

# Executive summary

## Context

MartinJenkins was commissioned in September 2025 to conduct an independent review of the Office of the Privacy Commissioner's (OPC) enquiries and complaints processes, with a focus on the efficiency and effectiveness of business operations. The review concentrated on the channels for incoming enquiries and complaints, work design, workflow, and workflow management, with a particular emphasis on the Investigations and Dispute Resolution (IDR) team, which handles the majority of OPC's enquiries and complaints.

OPC is under significant pressure from both increasing demand and financial constraints. The volume of enquiries and complaints continues to grow, and additional resourcing presents a fiscal challenge in a highly constrained context. The time taken to resolve complaints has increased, with the average response time at 9.5 months.

OPC are also experiencing an increase in unreasonable conduct from members of the public, including abusive and threatening behaviour towards staff. OPC is particularly interested in how work design and the work environment can be improved to better protect staff from psychosocial risks associated with this work.

## Significant finding – a lack of a workflow management is hampering OPC's ability to respond to demand

OPC currently uses Objective as its document management system. However, Objective is not a workflow management tool. While multiple teams across the organisation have made efforts to extend its functionality, the absence of a dedicated workflow management system for handling enquiries and complaints significantly limits efficiency. In our view, implementing a purpose-built workflow management tool would have the greatest impact on improving operational efficiency – both at the team level and across the organisation.

Objective is also not designed to collect data in a structured or measurable way, particularly not to the standard required by a regulator like OPC to monitor trends, manage performance, and respond proactively. The system imposes a considerable administrative burden when used for reporting purposes. As a result, OPC currently operates with a low level of data maturity, and the limitations in data quality emerged as a key theme throughout this review.



## Other findings – enquiries, channels, process design, workflow management and mentally healthy work practices

Handling public enquiries is highly resource intensive and the time taken to respond is growing. This review suggests OPC has an opportunity to consider the level of support provided for public enquiries, with resources then being able to be directed into complaints.

OPC currently offers multiple channels for public contact, which, in the context of rising demand, is stretching the organisation's ability to respond. Work has been underway to strengthen information provision, supporting a move to a shift to more self-service for the public, agencies and organisations. Rationalising channels and requiring greater self-service will reduce incoming enquiries to OPC – the latter will require a firmer stance with agencies and organisations.

In the Investigations and Dispute Resolution team, the queue of work is feeling insurmountable and some of the senior staff are diverted from investigations to other tasks. This review finds there are opportunities to minimise these diversions and focus staff efforts on investigations. There is a need to better align work allocation with staff skills and experience, and to reduce context-switching and manual processes.

A review of processes and process documentation has highlighted opportunities for efficiencies. We found process documentation lengthy, lacking real clarity and often outdated. This made process mapping challenging. Despite this, this review has identified recommendations that can drive meaningful change.

OPC demonstrates a strong commitment to staff mental wellbeing, but psychosocial risks from unreasonable complainant behaviour persist. Protective factors include a supportive team culture and access to psychological support. Further improvements in work design, workflow, and resource allocation will make a difference.

## Conclusion

OPC has limited resources and increased demand. Opportunities to deal with this lie in the ways of working, the nature of the work completed and shifting resources around to meet demand. Several recommendations have been made for OPC leadership to consider, and these are designed to drive efficiency and enable a more strategic, organisation-wide approach to regulatory priorities.

The most significant recommendation – introducing a modern workflow management system – will require investment. However, our conclusion is that without a workflow management tool, any other changes – while important to start working towards in the short term and lower cost in nature – will only get OPC part of the way towards servicing the demand on services.

