

From: [REDACTED]
To: [FOIDR](#)
Subject: Submission - Disclosure of public servants' names and contact details
Date: Sunday, 4 August 2019 5:33:20 PM

Dear OAIC

As a low-level public servant, I do not believe the names and contact details of non-SES employees should be made public in FOI requests.

For SES employees, their potential public-facing role within an agency, as well as their responsibility, pay and assistants to filter calls, means release of names is reasonable.

Due to their minor roles within an agency, there is no benefit to people knowing the names of non-SES employees. This will not assist the purposes of the FOI request. If a member of the public is communicating directly with the agency, they will have the relevant names and contact details they need for their own issue. Journalists etc. are able to obtain relevant details and public stories without the names of low-level staff.

Non-SES employees are rarely responsible for major decisions and typically the correspondence released with their names is documentation which may relate to an issue, but for which they are not ultimately responsible. There is no utility for a member of the public to see the names of every employee who worked on an issue.

Non-SES employees who are decision-makers will typically make decisions within a framework which sets out how the decision is to be made and allows for recognised methods for merits and/or judicial review. It is inappropriate to try and contact an officer through another method regardless of whether they were involved with a decision or not.

Knowing the names of non-SES employees does not assist with the purpose of FOI. Transparency is achieved with the release of documents and the ideas and processes of the agency, personal details not required.

There is a risk of harm to non-SES employees if their names are released. They could be the subject of stalking and harassment. Given they are not publicly representing their agency at a high level, the only benefit of someone knowing their names would be to try and find out more about the individual, or to try and make inappropriate contact.

For non-SES employees, there is no need to know who may have worked on certain matters as the lack of responsibility at that level means there are unlikely to be relevant connections or biases that could be uncovered. Furthermore, should any unsuitable

connections or biases exist with low-level employees, it would be the role of security vetting and relevant senior officers to determine this, not members of the public. There is no benefit to names being released other than to satisfy the unnecessary curiosity of some people to learn more about the personal lives of some people who may perform work under instructions of the government.

Further, public servants are typically under strict social media policies which means they do not engage with political public debate with their personal names due to potential appearance of bias. This means non-SES employees' personal names can be discussed in the public arena after an FOI request, with the employee in question being unable to engage in the debate in any respects. Already, public servants concerned about their name being released in FOI are less likely to give frank and fearless advice.

There is a clear risk of the personal life of non-SES employees being disturbed as a result of the release of their names in FOI. This is particularly the case for employees who may have uncommon names and/or live in smaller towns and are therefore more likely to have their personal details uncovered or disturbed. There is also a risk of foreign governments using FOI to try and ascertain personal details of APS officers for nefarious purposes.

FOI legislation was developed prior to the advent of the internet and social media where it became possible to collect large amounts of information about individuals quickly. FOI requests were released to the requestor, rather than published online. The landscape has changed significantly and protection of the privacy of non-SES employees should be adjusted accordingly.

I would suggest FOI requirements are change to automatically remove the names and contact details of non-SES employees.

Please do not publish this submission or publish anonymously if you must publish.

Kind regards