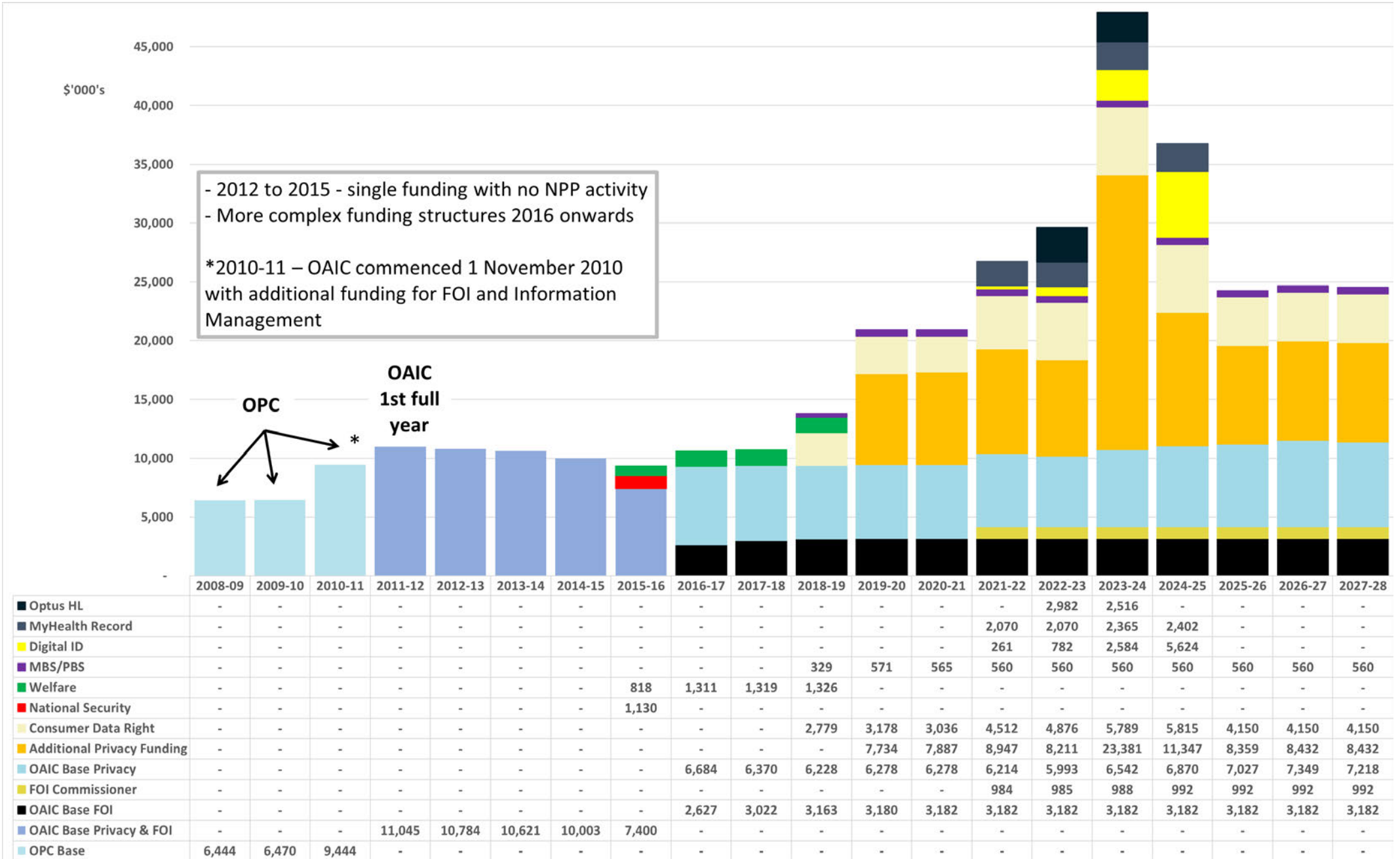
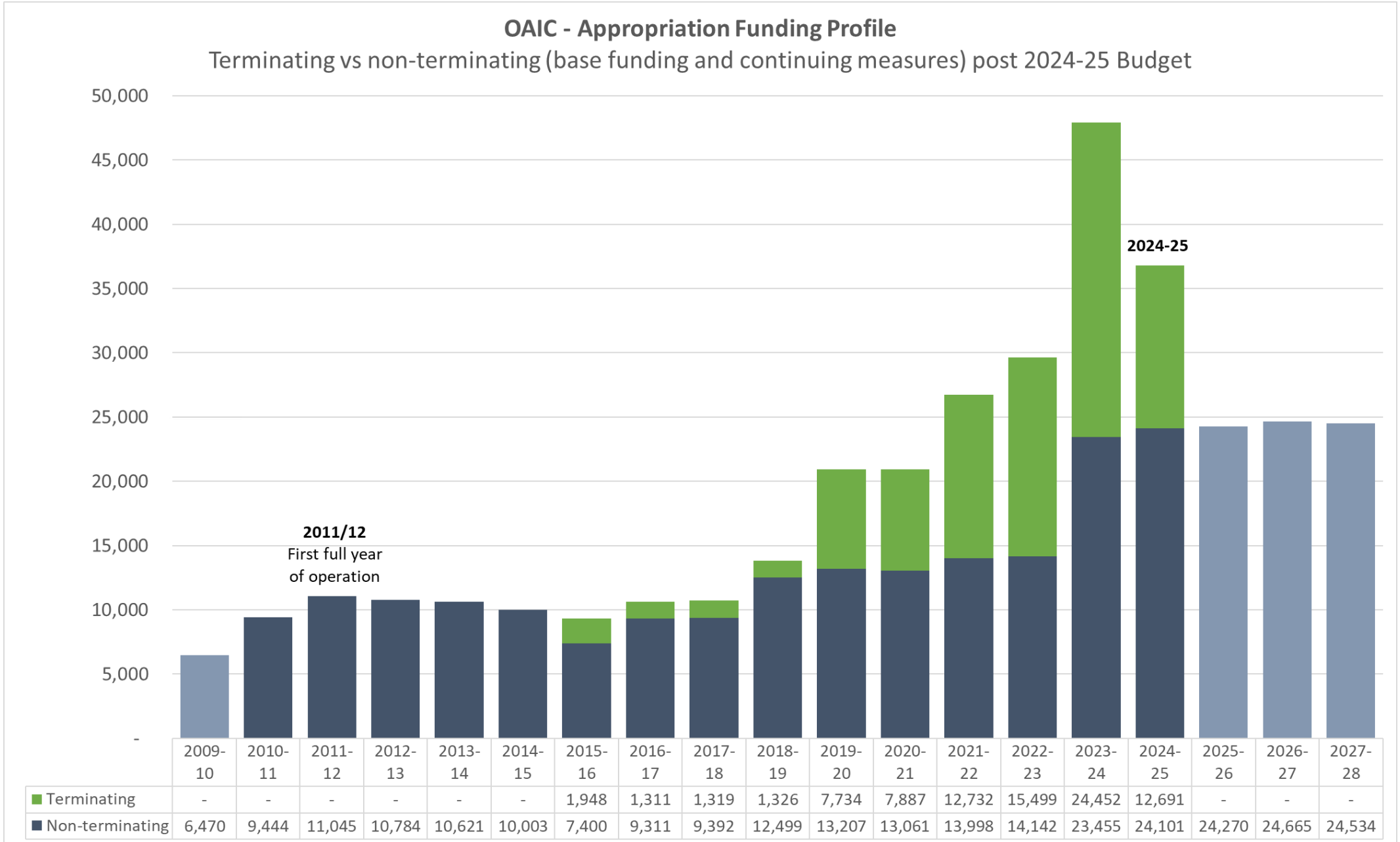


Appendix B – Historical funding profile & composition



Appendix C – Historical appropriation funding – terminating versus non-terminating



Appendix D - Description of funding components

Component	Description
OAIC Base Privacy	Total funding from 2009 to 2016, is solely Privacy funding from 2017 onwards after the transfer back from AHRC and AGD.
Additional Privacy Funding	<p>This includes various terminating measures since 2017, being:</p> <ul style="list-style-type: none"> • Privacy/Social Media - First 3 years - a new privacy regime for social media/online platforms that trade in personal information, underpinning new penalties/enforcement powers under the Privacy Act, ensuring that there are appropriate safeguards and penalties for the misuse of private information, including by major social media platforms. • Shared service transition & federal court costs - transition costs to DEWR/SDO/SAP and ongoing social media litigation. • Privacy/Social Media - Second 2 years - to process privacy complaints and enhance the OAIC's capacity to take regulatory action for breaches of privacy, e.g. litigation against social media platforms. Funding until end of Privacy Act Review. • Strengthening Privacy – NDB work/incl. major investigations, data capability, strategic review and Privacy Commissioner.
OAIC Base FOI (2017 onwards)	<p>Comprises the FOI funding returned to the OAIC after the reorganisation, being:</p> <ul style="list-style-type: none"> • 2017 - funding returned from AHRC and AGD • 2018 - funding returned from AAT (incl. merits reviews, document management and dealing with ex AAT clients)
FOI Commissioner (2022 onwards)	To fund the FOI Commissioner and support staff.
CDR (2019 onwards)	<p>Combines the various CDR components, being:</p> <ul style="list-style-type: none"> • The OAIC and Australian Competition and Consumer Commission (ACCC) co-regulate the CDR scheme. The OAIC is the primary complaint-handler and has responsibility for overseeing the privacy aspects of the scheme. The OAIC also works closely with the ACCC to deliver a consumer education campaign and to publish guidance for consumers and industry. • VDR Enhancement & Future Directions - Continued regulation of the CDR scheme reflecting the expansion of the scheme to include new sectors.

Component	Description
National Security (2016, 2017 to 2019 in AHRC)	Regulatory oversight of privacy implications arising from the Counter-Terrorism Legislation Amendment (Foreign Fighters) Act 2014 and the Telecommunications (Interception and Access) Amendment (Data Retention) Act 2015. Oversight includes provision of guidance material, assessments, advice and complaint handling activities.
Welfare data matching (2016 to 2019)	To provide regulatory oversight of privacy implications arising from the Department of Human Services' (DHS) Increased Welfare Compliance from Data Matching NPP
MBS/PBS (2019 onwards)	Complaint handling for the guaranteeing Medicare regime, and the mechanism through which consumers can seek a formal remedy to redress a breach of their privacy and respond to general enquiries from the community. This includes investigating and taking enforcement action in relation to breaches of the scheme, including the conduct of Commissioner-Initiated Investigations. The funding also enables the OAIC to undertake two privacy assessments (audits) per year to proactively monitor whether information subject to the arrangements is being maintained and handled in accordance with the relevant legislative obligations and recommend how areas of non-compliance can be addressed and privacy risks reduced.
Digital Identity	To acquit the statutory requirements of the digital identity scheme while also appropriately focusing on the timely investigation and enforcement of high-privacy risks. From January 2024 relates to the implementation of the new Digital Identity framework with the aim to have the framework in place from July 2024. This was extended for one year in the 2024-25 budget to commence the operation of the new Digital Identity framework.
MyHealth Record	To continue to undertake the My Health Record privacy regulatory functions. This is done to provide the community with confidence in the handling of digital health information.
Optus	To support the OAIC's response to the Optus incident in the form of an investigation into the personal information handling practices of Optus companies.

ESTIMATES BRIEF

Staffing – *Figures are as at 6 November 2024*

Key Points

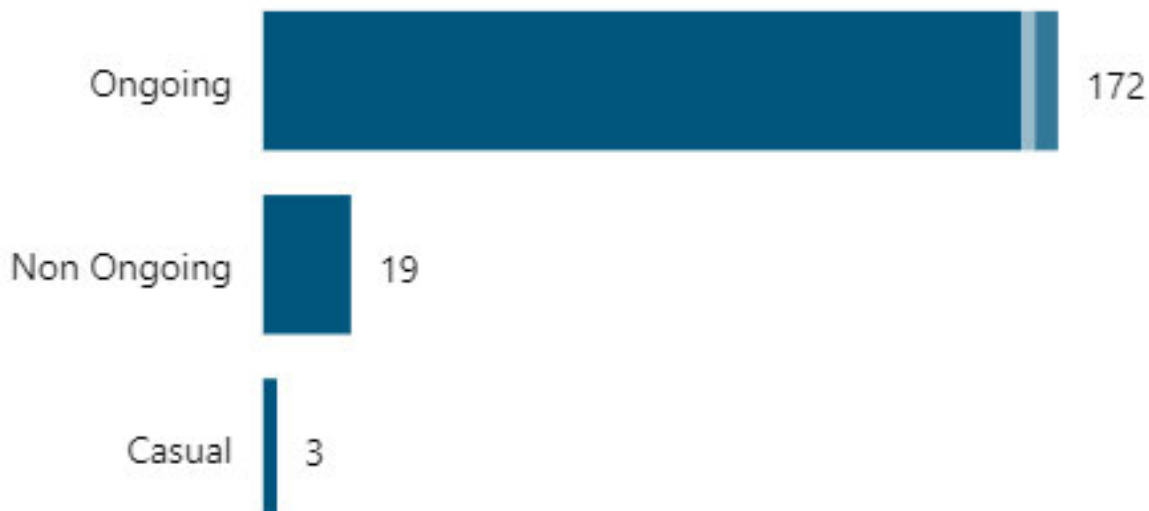
- Current budgeted 2024/25 ASL: 172 (2023-24: 200)
- Figures as at 6 November 2024
 - FTE number: Payroll = Total 173.5
 - Headcount: Payroll = Total 194









(Definition: Includes ongoing, non-ongoing, casual, secondments out of the agency paid for by OAIC, extended leave of 3 months or more paid/unpaid absence, maternity leave paid/unpaid. Excludes staff on section 26 temporary transfers out of the OAIC, and external staff)









- Vacancies: The OAIC is currently undertaking an organisational restructure. There are no identified vacancies at this time, however as vacancies arise, internal staff will be considered prior to conducting external recruitment processes.
- Staff sentiment data: See brief '*OAIC APS Census Results*' for recent high-level results
- Expenditure on staff training as at end of Period 1: \$70,000

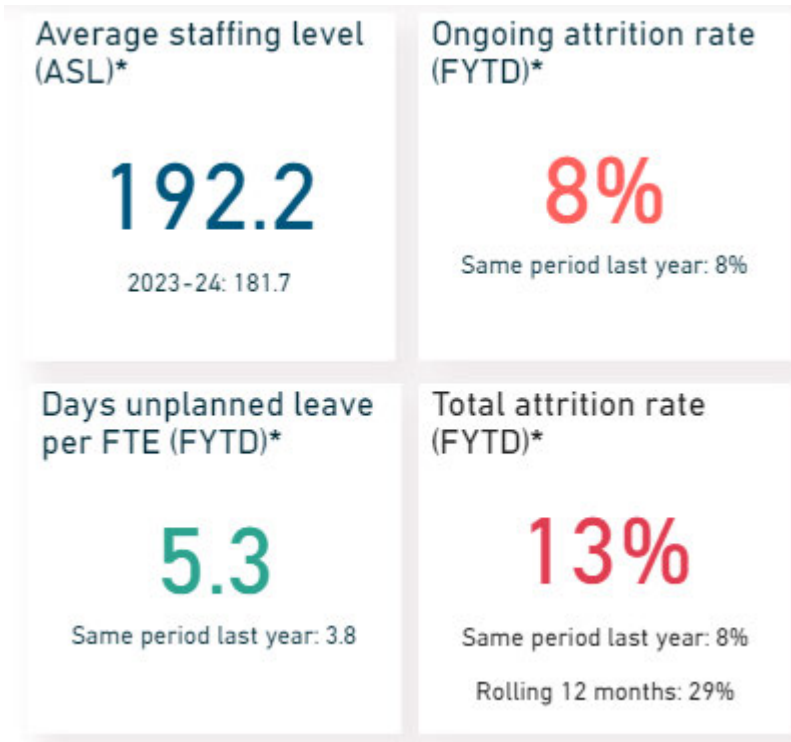
Total headcount by category and availability

● Available ● Extended Leave ● Maternity Leave



Branch	Headcount	FTE	Separations FYTD	
Dispute Resolution		52	48.0	4
Regulation and Strategy		37	31.8	2
Freedom of Information		36	29.3	3
Corporate		27	26.1	1
Corporate - Legal		17	16.8	2
Executive		15	14.9	4
Major Investigations		11	10.6	1
Digital ID Implementation Team		7	6.4	2
Total		202	183.9	19

Branch	Headcount	FTE	Separations FYTD	
Dispute Resolution		52	46.4	5
Freedom of Information		36	29.5	3
Regulation and Strategy		35	29.8	4
Corporate		27	26.1	1
Corporate - Legal		15	13.8	2
Executive		12	11.9	6
Major Investigations		10	9.6	2
Digital ID Implementation		7	6.4	2
Total		194	173.5	25



Classification

Substantive classification	Total
SOH	3.0
SEB 2	
SEB 1	4.9
EXEC 2	33.5
EXEC 1	49.7
APS 6	53.2
APS 5	18.2
APS 4	8.6
APS 3	
APS 2	2.4
Total	173.5

Substantive Classification	FTE	
SOH		3.0
SEB 2		
SEB 1	█	6.9
EXEC 2	█	33.5
EXEC 1	█	54.7
APS 6	█	54.8
APS 5	█	20.0
APS 4	█	8.6
APS 3		
APS 2		2.4
Total		183.9

Update 'Current at' date below following each update	Cleared by: Brenton Attard	Action officer: Mark Smolonogov
Current at: 20 November 2024	Phone number: 02 9942 4046	Action officer number: 02 9942 4243

ESTIMATES BRIEF: OTHER

Subject: OAIC's APS Census Results

Type: Report

Key details			
Origin	APS Census results		
Responsible Branch & team	People and Culture		
Content author	Mark Smolonogov	Phone	02 9942 4243
Clearance by	Brenton Attard	Phone	
Brief current at	20 November 2024		

Brief overview

High level results across APS Indexes were as follows:

APS Index	2024 score (improvement on 2023)
Employee Engagement	75 (+1pp)
Leadership – Immediate Supervisor	78 (+1pp)
Leadership – SES manager	75 (+3pp)
Communication and change	69 (+0pp)
Enabling Innovation	64 (-2pp)
Wellbeing policies and support	72 (-1pp)

- OAIC achieved a response rate of 84%, which was a 15% increase from 2023
- Given the changes the agency has undergone and continues to experience, if the Census was conducted now, there might be different results
- Approach – focus on key themes aligned to the Redesign of the OAIC work which seek to promote staff guidance/training and reduce the levels of clearances decision-making may improve census results going forward

- However the results may also reflect significant program of change within the OAIC that commenced in 2023 and will continue to be delivered over the next 12 months.
- Our highest rankings as an agency were in Leadership for SES Manager and Immediate Supervisor:
 - The OAIC ranked 22nd and 35th respectively out of 104 agencies
 - Positioned above the APS score for these indexes
- Our lowest rankings as an agency were in Employee Engagement and Enabling Innovation:
 - The OAIC ranked 49th and 76th respectively out of 104 agencies
 - Our Employee Engagement index was positioned above the APS index
 - Our Enabling Innovation index fell below the APS index

Current action

- Receiving feedback from Executive
- Communication of draft priorities to staff
- Integrate feedback into proposed 2024 Census Action Plan (Roadmap)
- Share Census Action Plan and settle (mid-Nov)
- Publish agency results and Roadmap on OAIC's website (late Nov)

Key Focus Areas to inform Census Roadmap

- Embedding the new structure
- Building leadership capability
- Teamwork for the Executive
- Change Management
- Health and Wellbeing

- Access to tools and resources
- Enhance integrity culture

Expected next steps/dates

- The OAIC is currently going through a period of significant change and moving from a current to future state structure through an organisational redesign project.
- The key focus for the Transformation and People and Culture teams leading the organisational redesign work is to ensure the new structure is embedded smoothly, and to provide staff with as much certainty as possible.

Background: public matters only

Issues of note for OAIC: Nil

ESTIMATES BRIEF: OTHER**Subject: OAIC response to HWLE data breach****Type: Report**

Key details			
When did OAIC learn of matter?	8 May 2023		
Origin	OAIC advised through data breach notification made by HWLE		
Is there an issue in the public domain?	Media comment about the breach		
Jurisdiction	General privacy		
Responsible Branch & team			
Content author	Sally Fetouh	Phone	
Clearance by	David Moore	Phone	
Brief current at	15 October 2024		

Brief overview of other

s 47E(d)

Current action

- The OAIC commenced a Commissioner Initiated Investigation against HWLE lawyers in respect of the data breach on 1 February 2024.

Timeline

Event	Dates
HWLE became aware of cyber attack	28 April 2023
HWLE made data breach notification to OAIC (in OAIC's capacity as privacy regulator)	8 May 2023
OAIC advised by HWLE that some of the OAIC's document were affected by cyber attack	10 June 2023

OAIC received initial list of OAIC matters affected by cyber attack	13 June 2023
OAIC placed a statement on its website in relation to HWLE data breach	15 June 2023
First tranche of documents provided to OAIC by HWLE	17 June 2023
First notification by OAIC	3 July 2023
Second notification by OAIC	11 July 2023
Assessment of personal information and risk of serious harm	July-August- September-October
HWLE notified s 47E(d)	17 October 2023
HWLE contacted a third party whose customers' information was compromised in the breach	20 October 2023
Third party responded to HWLE stating that all of their affected customers have been notified	20 November 2023 No further updates beyond this date

Expected next steps/dates

- n/a

Background: public matters only

Issues of note for OAIC

- OAIC has a CII underway, refer to separate briefing.

ESTIMATES BRIEF

External Legal expenditure

(All costs up to **31 October 2024** and are including disbursements and excluding GST)

Key statistics

- The OAIC received the following funding allocations for litigation:
 - 20/21 \$2.42M s 47E(d)
 - 21/22 \$2.32M
 - 22/23 \$4.29M
 - 23/24 \$10.43M s 47E(d) contingent privacy litigation funding
 - 24/25 s 47E(d) contingent privacy litigation funding
- Total contingent privacy litigation funding s 47E(d)
- The OAIC spent the following on external legal costs (per the annual OLSC reports) (broken down by enforcement actions and remitted matters)
 - 20/21 \$0.922M (plus internal \$1.483M)
 - 21/22 \$1.032M (plus internal \$1.276M)
 - 22/23 \$5.700M (plus internal \$1.703M)
 - 23/24 \$8.089M (plus internal \$3.327M)
- Our budget for external legal expenditure in 24/25 is \$2.5M

Significant litigation

- The most significant cases involved are:
 - s 47E(d) In 2020, AIC filed civil penalty proceedings against Facebook, alleging contraventions of s 13G in relation to APP 6 and APP 11.1. The Commissioner alleges that the personal information of Australian Facebook users was disclosed to the This is Your Digital Life app for a purpose other than the purpose for which the information was collected, and that Facebook did not take reasonable steps to protect its users' personal information from unauthorised disclosure.
 - s 47E(d) . AIC filed for civil penalty proceedings against ACL for contraventions of s13G in relation to APP 11.1 and the notifiable data breach regime. The Commissioner alleges that ACL failed to take reasonable steps to protect personal information it held from unauthorised access, failed to carry out a reasonable and expeditious assessment of whether there had been an eligible data breach and failed to notify the AIC of an eligible data breach as soon as practicable.
 - s 47E(d) - Mr Patrick has applied to the High Court of Australia for special leave to appeal a Full Federal Court's decision affirming that there was not unreasonable delay in handling his IC Reviews under the Administrative Decisions (Judicial Review) Act 1977 (Cth).
 - s 47E(d) . AIC filed for civil penalty proceedings against Medibank for contraventions of s13G in relation to APP 11.1. Details below.
- Spend against contingent litigation fund
 - s 47E(d)
 - Balance of the fund not expended s 47E(d)

Key messages

- The OAIC is progressing enforcement action in a targeted and fiscally conscious manner.
- Litigation funds remain available to the OAIC.

Significant investigations

- The OAIC also incurs external legal costs in the course of undertaking significant investigations. The major investigations involving considerable external legal expenditure to date include:
 - **s 47E(d)** [REDACTED] Data breach involving the unauthorised access to Optus systems and exfiltration of the personal information of more than 9.5 million individuals, including identification information such as driver licences, passports and Medicare numbers. Matter is currently under investigation.
 - **s 47E(d)** [REDACTED] Data breach involving unauthorised access to Medibank's systems and exfiltration of personal information, affecting approximately 9.7 million individuals. Matter in litigation.
 - **s 47E(d)** [REDACTED]. An allegation relating to AMEX's failure to protect personal information from unauthorised access on several occasions.
 - **s 47E(d)** [REDACTED] Data breach involving unauthorised access and exfiltration of data from HWLE's systems.
 - **s 47E(d)** [REDACTED] Data breach involving unauthorised access to Latitude's systems and exfiltration of personal information of approximately 14.1 million individuals in Australia and New Zealand. Investigation conducted jointly with Office of the Privacy Commissioner New Zealand. Matter is currently under investigation.

Key messages

- These investigations are at various stages with each being managed according to an investigation plan.

Update 'Current at' date below following each update	Cleared by: Elizabeth Tydd	Action officer: David Moore
Current at: 23 October 2024	Phone number: 02 99420436	Action officer number: 02 9942 4131

ESTIMATES BRIEF: OTHER

Subject: Regulatory Priority 1 (Online privacy) – Key activities 2019-20 to 2024-25

Type: Budget measure

Key details			
When did OAIC learn of matter?	2019-20 terminating budget measure		
Origin	n/a		
Is there an issue in the public domain?	This measure has terminated		
Jurisdiction	Privacy		
Responsible Branch & team	Regulation & Strategy, Corporate		
Content author	Rebecca Brown	Phone	02 9942 4117
Clearance by	Sarah Ghali	Phone	02 9942 4208
Brief current at	11 October 2024		

Brief overview of other

- In the 2019-20 Budget, the OAIC received \$23.1M over three years (plus capital funding of \$2M) to facilitate timely responses to privacy complaints and support strengthened enforcement action in relation to social media and other online platforms that breach privacy regulations.
- The table below sets out key activities undertaken in relation to social media and other online platforms.

Jan 2020	<ul style="list-style-type: none"> • The OAIC quickly produced a range of privacy guidance for business, Australian Government agencies and individuals, including how to safeguard personal information in changed online work environments, the use of check in apps for contact tracing purposes and guidance on privacy obligations when using the COVIDsafe and COVID app data and ultimately provided expert input to COVIDSafe app system.
March 2020	<ul style="list-style-type: none"> • The OAIC and other Australian privacy regulators convened a National COVID-19 Privacy Team to respond to COVID response proposals with national implications; eg check in apps and digital vaccine certificates.

July – Oct 2020	<ul style="list-style-type: none"> The OAIC and five other data protection and privacy regulators set out principles to address some key privacy risks with video teleconferencing and issued guiding principles.
April 2020	<ul style="list-style-type: none"> Federal Court granted leave to serve commencement proceedings on Facebook. Ongoing matter following High Court revocation of leave.
June 2020 - August 2022	<ul style="list-style-type: none"> COVIDSafe assessment program: 5 assessments following the information lifecycle of COVID app data, 6 monthly reports under s 94ZB (last Nov 2022). External costs \$725K.
October 2020	<ul style="list-style-type: none"> Privacy Act Review commenced and underwent two rounds of public consultation with an initial Issues Paper (2020) followed by a Discussion Paper in October 2021. The OAIC engaged closely with the Department throughout the review process and made significant submissions to both of those consultations to ensure Australia’s privacy framework is fit for purpose in the digital age.
October 2020	<ul style="list-style-type: none"> The OAIC and the UK ICO presented a Resolution on Facial Recognition Technology at the Global Privacy Assembly (GPA) Closed Session Conference. The OAIC worked with other GPA members to develop principles and expectations for the appropriate use of personal information in FRT. The Resolution for the principles was passed at the 44th GPA in Istanbul in October 2022.
July 2021	<ul style="list-style-type: none"> Privacy determination following CII into Uber Technologies and Uber BV
September 2021	<ul style="list-style-type: none"> Determination following CII into 7-Eleven
October 2021	<ul style="list-style-type: none"> Privacy determination following CII into Clearview AI
October 2021	<ul style="list-style-type: none"> The OAIC took part in the Global Privacy Enforcement Network (GPEN) Sweep 2020–21 which examined how privacy considerations have been taken into account by organisations responsible for various COVID-19 solutions and initiatives, including in the deployment of contact tracing mobile apps.
December 2019 – March 2022	<ul style="list-style-type: none"> The OAIC worked closely with the Attorney-General’s Department in developing the Privacy

	<p>Legislation Amendment (Enhancing Online Privacy and Other Measures) Bill.</p> <ul style="list-style-type: none"> • The OAIC continued to liaise closely with the Department as it then developed the <i>Privacy Legislation Amendment (Enforcement and Other Measures) Act 2022</i>, which introduced increased penalties for serious and repeated privacy breaches and other targeted measures to enhance the OAIC's ability to protect Australian's privacy in the digital environment.
November 2021	<ul style="list-style-type: none"> • Determination following CII into Australian Federal Police's use of Clearview.
March 2022 (ongoing)	<ul style="list-style-type: none"> • Digital Platforms Regulators Forum (DP-REG) was established.
August 2023	<ul style="list-style-type: none"> • Global expectations of social media platforms and other sites to safeguard against unlawful data scraping – the OAIC and 11 other international data protection and privacy regulators released a joint statement to address the issue of data scraping on social media platforms and other publicly accessible sites.
January 2024	<ul style="list-style-type: none"> • On 19 January 2024, the OAIC sent preliminary inquiries to TikTok.
January 2024 (ongoing)	<ul style="list-style-type: none"> • The OAIC took part in the Global Privacy Enforcement Network (GPEN) Sweep 2024 which is examining deceptive design patterns (also known as "dark patterns").
Ongoing	<ul style="list-style-type: none"> • Global Privacy Assembly – participate in annual GPA conference and engages with the GPA's Working Groups, including the Digital Citizen and Consumer Working Group and the International Enforcement Working Group.

ESTIMATES BRIEF: OTHER

Subject: QoNs asked of other agencies

Type: Report

Key details			
Origin	From previous estimates and QoNs		
Is there an issue in the public domain?	No		
Jurisdiction	FOI and privacy		
Responsible Branch & team	Strategic Communications (Corporate)		
Content author	Andrew Stokes	Phone	9284 9364
Clearance by		Phone	
Brief current at	13 October 2024		

Brief overview

- The brief refers to QoNs that have been asked of agencies from the last Estimates round that may touch upon FOI, privacy and data breaches.
- Due to the high number of QoNs asked, some relevant responses may have been missed by the online search

Recent developments

- Noting that Senator Paul Scarr (Lib) asked the Attorney-General's Department during previous estimates session about processing of FOI¹ (in previous Estimates transcript)
- Senate Jane Hume (Lib) asked the National Health and Medical Research Council the number of FOI request the council had received since the start of the year and how they had been classified.²
- Senator Shoebridge asked the Department of Infrastructure, Transport, Regional Development, Communications and the Arts about what industry stakeholders (acting under Digi) would be involved in the misinformation code³

¹ <https://www.aph.gov.au/api/qon/downloadattachment?attachmentId=b0811d91-1cdb-4302-b797-f4df67311455>

² [NHMRC SQ24-002382.pdf](#)

³ <https://www.aph.gov.au/api/qon/downloadattachment?attachmentId=e69ba121-8319-43e3-8bf6-18f12cae9673>

- Senator James McGrath (Lib) asked the NDIS about its processes for protecting privacy when using third party contractors. Questions included 'does the NDIS have internal requirements that "classified or sensitive" work be kept onshore for confidentiality reasons? and how does the NDIS ensure that all "classified and sensitive" information that is provided to third party providers for the purposes of completing work is kept confidential?'⁴
- Senator Paterson (Lib) asked Home Affairs about progress of the cybersecurity plan.⁵

Background: public matters only
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Issues of note for OAIC

- None. Key issues are in transcript of OAIC's appearance at previous estimates.

⁴ <https://www.aph.gov.au/api/qon/downloadattachment?attachmentId=47be13a4-0d52-4bca-b2a5-7cb9a6b5e396>

⁵ <https://www.aph.gov.au/api/qon/downloadattachment?attachmentId=072b8e82-40a0-4a7b-9a1b-dad931dad69c>

ESTIMATES BRIEF: OTHER

Subject: Designing the Future OAIC

Type: Advice

Key details			
When did OAIC learn of matter?	N/A		
Origin	OAIC initiated		
Is there an issue in the public domain?	Yes. Public discussion of OAIC budget changes and strategic review.		
Jurisdiction	AIC Act		
Responsible Branch & team	Reform Office		
Content author	Annan Boag	Phone	s 47F
Clearance by	Annan Boag	Phone	
Brief current at	19 November 2024		

Brief overview

- The May 24 Budget resulted in a reduction of the OAIC's budget by 23% (\$11.1m) due to the cessation of terminating funding measures.
- From July 2024, OAIC's incoming commissioners and leadership have acted swiftly to reduce OAIC's expenditure and staffing levels to fit within this budget, and OAIC is now on track to post a manageable deficit.
- To allow it to operate effectively on a smaller scale, OAIC is undergoing a restructure and change program informed by recommendations of a Strategic Review conducted in late 2023.
- While OAIC is seeking to minimise job losses and impacts on services from the budget reduction, it is likely there will be some redundancies and performance impact especially in the first half of the 2025 calendar year.
- OAIC is prioritising its mandatory casework (FOI reviews and privacy complaints) to avoid growing backlogs.
- The OAIC is managing its expenditure centrally during this period of change to achieve fiscal sustainability.

Current action

- The majority of staff (70%) were directly appointed to the new structure developed following consultation with staff.

- On 17 and 18 October 2024, OAIC notified 60 staff that their roles may be 'excess' (i.e., more staff than roles available) and would be invited to complete an expression of interest for available roles.
- Following the completion of the EOI process on 18 November 2024, 47 of the 60 staff were placed in roles, while 5 had resigned from the OAIC to pursue other opportunities. This means there were 8 staff not placed in roles. The OAIC is having individual discussions with these staff through via the 'excess employee' provisions in OAIC's enterprise agreement.
- These arrangements also include opportunities for transfers to other agencies – this program of work has facilitated a number of placement of staff in other agencies and reduced the 'potential excess' staff.

Recent developments

- Nil to note.

Expected next steps/dates

- October 2024 to early November – finalisation of expressions of interest.
- 3 December 2024 – staff begin working in new organisational structure.
- November 2024 to February 2024 – redeployment processes for excess staff, and potential redundancies.

Background

Budget and expenditure reduction

- The May 2024 Budget resulted in a reduction of the OAIC's total operating budget by 23% (\$11.1m) and its staffing cap by 13% (26.3 ASL).
- OAIC did not immediately reduce its staffing on the belief that additional funded activities would be conferred in MYEFO 2025 which it would need current staff to deliver.
- However, it became apparent in July 2024 that additional funding would not be available. This necessitated rapid reductions as OAIC's rate of expenditure at the start of 2024/25 put it on track for a deficit of approximately \$14m.
- OAIC's incoming commissioners and leadership team have acted quickly to reduce expenditure, including cutting supplier costs, closing OAIC's Canberra office, and returning seconded staff to home agencies. Applying

these measures, OAIC is on track to post a manageable deficit for 2024/25 that can be covered by OAIC's cash reserves.

- OAIC has also refocused an ongoing organisational change project, Designing the Future OAIC, towards supporting OAIC to operate sustainably and with maximum effectiveness at a smaller scale.

Designing the Future OAIC and OAIC Strategic Review

- Designing the Future OAIC arose from a Strategic Review of the OAIC conducted by an external consultancy, Nous Group, in late 2023. The review was overseen by a Steering Group including the Attorney-Generals' Department and the Department of Finance.
- The Strategic Review report was delivered to the Australian Information Commissioner and the Secretary of the Attorney-Generals' Department on 19 February 2024.
- The report has been released in part under the FOI Act. This release includes all recommendations addressed to the OAIC. A decision about the release of the balance of the report would be a matter for Government.
- The report made 11 recommendations. This included a recommendation to redesign the OAIC's structure to better reflect the 3-Commissioner model. To achieve this recommendation and deliver more efficient and effective regulatory functions OAIC has been conducting a restructure project, Designing the Future OAIC, since June 2024.
- The redesign project and related organisational structure reflects the:
 - strategic review findings in relation to a revised OAIC regulatory focus on proportionality; education and enforcement together with a less risk adverse approach and more streamlined procedures;
 - promotion of Commissioner priorities;
 - OAIC Four Operating Pillars: Purpose; People Orientated; Proportionate and Proactive;
 - adjustment of our staffing profile to support mandatory front-line regulatory services with appropriate staffing levels and a commensurate reduction in executive level staff.

Staffing level reductions

- After OAIC became aware of the need to reduce its staffing level, the change project was refocused towards an objective of reducing OAIC's staffing level, from approximately 200 to approximately 165 FTE, to operate within in the 2024/25 budgetary parameters.

- Consultations under OAIC's Enterprise Agreement were conducted on a proposed structure between 3 and 20 September 2024.
- OAIC's future structure and staffing levels will be announced to staff on 9 October 2024, and 'excess employee' consultation processes with individual staff will begin on 16 October 2024 and run through to early 2025.
- OAIC is redeploying staff to other roles within and outside the OAIC where possible to minimise job losses. However, some voluntary and involuntary redundancies are likely to affect approximately 5-10% of the OAIC's workforce between October 2024 and February 2025. Management and senior executive roles are most affected.

Impact on OAIC due to staffing reductions

- The scale of these staffing reductions and disruption from the change will reduce OAIC's activity levels and performance this financial year. This will be most pronounced in the first half of the 2025 calendar year, during which OAIC will be operating below its ideal staffing level.
- The OAIC's leadership plan is designed to ensure that performance will stabilise and improve from the second half of 2025, when the benefits of the change project underway will be realised.
- OAIC is seeking to minimise disruption to services, especially mandatory casework services (FOI reviews and privacy complaints). By prioritising this work, OAIC seeks to avoid growth in case backlogs and minimise direct impacts on the community.