

From: David Bath [
Sent: Friday, 23 February 2007 2:52 AM
To: FPA, Committee (SEN)
Subject: Submission regarding the Human Services
(Enhanced Service Delivery) Bill 2007

To: Committee Secretary, Senate Finance and Public Administration Committee
Re: Human Services (Enhanced Service Delivery) Bill 2007 (aka Access Card)

I urge the committee to include in the legislation penalties for mismanagement of AccessCard information within government departments, not just abuse by those outside the relevant departments.

As an information management professional for over 20 years, with experience handling medical records as well as many periods carrying out work in agencies, I have grave doubts about the ability of Human Services to manage the information in a secure manner, regardless of the demands of the legislation when it comes to force.

I believe that if my comments are not appropriate for the bill itself, they are relevant to explanatory memoranda and should be considered for inclusion in associated regulations.

I recommend that relevant expert agencies (dsd.gov.au, agimo.gov.au, naa.gov.au) together with the Australian National Audit Office are required to review all the specifications of work in contracts to implement the system, sign off on the implementation before it goes into production and carry out appropriately resourced audits on an annual basis.

These audits should review not only those systems directly involved with the AccessCard, but the security of their connections to other systems within Human Services, and external organizations that link into Human Services (e.g. through Centrelink).

I also refer you to my submission regarding the exposure draft, now available at http://www.accesscard.gov.au/Exposure_Draft_Submissions/David%20Bath.pdf

Thankyou for considering my submissions.

David T. Bath