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Mercedes

This reply is further to your 19 September follow up of Richard Glenn's 3 September invitation to the round table meeting on 26 September. Apologies for the delay in responding to the original email.

Thank you for the invitation. As you know, APF is an entirely volunteer organisation, and is routinely called on to comment on initiatives with privacy implications emanating from the private sector and the nine Australian governments. We accordingly have to prioritise our commitments. At present we are overloaded with requests to comment on a variety of Commonwealth initiatives including your own consultation on draft Privacy Regulations, the imminent DBCDE response to Pt J of the ALRC Report and the worrying proposals from another division of your Department for changes to so called national security legislation.

In this case, where the issue is the design and implementation of privacy education programmes, it is sufficient for us to confirm that we of course support the need for effective community education, particularly around the major changes to the credit reporting regime that are currently before the Parliament.

The Office of the Australian Information Commissioner is obviously a key player and will presumably be closely involved in this project. While they already have staff and budget dedicated to community education, the scale of the awareness task associated with the proposed changes to the Privacy Act means that significant additional resources will be required. It does not necessarily follow that OAIC should undertake the new awareness activity in relation to credit reporting changes – there may well be other agencies and organisations, and alternative channels, better placed to reach affected consumers, and a variety of options should be considered.

There are a number of financial consumer NGOs who are better placed than APF to provide input to the design of a credit reporting education programme, and they may also have a direct role to play in delivering community education. You are aware that we work closely with these NGOs in relation to the credit reporting provisions of the Privacy Act. On this occasion we will have to leave civil society input to your consultation in their capable hands.

We hope the consultation goes well and look forward to hearing about the government's plans for community education in due course. We note that the House of Representatives Social and Legal Policy Committee, in its recently issued report on the Privacy Amendment Bill, identifies a clear need for significant education more broadly than just in the credit reporting area.

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