



Office of the Information Commissioner
Queensland

Results of Desktop Audits 2013-14

Review of Publication Schemes, Disclosure Logs and Information Privacy Awareness in Departments and Hospital and Health Services



This report to the Queensland Legislative Assembly by the Office of the Information Commissioner is licensed under a Creative Commons – Attribution License. People reading or using this report may do so in accordance with the following conditions: Attribution (BY), requiring attribution to the original author.

© The State of Queensland. (Office of the Information Commissioner) 2014

Copies of this report are available on our website at www.oic.qld.gov.au and further copies are available on request to:

Office of the Information Commissioner
Level 8, 160 Mary Street, Brisbane, Qld 4000
PO Box 10143, Adelaide Street, Brisbane, Qld 4000
Phone 07 3234 7373
Fax 07 3405 1122
Email administration@oic.qld.gov.au
Web www.oic.qld.gov.au

ISBN: 978-0-646-92721-3

September 2014

Mr Ian Berry MP
Chair
Legal Affairs and Community Safety Committee
Parliament House
George Street
Brisbane QLD 4000

Dear Mr Berry

I am pleased to present *Results of Desktop Audits 2013-14: Review of Publication Schemes, Disclosure Logs and Information Privacy Awareness in Departments and Hospital and Health Services*. This report is prepared under section 131 of the *Right to Information Act 2009* (Qld) and section 135 of the *Information Privacy Act 2009* (Qld).

The report reviews compliance with the *Right to Information Act 2009* (Qld), in particular requirements relating to publication schemes and disclosure logs. It also reviews compliance with the *Information Privacy Act 2009* (Qld) in relation to compliance with Information Privacy Principle 2 and National Privacy Principle 1 (Collection of personal information) and Information Privacy Principle 5 and National Privacy Principle 5 (IPP5 - Providing information about documents containing personal information and NPP5 - Openness). Agencies are required to adopt Information Privacy Principles under section 27 of the *Information Privacy Act 2009* (Qld). Health agencies must comply with the National Privacy Principles under section 31 of the *Information Privacy Act 2009* (Qld).

In accordance with subsection 184(5) of the *Right to Information Act 2009* (Qld) and subsection 193(5) of the *Information Privacy Act 2009* (Qld), I request that you arrange for the report to be tabled in the Legislative Assembly on the next sitting day.

Yours sincerely



Rachael Rangihaeata
Information Commissioner

Table of Contents

Executive Summary	1
Summary of key findings	3
1 Introduction	5
1.1 Background	5
1.2 Objectives	5
1.3 Scope	6
1.4 Methodology	7
1.5 Making government information and services readily available	8
1.6 Future directions	10
2 Visibility of right to information	12
2.1 Background	12
2.2 Availability and accessibility of RTI webpages	13
2.3 Information about administrative access schemes	14
2.4 Information about formal application processes	15
2.5 Conclusions	17
3 Publication schemes	19
3.1 Background	19
3.2 Availability and accessibility of online publication schemes	20
3.3 Structure and content of publication schemes	21
3.4 Providing information in alternative formats	24
3.5 Information about terms and conditions, including charges	25
3.6 Maintaining the publication scheme	25
3.7 Providing feedback about the publication scheme	25
3.8 Conclusions	26
4 Open Data	28
4.1 Background	28
4.2 Publication of Open Data Strategies and datasets	29
4.3 Accessibility of Open Data Strategies and datasets	29
4.4 Conclusions	30

5	Disclosure logs.....	31
5.1	Background	31
5.2	Availability and accessibility of disclosure logs	32
5.3	Disclosure logs – departments	32
5.4	Disclosure logs – HHSs	33
5.5	Accessing documents on the disclosure log	34
5.6	Publishing blank pages on the disclosure log	34
5.7	Conclusions	35
6	Privacy	37
6.1	Background	38
6.2	Profile of privacy information on agency websites	39
6.3	IPP2 and NPP1 – collection via online forms and email	39
6.4	IPP5 and NPP5 – personal information holdings and privacy plans	42
6.5	Information about privacy complaints	43
6.6	Conclusions	44
7	Agency Response	45
8	Conclusion.....	46
	Appendix 1 – Acronyms	47
	Appendix 2 – Agencies reviewed and type of audit.....	48

Executive Summary

Proactive disclosure, including publishing information online, benefits both government and the community, because it makes government information available for re-use quickly and is generally resource and cost effective compared to dealing with access requests under formal processes. Publication schemes, disclosure logs and administrative access arrangements are part of a broader framework by which agencies can proactively release information to the community.

The Office of the Information Commissioner (**OIC**) audits government agency compliance with both specific legislative requirements and general legislative requirements for proactive disclosure of information and protection of personal information. In 2013-14, OIC conducted desktop audits to examine agency websites from the perspective of a member of the public looking for information available online and assess compliance. Reviews were conducted of 38 departmental and Hospital and Health Service (**HHS**) websites, including 36 full individual audits and 2 website scans.

Overall, all agencies provided clear pathways to access information, either administratively through publication of information on the website, or formally through the legislative access application processes. Disclosure logs were also easily accessible. 70% of disclosure logs met all assessed requirements.

While 5 departments now have compliant publication schemes, most agencies are still required to publish more significant and appropriate information. Tendering and procurement information, and information promoting accountability in decision-making, for example, governance arrangements or progress towards key performance targets are areas identified as requiring improvement.

The Open Data initiative of the Queensland Government promotes the release of as much data as possible to the public. Agencies should maximise the effectiveness of this initiative by ensuring clear, visible pathways from their websites to their datasets published on the Queensland Government's data website as part of their publication scheme.

All agencies need to improve the information provided to the community about their privacy practices, particularly about their privacy policies, their use and disclosure of personal information, and notifications at the time of collection about how agencies will use the personal information.

A new report card assessment system was used in 2013-14 in recognition of a greater expectation of agency maturity in right to information and information privacy compliance and practices as we approached five years of operation of the legislation. Agencies were provided with individual desktop audit report cards rating components of the audit, and recommendations for areas of improvement. Aggregated results are set out in this report.

Most agencies responded to their individual report cards, and all reported on action being taken to address issues raised. It is clear that the desktop audit program is an important strategy in promoting awareness and fostering improvement in the right to information and information privacy practices.

Summary of key findings

Right to Information on agency websites

- All audited websites provided access to a Right to Information (RTI) webpage.
- All RTI webpages were easily accessible.
- Agency websites could be better used to promote administrative access to information, so that formal applications are made only as a last resort.

Publication schemes

- 78% of agencies had a publication scheme, and these were all easy to locate and access.
- Most agencies required further significant information to be published to meet requirements for publication scheme information classes relating to finances (particularly procurement), priorities (particularly agencies' performance), decisions and policies.
- 64% of agencies maintaining a publication scheme were considered to be keeping the publication scheme appropriately maintained and up-to-date.
- Only 57% of agencies maintaining a publication scheme provided details of how to obtain access to documents in an alternate format.

Disclosure logs

- 75% of the agency websites audited maintained a disclosure log. All disclosure logs maintained by agencies were easily accessible.
- 70% of disclosure logs were assessed as fully compliant with prescribed requirements such as publishing applicant names as required, providing explanations for blank pages or redacted material, providing direct access to documents and describing how to obtain information in alternative formats.

Open Data

- 15 departments (79%) satisfied all requirements to publish an Open Data Strategy and datasets in accordance with the schedule in their Strategy.
- Agencies could better promote Open Data on their websites and provide clear pathways from their websites to access their datasets and strategies on the Queensland Government's data website.

Privacy principles

- Agencies are generally aware of the importance of privacy and have taken steps to handle personal information appropriately, but have not yet fully addressed the specific requirements of the IP Act.
- All agency websites had one or more of the following:
 - a link to 'privacy' in the website footer (100% of agencies)
 - a privacy statement (97% usually accessible from the website footer)
 - a privacy plan or policy (36%); or
 - other privacy content such as a listing of the type of personal information held (81%), access to personal information arrangements (94%), procedures for making complaints about privacy (97%) and a contact for privacy information (97%).
- Information Privacy Principle 2 (IPP2) compliance for emails was achieved in most instances by a link to a global privacy statement, but only where the global statement specifically dealt with the collection of personal information through email and internet usage.

Agency responses

- 21 agencies (58%) responded to OIC's findings.
- All responding agencies accepted all OIC's findings and recommendations.

1 Introduction

1.1 Background

The functions of the Information Commissioner include reviewing and reporting on agencies' performance in relation to the operation of the *Right to Information Act 2009* (Qld) (**RTI Act**)¹ and the *Information Privacy Act 2009* (Qld) (**IP Act**). The Office of the Information Commissioner (**OIC**) monitors agency performance by conducting reviews including compliance audits. OIC also develops self-assessment tools to help agencies assess their own progress. This report is about the outcome of reviews of 20 Government departments, the Public Service Commission² and 17 Hospital and Health Service (**HHS**) websites, undertaken during the period 1 July 2013 to 30 June 2014 on publication schemes, disclosure logs and the privacy principles that are assessable online from an auditor's desktop.

On 1 July 2012, the 17 Hospital and Health Service agencies that were established under the *Hospital and Health Boards Act 2011* (Qld) became operational. Under the Act, HHSs are statutory bodies governed by an independent and locally controlled Hospital and Health Board. The Department of Health and the HHSs are health agencies.

Under the IP Act an agency, other than a health agency, must comply with the Information Privacy Principles (**IPPs**). Health agencies must comply with the National Privacy Principles (**NPPs**).³

1.2 Objectives

The objectives of the desktop audit program of review were to assess the accessibility and availability of information on department and HHS agency websites, and consider:

- whether right to information, publication schemes and disclosure log webpages met requirements under the RTI Act and Ministerial Guidelines, and promoted better and easier access to government held information
- the sufficiency of the amount of information made routinely available by each agency via these webpages

¹ Acronyms are listed in Appendix 1.

² Given the role of the Public Service Commission with respect to departments the agency was included in the desktop audit program for 2013-14.

³ The NPPs rather than the IPPs are applied to health agencies under the IP Act to reflect arrangements applying nationally to health agencies in other jurisdictions and with private health providers – see section 30 of the *Information Privacy Act 2009* (Qld).

- the effectiveness of personal information collection notices in making people aware of the purpose of collection, laws authorising or requiring collection and disclosure practices in compliance with IPP2, and for health agencies, compliance with NPP1; and
- the effectiveness of providing information about documents containing personal information in accordance with IPP5 and NPP5.

Other compliance issues that required behind-the-scenes examination of agency practices, such as application handling and decision making practices were not covered by these audits.

1.3 Scope

This report covers 20 departments, the Public Service Commission and 17 HHS agencies. Although 38 agencies were subject to review, agency restructures meant that 36 full individual desktop audits and 2 website scans were performed during 2013-14.

In September 2013, the Police and Community Safety Review (**PACSR**) recommended a number of Machinery-of-Government changes which repositioned the functions of the Department of Community Safety (**DCS**). As a result, DCS functions were either relocated to other agencies or established as independent functions.⁴ This triggered the development of a new agency website, however it was not live during the audit period. The decision was taken that a full, individual desktop audit of the DCS website would not be appropriate under these circumstances. Instead, OIC conducted a scan of their website to determine the most appropriate course of action. Subsequently, OIC wrote to the new agency informing them of their obligations under the legislation and included a checklist to assist them in developing a legislatively compliant website.

After an initial website scan, a decision was made not to conduct a full individual desktop audit of the Cape York HHS due to the imminent merger with the Torres Strait-Northern Peninsula HHS on 1 July 2014.

Aggregate numbers reported throughout this report will be representative of the 36 full individual desktop audits conducted. A list of agencies audited can be found in Appendix 2.

⁴ *Police and Community Safety Review*, viewed at <https://www.fire.qld.gov.au/PACSR.asp> on 7 August 2014. Departmental functions were relocated to other agencies, except for the Queensland Fire and Rescue Service, which was renamed the Queensland Fire and Emergency Services (**QFES**) and established as a separate entity, and corporate functions, which were transferred to a new Public Safety Business Agency (**PSBA**).

1.4 Methodology

The desktop audits examined the parts of an agency's website visible to a member of the public.

The audits focused on agency webpages providing information about the right to information, the publication scheme, the disclosure log, disclosure of and access to personal information holdings, and points of contact where individuals were asked to provide personal information.

In a desktop audit, an OIC auditor examines agency websites taking the perspective of a member of the public looking at information available online. The desktop audit assesses the agency websites against auditable items as required by the RTI Act, IP Act or the Ministerial Guidelines made under the legislation. As a minimum, 729 compliance obligations are assessed, and up to 914 items might be assessed, depending on responses to initial assessments. These obligations relate to the general visibility and accuracy of webpages describing right to information, the operation of publication schemes, the publication and accessibility of material relating to the Queensland Government's Open Data initiative, the operation of disclosure logs, the promotion of administrative access arrangements and compliance with IPP2 (NPP1) and IPP5 (NPP5) concerning notifications about the collection, use and disclosure of personal information.

As noted under the objectives of the desktop audit program, IPP2 and NPP1 applied to the collection of personal information from an individual. As the purpose of the desktop audits was to examine the parts of an agency's website visible to a member of the public, the focus of OIC's desktop audits was limited to the collection of personal information via online forms and solicited email contact with the agency, and compliance with the aspects of IPP2 and NPP1 which could be assessed effectively from an auditor's desktop. Agency websites were also audited for compliance with IPP5 and NPP5, which relate to the provision of information about documents containing personal information.

In 2013-14, OIC also considered aspects of publication and accessibility of material relating to an agencies' Open Data Strategies and datasets, as such information was significant and should be included in a publication scheme. The scope of the desktop audit did not include an examination of datasets for compliance with privacy

requirements as it was not practicable to do so within the methodology and resources of the desktop audit program.⁵

At the conclusion of each individual desktop audit, each agency was provided with a preliminary report and recommendations as to the audit's findings and was invited to respond to the findings and recommendations. The preliminary report also presented findings in a report card format as a snapshot of the level of compliance achieved across six areas. In future aggregate reports, OIC will consider publishing individual agency's report card assessments.

The results of audits conducted by OIC are discussed in Sections 2 – 6 of this report. Details of agencies included in the OIC's audit program including the type of audit conducted for each agency is contained in Appendix 2.

It should be noted that in some places, percentages in summary tables do not total 100%, due to rounding.

1.5 Making government information and services readily available

The RTI and IP Acts require government agencies to make information available to the public unless there is a good reason not to. A formal application for government-held information under the RTI or IP Act should only be made as a last resort.⁶ Therefore, as much government-held information as possible should, where appropriate, be given through informal means like an agency's website, publication scheme, disclosure log, or through administrative release.

In the 2013-14 desktop audit program, OIC paid particular attention to the way agencies used the internet to facilitate better service delivery, and the use of administrative access arrangements to provide government-held information.

Australians are increasingly using the internet to obtain information and services. Where government agencies have an obligation to publish information or provide information services, the internet is a convenient and effective way to provide information and services.

The growth in the importance of the internet as an information and service delivery channel is well-documented.

⁵ Outside of this audit, OIC provides ongoing advice to agencies on the publication of datasets while ensuring compliance with the IP Act, for example, dataset publication and de-identification techniques, dataset publication and privacy and dataset publication and risk assessment.

⁶ As detailed in the preamble to the RTI Act.

In November 2013, the Australian Communications and Media Authority (**ACMA**) reported that Australia's digital economy grew very strongly in part due to increased levels of online participation. As at 30 June 2013, 14.24 million Australians had access to the internet in their homes. This represented a 2% increase from the previous year.⁷

Other technologies such as smartphones have had an increasing influence on the way individuals access the internet. In April 2014, ACMA reported that in 2013 the use of mobile broadband increased Australia's productivity by \$33.8 billion and reduced business costs by 1.4%.⁸

Demand for online options to interact with government is also growing. Research released by the Australian Government Information Management Office found in 2011 that 42% of individuals prefer to use the internet to obtain information from government and provide information to government.⁹

Encouraging people to engage with government online is advantageous for the public sector. For example, research has shown that providing services online can reduce transaction time and cost.

At the state level the Queensland Government has recognised the importance of providing government information and services online in the context of increasing use and expectations by the community. The Queensland Government's ICT¹⁰ strategy commits to providing equitable access to government information, increasing the number of cost effective services online and ensuring each individual's privacy is appropriately protected.¹¹ This is supported by the Queensland Government's GoDigitalQld initiative. One of the goals of this initiative is to provide community access to government information and services at any time.¹²

Open Data is the government's initiative to release online as much public data as possible, free of charge where appropriate.¹³ Open Data Strategies published by agencies have been captured by this desktop audit program and will be discussed later in the report.

⁷ ACMA Communications Report 2012-13. Viewed at <http://www.acma.gov.au/theACMA/Library/Corporate-library/Corporate-publications/communications-report-2012-13> on 16 July 2014.

⁸ *The economic impacts of mobile broadband on the Australian Economy, from 2006 to 2013*. Viewed at <http://www.acma.gov.au/theACMA/Library/researchacma/Research-reports/economic-impacts-of-mobile-broadband-1> on 16 July 2014.

⁹ AGIMO, *Interacting with Government: Australians' use and satisfaction with e-government services* (2011). <<http://www.finance.gov.au/publications/interacting-with-government-2011>>

¹⁰ 'ICT' stands for Information and Communications Technology.

¹¹ *Queensland Government ICT strategy 2013-17*. Viewed at <http://www.qld.gov.au/dsitia/initiatives/ict-strategy/> on 16 July 2014.

¹² *GoDigitalQld Queensland Digital Economy Strategy and Action Plan*. Viewed at <http://www.godigitalqld.dsitia.qld.gov.au/welcome-to-godigitalqld> on 16 July 2014.

¹³ Taken from the Glossary of terms – *Queensland Government ICT Strategy 2013-17*.

OIC audits agency's online information and service delivery with these strategies in mind, to identify and recognise agencies which have addressed their information management obligations online, and to encourage other agencies to consider adopting similar practices.

Agencies which are compliant with the RTI and IP Act requirements will have the benefit of being more likely to meet the expectations of citizens regarding the ability to access online information and services.

1.6 Future directions

As agencies' practices mature and agencies increasingly find ways to optimise RTI and IP practice, OIC expects greater proactive disclosure of information, including administrative release, and continuous improvement to be built into existing agency-wide workflows and activities (for example, for internal audit or web publishing).

The emphasis on performance monitoring for technical compliance is expected to diminish over time as agencies move beyond compliance to well-managed practices, and realise the broader benefits that have come from building their capacity and capability in this area.

These benefits include:

- provision of greater service to the community
- efficiencies for both the community and government by increasing ease of access to information through direct pathways to information online or informal access on request
- greater opportunities to develop innovative products and services that make use of the information and data assets held by government
- communities that are better informed and more able to participate in the democratic process; and
- enhanced collaboration between government agencies, and between government and other agencies.

OIC will continue to support agencies by:

- promoting greater awareness of RTI and IP, including engaging at senior levels and focusing on regional agencies

- producing audit tools that cover the requirements of the legislation and related Ministerial Guidelines, and updating these in response to stakeholder feedback and changes in the legislation and guidelines
- providing information resources and advice
- assisting agencies to publish agency data in accordance with the requirements of the IPPs and NPPs; and
- delivering training that meets the needs of the agency staff engaged in self-audit processes.

2 Visibility of right to information

Quick facts

- All audited agencies had websites with some content relating to Right to Information. HHSs provided access to RTI through the Department of Health's website.
- All 36 agencies relied upon RTI webpages that were easily accessible, often through a direct link from the home page or the website's main menu.
- 67% of agencies provided detailed information about their administrative access schemes available through the RTI webpage they used. 17% of agencies needed to include information to encourage applicants to consider using administrative access schemes, to increase community awareness and facilitate easier access to information.
- 89% of agencies provided some level of information about making a formal application on the RTI webpage they used. 69% of agencies provided detailed information, including details about application processes, costs, timeframes and review rights.

2.1 Background

Under the RTI Act, government information will be released administratively as a matter of course, unless there is a good reason not to. An application under the RTI Act should be necessary only as a last resort.¹⁴

Proactive disclosure increases the flow of government information to the community by active publication of information rather than by agencies requiring a formal application under a legislative process before releasing information.

This approach to information management increases innovation and participatory government. It reduces red tape for accessing information, and is faster and more cost effective than undertaking the formal application process.

¹⁴ As detailed in the Preamble to the RTI Act.

Publication schemes, disclosure logs and administrative access arrangements are active publication methods. One of the principal strategies for proactive disclosure is to provide clear, visible pathways online to administrative access arrangements.¹⁵

Where it is necessary to use the formal legislative process, it is important that there is clear, accurate and complete information on the agency website for applicants about the process.

With this in mind, OIC assessed the visibility of RTI and administrative access arrangements on agency webpages. Emphasis was placed on whether an agency provided direct access (this included via hyperlinks) from their RTI webpage to their publication scheme, disclosure log, and information about administrative access arrangements and formal application processes under the RTI and IP Acts.

2.2 Availability and accessibility of RTI webpages

OIC audited how well agencies raised public awareness about how information could be accessed administratively or under the legislative processes.

All 36 agencies audited had websites containing RTI related web content. This consisted of one or more RTI webpages (that is, an RTI webpage, publication scheme, disclosure log or administrative access arrangement). There were differences between the availability of the different types of RTI related web content on agency websites as depicted in Table 1.

Table 1: Availability of RTI web content by type on agency websites

RTI webpage content by type	RTI web content by type	% with RTI web content by type
Contacting agency for further information	36	100%
Publication scheme	28	78%
Disclosure log	27	75%
Administrative access processes	29	81%

In terms of information about administrative access processes on an agency's website, 2 agencies (6%) mentioned administrative access, but did not provide information on

¹⁵ *Proactive disclosure and publication schemes.* Viewed at <http://www.oic.qld.gov.au/guidelines-for-government/access-and-amendment/proactive-disclosure/proactive-disclosure-and-publication-schemes> on 21 July 2014.

the type of information available administratively or how it could be accessed. A further 5 agencies (14%) did not mention or provide any information about administrative access arrangements.

OIC encourages agencies that have not yet developed RTI related webpages to consider doing so as a way of informing the community about how they can access government-held information online, administratively or under legislative processes.

Overall, all 36 agencies had RTI webpages that were easily accessible from their website's home page. Agencies with RTI webpages that were easy to locate and access had an identifiable link to RTI either in the website footer or from within the website's main menu. In order to make it easier for individuals to use and search government websites, the Queensland Government aims to standardise government websites through the Consistent User Experience Standard 3.0 (CUE 3.0).¹⁶ The CUE 3.0 requires agencies to include a link to RTI and privacy in the footer of their webpage. Of the 36 agencies audited, 34 agencies (94%) met this standard.

2.3 Information about administrative access schemes

Administrative access is an arrangement to provide information to people using a quicker and less formal process than an access application under the RTI or IP Acts. A key element of administrative access arrangements is that the information is non-sensitive in the hands of the person it is provided to.¹⁷ The advantage of administrative access is that agencies can publish information to the community faster and at a lower cost, especially if information can be provided online without the need to contact the agency, for example, a self-service transaction.

In 2013, OIC reported to the Legislative Assembly on agencies' self-reported progress in implementing right to information.¹⁸ That report found that stronger performance in making arrangements for information to be accessed administratively outside of formal RTI processes was required. Agencies also reported that more work was needed to ensure existing administrative access arrangements were readily accessible.

¹⁶ Consistent User Experience Standard 3.0 (CUE 3.0), Module 2, Checkpoint 29 for Privacy, viewed at <http://www.qld.gov.au/web/cue/module2/checkpoints/checkpoint29/> on 7 August 2014, and Checkpoint 30 for Right to Information, viewed at <http://www.qld.gov.au/web/cue/module2/checkpoints/checkpoint30/> on 7 August 2014.

¹⁷ *Administrative Release of Information*. Viewed at <http://www.oic.qld.gov.au/guidelines/for-government/access-and-amendment/proactive-disclosure/administrative-release-of-information> on 21 July 2014.

¹⁸ *2013 Right to Information and Information Privacy Electronic Audit: Queensland public sector agencies' responses and comparative analysis with 2010 results* Report No. 2 of 2013/14 to the Queensland Legislative Assembly. Viewed at <http://www.oic.qld.gov.au/about/our-organisation/key-functions/compliance-and-audit-reports/2013-right-to-information-and-information-privacy-electronic-audit> on 21 July 2014.

This desktop audits confirmed that overall, agencies had made limited progress in promoting the use of administrative access arrangements online. In this desktop audit, OIC found that only 3 agencies (8%) had well-managed administrative access arrangements that were clearly documented, visible and easily accessible from the agency's RTI webpage. The Queensland Police Service offered one example of a RTI webpage that was well-managed, in that it was informative and efficient in referring persons to administrative access arrangements outside of RTI and IP legislative processes. 23 agencies (64%) were considered compliant. At the other end of the scale, 3 agencies (8%) provided no information about administrative access arrangements on their website.

21 agencies (58%) audited by OIC provided a link from the RTI webpage to the agency's administrative access arrangements. 11 agencies (31%) provided no direct access to formal administrative access arrangements.

Given the increasing community expectation of engagement through, and the relative efficiency of, online services, agencies should endeavour to provide detailed information as to what can be released administratively as part of the online arrangements. 24 agencies (67%) provided detailed information about the administrative arrangements online. 5 agencies (14%) required the individual to contact the agency for information on administrative access arrangements, rather than providing the information online.

Agencies are encouraged to seize online service delivery opportunities to promote information available administratively as a way of improving service to the community, cutting costs and reducing red tape when releasing information.

2.4 Information about formal application processes

In order to promote awareness about the right to information, including personal and non-personal information, and better manage the expectations of applicants, agencies should provide sufficient information about the legislative application process.

There was variation in the level of detail provided about making applications through formal legislative processes, as depicted in Table 2.

Table 2: Level of information provided about application processes

Application process	No. of agencies providing information	% of agencies providing information
Making public aware of their RTI rights	28	78%
Provides detailed information about the application processes (includes processing periods, application costs and review rights)	25	69%
Access to both government approved forms for making access and amendment applications	31	86%

The desktop audits undertaken during 2013-14 identified that 28 agencies (78%) made the public aware of their right to be given access to government held information, in accordance with the legislation, when introducing the concept of RTI on their RTI webpage.

When auditing the content of an agency's RTI webpage, OIC assessed the level of detail provided about the application process, including how to apply and submit an application, processing timeframes, applicable fees and charges and disclosure of review rights. As per the summary in Table 2, of the 36 agencies audited, 25 agencies (69%) provided detailed information about the application process. Some of the qualitative issues identified for the other agencies were:

- limited information was provided about submitting an application, processing times and rights of review (seven agencies or 19%)
- the information that was provided was confined to being a link to the approved forms only (three agencies or 8%); and
- incorrect information was provided about the application process (two agencies or 6%).

Agencies need to ensure that information provided about the access application process, cost, timeframes, review rights and review period is sufficient, is accurate and is up-to-date.

Under the RTI and IP Acts, access and amendment applications must be in the approved form.¹⁹ As per the summary in Table 2, 31 (86%) agencies audited provided direct access to the government approved forms for both access and amendment applications. A further 4 agencies (11%) provided direct access to the approved form for making an access application only.²⁰

2.5 Conclusions

One of the principle strategies for enhancing proactive disclosure practices is to ensure agency websites provide clear pathways to access information. Emphasis in this desktop audit program was placed on whether an agency provided direct access (this includes via hyperlinks) to their publication scheme, disclosure log, administrative access arrangements and formal access application processes under the RTI and IP Act from their RTI webpage.

Table 3 sets out the overall ratings of agency RTI webpage achieved by agencies.

Table 3: Ratings of agency RTI Webpages

Maturity of Right to Information webpage	No. of agencies achieving rating	% of agencies achieving rating
Well-managed (Practices managed effectively and being optimised)	20	56%
Compliant (Practices managed and appropriate)	10	28%
In progress to compliance (Practices well-defined, activity evident)	6	17%
Limited progress to compliance (Need for more definition of practices, ad hoc activity evident)	-	-
Non-compliant (Legislative requirements not met)	-	-

Overall, agencies provided clear pathways to access information either administratively through one of many mechanisms available on their RTI webpage or through formal application under the legislative process. Only 6 agencies (17%) audited required

¹⁹ Section 24 of the RTI Act and section 43 of the IP Act deal with making a valid access application. Section 44 of the IP Act contain the requirements for a valid amendment application.

²⁰ One agency was not audited on this topic, because the agency did not provide its own webpage on this topic, instead linking to the Whole-of-Government webpage. An audit of the Whole-of-Government webpage on RTI is outside the scope of this audit.

more work to ensure their RTI webpage was compliant. Overall, 30 agencies (83%) had an RTI webpage that was well-defined in terms of provision of information and providing clear pathways to access to information.

3 Publication schemes

Quick facts

- 78% of the audited agencies included a publication scheme on their webpages. All departments maintained an online publication scheme. Eight HHSs did not maintain a publication scheme online.
- The majority of agencies with publication schemes (96%) structured their publication schemes using the seven information classes required by the Ministerial Guidelines.²¹
- Classes dealing with general information about the agency, services and lists were generally well-populated. Classes dealing with finances (particularly contracts, tenders and procurement activities), priorities (particularly information about agency performance), decisions and policies required improvement.
- 43% of agencies maintaining a publication scheme did not provide details about accessing documents in alternative formats, for instance, html or pdf.²²
- 71% of agencies' publication scheme webpages contained information about terms and conditions, including charges, as required under the RTI Act.
- 64% of agencies maintaining a publication scheme were considered to be keeping the publication scheme appropriately maintained and up-to-date.
- While general feedback and complaint processes were commonly provided (93% of agencies), fewer agencies (61%) explicitly advised individuals how to make a complaint if information in the publication scheme was not available.

3.1 Background

The publication scheme is a structured list of agency information available to the community. The publication scheme forms part of the framework for proactive

²¹ OIC also assessed compliance with the *Ministerial Guidelines – Operation of Publication Schemes and Disclosure Logs (Ministerial Guidelines)*. Viewed at <http://www.rti.qld.gov.au/right-to-information-act/publication-schemes> on 24 July 2014.

²² 'html' stands for 'hypertext markup language' – the standard language for webpages which allows for insertion of images and for interactivity. 'pdf' stands for 'portable document format' – a file format which ensures the document appears to the recipient in its original format.

disclosure of government-held information to the community to promote open, transparent and accountable government.

All departments and HHSs are required to have a publication scheme which sets out classes of information that the agency has available and the terms on which it will make that information available. Section 21(3) of the RTI Act requires an agency to ensure that its publication scheme complies with guidelines as published by the Minister (**Ministerial Guidelines**).

The Ministerial Guidelines specify seven classes in which information must be organised and published.²³ In considering what to include in their publication scheme, agencies should assess documents against three key criteria: the information included must be significant; appropriate for release; and accurate.

Information should be published routinely and where possible, access to it should incur no charge. Publication schemes should be regularly reviewed to ensure information in the publication scheme is current and up-to-date. Publication schemes should be easy to use and information rich, to encourage the wider community to use publication schemes as a key resource tool.

According to the Ministerial Guidelines, information in the publication scheme should be easily accessible through the agency's website and a direct link to documents should be provided. If that is not possible (for example, if a document is too large) or if alternative access is required, the mechanism for obtaining a copy of the document should be clearly set out. In addition, the Ministerial Guidelines require agencies to implement a complaints procedure which sets out how to make a complaint when information included in the publication scheme is not available.

OIC assessed agency publication schemes against the requirements set out under the RTI Act and Ministerial Guidelines. The results are discussed in the following sections.

3.2 Availability and accessibility of online publication schemes

Under the RTI Act, an agency other than an excluded entity must publish a publication scheme.²⁴ Departments and HHSs are required to publish a publication scheme.

Of the 36 agencies audited, 28 agencies (78%) provided online access to a publication scheme. This included 2 departments whose publication schemes were maintained by

²³ About Us, Our Services, Our Finances, Our Priorities, Our Decisions, Our Policies, Our Lists.

²⁴ Section 21(1) of the RTI Act.

another agency.²⁵ Where an agency's publication scheme is maintained by another agency, OIC audits the publication scheme as if it were maintained by the original agency, as the original agency retains responsibility for ensuring it is operated so as to comply with the legislation. Eight HHSs did not publish an online publication scheme.

All publication schemes for those agencies who maintained one were easy to locate on the agency's website, and were either directly included as part of the website, RTI webpage or via a link from the RTI webpage to a publication scheme webpage.

The eight HHSs without an online publication scheme might be compliant with the requirement in the RTI Act to publish a publication scheme if they publish a publication scheme in some other way, for example, in hard copy. The scope of this desktop audit program is confined to an examination of online publication, so a finding of compliance or non-compliance was not possible for these agencies. OIC encourages these HHSs to consider publishing a publication scheme online, for reasons provided previously, and in particular, for ease of access for members of the community seeking information.

3.3 Structure and content of publication schemes

Ministerial Guidelines made pursuant to the RTI Act require any information that an agency makes routinely available through its publication scheme to be published under seven information classes. The majority of agencies (96%) with online publication schemes published information under the seven classes outlined in the Ministerial Guidelines. The one agency which did not meet this requirement had a publication scheme organised under six of the seven classes. Following the receipt of OIC's report on the individual agency's findings, that agency has now corrected the structure of its publication scheme.

Ministerial Guidelines require publication schemes to include information that is significant and appropriate. The Ministerial Guidelines assist in determining specific documents to be published in the sub-descriptions of the information classes. For example, the Ministerial Guidelines describe the 'About Us' class as including 'Agency information, location and contacts, constitutional and legal governance'. Some other factors that might help agencies to determine significant information include:

- high demand for certain categories of information

²⁵ Section 21(2) of the RTI Act provides that an agency may comply with the requirement for a publication scheme if another agency publishes the required scheme for the agency.

- information relating to future challenges, operational goals or industry development; or
- information promoting accountability in decision-making, governance arrangements or achievement of key performance targets.

With this in mind, OIC audited the level of information published under each information class against the Ministerial Guidelines.

It should also be noted that OIC has a longstanding practice of splitting the assessment of the 'Our Finances' class in two. This is for practical reasons. Most agencies are compliant with the requirement in the Ministerial Guidelines to publish projected and actual income and expenditure. Many agencies are non-compliant with the requirement to publish information relating to tendering, procurement and contracts. In order to recognise the compliant practices and to avoid masking non-compliance, OIC has split the assessment of the 'Our Finances' class to make this pattern of compliance and non-compliance clear and explicit (where it exists).

Classes were assessed as either 'well managed' or 'compliant' if significant information required by the Ministerial Guidelines was published; 'in progress' if some information required was absent; and either 'limited progress' or 'negligible' if the class contained little to no information required by the Ministerial Guidelines. The 'well-managed' rating was created to enable OIC to highlight practices that were particularly effective in achieving compliance.

A small number of agencies achieved 'well-managed' ratings for three information classes: 'About Us', 'Our Services' and 'Our Finances'.

Publication schemes were usually better populated in information classes covering general information about the agency:

- 75% of agencies achieved a rating of well-managed or compliant for the 'About Us' class
- 53% of agencies achieved a rating of well-managed or compliant for the 'Our Services' class; and
- 71% of agencies achieved a rating of compliant for the 'Our Lists' class.

Overall, these information classes were well populated with information, consistent with the requirements of the Ministerial Guidelines (see Figure 1).

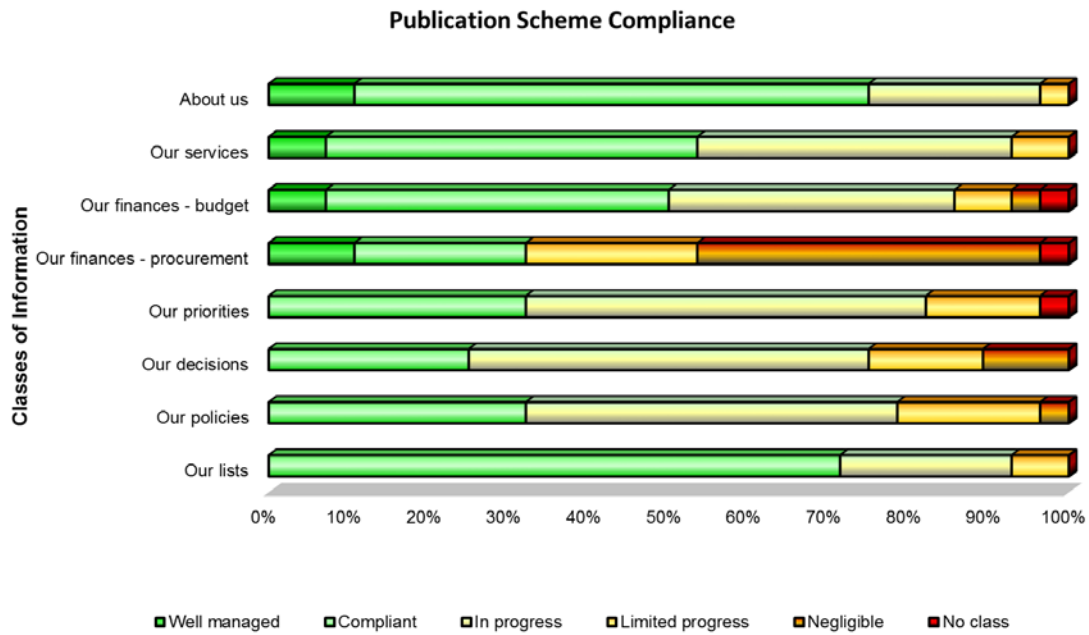


Figure 1: Population of publication scheme classes for individually audited websites

Information classes that provide greater insight into the work and governance of the agency were less well-populated. Figure 1 shows that information classes relating to agency finances, priorities, decisions and policies were classes where opportunities to publish significantly more information existed.

Consistent with results in previous audits, compliance with the 'Our Finances' class was divided:

- 50% of agencies published budget information in a way that was assessed as well-managed or compliant, and a further 36% were assessed as being in progress to compliance.
- Only 32% of agencies provided procurement related information such as tendering and contracts awarded in a way that was well-managed or compliant. 18 agencies (64%) achieved a rating of limited progress or less in publishing procurement, tendering and contract information. The Department of Education, Training and Employment was one agency that performed strongly in this area by providing access to key financial and procurement information. This included a relatively simple method of providing information about upcoming, current and closed tenders and contracts - linking to the

Queensland government's central procurement and tenders website, QTenders.²⁶

In the 'Our Priorities' information class, half of the agencies (14 agencies or 50%) were in progress to compliance and 4 agencies (14%) had made limited progress. Key information not yet included in the class as required related to agency performance, or information about plans, assessments and inspections. An exception to this general finding was Queensland Health, which provided performance information for hospitals and for Hospital and Health Services both through the Queensland Health website²⁷ and for hospitals through the MyHospitals website.²⁸

The 'Our Decisions' information class was another area where agencies could improve the publication of information. Only 7 agencies (25%) achieved a compliant rating for the information made available through this class. Agencies generally did not publish the type of information set out in the Ministerial Guidelines in this class, including information about policy proposals, policy decisions, minutes of meetings, internal criteria and procedures for decision-making and information about any public consultations. The best addressed element was the publication of information about decision-making processes (which was compliant for 50% of agencies).

OIC encourages all agencies to regularly review the extent to which the classes in their publication scheme are populated with significant documents as required by the Ministerial Guidelines.

3.4 Providing information in alternative formats

Under the Ministerial Guidelines, in the interest of equitable access to information for all members of the community, an agency should provide access to documents in alternative formats upon request. Agencies need to provide some form of advice or notification on their publication scheme webpage to make it clear that documents are available in alternative formats on request (for example as a printed copy, CD or other suitable format).

When auditing the 28 agencies who maintained a publication scheme, OIC found that 16 agencies (57%) had publications schemes that were consistent with the requirements of the Ministerial Guidelines for providing information about accessing documents in an alternative format.

²⁶ QTenders is viewable at <https://secure.publicworks.qld.gov.au/etender/index.do>.

²⁷ Viewable at <http://www.health.qld.gov.au/system-governance/performance/default.asp>.

²⁸ Viewable at <http://www.myhospitals.gov.au/>.

OIC encourages agencies to ensure documents can be accessed in alternative formats if requested to meet differing needs of the community in accessing government held information.

3.5 Information about terms and conditions, including charges

Section 21(1)(b) of the RTI Act stipulates that publication schemes must include the terms on which information will be made available, including any charges.

OIC audited agency publication schemes for this requirement. Of the 28 agencies with a publication scheme, 20 agencies (71%) provided information about terms of access including any potential charges.

OIC encourages agencies to review their publication schemes to ensure they set out any terms and charges for the provision of information, as required by the legislation.

3.6 Maintaining the publication scheme

Information in the publication scheme should be relevant, up-to-date and accurate. The Ministerial Guidelines state that publication schemes should be regularly reviewed with procedures in place to make new information available via the publication scheme and ensure outdated information is replaced or archived in accordance with the requirements.

Agencies could improve the way they maintain their publication schemes. Of the 28 agencies with an auditable publication scheme, 10 agencies (36%) were found to have information that was considered out-of-date or that had links to information that did not work. One agency provided access to information considered out-of-date on five or more occasions. Four agencies (14%) had five or more links to information that did not work, impeding access to the information.

Agencies need to regularly review their publication schemes to ensure information being proactively disclosed to the community is accessible, up-to-date and accurate as required by the Ministerial Guidelines.

3.7 Providing feedback about the publication scheme

Agencies are required to implement a procedure which sets out how to make a complaint when information included in the publication scheme is not available. Agencies should clearly set out the procedure and relevant contact details for making a complaint about the publication scheme.

OIC found that 26 agencies (93%) with an auditable publication scheme had a general complaints policy and procedure readily available on their website. However, only 17 agencies (61%) had a specific feedback process dealing with the accessibility of information in the publication scheme.

Agencies are encouraged to ensure they describe how to provide feedback if information in the publication scheme is unavailable, as required by the Ministerial Guidelines.

3.8 Conclusions

The effective operation of the publication scheme facilitates the proactive release of information to the community. Publication schemes that are maintained and richly populated with significant, accurate and appropriate information assist the community and reduce the cost and time to the agency of dealing with requests for information.

OIC audited the operation of agency publication schemes against key requirements of the RTI Act and Ministerial Guidelines. Tables 4 and 5 show the overall ratings achieved by departments and HHSs in operating their publication scheme in accordance with the legislative requirements.

Table 4: Ratings of departmental operation of publication schemes

Maturity of operation of publication scheme	No. of departments per rating	% of departments per rating
Well-managed (Practices managed effectively and being optimised)	-	-
Compliant (Practices managed and appropriate)	5	25%
In progress to compliance (Practices well-defined, activity evident)	13	65%
Limited progress to compliance (Need for more definition of practices, ad hoc activity evident)	2	10%
No publication scheme	-	-

Table 5: Ratings of HHSs' operation of publication schemes

Maturity of operation of publication scheme	No. of HHSs per rating	% of HHSs per rating
Well-managed (Practices managed effectively and being optimised)	-	-
Compliant (Practices managed and appropriate)	-	-
In progress to compliance (Practices well-defined, activity evident)	8	50%
Limited progress to compliance (Need for more definition of practices, ad hoc activity evident)	-	-
No publication scheme	8	50%

Overall, 28 of 36 agencies maintained a publication scheme as required by section 21 of the RTI Act. Eight HHSs did not maintain a publication scheme online. Opportunities to improve the overall operation of the publication scheme were noted with 23 agencies (64%) still progressing towards having a compliant publication scheme.

As noted earlier, the greatest opportunity for agencies with publication schemes to improve was in the amount of significant and appropriate information proactively published, and in agency processes for ensuring the publication scheme is actively maintained. In particular, agencies need to concentrate their efforts on publication of information about tendering and procurement and about agency performance.

4 Open Data

Quick Facts

- All departments audited published an Open Data Strategy on the Queensland Government's open data portal.
- 8 departments (42%) audited provided a link to the Open Data portal from their website, which was easy to access for 37% of departments.
- Overall compliance with the requirement to publish datasets in line with their Open Data Strategy was achieved by 79% of agencies.

4.1 Background

The Queensland Premier has committed to release of government-held information through an Open Data initiative. The Queensland Government's Open Data initiative aims to release as much public data as possible, free of charge where appropriate, to anyone wishing to use it.²⁹ Data are to be made available to the broader community under flexible licences through the Queensland Government's data website.³⁰ Datasets will be released with appropriate protections for personal information. Open data is aimed at driving economic growth and ensuring open and accountable government and increased community participation in government decision-making through greater access to government information.

The commitment to publish datasets is closely aligned with other government requirements to publish information as expressed in the RTI Act and IP Act. The specification of a requirement to publish datasets is an explicit identification by the Queensland Government of information that it considers to be significant and appropriate for publication, that is, to be published in the publication scheme. Agencies' publication schemes should link to their Open Data Strategy on the Queensland Government's data website from the 'Our Priorities' class, and their published datasets from the 'Our Lists' class.

²⁹ Taken from the Glossary of terms – *Queensland Government ICT Strategy 2013-17*.

³⁰ www.data.qld.gov.au

For the first time in 2013-14, OIC's desktop audit program included an audit of relevant aspects of Open Data. The purpose of the desktop audit program was to assess the ease of access to and the publication of agency Open Data Strategies and datasets.

4.2 Publication of Open Data Strategies and datasets

Under the Queensland Government's Open Data Initiative, departments are required to publish an Open Data Strategy listing the datasets that the agency plans to release and the expected timing for release. All departments published an Open Data Strategy dated from 2013 on the government's data website.³¹

661 data sets out of 922 identified in Open Data Strategies were published as at the date of the desktop audit program (72%), 12% were scheduled to be published in the future (109 of 922) and 16% were scheduled for publication but had not been published as scheduled as at the time of the audit. OIC notes that departments continued to publish a substantial number of datasets in the final quarter of 2013-14.

4.3 Accessibility of Open Data Strategies and datasets

OIC audited visibility and accessibility of the pathway from the departments' websites to where strategies and datasets were published on the Queensland Government's data website. This was assessed from the perspective of a member of the public searching for information on the department's website.

Of the 19 departments audited, 8 departments (42%) provided a link on their website to the Queensland Government's data website, where agencies published datasets identified for release in their strategies. Only 7 departments (37%) were considered to have provided clear and easy access to their Open Data Strategy from their website. A further 4 departments (21%) required use of the websites search engine to find a link to their Open Data Strategy.

To improve visibility and accessibility to Open Data on the department's website or Queensland Government's data website, OIC encourages departments to provide links to their Open Data Strategy from the 'Our Priorities' class and to the datasets from the 'Our Lists' class in the publication scheme.

³¹ For the purpose of assessing compliance with Open Data Initiative requirements, the Public Service Commission was not included as a department.

4.4 Conclusions

Table 6 shows the overall ratings achieved by departments in implementing Open Data in accordance with the Government's initiative.

Table 6: Ratings of visibility and access to Open Data

Implementation of Open Data	No. of departments per rating	% of departments per rating
Well-managed (Practices managed effectively and being optimised)	1	5%
Compliant (Has published an Open Data Strategy and datasets in accordance with the schedule)	14	74%
In progress (Has published either an Open Data Strategy or some datasets)	4	21%
Limited progress (Agency mentions Open Data but no strategy has been published)	-	-
No Open Data Strategy or datasets published	-	-

Overall, 15 departments (79%) had satisfied all the requirements to publish an Open Data Strategy and datasets in accordance with the schedule contained in the Strategy.

An example of an agency with a well-managed approach to the Open Data Strategy and publication of datasets was the Department of Energy and Water Supply. This department had not only satisfied all the requirements for the Open Data Strategy, they also maintained a separate webpage linking to the Open Data Strategy and to 13 out of the 14 datasets published. In addition datasets were also linked from the 'Our Lists' class in the publication scheme.

For other departments, improvement opportunities exist to better promote Open Data on their websites and provide clearer pathways to access their strategies and datasets on the Queensland Government's data website.

5 Disclosure logs

Quick Facts

- 19 out of 20 departments and 7 out of 16 HHSs (44%) audited published a disclosure log on their website.
- 19 disclosure logs (70%) were well-managed or compliant.
- All disclosure logs maintained by agencies were easily located and accessible from the agency's RTI webpage. Most were easy to use (93%).
- Agencies complied well with requirements to provide accompanying text summarising the content of documents (85%).
- 67% of agencies provided direct access to documents on most occasions without the need to contact the agency.
- Departments had additional requirements for the operation of disclosure logs compared to non-departments, which were generally met. Examples are that 95% of departmental disclosure logs published the details of information being sought by the applicant, and all departmental disclosure logs included the date the application was made.

5.1 Background

A disclosure log³² is part of an agency's website containing a list of documents that an agency has already released under the RTI Act. Disclosure logs are an important strategy for proactive disclosure of information. The rationale for disclosure logs is that if one person has expressed an interest in documents containing information other than their own personal information, then these same documents might be of interest to the wider public. Disclosure log content can also be used by agencies to identify information that could be included in publication schemes or that could be made available through administrative access arrangements.

Ministers and Departments are required to maintain a disclosure log. Other agencies may include a copy of a document released under an RTI Act application process. If an

³² Provisions for a disclosure log are contained within sections 78, 78A and 78B of the RTI Act.

agency maintains a disclosure log, the RTI Act and Ministerial Guidelines set out requirements for its operation.³³

5.2 Availability and accessibility of disclosure logs

OIC found that 19 departments (95%) and 7 HHSs (44%) had a disclosure log on their website.³⁴

All disclosure logs were considered easy to locate, for example, all were accessible within one to three links from the agency's website home page.

OIC encourages agencies without a disclosure log to consider adopting this approach for proactively publishing information, and for agencies with a disclosure log to ensure the disclosure log can be easily found and accessed by the community.

5.3 Disclosure logs – departments

As soon practicable after receiving a valid application, a department must record the details of the information being sought by the applicant and the date the application was made in their disclosure log. Overall, departments were meeting the requirements for recording details of valid applications in their disclosure logs. OIC's desktop audit of departmental disclosure logs noted that the 19 departments³⁵ included a list of applications made to them, including the date the application was made. In terms of providing details of the information being sought in each application, the desktop audits noted that 18 out of 19 departments (95%) that were required to provide this information met this requirement.

If a decision is made to release the information and it does not contain the personal information of the applicant, a department must also include in the disclosure log a copy of the document, the applicant's name and the name of the entity for whom the document was sought or who might benefit from the use of the document, if other than the applicant.

³³ Section 78B(1) of the RTI Act imposes legislative requirements on agencies to comply with any guidelines about disclosure logs published by the Minister, OIC also assessed compliance with the *Ministerial Guidelines – Operation of Publication Schemes and Disclosure Logs (Ministerial Guidelines)*. Viewed at <http://www.rti.qld.gov.au/right-to-information-act/publication-schemes> on 12 August 2014.

³⁴ The disclosure log for one of these agencies was maintained under arrangement by another agency. The RTI Act does not make explicit provision for disclosure logs for one agency to be operated by another agency (in contrast to explicit provisions to this effect for publication schemes). However, the RTI Act does not prohibit this practice, so it has not been treated by this desktop audit as being a non-compliance. Another agency's RTI webpage made mention of a disclosure log but an audit of the website found no evidence that it had been published.

³⁵ For the purpose of assessing compliance with specific requirements for departments about disclosure logs, the Public Service Commission was not included as a department.

A copy of the released document was provided consistently in 12 departmental (63%) disclosure logs. The remaining 7 departments (37%) were sporadic in terms of the consistency with which they published released documents in their disclosure log. While not technically required in this instance, an explanation would be useful to visitors to the webpage. For example, some departments are very effective in providing simple clear explanations as to why documents, or information on the disclosure log such as names, are not published.

Where the department provided access to a document, the applicant's name was published in 11 departmental disclosure logs (58%) consistent with the requirements of the RTI Act. Seven departments (37%) published the applicant's name on some occasions and one did not publish these details at all. The name of the entity for whom the document was sought for was identified as being included in 13 departmental (68%) disclosure logs. Establishing whether or not there was a reasonable explanation for such results is outside the scope of the desktop audit process. However, OIC made recommendations in individual desktop report cards that departments review their processes to ensure required information is published to their disclosure logs where potential issues or inconsistent practices were noted.

OIC encourages departments to consider publishing documents released under the RTI Act in their disclosure logs, as a proactive means for releasing more information into the community and in compliance with the requirements of the RTI Act. Where it is impractical to publish this information or inconsistent with section 78B(2) of the RTI Act, then notations to this effect in the online disclosure log, whilst not required by the RTI Act or Ministerial Guidelines, would be of assistance to members of the community seeking information.

5.4 Disclosure logs – HHSs

OIC's desktop audit of HHSs' disclosure logs noted that seven HHSs (44%) maintained a disclosure log and that of these, six HHSs (86%) provided a description of the content of documents in the disclosure log.

Out of the seven HHSs, four HHSs (57%) met the requirements for disclosure logs and three HHSs (43%) were in progress to compliance.

OIC encourages HHSs to consider using disclosure logs to publish documents released under the RTI Act as a proactive means for releasing more information into the community and in accordance with the RTI Act.

5.5 Accessing documents on the disclosure log

Under section 78 of the RTI Act, at the time of receiving a valid application, a department or Minister must publish in their disclosure log details of the information as sought under the application. Under section 78A as it applies to other agencies, a copy of the document may be included in the disclosure log or if this is impractical, details identifying the document and how it may be accessed may be included.

Overall, there was a high level of compliance with these requirements. OIC noted that 23 of the 27 agencies (85%) maintaining a disclosure log provided text summarising the content of the documents in sufficient detail to inform users of the documents' contents.

Of the 27 agencies maintaining a disclosure log, 13 agencies (48%) provided direct access to released documents and a further 5 agencies (19%) provided direct access to released documents some of the time. Where direct access was not provided to documents, 5 agencies (19%) made their documents available by contacting the agency. Only 2 agencies (7%) did not provide direct access to released documents in their disclosure log by either a direct link or through contact with the agency.

The Ministerial Guidelines state that pdf documents may be included in an agency's disclosure log rather than using an accessible format such as html, but the agency must include contact details so that an individual can request the information in an alternative format. Of the 20 agencies that provided documents in pdf format only, 15 agencies (75%) provided details of how to contact the agency to arrange for documents to be provided in an alternative format. These details were not provided for 5 agencies (25%).

This desktop audit has identified that an opportunity exists to improve the way information is proactively released through the disclosure log. Where it is practical to do so, agencies should consider providing direct access to released documents. Where possible, contact with the agency should also be limited to arranging for access to documents in alternative formats. Providing direct access to documents without the need to contact the agency meets the community expectations of engaging with government online. It is also more cost and time effective in dealing with these types of requests.

5.6 Publishing blank pages on the disclosure log

Where information has been deleted from released documents under section 78B of the RTI Act, or when the agency has decided not to include the released documents on

their disclosure log, it would be good practice to provide a clear explanation of why information has been deleted or withheld from publication. This promotes procedural transparency, avoids unnecessary queries and helps to manage community perceptions.

OIC audited agency disclosure logs for evidence that notations are provided explaining why information has been deleted under section 78B or withheld from publication. Of the 27 agencies with a disclosure log, 12 agencies (44%) provided explanations for deleted or withheld information.

OIC encourages agencies to consider improving their disclosure logs by providing explanations for deleted or redacted material or withheld documents.

5.7 Conclusions

Overall, all departments and 7 HHSs maintained a disclosure log. The remaining nine HHSs are encouraged to publish a disclosure log to proactively release information to the community.

Table 7 shows the overall ratings achieved by agencies in operating their disclosure logs in accordance with the legislative requirements.

Table 7: Ratings of agency operation of disclosure logs

Maturity of operation of disclosure log	No. of agencies per rating	% of agencies per rating
Well-managed (Practices managed effectively and being optimised)	1	3%
Compliant (Practices managed and appropriate)	18	50%
In progress to compliance (Practices well-defined, activity evident)	8	22%
Limited progress to compliance (Need for more definition of practices, ad hoc activity evident)	-	-
No disclosure log	9	25%

Opportunities to improve the overall operation of disclosure logs were noted with 8 agencies (22%) progressing towards having a compliant disclosure log. The greatest opportunity for agencies to improve the operation of their disclosure log is in the amount of information made directly available without the need to request it from the

agency. Agencies could also improve the transparency of their disclosure log by providing more explanations for deleted and redacted material.

The Department of Communities' disclosure log was well-managed and published all categories of required information in accordance with the legislation and Ministerial Guidelines. The Department's disclosure log provided reasons for withholding information in accordance with section 78B, and a general comment for each application where the name of the applicant was withheld.

6 Privacy

Quick Facts

- All websites audited had one or more of the following:
 - a privacy link in the webpage footer
 - a privacy statement
 - a privacy plan or policy; or
 - other information on personal information holdings and practices.
- 31% of agencies had forms collecting personal information that were compliant with the audited elements of Information Privacy Principle 2 (IPP2) and National Privacy Principle 1 (NPP1).
- In almost all instances where personal information was being collected via email contact with the agency, all collection notices for emails appeared compliant, due to the prevalence of general privacy statements available from links in the websites' global footer. Agencies are encouraged to review their email contact addresses to determine whether the global privacy statement meets the minimum standard required for compliance with IPP2 or NPP1.
- 81% of audited agency websites provided information about the type of personal information held in accordance with Information Privacy Principle 5 (IPP5) or National Privacy Principle 5 (NPP5). However, only 69% of agencies provided details about the main purposes for which the information is used.
- 36% of the agency websites audited had a privacy plan or policy, which can assist an agency with IPP5 or NPP5 compliance. The quality of privacy plans and policies varied. Some plans did not identify personal information holdings.
- While not required under the IP Act, agencies could improve privacy plans, policies or privacy webpages by including more detailed information about the privacy complaints process, making it more transparent and better equipped to manage the expectations of individuals.

6.1 Background

In Queensland, the IP Act provides for the fair collection and handling of personal information in the public sector environment. Under the IP Act an agency, other than a health agency, must comply with the 11 Information Privacy Principles (IPPs).³⁶ Section 31 of the IP Act states that health agencies must comply with the 9 National Privacy Principles (NPPs).³⁷

Information Privacy Principle 2 (IPP2) applies to an agency's collection of personal information from the individual. IPP2 requires the agency to take all reasonable steps to ensure that the individual is generally aware of the purpose of the collection, any law that might authorise or require the collection, and to whom the information would usually be disclosed. When an agency collects personal information from an individual, for example, by giving the individual the capacity to contact the agency by e-mail or to complete a form, this commonly occurs through the inclusion of text on the associated webpage or form, termed by OIC as a 'collection notice'.³⁸ The personal information collection requirements of National Privacy Principle 1 (NPP1) are similar to IPP2. However, NPP1 imposes different requirements, for example, the collection notice must include notification that an individual can gain access to their personal information, it must identify the health agency and must provide advice on how to contact the health agency and the consequences where there is a failure to provide this information.³⁹

Information Privacy Principle 5 (IPP5) and National Privacy Principle 5 (NPP5) require agencies to provide details about the types of personal information they hold and the use that is made of that information. IPP5 requires agencies to inform individuals as to how they can access their personal information. The privacy principles do not obligate government agencies to have a 'privacy plan'. However, a privacy plan is a practical means for an agency to meet its IPP5 and NPP5 obligations.

In auditing compliance with these privacy principles, OIC assessed collection notices on online forms and email invitations that collected an individual's personal information.

³⁶ Section 27 of the *Information Privacy Act 2009* (Qld).

³⁷ The reason that NPPs rather than the IPPs are applied to health agencies under the IP Act is due to arrangements applying nationally to health agencies in all Australian jurisdictions and with the private health providers. These arrangements are designed to manage the flow of health information through the system.

³⁸ The term 'collection notice' is not used in the IP Act. OIC uses the term 'collection notice' to denote information provided to an individual by a government agency that complies with IPP2.

³⁹ IPP2 also imposes a requirement for agencies to ensure individuals are generally aware of secondary disclosure. That is, if an agency is aware that it is the usual practice of a first entity, to whom the agency usually discloses information, to then pass on that information to a second entity, the agency should make individuals aware of this. The desktop audit process does not test for this element of IPP2, as it would be impractical in a desktop audit process.

OIC also examined whether the agencies made people aware of the personal information held by the agency, what it is used for, and for IPP5, how an individual could access their information.

It should be noted that when presenting the aggregate findings of the desktop audit of online forms and personal information holdings in this report, the Department of Health has been included with the HHS agencies, because the Department of Health and the HHSs are subject to NPPs rather than IPPs.

6.2 Profile of privacy information on agency websites

The profile of information privacy in general on the websites audited by OIC was high, with 35 of 36 agencies having a link to a privacy statement from the global footer of their website, consistent with the requirements of the CUE 3.0 Standard.⁴⁰

OIC audited the privacy content accessible from agency websites and noted the following:

- All privacy statements addressed the collection of personal information via email contact with the agency
- 35 agencies (97%) provided access to the IP Act either from their privacy statement, another privacy webpage or their RTI webpage
- 34 agencies (94%) provided details on how an individual can access their personal information; and
- 32 agencies (89%) provided details on how an individual can amend their personal information.

Overall, agencies provided easy access to information about their privacy practices.

6.3 IPP2 and NPP1 – collection via online forms and email

The collection of personal information is specifically addressed in the IPPs and NPPs. Whenever an agency collects personal information from an individual⁴¹ either through an email to an agency contact email address or by completion of a form available online, IPP2 and NPP1 require that the agency takes reasonable steps to advise the individual of the purpose of the collection, any law authorising or requiring the

⁴⁰ One agency provided a link from the global website footer to the Queensland Government's privacy statement. CUE 3.0 states that the footer must contain a link to a privacy statement that applies to personal information collected on the agency's website. *Consistent User Experience Standard v3.0 Module 2 – Screen layout, Checkpoint 29 – Privacy* contains the agency requirements for privacy statements. Viewed at www.qld.gov.au/web/cue/module2/checkpoints/checkpoint29/ on 5 August 2014.

⁴¹ NPP1 also applies to collection of personal information from someone other than the individual.

collection and if it is the agency's practice to disclose the information to any entity. In addition to IPP2, NPP1 also requires notification that an individual can gain access to their personal information, identification of the health agency and how to contact it and the main consequences for the individual if all or part of the information is not provided.

An effective, convenient and straightforward method of meeting the requirements of IPP2 and NPP1 is for an agency to provide a short notice at the point of information collection. 'Collection notices' promote transparency and confidence by informing individuals about how an agency will handle their personal information.⁴²

In assessing agency adoption of IPP2 and NPP1, OIC examined agency websites to ascertain whether or not a collection notice was provided on forms available online and on link to email addresses.

Online forms

Audits were conducted in 2013-14 of online forms on department and health agency websites for compliance with IPP2 and NPP1.

A high level of compliance with IPP2 was evident on departmental websites. Of the 169 forms audited for departments, 142 forms (84%) were assessed as compliant with the audited requirements of IPP2. A further 26 forms (15%) were assessed as partially compliant.

There was room to improve the clarity of the collection notices. For example, there were circumstances where the form appeared to be designed to administer aspects of the agency's legislation, but this was not explicit in the collection notice. 27 forms (16%) had collection notices where this occurred. Another example is that there were 47 forms (28%) where the collection notice was unclear about whether or not it was the agency's usual practice to disclose the personal information to another entity, but this might have been acceptable given the purpose of the form. In the desktop audit process it is not possible to ascertain whether or not these collection notices complied with the IP Act. Agencies are encouraged to review their collection notices to ensure compliance with the Act.

Fewer online forms were available for desktop audit for health agencies. Of the 30 forms audited by OIC, 7 forms (23%) were considered to be compliant with the audited requirements of NPP1. A further 22 forms (73%) were assessed as partly compliant.

⁴² Information Privacy Principle 2 – deals with the collection of information and how it shapes the way agencies can use the personal information collected.

26 forms (87%) had clear notification as to how to contact the agency. 22 forms (73%) did not disclose to the individual that they could gain access to their personal information, 7 forms (23%) did not disclose if the collection of the information was authorised or required by law and 7 forms (23%) did not advise whether the information would be disclosed to other entities.

OIC considered improvement was needed for health agencies to meet their obligations under NPP1. Recommendations were raised with relevant health agencies as part of the desktop audit process. 5 of the 9 health agencies who received individual desktop audit reports responded to OIC about the outcome of their desktop audit. Each of those 5 health agencies accepted the recommendations and agreed to action them accordingly.

Email contact addresses

It is a common practice in government for agencies to provide email contact addresses through which the community can communicate or conduct transactions with the agency. Some of these emails may be unsolicited. When individuals send emails to the agency using the email link provided, agencies can collect personal information such as the person's name, email address⁴³ and other personal information which may be contained within the body of the email. Departments are required to comply with IPP2 and health agencies with NPP1 in their management of email contact addresses.

Of the 36 agencies audited, 33 agencies (92%) had a collection notice that was IPP2 or NPP1 compliant, covering collection of personal information through email links. There were 2 agencies (6%) that did not have email contact addresses on their website.

In total, OIC audited 255 email contact addresses available on department and HHS agency websites. For 245 email contact addresses (96%), the collection notice was not attached specifically to the email link, but was reached via the global privacy footer. There were 10 email contact addresses (4%) where a specific collection notice was provided on the webpage containing the email contact address.

The use of global collection notices can satisfy the requirements of IPP2 and NPP1, if the global privacy notice includes all the modes in which personal information can be collected, for example, through use of email links. Privacy notices should also inform people about individual or specific disclosures to other entities.

⁴³ If an email address can be linked back to an identifiable person, the address will constitute personal information. Many email addresses use the individual's name – jane.smith@serviceprovider.com.au.

For an agency to be compliant with IPP2 or NPP1 they must take reasonable steps to ensure the individual is made generally aware of their collection, use and disclosure practices. Where a link to a global privacy statement is used in preference to individual collection notices, agencies must ensure the global statement addresses purpose, use and disclosure practices specific to the personal information being collected.

Agencies should consider the visibility, accuracy and completeness of their privacy information to ensure they meet their obligations under the IP Act.

6.4 IPP5 and NPP5 – personal information holdings and privacy plans

Under IPP5 and NPP5, agencies have an obligation to ensure that an individual can find out the type of personal information the agency holds, the main purpose for which it is used and for IPP5, what an individual should do to obtain access to a document containing their personal information. In addition to this, NPP5 requires health agencies to include how they collect and disclose that information.

Only 8 of the 19 departments (42%) audited were compliant with IPP5 in that they met the audited requirements in full for providing details of the types of personal information they hold, the main purpose for which the information is used and what an individual should do to obtain access to documents containing their personal information.

IPP5 requires agencies to take all reasonable steps to ensure an individual can find out how to obtain access to any document held by the agency that contains personal information about them. Overall, 17 of the 19 departments (89%) provided details of what an individual should do to obtain access to a document containing their personal information. Disclosure of the types of personal information held was provided by 12 departments (63%). Only 8 departments (42%) provided a description of the purposes for which the personal information was used.

The IP Act does not require departments to have a privacy plan or policy, but a privacy plan or policy, which describes the way in which the agency addresses the full range of privacy obligations, is a practical method of ensuring that a department is compliant with the IPPs or NPPs. The desktop audits noted that 13 departments (68%) had published a privacy plan. A privacy plan should be readily available to the public, preferably on the department's website. Of the 13 departments who published a privacy plan, 12 of the 13 privacy plans (92%) were easily accessible from their privacy webpage. Departments without a published list of personal information holdings could consider creating a privacy plan or updating other privacy information on their websites to comply with IPP5.

All 17 health agencies were compliant with the audited elements of NPP5.⁴⁴ The 16 HHS agencies provided access from their website to documents containing the personal information management policies located on the Department of Health website. Documents available on the Department of Health's website appropriately disclosed the type of personal information held, and how it was collected, used and stored. The documents also provide sufficient detail of when personal information collected may be disclosed to another agency.

OIC encourages all agencies to review all privacy-related documents and web content regularly to ensure that they are up-to-date and reflect all of the agency's obligations under the IP Act.

6.5 Information about privacy complaints

A robust privacy governance framework reassures the community about using online services. When trust in such frameworks is high, the community engages frankly and effectively with online services, and in fact, prefers to use them.⁴⁵

A system for privacy complaint handling is part of a robust governance framework. OIC considered the presence and strength of privacy complaint handling systems in this context.

The audit found that 35 of the 36 agencies (97%) published details of a contact person for privacy issues. Providing access to information about privacy complaint management and procedures was a common practice (33 agencies – 92%). However, there was a variance in the level of detail provided. The desktop audits noted 12 agencies (33%) provided detailed information, for example, information on the right to make a complaint, the process for complaint handling, how to lodge a complaint and information about referring unresolved privacy complaints to OIC. A further 21 agencies (58%) provided some information, for example, a general overview of the privacy complaint process. Two agencies provided access to their general complaints process.

In providing greater transparency when dealing with privacy issues, opportunities exist for agencies to provide more detailed information about the complaints process to better manage individual expectations and trust in the process.

⁴⁴ For reporting purposes, the Department of Health has been included with the 16 HHS agencies.

⁴⁵ Tolbert, C. J. and Mossberger, K. (2006), *The Effects of E-Government on Trust and Confidence in Government*. Public Administration Review, 66: 354–369, viewed at <http://onlinelibrary.wiley.com/doi/10.1111/j.1540-6210.2006.00594.x/abstract;jsessionid=94C6E4B0FACB0D69C8607A7ADEB4E50A.d02t01?deniedAccessCustomisedMessage=&userIsAuthenticated=false> on 8 August 2013.

6.6 Conclusions

The desktop audits found that agencies generally informed the community about their privacy practices with respect to handling personal information. However, online compliance with the privacy principles was not consistent.

Agencies had statements on their websites to ensure that individuals would be generally aware of the purpose of collection of their personal information, any law that might authorise or require the collection, and to whom the information would usually be disclosed. However, the information was not provided in sufficient detail in specific instances. Only about a third of agencies consistently had notifications on their forms available online. Agencies need to review forms with this in mind. OIC also encourages agencies to review collection notices associated with email links, to ensure the global privacy statement or policy provides sufficient information.

Agencies were reasonably informative about their processes for handling personal information. Less than half of the departments fully addressed the requirements to provide details of the types of personal information held, the main purpose for which the information is used and what an individual should do to obtain access to documents containing their personal information.

Nearly all agencies provided details of a person in their agency whom individuals could contact about any privacy concerns. However, only a third of agencies provided sufficiently detailed information.

OIC concluded that overall, agencies are generally aware of the importance of privacy and have taken steps to handle personal information appropriately, but have not yet fully addressed the specific requirements of the IP Act.

7 Agency Response

As part of the individual desktop audit process, a preliminary report was issued to each agency and an opportunity to respond to the recommendations was provided. 21 agencies (58%) responded to OIC about the recommendations of the report. All responding agencies accepted all recommendations made by OIC.

Agencies responded with detailed plans of action for implementing the recommendations made in the reports, and expressed appreciation of identification of opportunities to continually improve their right to information and information privacy practices.

OIC would like to take the opportunity to thank those agencies who considered OIC's findings and responded positively to the recommendations.

8 Conclusion

Publication schemes, disclosure logs, administrative access arrangements and the Government's Open Data initiative are all part of a broader strategy for providing greater access to government information and better delivery of services. In desktop audits conducted in 2013-14, OIC audited department and HHS online information to assess performance with relevant right to information and privacy obligations.

One of the principal strategies for enhancing proactive disclosure practices is to ensure agency websites provide clear pathways to information. Departments and HHS websites were effective in raising public awareness about how information can be accessed.

Most, but not all agencies are generally meeting their legislative requirements. Administrative access arrangements and publication schemes could be used more effectively to provide clear pathways and easier access to information. All agencies, including agencies who have achieved more maturity in meeting legislative requirements, need to be more active in using push model strategies to improve services and promote open, transparent and accountable government. Publication scheme information needs to be maintained to ensure compliance and effectiveness, particularly in relation to procurement, performance, decisions, policies and priorities.

OIC has found agencies have been responsive to implementing recommendations made by OIC in individual desktop audit reports, out of a recognition of the need to continually improve, be open and transparent, and better service the community. Right to information and information privacy provide a framework for agencies to meet changing community expectations. OIC will continue to support agencies through its assistance functions to meet their information obligations and meet such changing expectations under this framework.

Appendix 1 – Acronyms

ACMA	Australian Communications and Media Authority
CUE 3.0	Consistent User Experience Standard 3.0
DCS	Department of Community Safety
HHS	Hospital and Health Service
html	Hyper Text Markup Language – the language used to write webpages, allowing embedding of images and interactivity
ICT	Information and Communications Technology
IP	Information Privacy
IP Act	<i>Information Privacy Act 2009</i> (Qld)
IPP	Information Privacy Principle
Ministerial Guidelines	<i>Operation of Publication Schemes and Disclosure Logs: Under section 21(3) and sections 78, 78A and 78B of the Right to Information Act 2009.</i> The latest version was issued in February 2013
NPP	National Privacy Principle
OIC	Office of the Information Commissioner
PACSR	Police and Community Safety Review
pdf	Portable Document Format – a file format which provides the recipient with a file in the format as it was originally intended to appear.
PSBA	Public Safety Business Agency
QFES	Queensland Fire and Emergency Services
RTI	Right to Information
RTI Act	<i>Right to Information Act 2009</i> (Qld)
WTO	World Trade Organisation

Appendix 2 – Agencies reviewed and type of audit

The OIC desktop audit program covered 38 agencies as set out in Table A2-1.

Table A2-1: Agencies reviewed and type of audit in 2013-14

Key	
Type of audit	Description
Individual audit – Report issued	An audit of an individual agency that addresses legislative requirements at a high level of detail for an individual agency.
Individual audit – Letter and checklist issued	An audit of an individual agency that addresses legislative requirements for an individual agency to the extent possible, and reports to the agency by letter, attaching a checklist to assist development of a legislatively compliant website.
Website scan	A scan of the agency's website to determine the appropriate course of action, for example, undertaking a full desktop audit or alternatively providing assistance, support and resources to the agency.

Departments	Type of audit
Department of Aboriginal and Torres Strait Islander and Multicultural Affairs	Individual audit – Report issued
Department of Agriculture, Fisheries and Forestry	Individual audit – Report issued
Department of Communities, Child Safety and Disability Services	Individual audit – Report issued
Department of Community Safety, now Queensland Fire and Emergency Service	Website scan
Department of Education, Training and Employment	Individual audit – Report issued
Department of Energy and Water Supply	Individual audit – Report issued
Department of Environment and Heritage Protection	Individual audit – Report issued
Department of Health	Individual audit – Report issued
Department of Housing and Public Works	Individual audit – Report issued
Department of Justice and Attorney General	Individual audit – Report issued
Department of Local Government, Community Recovery and Resilience	Individual audit – Report issued
Department of National Parks, Recreation, Sport and Racing	Individual audit – Report issued
Department of Natural Resources and Mines	Individual audit – Report issued
Department of the Premier and Cabinet	Individual audit – Report issued
Department of Science, Information	Individual audit – Report issued

Departments	Type of audit
Technology, Innovation and the Arts	
Department of State Development, Infrastructure and Planning	Individual audit – Report issued
Department of Tourism, Major Events, Small Business and the Commonwealth Games	Individual audit – Report issued
Department of Transport and Main Roads	Individual audit – Report issued
Public Service Commission	Individual audit – Report issued
Queensland Police	Individual audit – Report issued
Queensland Treasury and Trade	Individual audit – Report issued

Hospital and Health Services	Type of audit
Cairns and Hinterland Hospital and Health Service	Individual audit – Report issued
Cape York Hospital and Health Service	Website scan
Central Queensland Hospital and Health Service	Individual audit – Letter and checklist issued
Central West Hospital and Health Service	Individual audit – Letter and checklist issued
Children’s Health Hospital and Health Service	Individual audit – Letter and checklist issued
Darling Downs Hospital and Health Service	Individual audit – Report issued
Gold Coast Hospital and Health Service	Individual audit – Report issued
Mackay Hospital and Health Service	Individual audit – Letter and checklist issued
Metro North Hospital and Health Service	Individual audit – Report issued
Metro South Hospital and Health Service	Individual audit – Report issued
North West Hospital and Health Service	Individual audit – Letter and checklist issued
South West Hospital and Health Service	Individual audit – Letter and checklist issued
Sunshine Coast Hospital and Health Service	Individual audit – Report issued
Torres Strait-Northern Peninsula Hospital and Health Service	Individual audit – Report issued
Townsville Hospital and Health Service	Individual audit – Report issued
West Moreton Hospital and Health Service	Individual audit – Letter and checklist issued
Wide Bay Hospital and Health Service	Individual audit – Letter and checklist issued