

20 November 2019

Ms Angelene Falk  
Australian Information Commissioner and Privacy Commissioner  
The Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001

Email: [consultation@oaic.gov.au](mailto:consultation@oaic.gov.au)

Dear Ms Falk

**Consultation on draft CDR Privacy Safeguard Guidelines**

Thank you for the opportunity to comment on the OAIC's draft CDR Privacy Safeguard Guidelines.

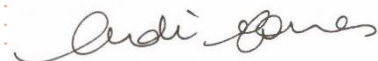
My office is likely to have to consider the privacy safeguards and supporting guidelines when the Consumer Data Right (CDR) regime is extended to the telecommunications sector.

I understand Treasury is considering options for the structure of External Dispute Resolution (EDR) schemes for complaints under the CDR regime. I believe the OAIC could lead an EDR regime that leverages the OAIC accreditation of industry EDR schemes. This would capitalise on the OAIC's existing central role in handling privacy complaints with the support of industry-based schemes. Leveraging the current regime would ensure simplicity and efficiency for both consumers and providers by removing duplication of membership and ensuring consistency of application across different EDR schemes.

As set out in my earlier submission,<sup>1</sup> some areas of the general CDR rules may not suit complaints handling for the telecommunications sector. I will be better placed to comment on telecommunications specific privacy safeguards and guidelines when the CDR regime is extended to the telecommunications sector. I support the OAIC revisiting the privacy guidelines at that time.

I look forward to being more closely involved in future consultations as the rules extend to the telecommunications sector.

Yours sincerely



Judi Jones

**Telecommunications Industry Ombudsman**

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<sup>1</sup> TIO submission to the ACCC, 17 May 2019, available at <https://www.tio.com.au/sites/default/files/2019-06/20190517%20TIO%20Letter%20to%20ACCC%20-%20CDR%20Rules.pdf>