



**Australian
Privacy
Foundation**

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6 November 2012

Catriona Larritt
General Manager for eServices
Australia Post
Catriona.Larritt@auspost.com.au

Dear Ms Larritt

Re: Digital Post Service

We refer to our letter of 22 April 2012 and Erin Kelly's reply of 8 June in relation to the then-planned Digital Post Service. We have recently also been approached by IIS, on your behalf.

We note that Australia Post launched the service at the end of October. The service's architecture is now in place, momentum is being generated, and any changes from now on to address concerns, problems or risks identified will be retro-fits, and so inevitably expensive, inefficient and problematic.

The consultative process Australia Post adopted appears quite deficient, in the following ways:

- To deliver benefits as improvements in design or reductions in personal information security or privacy risk, PIA processes must be performed in advance, as part of the design process, not in arrears
- PIA processes need to be based on detailed background documents sufficiently robust to enable fairly full understanding of the proposed application. The document provided to us was merely the Executive Summary of an apparently already-complete PIA Report, together with some tables from the end. The description of the proposal was one page long, which failed to provide a suitable basis for analysis and discussion

Does your organisation reasonably expect the APF or other civil society entities to invest their limited resources in analysis and discussion based on inadequate information and in relation to a design that has already been set in stone?

In the event that we have misunderstood in some way, and the design of the scheme can be actually readily changed to reflect feedback provided by civil society, would you please let us know.

Yours sincerely

Vice-Chair, for the Board of the APF
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