



**Australian  
Privacy  
Foundation**

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31 October 2011

Ms Angelene Falk  
Acting Assistant Commissioner Policy  
Office of the Australian Information Commissioner  
GPO Box 5218  
SYDNEY NSW 2001

Dear Angelene

**Re: TFN Guideline Review**

Thank you for the opportunity to comment on this review. We note that due to a misunderstanding over our postal address (we no longer have one except by arrangement), we did not receive the initial invitation in August. We appreciate the fact that OAIC followed up about this in early October (after the closing date for submissions) and requested our comments by 28 October.

Unfortunately pressure on our limited, all-volunteer resources because of the large number of other important consultations and issues has prevented us from giving the proposed new Guidelines and associated material any serious consideration. However, given your assurances that there has been no change in the policy intent or effect, we have no objections to the revised documents.

We welcome the objective of updating the Guidelines and clarifying their effect – this should benefit both TFN recipients and taxpayers. The proposed re-ordering of the Guidelines to reflect the information life-cycle (and thereby make them more consistent with the privacy principles) appears sensible.

For the reasons already explained above, we are not in a position to answer any of the specific stimulus questions in the consultation paper. We hope that you have sought and received feedback on the clarity and comprehensiveness of the new documents, particularly from a taxpayer / public perspective.

We would be interested to know which other organizations have made submissions. It may be that some of them would have shared interests with APF and we could look at their submissions to see if they have raised any concerns which we would support. You have indicated that submissions will be published. Could you please advise if they are available.

Yours sincerely

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