

Right to Information and Information Privacy Agency Electronic Audit

1. Introduction

In August 2008, the Queensland Government released *The Right to Information: A Response to the Review of Queensland's Freedom of Information Act*.

The review recommended that government maximise the publication of information and ensure easy access to public sector information.

In response to the review, the Queensland Government passed the *Right to Information Act 2009* (RTI Act) and the *Information Privacy Act 2009* (IP Act), to ensure that government information was made available, while at the same time protecting individual privacy and other public interest. In doing so, the Queensland Premier said "Openness and accountability are the cornerstones of good government."

Under the legislation, the Office of the Information Commissioner (OIC) is the champion and monitor of the right to access information, and has a role in supporting agencies to maximise disclosure and supporting applicants in knowing and using their rights.

2. Purposes and uses of the Electronic Audit

OIC will undertake regular audits to measure the impact of the legislation on fostering a public service culture of openness and accountability. Open government has three dimensions: transparency (open to scrutiny), accessibility (equitable entry and treatment) and responsiveness (open for business).

This electronic audit is designed to achieve two purposes:

- It assists agencies to assess their procedures and activities for compliance with the RTI and IP Act; and
- It provides information to the Office of the Information Commissioner (OIC) about legislative compliance across the public sector.

The electronic audit will be conducted annually, through the Office of Economic and Statistical Research (OESR), to track the progress made by agencies over time towards increasing openness of government. If there are areas in which agencies are not yet compliant, they are encouraged to provide comments, for example on their plans for implementation, so that these comments can be included in any report by the OIC.

Some questions do not have to be answered by Government Owned Corporations (GOCs), local governments or statutory authorities, as they relate to the additional obligations of Queensland government departments. *Information Standard 44*, for example, requires Queensland government departments to conduct a review of information assets, and ensure that information assets are captured in an Information Asset Register, which places all auditable elements in one resource document. Where a survey question **does not** apply to GOCs, local governments or statutory authorities, the question is noted to that effect.

A summary of audit results will be published on OIC's website and key findings documented in its Annual Report. The Information Commissioner will also write to agencies to provide a summary of results.

All data collected is strictly confidential and will be de-identified before publication. Respondents are required to complete the online survey for the Office of Economic and Statistical Research by <four weeks from date of issue>.

Right to Information and Information Privacy Agency Electronic Audit

Section A – Leadership

(Note to person coordinating responses - This section could be completed by the Information Champion, or executive within the agency responsible for information management.)

Response options:	Use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

	Criteria Question	Yes	IP	Id	No	Optional Comments (for example, implementation plans)
1.	Open government	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.1	The agency has a culture open to the release of information.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.2	Agency policy frameworks describe how the community is to be included in development of policies affecting external operations.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.3	The agency has a mechanism for identifying the information that its industry stakeholders would find useful, for example, a consultation strategy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.4	The agency has a mechanism for providing the information to industry stakeholders that the industry stakeholders have identified as being useful to them, for example, a procedure for publishing information that industry stakeholders have identified as being useful to them.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.5	When developing RTI and IP policy, the agency conducts appropriate internal consultation, for example, with decision makers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.6	The agency tracks the type of person seeking information under the RTI Act or IP Act (for example, individuals, companies, journalists, lobby / community groups, politicians, legal representatives, agents, prisoners or government agencies).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.7	Over time, the data is showing an increase in diversity in the type of person seeking information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Right to Information and Information Privacy Agency Electronic Audit

Section A – Leadership

(Note to person coordinating responses - This section could be completed by the Information Champion, or executive within the agency responsible for information management.)

Response options:	Use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

	Criteria Question	Yes	IP	Id	No	Optional Comments (for example, implementation plans)
2	The agency actively manages its responsibilities through good governance					
2.1	<p>Department only question. GOCs, local government, and other agencies please disregard.</p> <p>An SES level Information Champion is appointed, and active in the role.</p> <p><i>(This is only a requirement for departments. GOCs, local governments and other agencies are not required to respond to this question.)</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.2	<p>Department only question. GOCs, local government, and other agencies please disregard.</p> <p>A formal information governance body is established (as per QGEA guidelines).</p> <p><i>(This is only a requirement for departments. GOCs, local governments and other agencies are not required to respond to this question.)</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.3	RTI and IP reforms are managed or have been managed by governance mechanisms which provide for development (e.g. planning for implementation).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.4	RTI and IP reforms are managed or have been managed by governance mechanisms which provide for implementation and accountability (e.g. identifying who is responsible for implementing actions and by when).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.5	RTI and IP reforms are managed or have been managed by governance mechanisms which provide governance mechanisms for review (e.g. mechanisms for reporting on achievements).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Right to Information and Information Privacy Agency Electronic Audit

Section A – Leadership

(Note to person coordinating responses - This section could be completed by the Information Champion, or executive within the agency responsible for information management.)

Response options:	Use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

	Criteria Question	Yes	IP	Id	No	Optional Comments (for example, implementation plans)
3	The agency actively manages information					
3.1	An explicit statement of commitment to RTI and IP is readily available within the agency, for example, in a policy document or as a policy statement on the agency's website.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.2	The agency has an external communications strategy to ensure consumers and stakeholders are aware of their RTI rights.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.3	The agency's RTI and IP policies and procedures give effect to the legislation, for example, as a standalone policy or as part of an information management framework.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.4	The agency's RTI and IP policies and procedures as per 3.3 are fully implemented.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.5	The agency's RTI and IP policies as per 3.3 are readily available to all staff e.g. easy to find on the agency's intranet.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.6	RTI and IP policies are complete and easy to understand.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.7	RTI and IP policies are reviewed on a regular basis.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.8	Privacy policies apply to the information of officers, for example, personnel records, as well as to the information of the public.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.9	The agency has a system to ensure it meets its obligations when entering into contracts with suppliers who provide services involving personal information.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Right to Information and Information Privacy Agency Electronic Audit

Section A – Leadership

(Note to person coordinating responses - This section could be completed by the Information Champion, or executive within the agency responsible for information management.)

Response options:	Use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

	Criteria Question	Yes	IP	Id	No	Optional Comments (for example, implementation plans)
3	The agency actively manages information					
3.10	<p>Department only question. GOCs, local government, and other agencies please disregard.</p> <p>The agency maintains an Information Asset Register either independently or as part of an existing register (as required by Information Standard 44).</p> <p><i>(This is a requirement for departments. It is not a requirement for local government, GOCs or other agencies, and they are not required to respond to this question.)</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4	Organisational structure and resourcing to the RTI and IP functions is appropriate					
4.1	Resourcing to IP and RTI functions is appropriate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.2	The number of staff members in the RTI/IP Unit or performing RTI/IP functions (might be a percentage of one person's time).	No.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.3	If the RTI/IP staff undertake other functions, estimate the percentage of time spent by the unit on RTI and IP functions.	% RTI	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.4	<p>Department only question. GOCs, local government, and other agencies please disregard.</p> <p>RTI and IP functions are independent of the Minister's office.</p> <p><i>(This is not a requirement for GOCs, local governments or independent statutory authorities. These agencies are not required to respond to this question.)</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.5	RTI and IP functions are independent of media and communications.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.6	RTI and IP functions report as closely as possible to the DG / CEO.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Right to Information and Information Privacy Agency Electronic Audit

Section A – Leadership

(Note to person coordinating responses - This section could be completed by the Information Champion, or executive within the agency responsible for information management.)

Response options:	Use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

	Criteria Question	Yes	IP	Id	No	Optional Comments (for example, implementation plans)
4	Organisational structure and resourcing to the RTI and IP functions is appropriate					
4.7	Agency administrative delegations have been updated to incorporate right to information handling and information privacy handling.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.8	There is a clear authorisation process for agency staff to assess and approve information for public release.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.9	The Principal Officer has appropriately delegated authority to deal with right to information and information privacy applications.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.10	Roles and responsibilities of the Principal Officer or the Principal Officer's delegates are clearly defined.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.11	There is a person who has responsibility for maintaining a system of recording, tracking and monitoring applications and reviews.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.12	Internal reviews are conducted by an officer different to the officer who made the reviewable decision.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.13	The officer conducting the internal review is more senior to the officer who made the reviewable decision.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.14	The agency can meet requirements to report on Freedom of Information, Right to Information and Information Privacy statistics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.15	The agency uses redaction technologies to assist in its decision making processes. (NB "Redaction technology" allows an original hard-copy document to be scanned, and then text to be electronically blocked out of the scanned copy - for example, personal information can be removed.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Right to Information and Information Privacy Agency Electronic Audit

Section A – Leadership

(Note to person coordinating responses - This section could be completed by the Information Champion, or executive within the agency responsible for information management.)

Response options:	Use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

	Criteria Question	Yes	IP	Id	No	Optional Comments (for example, implementation plans)
5	Training					
5.1	Number of agency staff who attended RTI or IP training, or any training containing information about RTI or IP during the year.	No.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.2	Agency staff are trained as to their level of authority to release information administratively.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.3	The agency has procedures in place to ensure new/existing staff are given appropriate training/awareness raising in relation to right to information handling and information privacy obligations.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.4	RTI/IP is mentioned in induction.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.5	Training for RTI/IP staff with respect to the RTI/IP function is effective.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.6	General staff training in RTI/IP is effective.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Right to Information and Information Privacy Agency Electronic Audit

Section B - Accountability requirements ¹

(Note to person coordinating responses - This section could be completed by the Information Champion, or executive within the agency responsible for information management.)

Response options:	Use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

	Criteria Question	Yes	IP	Id	No	Optional Comments (for example, implementation plans)
1	Complaint handling procedures capture opportunities for improvement in RTI/IP implementation of reforms.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2	Opportunities for improvement in RTI/IP implementation of reforms are recorded and actions on them are tracked.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3	Opportunities for improvement are actioned and result in improvements to systems for the release of information or information privacy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4	The agency has internal systems and procedures for reviewing the effectiveness of the right to information and information privacy functions.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5	Performance measurement for the RTI implementation across the agency is in place.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6	Performance measurement for the RTI implementation across the agency is used.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7	Performance measurement for the RTI implementation across the agency is useful	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8	Performance measurement for the IP implementation across the agency is in place	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9	Performance measurement for the IP implementation across the agency is used	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10	Performance measurement for the IP implementation across the agency is useful	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11	Review and reporting mechanisms are embedded at all levels of the organisation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

¹ Sourced from the OIC survey of agencies and the recommendations of the Solomon report

Right to Information and Information Privacy Agency Electronic Audit

Section C - Maximum Disclosure

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
1. General					
1.1 More information is in the public domain e.g. additional data sets are now available to the public.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.2 More information is available via the publication scheme than was previously available under the Statement of Affairs.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Department only question. GOCs, local government, and other agencies please disregard. 1.3 Using the Information Asset Register as a guide, the agency has achieved maximum disclosure of publishable information assets. <i>(This is a requirement for departments. It is not a requirement for GOCs, local governments or other agencies, and they are not required to respond to this question.)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Right to Information and Information Privacy Agency Electronic Audit

Section D - Compliance

D.1 Detailed questions about active management of agency responsibilities ²

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments
					(NB Could include date planned for implementation)
1. Active management of responsibilities – managing the process					
1.1 Searches					
Overall sufficiency of search e.g. the number of times sufficiency of search is an issue in internal or external review matters.	Low <input type="checkbox"/>	Medium <input type="checkbox"/>	High <input type="checkbox"/>		
Additional documents located during external review.	Often <input type="checkbox"/>	Sometimes <input type="checkbox"/>	Rarely <input type="checkbox"/>		
Level of satisfaction by RTI Unit or decision maker with documentation received from other staff.	Low <input type="checkbox"/>	Medium <input type="checkbox"/>	High <input type="checkbox"/>		
1.2 Transfer of information					
If relevant, the agency has procedures in place for transfer of personal information outside Australia only in accordance with s33 of the IP Act. (Note: Not required for local government until 1 July 2010)	Y <input type="checkbox"/>	IP <input type="checkbox"/>	Id <input type="checkbox"/>	N <input type="checkbox"/>	
1.3 Record Keeping					
Record keeping systems allow efficient location of records relevant to RTI and IP requests.	Y <input type="checkbox"/>	IP <input type="checkbox"/>	Id <input type="checkbox"/>	N <input type="checkbox"/>	
Accurate records exist to document the processing of requests.	Y <input type="checkbox"/>	IP <input type="checkbox"/>	Id <input type="checkbox"/>	N <input type="checkbox"/>	
2. Active management of responsibilities – assisting and advising the parties					
2.1 Negotiation					
Applicants are assisted through negotiation, either prior to making an application or once an application is made, to clarify and particularise their requests.	Y <input type="checkbox"/>	IP <input type="checkbox"/>	Id <input type="checkbox"/>	N <input type="checkbox"/>	

² Sourced from *FOI Standards and Measures*, produced by the Office of the Information Commissioner, Western Australia, as a result of an FOI practitioners workshop, unless indicated differently.

Right to Information and Information Privacy Agency Electronic Audit

Section D - Compliance

D.1 Detailed questions about active management of agency responsibilities ³

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments
					(NB Could include date planned for implementation)
2.2 Communication					
For every application received, the agency considers calling the applicant as soon as practicable on receipt of the application to clarify the applicant's information request and explore options for providing the information.	Y <input type="checkbox"/>	IP <input type="checkbox"/>	Id <input type="checkbox"/>	N <input type="checkbox"/>	
Open communication exists between the agency and the parties.	Y <input type="checkbox"/>	IP <input type="checkbox"/>	Id <input type="checkbox"/>	N <input type="checkbox"/>	
Level of satisfaction by the parties with the communication in general.	Low <input type="checkbox"/>	Medium <input type="checkbox"/>	High <input type="checkbox"/>		
The agency is responsive and open to requests for information.	Y <input type="checkbox"/>	IP <input type="checkbox"/>	Id <input type="checkbox"/>	N <input type="checkbox"/>	
2.3 Decision communication					
Decisions are made promptly and parties informed as soon as possible.	Y <input type="checkbox"/>	IP <input type="checkbox"/>	Id <input type="checkbox"/>	N <input type="checkbox"/>	
2.4 Timeliness					
Level of satisfaction by the parties with the communication about time issues.	Low <input type="checkbox"/>	Medium <input type="checkbox"/>	High <input type="checkbox"/>		

³ Sourced from *FOI Standards and Measures*, produced by the Office of the Information Commissioner, Western Australia, as a result of an FOI practitioners workshop, unless indicated differently.

Right to Information and Information Privacy Agency Electronic Audit

Section D - Compliance

D.2 Requirements for Publication Schemes ⁴

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
1. Seven classes of information are published (About us, Our services, Our finances, Our priorities, Our decisions, Our policies, Our lists).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Information in the publication scheme is significant (key initiative and policy documents).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Information in the publication scheme is appropriate (having regard to legislation, privacy principles and security issues).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Information in the publication scheme is accurate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Significant documents are not excluded by irrelevant factors e.g. embarrassment to the agency, misunderstanding by the applicant, mischievous conduct by the applicant or the seniority of an author (Part 1, Schedule 4 Right to Information Act 2009).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Schemes are readily accessible (e.g. a link on home page).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Direct links to documents suitable for online publication are provided. (Documents might be unsuitable for online publication if they are too large, or not in a suitable format)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. All documents referred to in the publication scheme are accessible centrally from the publication scheme.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. Documents linked to the publication scheme are no more than 3 mouse clicks away.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. If a direct link to a document is impractical, e.g. due to the size of the document, a summary of the document is provided and access arrangements are described.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

⁴ From *Ministerial Guidelines, Operation of Publication Schemes and Disclosure Logs* issued pursuant to section 21(3) and section 78(2) of the *Right to Information Act 2009*

Right to Information and Information Privacy Agency Electronic Audit

Section D - Compliance

D.2 Requirements for Publication Schemes ⁵

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
11. The publication scheme sets out the terms on which information is available including any applicable fees/charges.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12. Charges for administrative release of documents are minimised.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13. Alternative formats of documents are available.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14. Web site design is user friendly (e.g. well organised, reviewed quarterly and up to date, information rich).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15. An agency officer has a responsibility to ensure the publication scheme is maintained and up-to-date.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16. A complaints procedure is in place to enable people to make complaints when information is not available from the publication scheme.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17. Quality of scheme from the agency's perspective.	Low <input type="checkbox"/>	Medium <input type="checkbox"/>	High <input type="checkbox"/>		
18. Changes to the publication scheme are formally approved. ⁶	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19. Changes and approvals to the publication scheme are documented. ⁶	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20. The documents describing changes to the publication scheme are kept as public records. ⁶	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

⁵ From *Ministerial Guidelines, Operation of Publication Schemes and Disclosure Logs* issued pursuant to section 21(3) and section 78(2) of the *Right to Information Act 2009*

⁶ Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether or not a publication scheme should be maintained as a public record.

Right to Information and Information Privacy Agency Electronic Audit

Section D - Compliance

D.2 Requirements for Publication Schemes ⁷

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments
	Y	IP	Id	N	(NB Could include date planned for implementation)
<p>Department only question. GOCs, local government, and other agencies please disregard.</p> <p>21. The information governance body has considered the development of the elements of the authorising and accountability environment, which may include:</p> <ul style="list-style-type: none"> • policies • business processes (e.g. internal approval processes for release upon request or publication in a publication scheme) • procedures • roles and responsibilities (e.g. who approves release) • supporting tools and systems. ⁸ <p>For example, the meeting agenda or minutes indicate these issues have been considered.</p> <p><i>(This is a requirement for departments. It is not a requirement for GOCs, local governments or other agencies, and they are not required to respond to this question.)</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

⁷ From *Ministerial Guidelines, Operation of Publication Schemes and Disclosure Logs* issued pursuant to section 21(3) and section 78(2) of the *Right to Information Act 2009*

⁸ From QGEA Guideline *Implementing Information Governance*

Right to Information and Information Privacy Agency Electronic Audit

Section D - Compliance

D.3 Requirements for Disclosure Logs ⁹

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
1. Agency has a disclosure log.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The disclosure log is readily accessible (e.g. within three mouse clicks from the home page).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Web site design is user friendly (e.g. well organised, reviewed quarterly and up to date, information rich).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Information released under the RTI Act is listed in the disclosure log unless there is a clear reason not to do so.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The disclosure log has an appropriate list of documents, for example, by comparison with the number of applications for non-personal information that have been granted.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The agency has a process in place to ensure documents are listed on the agency's disclosure log not sooner than 24 hours after the applicant accesses the document.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. The agency has a process in place to ensure documents are listed on the agency's disclosure log no later than 5 business days after the applicant accesses the document.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Where an applicant has not accessed a document within the access period, and where it is appropriate to do so, the agency provides access details to the document (including any applicable charges) in the agency's disclosure log.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. Documents published to the disclosure log are accompanied by brief text with a summary and the context of the information.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. If documents are not included in a disclosure log, the details of the decision and reasons are documented in the agency's internal records.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

⁹ From *Ministerial Guidelines, Operation of Publication Schemes and Disclosure Logs* issued pursuant to section 21(3) and section 78(2) of the *Right to Information Act 2009*

Right to Information and Information Privacy Agency Electronic Audit

Section 4 - Compliance

D.3 Requirements for Disclosure Logs ¹⁰

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
11. An agency officer has a responsibility to ensure the disclosure log is maintained and up-to-date and in accordance with ministerial guidelines.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12. The disclosure log does NOT contain information that:-	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(a) - Is prevented by law from disclosure.	Yes <input type="checkbox"/>	No <input type="checkbox"/>			
(b) - May be defamatory.	Yes <input type="checkbox"/>	No <input type="checkbox"/>			
(c) -If released would breach the <i>Information Privacy Act 2009</i> .	Yes <input type="checkbox"/>	No <input type="checkbox"/>			
(d) - Contains or alludes to information received in confidence from a third party or which is protected by contract.	Yes <input type="checkbox"/>	No <input type="checkbox"/>			
(e) - Would otherwise cause substantial harm if disclosed.	Yes <input type="checkbox"/>	No <input type="checkbox"/>			
(f) - Is the personal information of the applicant.	Yes <input type="checkbox"/>	No <input type="checkbox"/>			
13. Changes to the disclosure log are formally approved. ¹¹	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14. Changes and approvals to the disclosure log are documented. ¹¹	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15. Documents describing changes to the disclosure log are kept as public records. ¹¹	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

¹⁰ From *Ministerial Guidelines, Operation of Publication Schemes and Disclosure Logs* issued pursuant to section 21(3) and section 8(2) of the *Right to Information Act 2009*

¹¹ Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether or not a disclosure log should be maintained as a public record.

Right to Information and Information Privacy Agency Electronic Audit

Section 4 - Compliance

D.3 Requirements for Disclosure Logs ¹²

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
Department only question. GOCs, local government, and other agencies please disregard.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>16. The information governance body has considered the development of the elements of the authorising and accountability environment, which may include:</p> <ul style="list-style-type: none"> • policies • business processes (e.g. internal approval processes for release upon request or publication in a publication scheme) • procedures • roles and responsibilities (e.g. who approves release) • supporting tools and systems. ¹³ <p>For example, the meeting agenda or minutes indicate these issues have been considered.</p> <p><i>(This is a requirement for departments. This is not a requirement for GOCs, local governments or other agencies and they are not required to respond to this question.)</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

¹² From *Ministerial Guidelines, Operation of Publication Schemes and Disclosure Logs* issued pursuant to section 21(3) and section 78(2) of the *Right to Information Act 2009*

¹³ From QGEA Guideline *Implementing Information Governance*

Right to Information and Information Privacy Agency Electronic Audit

Section D - Compliance

D.4 Administrative Access Schemes

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
Department only question. GOCs, local government, and other agencies please disregard. 1. Schemes generally conform to QGEA guidelines. <i>(This is a requirement for departments. This is not a requirement for GOCs, local governments or other agencies and they are not required to respond to this question.)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Have any new administrative access schemes been introduced since the commencement of the RTI Act?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Has any new information been introduced into existing administrative access schemes since the commencement of the RTI Act?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are there mechanisms in place to evaluate the viability of administrative access schemes (e.g. a review of information requests).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are there indicators that the administrative access schemes are used first.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Publicly available administrative access schemes are readily accessible (e.g. button on home page).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Multiple avenues of access are available (e.g. HTML, open formats or hard copy on request).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. If appropriate, web site design is user friendly and compliant with the Consistent User Experience CUE standard (e.g. well organised, reviewed quarterly and up to date, information rich).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Right to Information and Information Privacy Agency Electronic Audit

Section D - Compliance

D.5 Receipt of applications ¹⁴

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
1. The agency uses the approved form, as per the RTI and IP Acts, for applications for information.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The agency has a procedure for obtaining evidence of the identity of the applicant within 10 business days e.g. a checklist of steps to be undertaken for each application.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. The agency has procedures in place for dealing with problems with the application, including proof of identity, a change of Act under which the application has been made or seeking an extension of time for the decision. For example, RTI officers might have a standard approach to these matters.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. The agency has procedures in place to issue charges estimates notices and the accompanying schedule of documents under the RTI Act.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The agency tracks time frames for handling charges estimates notices and schedules of documents.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The agency has procedures in place for dealing with third party consultation e.g. a checklist of steps to be undertaken for each application.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. The agency has a procedure to track timeframes for third party consultations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The agency has procedures in place for transferring an application to another agency e.g. . a checklist of steps to be undertaken for each application..	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. The agency has checked applicable fees and charges and ensured procedures are correct.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

¹⁴ Taken from the requirements in the *Right to Information Act 2009* and *Information Privacy Act 2009*

Right to Information and Information Privacy Agency Electronic Audit

D.6 Deciding how to deal with applications ¹⁵

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
1. The agency has procedures for deciding whether or not an application is outside the scope of the Act e.g. consideration of questions of scope are file noted.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The agency has procedures for ensuring applicants are notified if their application is outside the scope of the Act, within 10 business days and in the prescribed form, including reasons for the decision.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If access or amendment is refused, the agency has steps to ensure the decision is according to the legislation, particularly balancing public interest factors under the RTI Act and applied by IP Act.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. If access or amendment is refused, the agency has steps to ensure that the notification is in the prescribed form, and that notification is made within time and with reasons for the decision.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

¹⁵ Taken from the requirements in the *Right to Information Act 2009* and *Information Privacy Act 2009*

Right to Information and Information Privacy Agency Electronic Audit

Section D - Compliance

D.7 Granting access to or amendment of documents ¹⁶

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
1. The agency has procedures to provide access to information in the requested format and within time e.g. a checklist of steps to be undertaken for each application.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The agency routinely meets statutory timeframes.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If access is not given in the requested format or it is deferred, the agency has procedures for recording the reasons for the difference in formats or the deferral, and that no additional charges are levied.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. The agency has procedures for ensuring the information goes to the correct person, for example, correctly to an agent or parent.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The agency has procedures for ensuring that applications under the RTI Act are considered for inclusion in the disclosure log in accordance with the RTI Act.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

¹⁶ Taken from the requirements in the *Right to Information Act 2009* and *Information Privacy Act 2009*

Right to Information and Information Privacy Agency Electronic Audit

D.8 Internal and External Review ¹⁷

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
1. Internal Review					
1.1 The agency has a procedure for tracking the timeframes for internal review applications e.g. a checklist of steps to be undertaken for each application.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.2 The agency uses the prescribed written notice for notifying the applicant of the result of the internal review, including provision of reasons.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.3 The agency has a procedure for tracking the timeframes for internal review decision making.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.4 The agency has a process in place to ensure internal review decisions are notified to the applicant within 20 business days from receipt of application.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.5 Written notices of internal review decisions are provided to the applicants.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. External Review and Compliance Notices					
2.1 The agency has a procedure to seek more time from the Information Commissioner to process the application if a deemed decision is being externally reviewed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.2 The agency understands that the onus is on the agency to show that the reviewable decision was justified.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.3 The agency understands and meets its obligations to assist the Information Commissioner.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.4 The agency understands and accepts its obligations to take any action required by a compliance notice issued under s158 of the IP Act.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.5 The agency routinely meets set timeframes in external reviews.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

¹⁷ Taken from the requirements in the *Right to Information Act 2009* and *Information Privacy Act 2009*

Right to Information and Information Privacy Agency Electronic Audit

Section D - Compliance

D.9 Detailed requirements for adoption of privacy principles ¹⁸

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

(Note: Government Owned Corporations are not required to adopt the Privacy Principles, and need not complete this section. Local governments are not required to adopt the Privacy Principles until 1 July 2010.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
1. General					
1.1 Personal information handling practices have not raised concerns or resulted in the issue of any compliance notices.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.2 Collection of information is appropriate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.3 Security safeguards are appropriate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.4 Processes are in place to ensure personal information is as accurate as possible.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.5 The agency is open about its processes for collecting, using and disclosing personal information.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.6 The agency use and disclosure of information is appropriate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
1.7 Privacy breaches and complaints are managed effectively.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Collection					
2.1 The agency identifies why it is collecting personal information.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.2 The agency provides a collection notice ¹⁹ to individuals from whom personal information is being collected.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.3 The agency has determined how much and the kind of personal information it needs to collect.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.4 The amount of personal information collected is no more than is necessary and relevant for the purpose for which it is required.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.5 The agency collects personal information lawfully and fairly.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

¹⁸ From Schedule 3 of the *Information Privacy Act 2009*

¹⁹ Note that the term 'collection notice' does not appear in the *Information Privacy Act 2009*. It is a generic term encompassing the obligation to make individuals generally aware of the facts listed in IPP 2.

Right to Information and Information Privacy Agency Electronic Audit

Section D - Compliance

D.9 Detailed requirements for adoption of privacy principles ²⁰

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

(Note: Government Owned Corporations are not required to comply with the privacy principles, and need not complete this section. Local governments are not required to comply with the privacy principles until 1 July 2010.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
2. Collection					
2.6 The agency has taken steps to ensure the information collected is accurate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Security					
3.1 Personal information held by the agency is protected against unauthorised access, use, modification or disclosure.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.2 Personal information held by the agency is protected against loss or misuse.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.3 The agency has adopted physical, technical and administrative safeguards to protect personal information.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.4 Security safeguards are appropriate given the sensitivity of the information.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.5 Processes are in place to record access to electronic records and datasets containing personal information.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.6 Processes are in place to ensure that disposal of personal information does not allow unauthorised access.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Accuracy					
4.1 Processes are in place for people to amend their personal information if it is incorrect.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.2 Processes are in place to record when and where key personal information was collected, including when it was updated.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

²⁰ From Schedule 3 of the *Information Privacy Act 2009*

Right to Information and Information Privacy Agency Electronic Audit

Section D - Compliance

D.9 Detailed requirements for adoption of privacy principles ²¹

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

(Note: Government Owned Corporations are not required to adopt the Privacy Principles, and need not complete this section. Local governments are not required to adopt the Privacy Principles until 1 July 2010.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments
	Y	IP	Id	N	(NB Could include date planned for implementation)
5. Openness					
5.1 The agency makes information available about its personal information policies and procedures.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.2 The agency tells people why it collects, how it uses and when it discloses their personal information at the time of collection.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.3 There is a person that members of the public can contact about privacy issues.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.4 The agency tells people how they can access and amend their personal information.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.5 The agency provides details to the public of the categories of personal information it holds.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Use and disclosure					
6.1 The agency uses information only for the purpose for which it was collected, unless an exception in IPP10 or NPP2 applies.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.2 The agency discloses information only where the person was advised when it was collected unless an exception in IPP11 or NPP2 applies.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.3 The agency has procedures in place to ensure that use or disclosure of personal information under IPP10, IPP11 or NPP2 is noted on the personal information where required.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

²¹ From Schedule 3 of the *Information Privacy Act 2009*

Right to Information and Information Privacy Agency Electronic Audit

Section D - Compliance

D.9 Detailed requirements for adoption of privacy principles ²²

(Note to person coordinating responses - This section could be completed by the person within the agency responsible for handling Right to Information / Information Privacy matters.)

(Note: Government Owned Corporations are not required to adopt the Privacy Principles, and need not complete this section. Local governments are not required to adopt the Privacy Principles until 1 July 2010.)

Response options:	Unless otherwise indicated, use this response option when:
Yes	A system, policy, strategy or process has been implemented in full across the agency.
In progress	Management has decided on a particular course of action and implementation has commenced or is complete in part but not all of the agency.
Identified	Management has identified this as an issue, but has not yet commenced to address the issue.
No	There are no strategies in place, and no immediate plans to pursue them.

Criteria question	Assessment				Optional Comments (NB Could include date planned for implementation)
	Y	IP	Id	N	
7. Breach and complaints					
7.1 There is a documented process for managing privacy breaches and privacy complaints.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.2 This process is documented and available to agency officers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.3 This process, or a version of it, is available to the public.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.4 Privacy complaint handling is timely and the complainants are generally satisfied with the response given.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.5 There is a clear process for complaint handlers to advise agency officers when practices that need changing are identified.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.6 There is a clear process to action identified changes.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.7 Identified reforms to agency processes have been implemented.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.8 There are no recurrences of privacy breaches.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

²² From Schedule 3 of the *Information Privacy Act 2009*