From:
To:
FOIDR

Subject: Consultation - Disclosure of public servants' names and contact details

Date: Friday, 2 August 2019 10:36:09 PM

OAIC

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I write in a private capacity as a member of the public to comment on the Discussion paper - Disclosure of public servants' names and contact details.

My consultation comments are below:

I believe that public servants' names and contact details should remain within the public domain.

Staff working in the public service (excepting in the security fields) should have an expectation that their actions and decisions are made available for scrutiny by the public through the Freedom of Information process.

Transparency and accountability are part of a public servant's employment conditions and are reinforced through induction and training.

Staff who have a need to keep their name and contact details private (due to safety concerns, family law matters, etc.) are already provided with the opportunity to have alternative 'work names' or, for their names to be identified to the relevant FOI Officer so as to be always redacted.

Additionally, there are already protections available within the Act, Decisions and Guidelines that may be used to redact individual officers information should that be required.

I do not agree that for the very small number of names that may be sensitive, that it should become default to remove all ownership and public accountability from a public servant's work.

Removing names of officials always reduces the evidentiary value of documents.

Removing the names of the officers who have been privy to a document can remove evidence of the chain of custody, the areas of responsibility involved, the extent of dissemination, the approval workflow, the level of decision-making, and the final level of approval.

Formal letters or documents containing broad contextual information are becoming rarer in the public service. It is now a common occurrence for matters to be communicated and determined through informal and digital forms of documents. These documents are often communicated without context or a signature block showing a person's position (if this discussion proposal became policy I would assume this would become the default). Given this, once you remove the name and contact details (e.g. phone number, email address) from the document you have removed all relevant context and ownership for the action or decision.

I believe it is a basic protection of transparency, accountability, provenance and probity, that the names of staff who have created, acted upon or approved actions within documents

continue to be made available. Removing public accountability will not promote and uphold the APS values nor maintain the integrity of the public service.

Privacy Notice: due to my position within the public service and the possibility that my views may be considered as that of my agency I do not consent for my name or email address to be published with my comments.

