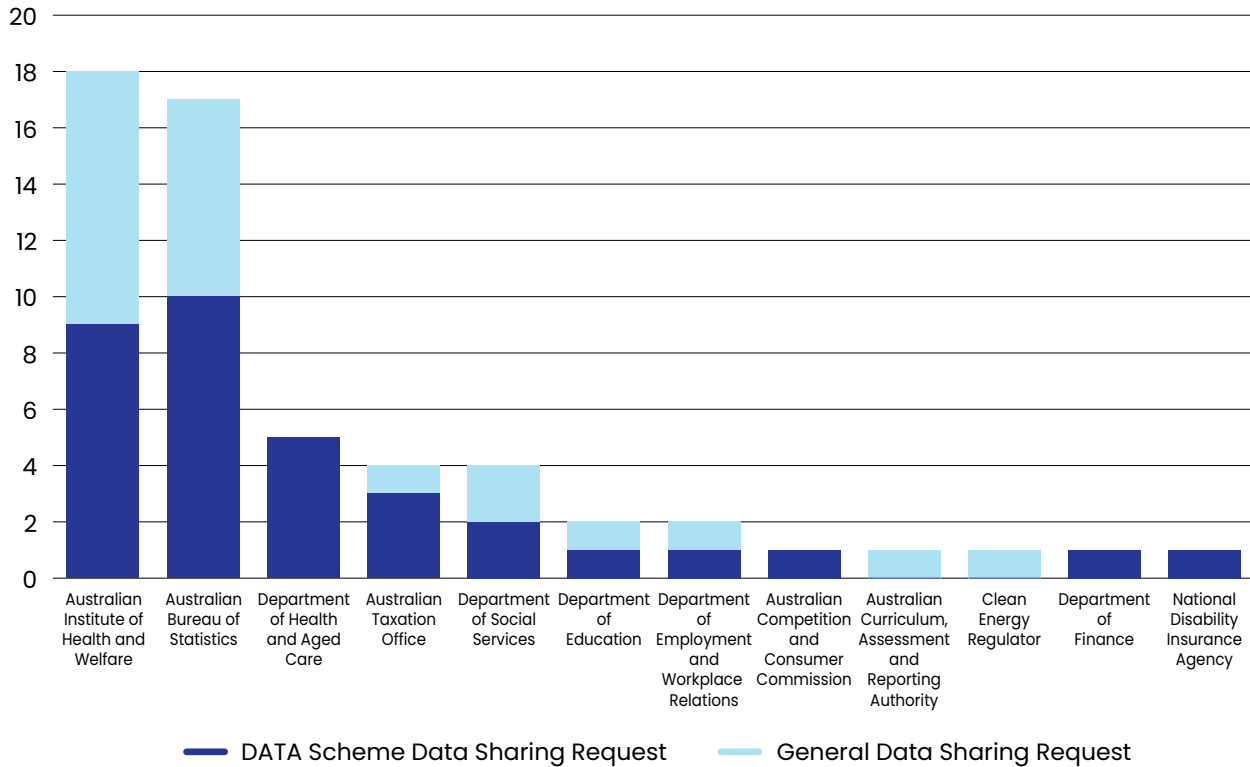


Figure 6. Data custodians who received data sharing requests over the life of the Scheme to 30 June 2025



During 2024-25, data sharing requests resulted in 14 data shares, comprised of 6 sharing agreements under the Scheme, 3 variations to Scheme agreements authorising additional data to be shared and 5 general data shares. The total of 14 data shares was just above our target of 13 for the year.

The 6 data sharing agreements under the Scheme and the 3 variations to Scheme agreements were to build the National Disability Data Asset (NDDA), an enduring national data asset. The NDDA brings together a wealth of disability and health-related data from Commonwealth, state and territory governments.

It is an initiative of national significance involving all jurisdictions in Australia working with the disability community to bring together data from a broad range of sources for research and analysis. The NDDA will help governments better understand the experiences of people with disability and better support them, their carers and the community. Data sharing agreements made under the DATA Scheme were used to create a new National Linkage Spine, the National Linkage Map and dual-use variables for the Australian National Data Integration Infrastructure.² The first release of the NDDA in December 2024 brought together 18 datasets.

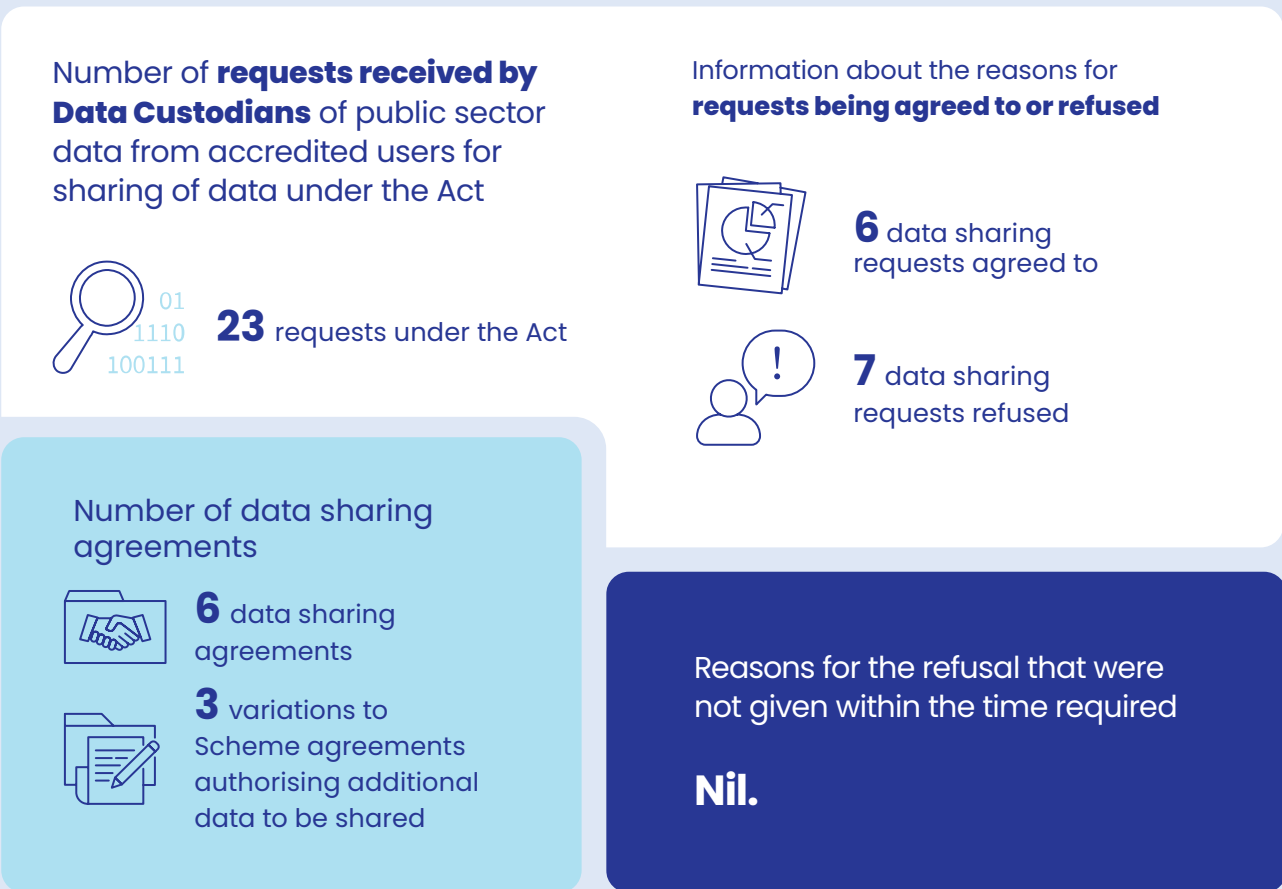
² <https://www.datacommissioner.gov.au/node/278>

The Act provided Commonwealth participants with the legal authorisation to share data into the NDDA, and also provides access to it, ensuring data sharing is safeguarded and used appropriately by the right people.

Seven Scheme requests were refused during 2024–25. All reasons for refusal were provided by Data Custodians within the time required by the Act. In some cases Data Custodians identified other legislative pathways for safe data sharing. In another instance, the Data Custodian provided publicly available data.

The ONDC confirmed 3 of these parties agreed to share the data outside the DATA Scheme as a general share. One of the refusals was made on the basis that the Data Custodian did not consider the requesting organisation (an Accredited User) to have the necessary experience or capability to handle the public sector data requested. The ONDC assesses entities and grants accreditation where they are capable of handling public sector data and minimising risk of unauthorised access or use. Accredited entities are subject to ongoing monitoring by the ONDC to ensure they continue to meet the criteria.

Figure 7. Key reporting: data sharing under the Act



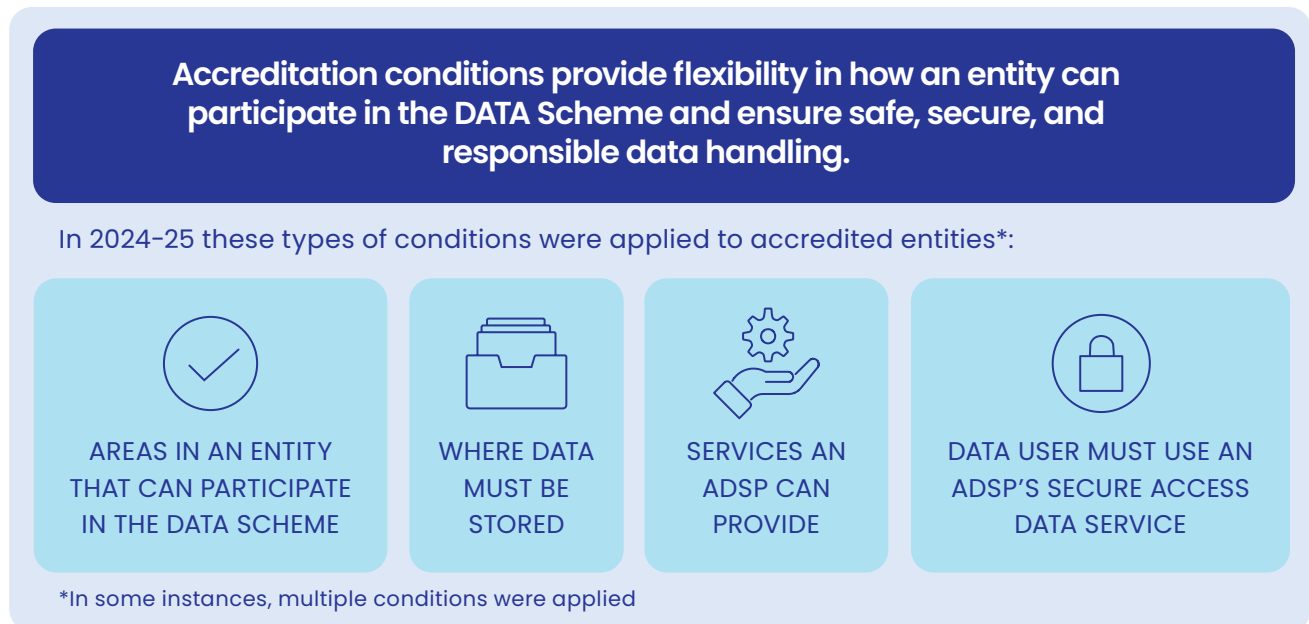
The trusted data sharing community continued to grow in 2024-25 (see [Figure 3](#)). Nine entities became Accredited Users – 4 Australian Government agencies, 2 state and territory government agencies, and 3 Australian universities – bringing the total to 33 Accredited Users at the end of 2024-25. These entities are now authorised to request data under the DATA Scheme and enter into data sharing agreements to receive and use data collected by Australian Government agencies.

In 2024-25, 2 entities – the Western Australian Department of the Premier and Cabinet, and the South Australian Department of Treasury and Finance – were accredited as data service providers, bringing the total to 13.

Accredited Data Service Providers act as intermediaries, de-identifying and integrating data and providing secure access to the data. A further 3 data service providers had their accreditation renewed in 2024-25.³

Accreditation conditions were imposed on 4 Accredited Users and 3 Accredited Data Service Providers during 2024-25.⁴ For example, a condition was imposed on an Accredited User to require the access of data through a secure access data service. Another condition specified areas within an entity that may collect or use Scheme data. Accreditation information, including any applicable conditions, are listed in our public registers. Also in 2024-25, one accreditation was cancelled due to a machinery of government change and one accreditation application was refused.

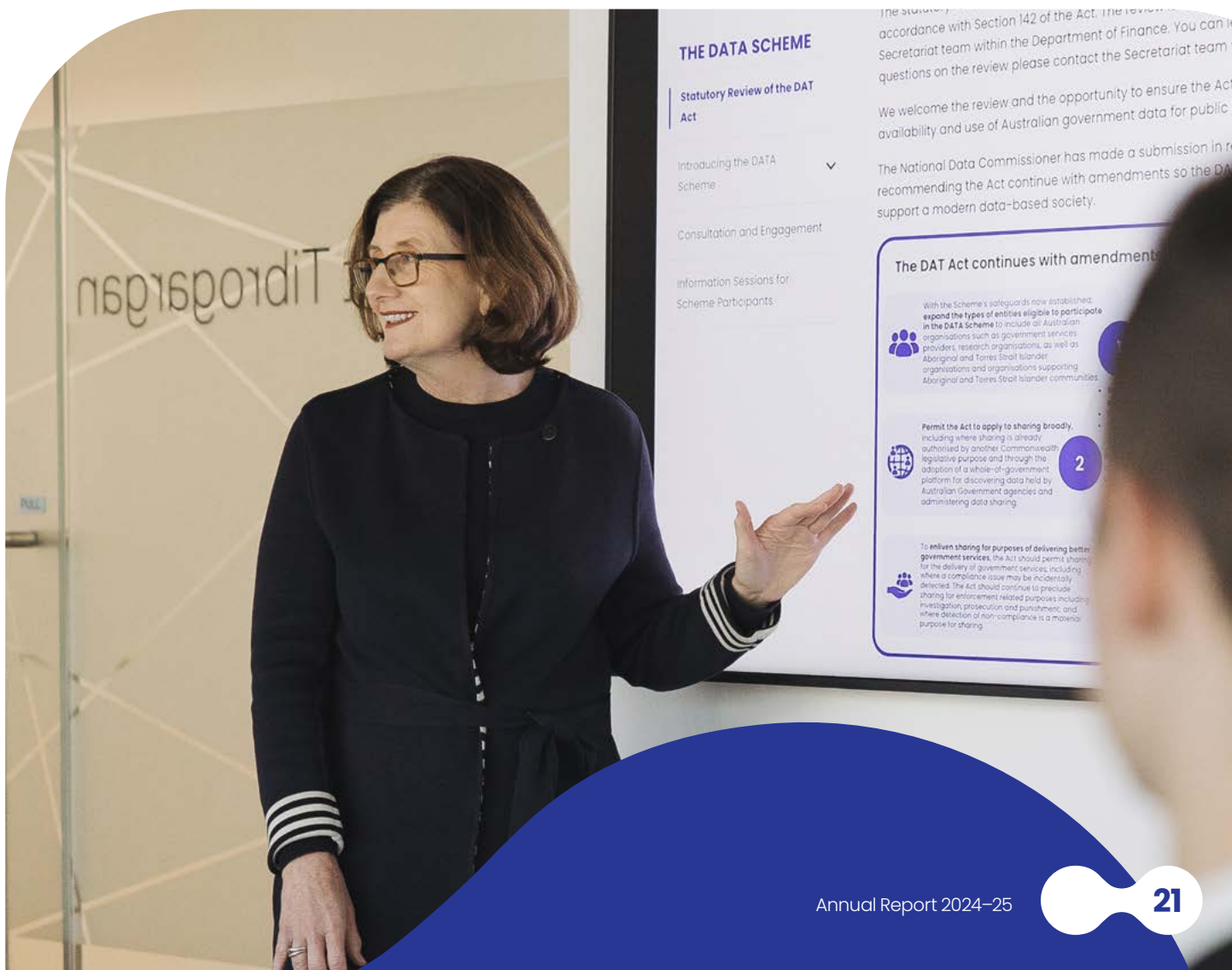
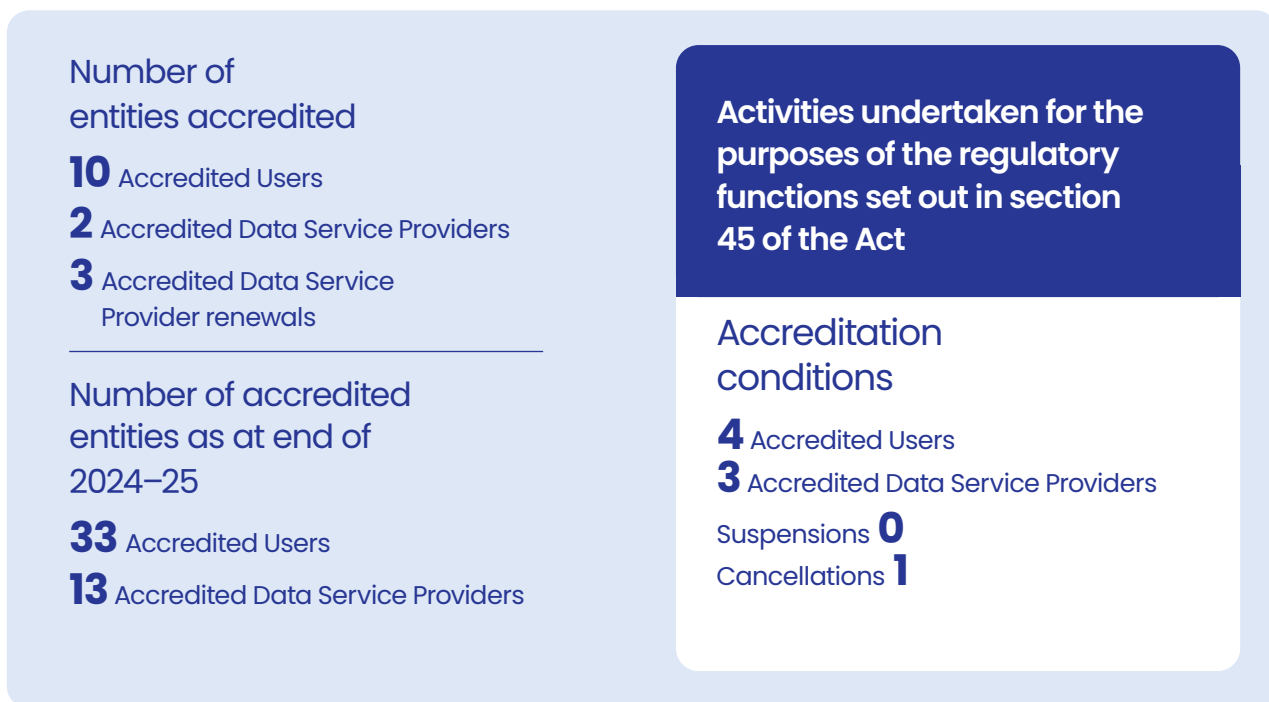
Figure 8. DATA Scheme accreditation conditions



³ The *Data Availability and Transparency (Consequential Amendments) Transitional Rules 2022* transitioned 6 Accredited Integrating Authorities to be Accredited Data Service Providers. An additional entity was transitioned in November 2023. These entities were required to renew their accreditation by 30 July 2025 so they could continue to provide data services post this date.

⁴ Section 74 of the Act allows the accreditation authority to grant accreditation with conditions.

Figure 9. Key reporting: accreditation



② Strengthen data handling and sharing across the Australian Public Service

The \$9 million Data Inventories Pilot Program (the Program) supported Australian Government agencies over 3 years to June 2024 to better understand their data assets in a systematic way through the development of data inventories. The ONDC engaged former Australian Deputy Statistician, Peter Harper to review this foundational Program. His report of October 2024, found the Program delivered positive outcomes with agencies creating or significantly improving their data inventories. The Program provided participating agencies a better understanding of the government's data agenda, impetus for better data management within agencies and an uplift of agency data capability. Most agencies considered the Program successful, and that it provided benefits exceeding their efforts. The Program also provided the government with a greater understanding of data holdings within agencies.

Based on the recommendations from the review, the ONDC continued to encourage agencies to further develop their inventories and contribute data asset records to the Australian Government Data Catalogue. This enables data users to search for and request data from Australian Government agencies, including under the DATA Scheme.

To continue raising awareness of the Scheme and to build greater confidence in the use of Australian Government data, the ONDC held 26 webinars during 2024-25. Topics included an introduction to the DATA Scheme, how to become an Accredited User, making and responding to data sharing requests and data discovery. An expanded suite of topics was offered, reflecting the growing maturity of the DATA Scheme and our participants' understanding of the Scheme.

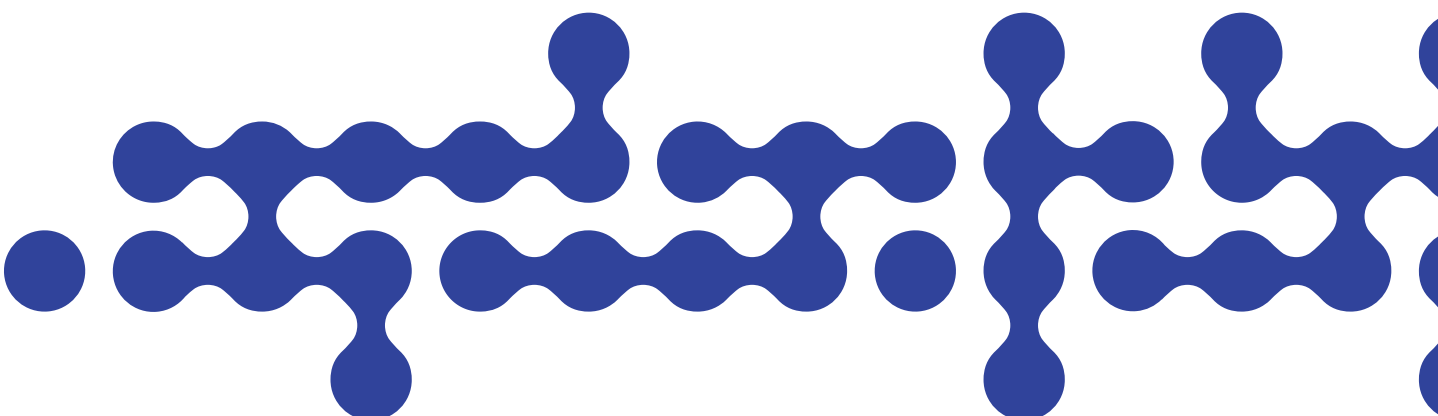
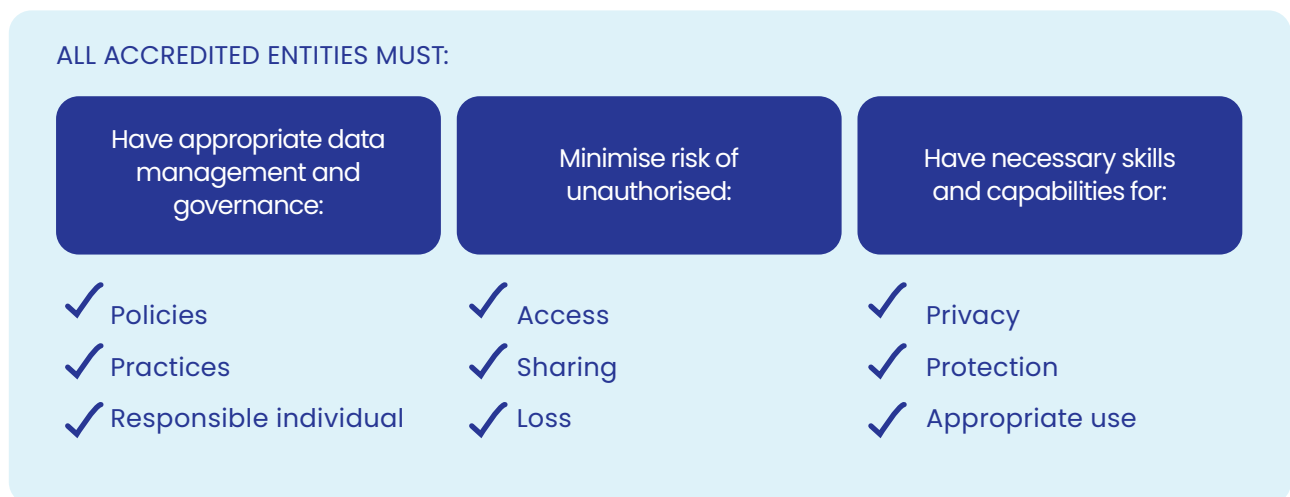
In 2024-25, a total of 26 webinars were delivered to nearly 700 attendees from over 120 unique organisations – Australian Government, state and territory governments, Australian universities and some private entities. The webinars offered participants essential information, system demonstrations, time for interactive Q&A and networking opportunities. We surveyed webinar participants later in the year and they reported satisfaction rates of 4.5 out of 5.

Throughout 2024-25, the ONDC applied its resources to best support Scheme participants to utilise the DATA Scheme. These initiatives included strengthening our concierge support for data users and seconding the ONDC staff to other Australian Government agencies to collaborate on the design and development of data sharing models and data sharing agreements.

We placed the ONDC lawyers with the Australian Institute of Health and Welfare (AIHW) and the Australian Centre for Disease Control Establishment Taskforce to bolster their capacity and capability. The AIHW placements resulted in 4 data sharing agreements under the Scheme to support the build of the NDDA. These agreements were settled using the streamlined data sharing agreement template developed by the ONDC. The short-form agreement enabled a standardised, efficient and repeatable process, allowing health and disability data from different states and territories to be provided into the NDDA.

We are working with Australian Government agencies to build their understanding of our approach to accreditation. We want to see greater recognition by Data Custodians of accreditation status to support more data sharing and to make sharing quicker and easier. As an action from the DATA Scheme Working Group (the Working Group), we are progressing work to publish profiles of accredited entities. This will provide Scheme entities with clearer insights about other capabilities.

Figure 10. DATA Scheme requirements for all accredited entities



CASE STUDY 1.

Enhancing data capability through accreditation

Accreditation is one of the DATA Scheme's key safeguards. It provides Data Custodians with assurance that Accredited Users have the right people and settings to safely handle Australian Government data.

The University of Tasmania applied to become an Accredited User under the DATA Scheme to allow it to access Australian Government data to support its research mission. Access to previously unavailable government data would expand and deepen the University's research data holdings, thereby supporting its evidence-based approach to delivery of impactful research in critical areas such as education, health and climate for Tasmania and beyond.

The accreditation process encouraged the University to review the maturity of its data governance arrangements, including senior management oversight of the data framework, management of data, data storage environments, and security settings. As a result of this review and the ONDC's feedback, the University made improvements to its data governance arrangements, including re-establishing a senior management committee to oversee university-wide data governance. The University also developed several internal procedural documents to support compliance with the Scheme, which detail relevant roles, responsibilities, and compliance obligations. These improvements led to the University developing a more robust and secure data storage environment and processes to manage and protect Scheme data.

The University became an Accredited User in April 2025 and is preparing its first data sharing request under the Scheme.

The National Data Commissioner and the ONDC play a role in strengthening APS data maturity through their participation in various forums and support for related initiatives. In 2024–25, the Commissioner participated in the Deputy Secretaries Data Group, the APS Data Profession Program Board and related initiatives on Indigenous data, gender data, disadvantaged cohorts, family and domestic violence, disease control data as well as cross-government data sharing (such as the Data and Digital Ministers Meeting). The Commissioner is also a member of the Australian Statistical Advisory Council.

For the third time running, the ONDC was a major sponsor of the Australian Government Data Forum, supporting the Australian Data Graduate Network to host the conference. The Forum brought together more than 500 data professionals from across the APS, state and territory governments, universities and the private sector to discuss the transformative

role of data in public policy, innovation, and delivering better outcomes for Australians. With 96% of respondents rating their experience as excellent or good. Since its inception in 2023, the ONDC has sponsored the APS data awards. Organised by the Australian Bureau of Statistics, the awards inspire and empower data professionals by recognising and celebrating innovation and excellence.

In 2024–25, the Commissioner and the ONDC senior executives presented at numerous conferences on data capability, including flagship events such as the Australian Government Data Forum, 9th Annual DataGov Conference, the Office of the Australian Information Commissioner's International Access to Information Day, and the Australian Government Solicitor Technology Forum. The Commissioner's speeches are available on the ONDC website.



3 Operate effectively and efficiently as a regulator, advisor, guide and educator

The National Data Commissioner, supported by the ONDC, is the regulator of the DATA Scheme. The Commissioner's regulatory functions include accrediting Scheme participants, registering data sharing agreements, handling complaints from Scheme participants and others, monitoring data sharing requests and assessing conduct within the Scheme where required. Our regulatory approach is guided by the principles of proportionality, transparency, accountability, fairness and timeliness. We promote compliance with the Scheme through advice, guidance and education.

Moving from establishment into a growth phase of the Scheme, our 2024-25 priorities continued to focus on our facilitative, intermediary role. We did this through an open, user-based approach to our operations to support and guide participants on using the Scheme and making and responding to data sharing requests. We accredited more entities and monitored sharing and conduct of Scheme participants. We continued our education offerings, to guide and educate Scheme participants and others in best practice data handling and sharing.

We maintained our service level standards for assessing applications for accreditation as well as handling enquiries and complaints. All accreditation applications received were assessed within our service level standards of 2 months for users and 3 months for data service providers. We met our service level standards of 3 days for simple enquiries and 6 days for complex enquiries around 70% of the time. We managed 8 complaints over the year, with 100% resolved within our service level standard timeframe of 30 days.

All 8 complaints received by the National Data Commissioner in 2024-25 were classified as 'other complaints', unrelated to the Scheme and outside the remit of the National Data Commissioner. Several complaints related to the collection, handling and use of the respective complainant's data by government entities, and private sector organisations. One was related to data sharing outside the remit of the Act. The complaints were appropriately guided to relevant regulators, such as the Office of the Victorian Information Commissioner, NSW Information and Privacy Commission, the Office of the Australian Information Commissioner, and the Inspector-General of Intelligence and Security. Other referrals were made to relevant government entities, such as Services Australia, the Australian Electoral Commission and the Australian Criminal Intelligence Commission.

Data Custodians did not report any complaints relating to the Scheme or their conduct in relation to the Scheme. The ONDC was not notified of any DATA Scheme breaches.

Proportionate to the increase in data requests, we stepped up our monitoring of how Australian Government agencies are responding to them, encouraging Australian Government agencies to respond in a timely way and look at ways they could share the data safely – a “yes, if appropriate safeguards are in place” approach. The Commissioner wrote to those Australian Government agencies taking more than 60 days to respond to requests, reminding them of their obligations under the Act to facilitate timely and appropriate responses to data sharing requests. The Commissioner recommends that Data Custodians acknowledge a request no later than 7 days of receipt, begin assessment and request any further information or rescoping no later than 14 days, and agree in principle to collaborate on a data sharing request or refuse the request no later than 28 days.

These agencies committed to actioning the data requests and improving future practices. Some noted the complexity of requests and volume of other data requests to their agency are contributing to unavoidable delays.

We have continued to strengthen our monitoring framework, incorporating proactive horizon scanning to identify emerging risks, particularly impacting accreditation, such as data breach incidents and issues related to the safe and secure handling of sensitive information, including those arising from organisational and governance changes.

Through the ongoing assessment of reported changes in circumstances for accredited entities, we have ensured continued compliance with the Scheme’s standards. In 2024–2025, 9 changes in circumstances were reported. Of these, one resulted in the cancellation of accreditation status for an accredited user. The reported changes in circumstances have mainly related to movements within entities, including authorised officer positions, restructures or machinery of government changes.

In line with the government’s best practice regulatory principle of continuous improvement and building trust, the ONDC initiated a number of processes to gather and respond to feedback from Scheme participants.

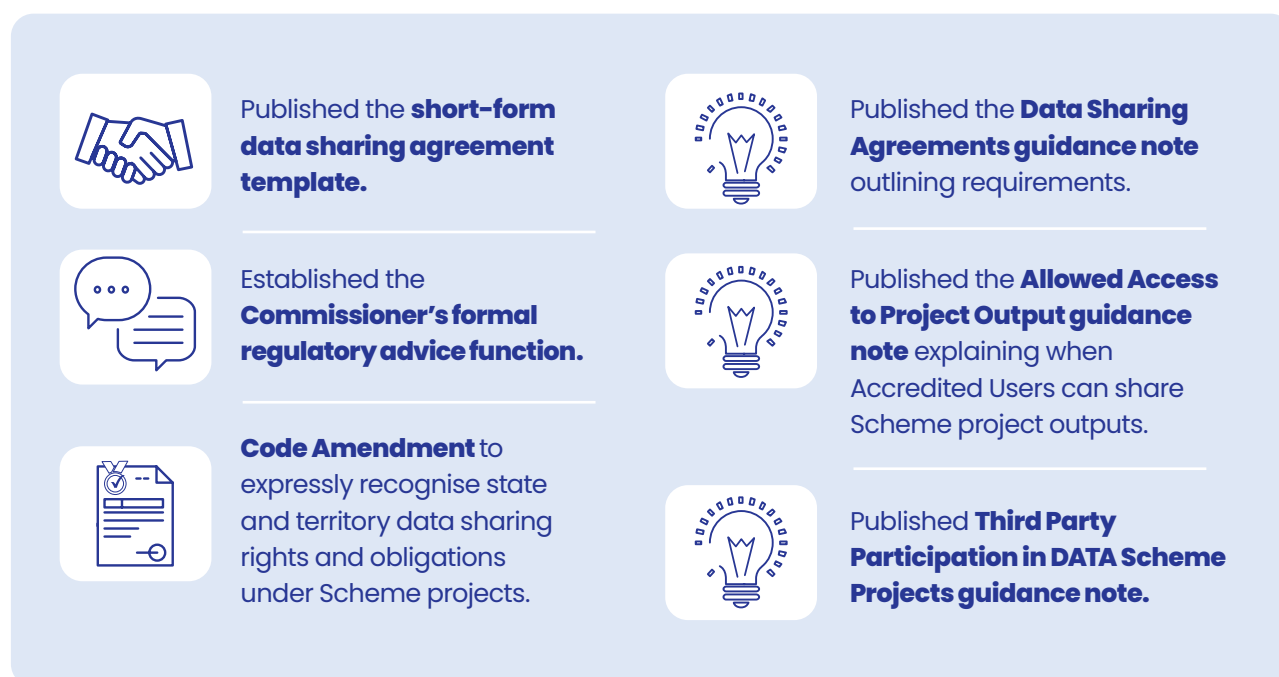
We sought feedback from participants on our operationalisation of the Scheme by establishing the DATA Scheme Working Group (the Working Group). It met 9 times between April and September 2024. The Working Group was established to identify the key issues impeding uptake of the Scheme and to identify potential solutions. Members were invited from states and territories, as well as from Commonwealth NDDA partners.

Convening the Working Group enabled the ONDC to benefit from a diversity of views from entities with Scheme experience and identify actions to respond to the findings. The Working Group also consulted with the university sector, and other states and territories through the Data and Digital Ministers Meeting⁵ Data and Analytics Working Group.

The Working Group reported in November 2024 and identified actions such as new guidance to clarify how data can exit the Scheme or be accessed by non-Scheme entities, and using subordinate legislation to clarify state and territory data rights. Most of the actions are now complete, with regular progress updates provided in DataPoints

and on the ONDC website, see [Figure 11](#). The actions included introducing a streamlined data sharing agreement template and the Commissioner making the *Data Availability and Transparency Amendment (No. 1) Code 2025*⁶ to expressly recognise the rights and obligations of state and territory bodies when sharing data with Commonwealth bodies for DATA Scheme projects. This disallowable instrument was released for public consultation in March 2025 and commenced on 20 June 2025. Another initiative was to stand up the Commissioner’s regulatory advice function. At the request of the Commonwealth partners, the Commissioner provided and published advice to support the creation of the NDDA and access to it.

Figure 11. Working group actions completed in 2024–25



⁵ The Data and Digital Ministers Meeting aims to achieve cross-government collaboration on data and digital transformation to ensure smarter service delivery and improved outcomes.

⁶ <https://www.legislation.gov.au/F2025L00701/latest/text>

During November 2024, the ONDC commissioned a series of executive interviews to gather further feedback on its performance as a regulator of the DATA Scheme. A sample of executive leaders from 23 organisations were approached; all agreed to participate. The ONDC used the feedback to inform our work program, including guidance and communications materials. Many participants viewed the ONDC as having played an important leadership role in supporting data sharing. Participants were positive about the ONDC's facilitative posture. Universities were optimistic about accessing data for research. Commonwealth agencies that identified as less data mature highly valued the learnings from the DATA Scheme's accreditation process.

Accreditation plays a critical role in ensuring the integrity of the Scheme. In line with best practice regulator principles, the accreditation framework was independently assessed by 2 review teams to ensure its robustness and that it remained fit for purpose. The first review was a Department of Finance Management Initiated Review focused on assessing the effectiveness of the

framework, including whether the design and implementation is in accordance with the legislative requirements. An expert review conducted by Cyber CX was also initiated to gain external, independent advice on the adequacy of the cyber requirements. Both reviews found the framework has satisfactory controls in place and no significant issues were identified.

We continued to actively engage with eligible DATA Scheme entities and others to continue our work in building awareness of the Scheme. This included 76 executive level meetings. We supported organisations to onboard to Dataplace, get accredited and share data. Subscribers to the Commissioner's monthly newsletter, DataPoints, increased by 6% over the year to 1,885. The ONDC's social media following grew 25%, reaching 900 followers, with an average of 8 posts per month over 2024-25. Our website maintains the ONDC's registers, guidance and reporting obligations. We reviewed it for functionality and user experience in 2024 and made improvements in early 2025. Visits to our website increased by 13% from the previous year to average ~12,700 monthly views.

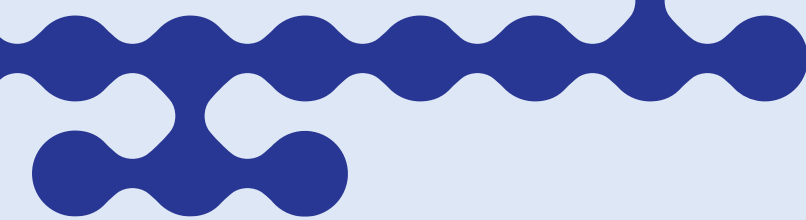


Figure 12. Key reporting: regulatory functions

<p>Information about legislative instruments and guidelines made by the Commissioner under the Act</p> <ul style="list-style-type: none">> one code amendment> 3 guidance documents <p>The number of complaints received by the Commissioner under Division 1 of Part 5.3 (Scheme complaints)</p> <ul style="list-style-type: none">> 0 <p>The number of complaints received by the Commissioner under Division 2 of Part 5.3 (general complaint)</p> <ul style="list-style-type: none">> 0 <p>Complaints unrelated to the Scheme. Not within the remit of the National Data Commissioner 'other complaints'</p> <ul style="list-style-type: none">> 8	<p>The number of complaints received by Data Custodians relating to the DATA Scheme or a Data Custodian's conduct in relation to the data sharing Scheme</p> <ul style="list-style-type: none">> 0 <p>Complaints service level standard adherence rate</p> <ul style="list-style-type: none">> 100% <p>Enquiries service level standard adherence rate</p> <ul style="list-style-type: none">> 69%
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Information about activities undertaken for the purposes of the regulatory functions set out in section 45

<p>Regulatory monitoring</p> <ul style="list-style-type: none">> monitored handling of data sharing requests> monitored conduct of Scheme participants	<p>Assisting DATA Scheme entities to comply with the requirements of the DATA Scheme</p> <ul style="list-style-type: none">> Assist meeting reporting obligations through pre-populated end of year letters> Regulatory advice> Guidance notes> Information sessions
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The National Data Commissioner's Statement of Intent outlines how the Commissioner, supported by the ONDC, plans to operate in step with the Minister's Statement of Expectations and the Australian Government's principles of regulator best practice.⁷

Figure 13. Best practice regulation: Performance highlights



⁷ Regulator best practice is defined under resource management guide (RMG) 128 <https://www.finance.gov.au/government/managing-commonwealth-resources/regulator-performance-rmg-128>

4 Deliver best practice institutional arrangements and build trust and transparency in data sharing

In 2024–25 we embedded the institutional arrangements and platform to support best practice data sharing.

Our digital platform, Dataplace, was developed to manage sharing of data held by Australian Government agencies. Dataplace guides users of the platform – Australian Government Data Custodians and those making requests for public data – to apply safe and consistent data sharing practices. Using standard practices and systems delivers time and cost savings for Data Custodians and users. Australian Government agencies and other Scheme participants can be assured that appropriate safeguards are being applied. Dataplace provides the added benefit of transparency. Scheme participants and the public are able to see what data is being shared, who it is being shared with and the purposes for which the data is being shared.

Dataplace was launched in June 2022. Over 2024–25, we continued to make improvements to enhance user experience and reporting for Australian Government agencies within Dataplace. In response to feedback from users, we implemented a streamlined data sharing agreement template, enhanced our notifications and made accessibility improvements.

To support operation of the Scheme, we implemented capability to enable foreign individual information to be captured and shared with the Australian Security Intelligence Organisation. Additional services were progressively rolled out including the Australian Government Data Catalogue (the Catalogue) which was launched in July 2024 with 12 Australian Government agencies contributing to it. The Catalogue now has 22 agencies directly contributing information about the assets they hold ([Figure 14](#)) and includes new demographic filters, making it easier to find disability, gender or indigenous related data.

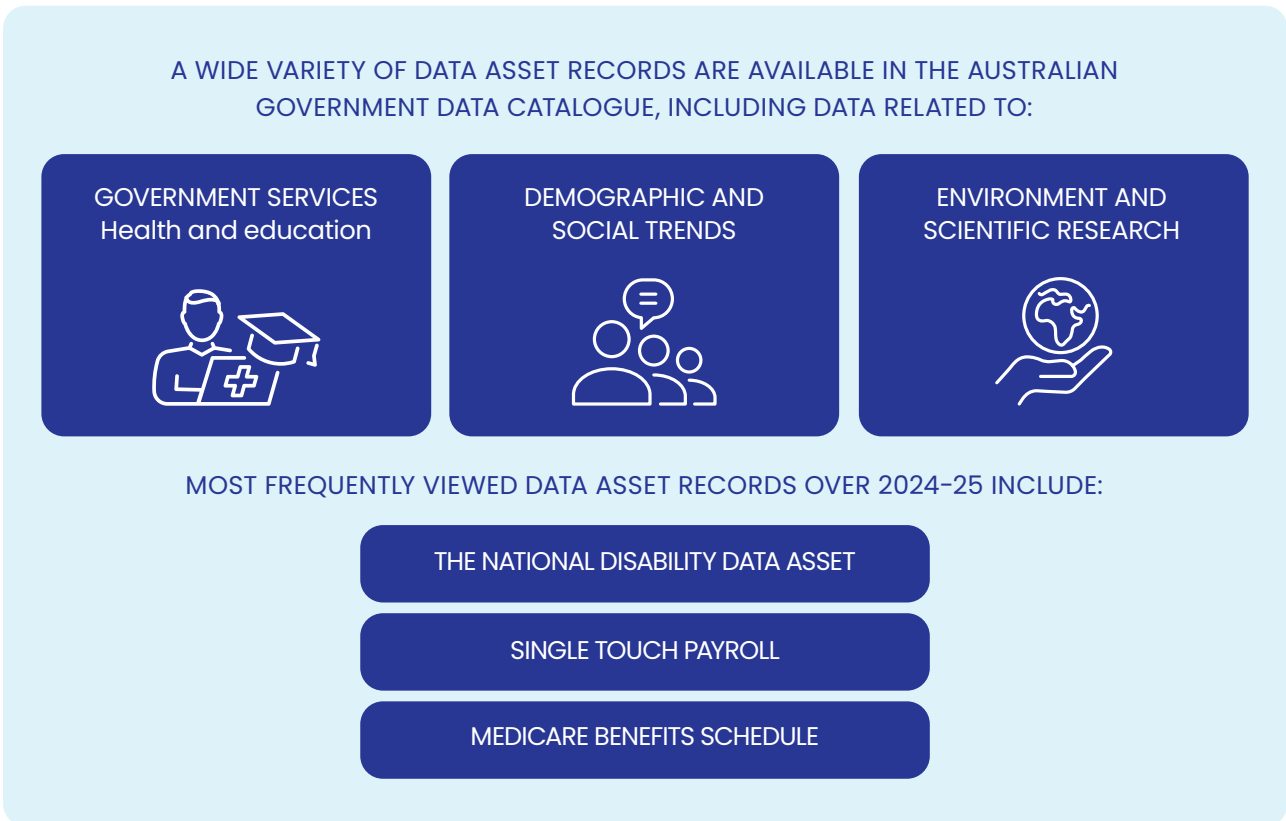
A highlight for this reporting period was the contribution of Geoscience Australia, which connected its existing catalogue of 25,195 records directly into the Catalogue. The Catalogue also draws source links from data.gov.au⁸ providing a searchable directory of between ~36,000 and ~55,000 Australian Government data assets over 2024–25.

⁸ Source data will fluctuate based on the contributions made by entities.

Figure 14. Commonwealth agencies contributing directly to the Catalogue⁹



Figure 15. Types of data assets available in the Catalogue



⁹ Larger text indicates higher number of direct contributions to the Catalogue.

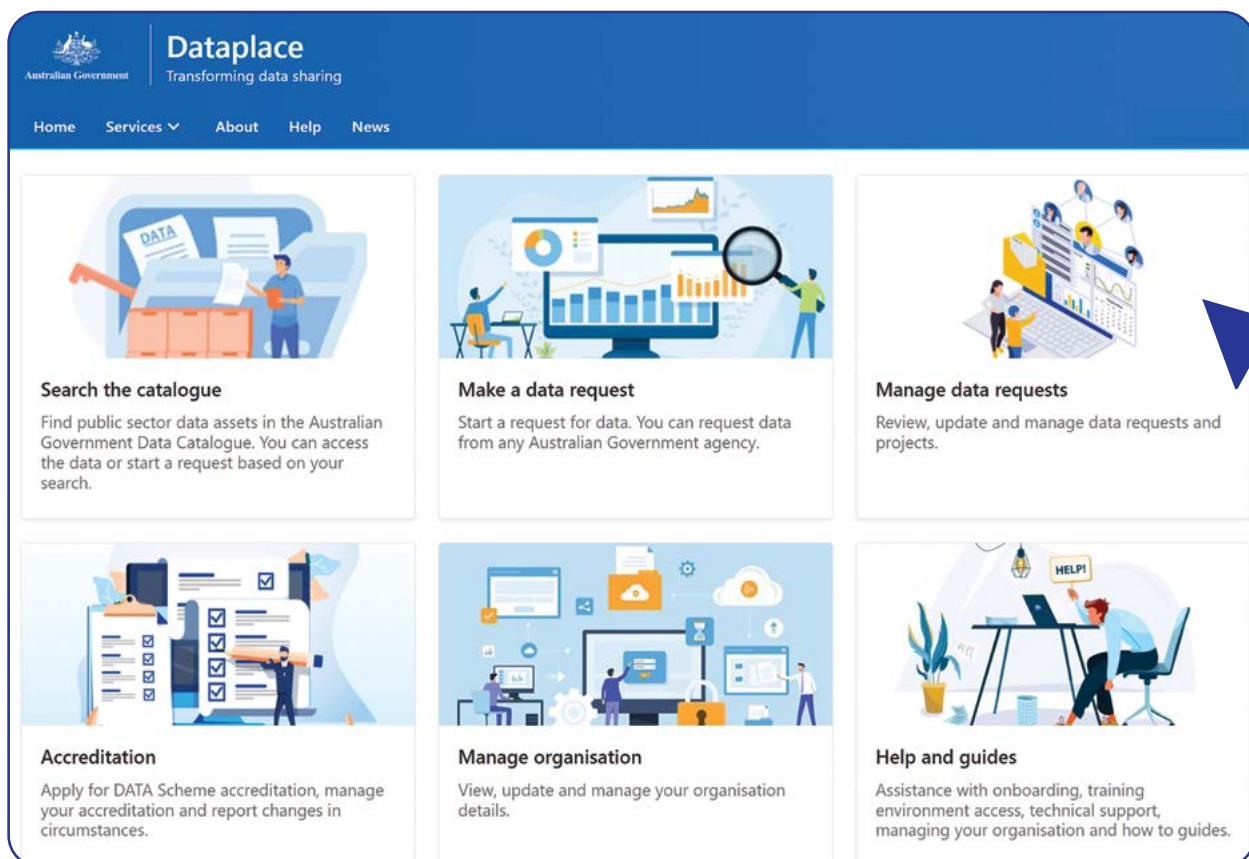
During 2024-25, the Catalogue was refined in line with whole of government initiatives including the Framework for Governance of Indigenous Data¹⁰ and the Gender Data Assets project. A new search filter was added to the Catalogue to identify data assets relevant to gender or sex-based analysis, Indigenous data, or data relating to people with a disability.

In line with our facilitative regulatory posture, we supported organisations to onboard to Dataplace and to use it. We have also focused on encouraging and supporting Australian Government agencies to adopt Dataplace as their platform to manage all of their data sharing activities.

Over the year, the number of organisations onboarded to Dataplace increased by 34 (almost 40%) to 122, comprising 48 Commonwealth agencies, 21 state and territory agencies, 21 universities and 32 other organisations.

The build and implementation phase of these whole-of-government infrastructure projects concluded in 2025. Going forward, the ONDC will continue to support and further develop the platform. Drawing on our experience and learning from this process, the ONDC is also supporting the development of a National Data Catalogue, one of the initiatives of the National Data Sharing Work Program.

Figure 16. Dataplace and the Australian Government Data Catalogue



¹⁰ Framework for Governance of Indigenous Data, Guideline 3: Provide knowledge of data assets, Action 1a <https://www.niaa.gov.au/resource-centre/framework-governance-indigenous-data>

CASE STUDY 2.

Facilitating safe data sharing

A researcher from the University of Queensland negotiated with the Department of Employment and Workplace Relations for data for a study examining labour demand and supply through employment services in Australia. While the data discovery and request process occurred outside Dataplace, the platform played a role in finalising the data sharing agreement. Once the data sharing agreement was established and signed, the Data Custodian uploaded the signed agreement to Dataplace, enabling a secure exchange and formal closure of the arrangement. Dataplace is also enabling ongoing centralised storage of the signed agreement for easy access and traceability.



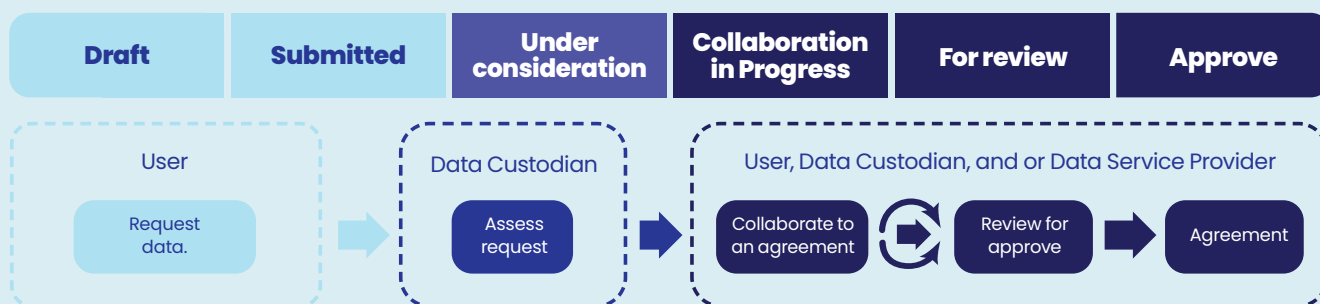
CASE STUDY 3.

Leveraging the Scheme best practices for general data sharing

The University of Melbourne and the Department of Employment and Workplace Relations used Dataplace from start to finish to establish a new data sharing project. The project aims to better understand early school leavers employment opportunities, with a goal of achieving better employment outcomes. Researchers from the university were guided to Dataplace to draft and submit the data sharing request to the department (the Data Custodian, see [Figure 17](#)). The department assessed the request, considering the University of Melbourne's status as an Accredited User and the purpose of the data request, and moved it into the collaboration stage to prepare the data sharing arrangement. The parties finalised a data sharing agreement through Dataplace which enabled sharing to commence.

Data will be integrated into Melbourne Institute's existing platform, YouthView,¹¹ which will provide useful insights about Australian regions to guide service providers delivering placement services.

Figure 17. Process for establishing a data sharing project in Dataplace



¹¹ <https://melbourneinstitute.unimelb.edu.au/research/reports/breaking-down-barriers>

To foster trust and transparency in data sharing, the ONDC maintained registers of accredited entities and data sharing agreements made under the Scheme on our website. We published the National Data Commissioner's third annual report. We provided the Minister with quarterly reports on Scheme activity.

The National Data Advisory Council (the Council) met 4 times in 2024–25. There were 3 regular meetings and one special out-of-session meeting focused on the Commissioner's submission to the statutory review of the Act.

Throughout the year, the Council provided advice on the breadth of the ONDC's activities, encompassing the National Data Commissioner's annual report, data sharing activity and challenges, and the DATA Scheme Working Group, including findings and implementation of recommendations. The Council advised on other feedback from Scheme participants, developments with Dataplace and the Australian Government Data Catalogue as well as the ONDC's annual priorities and performance targets.



The statutory review of the Act and the implications of artificial intelligence for the Scheme were other areas of focus. The Council also reviewed its own performance.

We welcomed 2 new ex-officio members to the Council. Ms Elizabeth Tydd joined in August 2024 as the new Information Commissioner and Professor Tony Haymet joined in February 2025 as the new Chief Scientist.

Drawing on the expertise of Council members, and through our relationships with other regulators, we monitored and considered developments in technology, industry practices, and community expectations.

The ONDC continued to act in accordance with the Australian Government's best practice regulator principles, closely working with other regulators such as the Office of the Australian Information Commissioner and state and territory regulators, and key stakeholders such as the Department of Home Affairs and the National Office of Cyber Security. These collaborations allowed identification of regulatory overlap, shared priorities and challenges.



Review of the Data Availability and Transparency Act 2022

Led by Dr Stephen King and supported by a Secretariat team within the Department of Finance, the statutory review of the *Data Availability and Transparency Act 2022* commenced in March 2025. The review is considering the effectiveness of the Act and whether its operation supports improvements in public sector data availability, sharing and transparency. The review will consider whether the Act should remain in force.

The ONDC provided Dr King with extensive information about the DATA Scheme and its operation. These resources were also made available on our website to support the review. We encouraged Scheme participants and others to engage with the review.

The Commissioner's public submission to the review, published in May 2025, drew on the experience and evidence of the first 3 years of the Act's operation. Our submission recommended the Act continue with amendments to enable the Scheme to operate as intended and realise the vision of a step change in the use of Australian Government data for public benefit and to support improvements in productivity. We proposed a package of amendments to streamline the Act, making it easier to use and enable the DATA Scheme to support the breadth of sharing by Australian Government agencies. Sharing would be standardised, generating efficiencies and ensuring best practice. Sharing could be authorised if in the national interest and sharing across all levels of government would be better enabled.

In addition to these legislative changes, we recommended a sustained focus and commitment to:

- address cultural resistance to sharing data and sharing it in a timely way
- further strengthen data capability of Australian Government agencies and other Scheme participants, and
- strategic allocation of existing resources with Australian Government agencies as well as across the Commonwealth, the different levels of government and the research sector to make better use of data.

Figure 18. National Data Commissioner’s proposed amendments to the DAT Act

The DAT Act continues with amendments so the DATA Scheme can operate as intended



Staffing and financial resources

The ONDC’s average staffing level for the reporting period was 48.86. This reflected the DATA Scheme and the ONDC moving into a growth stage following the initial establishment activities of the Scheme. We refined our organisational arrangements over the year to strengthen our facilitative regulatory posture, in particular by enabling a dedicated team to support participants to request and obtain data under the Scheme. Our organisational structure is shown in [Figure 19](#).

We continued to grow and build our knowledge, expertise and relationships to deliver our functions, and seconded staff to multiple entities to better support those entities in capability uplift, designing data sharing models and developing data sharing agreements. Secondments in 2024-25 have included to the Australian Institute of Health and Welfare and the Australian Centre for Disease Control Establishment Taskforce.

Figure 19. ONDC organisational structure

National Data Commissioner Gayle Milnes			
Sharing, Policy and Legal Acting Assistant Secretary Taylor Black (partial period) Liam Burke (partial period)		Platforms and Regulation Assistant Secretary Dr Andrew Taylor	
		Expert Data Advisors	
Advice and Education	Data Sharing and Engagement	Accreditation	Data Platforms
Legal Services	Strategy, Communications and Governance	Regulation and Compliance	

Expenditure

Total operational expenditure for 2024–25 was \$9.6 million, in line with the funds appropriated. Expenditure comprised employee expenses of \$8.220 million and supplier expenses of \$1.425 million.

Revenue

The ONDC did not charge any fees during 2024–25.

Managing our assets

Total capital expenditure for the financial year was \$1.207 million for the Australian Government Data Catalogue and \$1.012 million for Dataplace. The remaining funds are forecast to be spent in 2025–26 to continue the sustainment and minor enhancements to these platforms.

Table 1. ONDC Resourcing

	Actual available appropriation for 2024–25	Payments made 2024–25	Balance remaining 2024–25
	\$'000 (a)	\$'000 (b)	\$'000 (a) – (b)
Departmental appropriation			
Operational budget	9,658	9,648	10
Capital budget	2,552	2,219	333
Total departmental annual budget	12,210	11,868	342

Note: numbers are rounded to the nearest \$'000 and totals may not add due to rounding.

Appendix 1. Correction of material errors

Page in 2023–24 Annual Report	Error
2	The number of data shares was reported as 12. The correct figure was 11.
7	The number of general data shares was reported as 10. The correct figure was 9.
14	The number of data shares was reported as 12. The correct figure was 11.

Appendix 2. Legislative reporting requirements

Reporting in accordance with section 138 of the *Data Availability and Transparency Act 2022*.

<i>Data Availability and Transparency Act 2022</i> reference	Description	Part of report or comment
138(2)(a)	information about legislative instruments and guidelines made by the Commissioner under this Act	Pages 28 , 30
138(2)(b)	information about activities undertaken for the purposes of the regulatory functions set out in section 45	Pages 20–21 , 26–27 , 30
138(2)(c)	a description of any efforts made by the Commissioner to assist DATA Scheme entities to comply with the requirements of the data sharing scheme	Pages 27 , 30
138(2)(d)(i)	the number of requests received by Data Custodians of public sector data from accredited users for sharing of data under this Act and information about the reasons for requests being agreed to or refused	Pages 16–19
138(2)(d)(ia)	the number of such requests refused by Data Custodians where reasons for the refusal were not given within the time required by subsection 25(3)	Page 19
138(2)(d)(ii)	the number of data sharing agreements made	Page 19

Data Availability and Transparency Act 2022 reference	Description	Part of report or comment
138(2)(d)(iii)	the number of entities accredited	Pages 20-21
138(2)(d)(iv)	the number of accredited entities as at the end of the financial year	Pages 15 , 20-21
138(2)(d)(v)	the number of complaints received by the Commissioner under Division 1 of Part 5.3 (Scheme complaints)	Pages 26-27 , 30
138(2)(d)(vi)	the number of complaints received by the Commissioner under Division 2 of Part 5.3 (general complaints)	Pages 26-27 , 30
138(2)(d)(vii)	the number of complaints received by Data Custodians relating to the data sharing scheme or a data custodian's conduct in relation to the data sharing scheme	Pages 27 , 30
138(2)(e)	information about the activities of the National Data Advisory Council	Page 37-38
138(2)(f)	information about the number of APS employees made available to the Commissioner as mentioned in section 47	Page 42
138(2)(g)	a report on financial matters, including a discussion and analysis of the financial resources available to the Commissioner in the financial year and how they were used	Page 43

Appendix 3. Membership of the National Data Advisory Council

Rod Sims (Chair of the Council) (February 2023 – Present):

Rod Sims AO is a Professor at the Crawford School of Public Policy, Australian National University, Canberra. He was also the Chair of the Australian Competition and Consumer Commission from 2011 – March 2022 where, among many other things, he worked extensively on digital platform and data issues.

National Data Commissioner (ex-officio member):

Ms Gayle Milnes was appointed as the inaugural National Data Commissioner in April 2022.

Australian Statistician (ex-officio member):

Dr David Gruen AO was appointed Australian Statistician in December 2019. As Agency Head of the Australian Bureau of Statistics, he is accountable for the functions and operations of the Bureau.

Australia's Chief Scientist (ex-officio member):

Professor Tony Haymet commenced as Australia's tenth Chief Scientist in January 2025. He provides authoritative and independent evidence-based advice to the Australian Government on whole-of-government science and technology priorities.

Dr Cathy Foley AO PSM was Australia's Chief Scientist from January 2021 until December 2025.

Australian Information Commissioner (ex-officio member):

Ms Elizabeth Tydd was appointed Australian Information Commissioner in August 2024. She leads the Office of the Australian Information Commissioner in fulfilling its functions across privacy, freedom of information and government information management.

Ms Angelene Falk was the Australian Information Commissioner and Privacy Commissioner from August 2018 to August 2024.

**Associate Professor
Kalinda Griffiths
(January 2023 – Present):**

Associate Professor Kalinda Griffiths (Yawuru) is an epidemiologist and Director of Poche SA+NT at Flinders University, Visiting Fellow at the Centre for Big Data Research in Health (UNSW), and Honorary Fellow at Menzies School of Health Research.

Kalinda's work spans Indigenous health measurement, official statistics, and Indigenous Data Governance, with applied programs in data governance, cancer, and genomics.

She advises on national data policy and infrastructure, contributing to efforts to embed Indigenous governance frameworks in data sharing and to strengthen whole-of-government capability and transparency.

Based on Larrakia Country (Darwin), she partners with communities, services, and system leaders to improve data quality, access and use for community and public benefit.

**Mr Peter Leonard
(January 2024 – Present):**

Peter Leonard is a Sydney based data and technology business consultant and lawyer and principal of Data Synergies. Many of his clients are data analytics services providers and businesses developing and implementing artificial intelligence and advanced data analytics projects and applications across many industry sectors.

**Professor Greg Kaplan
(January 2023 – Present):**

Greg Kaplan is a Professor of Economics at the University of Chicago, Editor of the Journal of Political Economy, Lead Editor of the Journal of Political Economy Macroeconomics, and Co-Founder and Non-Executive Director of the non-partisan Australian think-tank, e6I Institute.

**Dr Kendra Vant
(January 2023 – Present):**

Dr Kendra Vant is a product and tech executive with experience across industry (Xero, SEEK, Telstra, Deloitte, Commonwealth Bank) and research (MIT, Los Alamos National Laboratory). She is an industry leader in driving development of data and AI products that change people's lives for the better.

**Dr Joshua Meltzer
(former member):**

Dr Joshua Paul Meltzer is a senior fellow at the Brookings Institution in Washington D.C. where he leads the Digital Economy and Trade Project. He also teaches digital trade law at the University of Melbourne, and teaches emerging technologies, data flows and the law at Monash University. Dr Meltzer served on the Council from April 2022 to April 2025.

**Professor Sallie Pearson
(former member):**

Sallie Pearson is the Professor of Health Systems at the School of Population Health, UNSW Sydney. She is also the Director of the National Health and Medical Research Council (NHMRC) Centre of Research Excellence in Medicines Intelligence. Professor Pearson has led national and international studies leveraging 'big health data' to generate real-world evidence on the use, benefits, and safety of prescribed medicines. Prof Pearson served on the Council from April 2022 to April 2025.

Office of the National Data Commissioner

Ngunnawal Country, One Canberra Avenue FORREST ACT 2603

Visit our website to learn more about the DATA Scheme and strengthen your data journey www.datacommissioner.gov.au

Follow us on LinkedIn @Office of the National Data Commissioner

Questions? Contact us at information@datacommissioner.gov.au

The bottom half of the image features a repeating pattern of white and dark blue wavy, organic shapes. These shapes are interconnected, creating a complex, cellular-like texture. The white shapes are set against a solid dark blue background, and the overall pattern is symmetrical and rhythmic.