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Submission to the Joint Committee of Public Accounts and Audit

Inquiry into the Management of Client Privacy in the Australian Public Sector

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Disclaimer:

This submission is made in a personal capacity. The views expressed are solely those of the author and do not represent the views of any employer, government agency, or professional body.

1. Introduction

I welcome the opportunity to make a submission to the Committee regarding the management of client privacy in the Australian public sector.

My professional experience has involved frontline public service environments where privacy obligations must be upheld while services continue to respond to urgent human need, operational pressures, workforce shortages, competing legal duties, and real-time decision-making.

This submission respectfully offers a practical perspective: privacy management should be understood not only as a legal or compliance issue, but as a live operational function within complex human systems.

2. Core Observation

Public services rarely operate in ideal conditions.

They often function through uncertainty, competing priorities, fragmented systems, staff movement, urgent demand, and incomplete information. Privacy obligations therefore need to be robust enough for real environments, not only policy documents.

Where privacy systems are overly abstract, unclear, or administratively burdensome, risk can increase rather than decrease.

3. Regional and Remote Realities

In regional, rural and remote Australia, privacy management may involve additional pressures:

- smaller communities where people may know one another socially or professionally
- limited specialist staffing and cross-role responsibilities

- higher staff turnover or temporary workforce reliance
- long travel distances requiring coordination across agencies
- after-hours service gaps
- greater reliance on telephone, email, and practical workarounds

Privacy frameworks should explicitly recognise these realities.

A privacy model designed around metropolitan assumptions may not always translate effectively to dispersed service environments.

4. Privacy and Safety Must Be Balanced

Frontline public servants can face genuine tension between:

- protecting privacy; and
- sharing sufficient information to prevent harm, coordinate care, or ensure continuity.

Where staff are uncertain, some may under-share important information out of fear of criticism or breach allegations. Others may over-share due to urgency.

Neither outcome is ideal.

The system should support proportionate, lawful, well-reasoned information sharing rather than fear-based decision-making.

5. Practical Risk Sources

In my respectful view, privacy incidents often arise less from malicious intent and more from:

- fragmented information systems
- unclear access permissions
- outdated processes
- inconsistent training
- unclear escalation pathways
- hurried communication under pressure
- lack of confidence in rules

This suggests reform should focus on systems design as much as individual accountability.

6. Recommendations

I respectfully recommend consideration of the following:

Recommendation 1

Develop plain-English privacy decision tools for frontline staff across agencies.

Recommendation 2

Create regional and remote privacy guidance recognising smaller workforce and service constraints.

Recommendation 3

Improve interoperability and secure data transfer between public systems to reduce unsafe workarounds.

Recommendation 4

Increase scenario-based privacy training using realistic operational examples.

Recommendation 5

Support staff who make good-faith, proportionate disclosures for safety or continuity purposes within lawful frameworks.

Recommendation 6

Encourage agencies to review privacy culture annually, not only technical compliance.

7. Final Comment

Privacy is essential to public trust. However, privacy systems must also be usable, intelligible, and durable under ordinary operational pressure.

The strongest privacy systems are not those that merely exist in policy. They are those that help real workers make sound decisions in real time.

Thank you for considering this submission.

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