



**Office of the Information Commissioner**  
Queensland

**Follow-up of review recommendations**

**(Queensland Health and Queensland Police Service)**

Review of agency adoption of recommendations made under the *Right to Information Act 2009* (Qld) and the *Information Privacy Act 2009* (Qld).

OIC thanks agencies for their cooperation throughout the review process and for the courtesy displayed towards the officers undertaking the assessment. In undertaking this follow-up review, OIC recognises the commitment of the business units and their desire for continuous improvement in right to information and information privacy.



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November 2013

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 'Follow-up of review recommendations (Queensland Health and Queensland Police Service): Review of agency adoption of recommendations made under the *Right to Information Act 2009* (Qld) and the *Information Privacy Act 2009* (Qld).' This report is prepared under section 131 of the *Right to Information Act 2009* (Qld).

The report reviews the extent to which agencies reviewed by the Office of the Information Commissioner have responded to review recommendations.

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.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rachael Rangihaeata', written in a cursive style.

Rachael Rangihaeata  
**Information Commissioner**



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# 1. Summary

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This is a report on the implementation of recommendations of two Office of the Information Commissioner (**OIC**) reports. These reports, tabled in Parliament during 2011/2012, were about the outcomes of reviews of agency performance under the *Right to Information Act 2009* (Qld) (**RTI Act**) and the *Information Privacy Act 2009* (Qld) (**IP Act**):

- **Report to Parliament No. 2 of 2011/12 – Compliance Review – Queensland Health**, Review of Queensland Health, Corporate Office, and Metro North and Metro South Health Service Districts' compliance with the *Right to Information Act 2009* (Qld) and the *Information Privacy Act 2009* (Qld).
- **Report to Parliament No. 3 of 2011/12 – Compliance Review – Queensland Police Service**, Review of Queensland Police Service compliance with the *Right to Information Act 2009* (Qld) and the *Information Privacy Act 2009* (Qld).

The reviews analysed:

- the extent to which Queensland Health and Queensland Police Service had a culture of openness and engaged with the community
- leadership within these agencies to champion proactive release of information and good information governance
- accountability and measurement of performance
- strategies adopted to maximise disclosure; and
- compliance with specific legislative requirements.

This report examines the extent of implementation of the report recommendations.

## **Conclusions**

Queensland Health and Queensland Police Service have made good progress towards implementing the recommendations from the 2011/12 review reports. Action to implement outstanding recommendations in full is in progress, following delays related to significant reviews and restructures of both Queensland Health and Queensland Police Service.

## **Key findings**

The two reports had a combined total of 48 recommendations: 41 of these recommendations have been fully implemented and seven partially implemented as at 11 October 2013. The follow-up review period was extended to enable the reviews to take into account anticipated activities for both Queensland Health and the Queensland Police Service to implement the recommendations. Figure 1 shows the implementation status of recommendations.

**Figure 1 – Implementation status of recommendation by agency**

| Report  | Total | Implementation Status |             |                               |
|---|-------|-----------------------|-------------|-------------------------------|
|   |       | Implemented           | In Progress | Approved but not yet actioned |
| Report to Parliament No. 2 of 2011/12 [Queensland Health]         | 20    | 17                    | 3           | Not Actioned                  |
| Report to Parliament No. 3 of 2011/12 [Queensland Police Service] | 28    | 24                    | 4           | Not Actioned                  |

### **Report No. 2 of 2011/12 – Queensland Health, Corporate Office, and Metro North and Metro South Health Service Districts’ compliance with the *Right to Information Act 2009 (Qld)* and the *Information Privacy Act 2009 (Qld)***

The 2011/12 review report concluded that Queensland Health (**QH**) was progressing well in meeting its legislative obligations. The report made 20 recommendations: to improve the proactive disclosure of information, to support compliance with RTI and IP obligations following a change to a structure incorporating a department and independent Hospital and Health Services (**HHS**), and to improve handling of requests for information.

QH has implemented 17 out of 20 recommendations in full, and three are in progress. Recommended actions taken have supported the HHSs to develop and progress their own strategies. The relationship now between QH and the HHSs is one of support and guidance in relation to right to information and information privacy.

Following the overall restructure of QH, a review has been conducted of internal information governance, resulting in a new information governance structure that is yet to be finalised. The three recommendations that are still being addressed have been

affected by this review, and will be implemented under the new structure. The new information governance arrangements are being progressed in the 2013/14 financial year.

**Report No. 3 of 2011/12 – Queensland Police Service compliance with the *Right to Information Act 2009 (Qld)* and the *Information Privacy Act 2009 (Qld)***

The 2011/12 review report concluded that the Queensland Police Service (**QPS**) had made progress in meeting its legislative obligations. The report made 28 recommendations: to improve strategic management of proactive release of information, to ensure practices were consistent with policy requirements; and to improve legislative compliance of processes for handling applications for information under the RTI and IP Acts.

QPS has implemented 24 out of 28 recommendations in full and four are in progress.

In particular, in June 2013 QPS launched the Online Crime Statistics Portal, including geospatial information, a significant achievement recommended by OIC in the review report. Crime statistics were sought by many of the stakeholders consulted during the review, for research purposes, to improve community services or to improve the operation of the criminal justice system.

OIC is also encouraged by the Right to Information and Privacy Unit's positive adoption of the recommendations, leading to improved legislative compliance and responsiveness to people requesting information.

Good progress has been made on the remaining recommendations to be implemented, which have been affected by delays associated with reviews and restructure of the QPS. It is critical that QPS complete the implementation of these recommendations to ensure it identifies opportunities QPS can take to proactively release specific information that is relevant and useful to the community at large.

***Reference to agency comments***

In accordance with the Office of the Information Commissioner's *Charter, Policy and Procedures* for the conduct of reviews, Queensland Health and Queensland Police Service were asked to provide information as to their views on this report on the progress of the implementation of the recommendations. Their responses are provided in Appendix A of this report.

## 2. Queensland Health, Corporate Office, and Metro North and Metro South Health Services

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### Key findings

- Seventeen recommendations (85%) have been fully implemented.
- Three recommendations have been partially implemented.
- A departmental restructure has delayed some work required of the Information Management Steering Committee, which will now be undertaken by Queensland Health under a new information governance model.

Queensland Health has:

- published strategies online for consumer and community engagement for the Hospital and Health Services
- clarified roles for the Hospital and Health Services in right to information and privacy and provided support in training, advice and guidance, role descriptions and performance monitoring; and
- improved application handling policies and procedures.

### 2.1. Background

Queensland Health is responsible for the management, administration and delivery of public sector health services in Queensland.

The 2011/12 review report concluded that Queensland Health published a wealth of significant information as a matter of course, including performance information. For example, its Hospital Performance data formed the basis of the national MyHospital initiative. The review also found that Queensland Health had sound governance structures in place, which operated effectively with vigorous and focused attention from senior governance.

The review also set out issues and opportunities for improvement.

Key findings were:

- The national health reforms presented a challenge for Queensland Health in ensuring that the new service delivery model provided for statewide consistency in community engagement, training, complaint handling, performance monitoring, policy and procedure development and advice, support and assistance on application handling.
- The Information Asset Register provided an opportunity for Queensland Health to identify and publish further information holdings.
- The handling of applications for information made under the RTI and IP Acts varied markedly between Corporate Office, Metro North Health Service District (HSD) and Metro South HSD. Good practices were observed in the Metro South HSD.

The 2011/12 review report made 20 recommendations, which Queensland Health accepted.

In 2012, the Queensland Health Corporate Office became the Department of Health, responsible for overall management of the public sector health system. Under the *Hospital and Health Boards Act 2011*, the Department entered into a service agreement with each Hospital and Health Service (**HHS**) for the delivery of hospital services, other health services, teaching, research and other services as required.

In 2013, the Department of Health's Internal Audit Governance Unit conducted a progress review of implementation of the 20 recommendations, covering all the recommendations relating to the Department of Health. This review did not specifically assess the status of recommendations for the former Metro North or Metro South Health Service Districts in terms of the current operations of those authorities, but considered them as they related to the responsibilities of the Department of Health, including in relation to recommendations required to be implemented by Queensland Health in its broader role prior to 1 July 2012. OIC considered that this was an appropriate level of follow-up at this stage, and plans to review HHSs as individual authorities in future.

The parameters of the review followed a test program developed by OIC, which described the way in which OIC would assess progress against each recommendation, the evidence that would be sought and the conclusions that might be drawn from the evidence.

OIC reviewed the *Department of Health Review of Right to Information (RTI) and Information Privacy (IP): Final Progress Report*, provided in June 2013. OIC was able to verify some findings immediately, for example, by checking enhancements to the Department of Health's website. Supporting documentation was provided for six of the recommendations and OIC obtained further evidence through discussion and documentation for nine recommendations. As a result of this assessment of the Final Progress Report and related material, OIC has made the following conclusions about Queensland Health's progress in implementing the recommendations.

## **2.2. Implementation status**

The department has implemented 17 of the 20 recommendations made in the original review report. Three recommendations are partially implemented. A summary is provided in Figure 2.

**Figure 2 – Implementation Status of Recommendations<sup>1</sup>**

| Culture of Openness   | Leadership & Accountability   | Maximum Disclosure  | Compliance   |
|---|---|---|--|
| <p>Engage with community so that more information flows to the community that the community wants, in a format that the community can use.<br/><i>(Rec 1 - Implemented)</i></p> | <p>Drive reforms through Information Management Steering Committee.<br/><i>(Rec 2 – In progress)</i></p>  | <p>Publish Information Asset Register.<br/><i>(Rec 8 – Implemented)</i></p>                                     | <p>Improve application handling:-</p> <ul style="list-style-type: none"> <li>❖ improve record keeping at Metro North <i>(Recs 10 and 11 - Implemented)</i></li> <li>❖ improve timeliness at Metro North <i>(Rec 20 - Implemented)</i></li> <li>❖ increase contact and engagement with applicants to better meet their needs <i>(Rec 12 - Implemented)</i></li> <li>❖ clarify procedure for briefing senior staff <i>(Rec 13 - Implemented)</i>; and</li> <li>❖ improve procedures and documentation <i>(Recs 14, 15, 16, 17, 18, 19 - Implemented)</i>.</li> </ul> |
| <p>Explore opportunities to work with peak bodies and professional associations.<br/><i>(Rec 1 - Implemented)</i></p>   | <p>Clarify roles for the Department and Local Health and Hospital Networks under national health reforms:-</p> <ul style="list-style-type: none"> <li>❖ training <i>(Recs 3, 5 and 6 - Implemented)</i></li> <li>❖ performance monitoring <i>(Rec 6 - Implemented)</i></li> <li>❖ roles and position descriptions <i>(Recs 4 and 6 - Implemented)</i></li> <li>❖ complaint handling <i>(Rec 6 - Implemented)</i></li> <li>❖ policies and procedures <i>(Rec 6 - Implemented)</i>; and</li> <li>❖ advice and support <i>(Rec 6 - Implemented)</i>.</li> </ul> <p>❖ performance monitoring <i>(Rec 7 – In progress)</i></p> | <p>Explore greater use of Queensland Health Performance Reporting webpage.<br/><i>(Rec 9 - In progress)</i></p> |  |

<sup>1</sup> Note – Rec = recommendation.

## **2.3. Progress update**

This section discusses the work completed and its impacts on the agency's operations and outcomes. It also identifies where further improvements can be made.

### **2.3.1. Work completed**

Queensland Health has:

- published strategies online for consumer and community engagement for the Hospital and Health Services
- clarified roles for the Hospital and Health Services in right to information and privacy and provided support in training, advice and guidance, role descriptions and performance monitoring; and
- improved application handling policies and procedures.

### **2.3.2. Work still to be done**

With respect to recommendations that are not fully implemented:

#### **Recommendation Two**

Recommendation Two required activities to be included in the Information Management Steering Committee (**IMSC**) workplan, so that the IMSC would be actively driving proactive release of information in accordance with the RTI and IP Acts, and the Queensland Government Enterprise Architecture (**QGEA**) Guidelines, by May 2012.

The IMSC developed an action plan to address the recommendations raised by OIC. Standing agenda items included Information Privacy, Right to Information and Policy. Since the implementation of Queensland Health reforms and structural changes across the health system, the IMSC has not met and has not been proactively driving the release of information.

A Strategic Review of the Health Services Information Agency (**HSIA**) has been undertaken by Deloitte. Deloitte has recommended a new Information and Communications Technology (**ICT**) governance framework which does not include the IMSC. Implementation of the new information governance framework will include

ownership of the proactive release of information in accordance with RTI and IP Acts and the QGEA.

Queensland Health have advised that as a result of the ongoing changes to Queensland Health through national health reform and departmental restructure, the RTI/IP governance model has not been finalised. However, it will continue to be pursued through executive management approval processes in the 2013/14 financial year.

Implementation of this recommendation has not been met and is in progress.

### **Recommendation Seven**

Recommendation Seven included that Queensland Health develop and incorporate key performance targets into the IMSC's workplan and the RTI and IP business units' operational plans, to measure effectiveness and efficiency in RTI and IP processes at the operational and strategic levels.

The Department of Health has a comprehensive performance management framework in place and a detailed listing of key performance indicators used to monitor the performance of each respective HHS, however this does not incorporate monitoring of the efficiency and effectiveness of RTI and IP activities. The Privacy and Right to Information Unit has implemented a number of tools to assist with the efficiency and effectiveness of processing RTI/IP applications, a form of operational level performance monitoring. These include: a processing checklist, operational procedure manual, case management system, revised responsibilities for staffing within the unit and individual file reviews.

The former IMSC also incorporated performance targets within the action plan with regards to the implementation of RTI/ IP legislation, however monitoring of targets has not occurred. The new information governance framework will include ownership of the proactive release of information in accordance with RTI and IP Acts and QGEA. Queensland Health has stated that implementation of the new information governance arrangements will be progressed in 2013/14.

Implementation of this recommendation is in progress.

## **Recommendation Nine**

Recommendation Nine required that Queensland Health continue to enhance the QH Performance Report webpages, under the active management of the IMSC, as an avenue for proactive release of information into the public domain.

Queensland Health noted that the performance report webpages historically published information: however the underlying data was not readily available or easily accessible. Queensland Health has advised that enhancements are being made to the way it releases data into the public domain and this will be addressed by the Open Data Strategy 2013-2016 which was published 6 May 2013. Implementation is progressing in a staged approach with data sets being made progressively available until March 2015. The responsibility for co-ordinating the implementation of the Queensland Health Open Data Strategy now rests with Governance Branch within System Support Services.

Implementation of this recommendation is in progress.

### 3. Queensland Police Service

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#### Key findings

- QPS have completed actions required in 86% of the recommendations and made progress on all recommendations.
- Four recommendations have been partially implemented.
- Full implementation of recommendations has been affected by delays associated with reviews and restructure of the QPS.

Queensland Police Service has:

- launched the Online Crime Statistics Portal, linked to geospatial information, a significant achievement recommended by OIC in the review report and consistent with the Queensland Government Open Data Initiative
- through the Right to Information and Privacy Unit, responsible for processing applications and dealing with the day to day requirements of the RTI Act and IP Act, diligently implemented or progressed all relevant recommendations; and
- made good progress on the remaining recommendations to be implemented. It is critical that QPS complete the implementation of these recommendations to ensure it identifies opportunities QPS can take to proactively release specific information that is relevant and useful to the community at large.

#### 3.1. Background

In 2010/11, the Information Commissioner conducted a review of the QPS's implementation of the *Right to Information Act 2009* (Qld) and *Information Privacy Act 2009* (Qld).

The 2011/12 review report found that QPS had made progress in meeting its legislative obligations, including:

- QPS had a stated commitment to an open culture and strong leadership was provided by the Police Commissioner.

- During the 2011 natural disasters, QPS was responsive to community needs for real time information and pushed it out using new media. QPS had developed other strategies to keep communities informed.
- QPS published a range of information as a matter of course. Information was readily accessible through the agency's internet, publication scheme, disclosure log and administrative access schemes.

The review also identified opportunities for improvement:

- QPS had a wealth of additional information that, if published, would be of vital use to the wider community for research purposes, to improve community services or to improve the operation of the criminal justice system. Crime statistics were identified as a significant, relevant and appropriate community resource for publication in the publication scheme.
- There were opportunities to improve the strategic and operational management of the pro-active release of information and the handling of applications for information under the RTI and IP Acts.

The report made 28 operational and compliance recommendations required to be implemented in full by November 2012, which QPS accepted.<sup>2</sup>

Since the original review, QPS has reported to OIC that QPS has met or is progressing towards meeting many of the recommendations raised in that review. OIC conducted this follow-up review to assess and report to Parliament on the extent to which QPS has implemented the recommendations of the original review.

Key findings were:

- QPS has fully implemented 86% of the recommendations.<sup>3</sup>
- Progress has been made on all recommendations.
- A significant initiative has been the publication of online crime statistics linked to geospatial information that is downloadable in machine-readable format. (Recommendation 13)

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<sup>2</sup> Recommendations 12 and 24 were supported in principle.

<sup>3</sup> QPS advised in their formal response to this report that Recommendation 6, which had been assessed as 'in progress', had been finalised (see Attachment A for the QPS response). OIC accepts this advice and has made necessary adjustments in this report.

- The greatest level of progress has been made by the business unit processing applications for information (the Right to Information and Privacy Unit – **RTIP Unit**), which has implemented or made progress on all recommendations for which the RTIP Unit was directly responsible.

OIC is encouraged by the implementation of many recommendations. This has been particularly evident in the RTIP Unit's positive adoption of recommendations, leading to improved legislative compliance and responsiveness to people requesting information.

As a result of the comprehensive follow-up review, OIC has made the following conclusions about QPS's progress in implementing the recommendations.

### ***3.2. Implementation status***

QPS has implemented fully 24 of the 28 recommendations made in the original review report, and four recommendations are in progress. Figure 3 outlines the implementation status of recommendations.

**Figure 3 - Implementation Status of Recommendations<sup>4</sup>**

| Culture of Openness  | Leadership & Accountability   | Maximum Disclosure   | Compliance  |
|--|---|--|---|
| Engage strategically with the community so information the community wants flows to the community, in a useable format<br><i>(Rec 1 - Implemented)</i> | Provide active leadership of information reforms through QPS's Information Steering Committee and the Information Champion<br><i>(Rec 3 - In Progress)</i>        | Promote QPS administrative access schemes by improving their visibility on the website<br><i>(Rec 9 - Implemented)</i> | Actively manage publication scheme<br><i>(Rec 14 - Implemented)</i><br>and publish information identified by stakeholders that is significant, appropriate and accurate,<br><i>(Rec 12 - In Progress)</i><br>including crime statistics<br><i>(Rec 13 - Implemented)</i>          |
| Reinforce internal commitment within QPS to the right to information and information privacy reforms<br><i>(Rec 2 - Implemented)</i>                   | Ensure proactive leadership and implementation of right to information and information privacy across QPS<br><i>(Rec 4 - Implemented<br/>Rec 5 - Implemented)</i> | Review the Information Asset Register to identify information that could be published<br><i>(Rec 10 - Implemented)</i> | Notify applicants and third parties of publication of released documents might in disclosure log<br><i>(Rec 15 - Implemented)</i>   |
|  | Actively manage intranet<br><i>(Rec 6 – Implemented )<sup>3</sup></i>   | Publish the Information Asset Register<br><i>(Rec 11 - Implemented)</i>  | Actively manage the process:-<br>❖ Engage with the applicant <i>(Rec 16)</i><br>❖ Case and knowledge management and administration<br><i>(Recs 17, 18 &amp; 20)</i><br>❖ Discontinue internal use of formal third party consultation<br><i>(Rec 19)</i><br><i>All implemented</i> |
|  | Actively manage internet<br><i>(Rec 7 - Implemented)</i>  |  |   |
|  | Implement strategic performance monitoring<br><i>(Rec 8 - In Progress)</i>  |  | Improve application handling through enhanced procedures, systems and procedural compliance   |
|  |   |  | <i>Recs 21, 22, 23, 24, 25, 27, 28<br/>Implemented</i>  |
|  |   |  | <i>Rec 26<br/>In Progress</i>   |

<sup>4</sup> Note – Rec = recommendation.

### **3.3. Progress update**

This section discusses the work completed and its impacts on the agency's operations and outcomes. It also identifies where further improvements can be made.

#### **3.3.1. Work completed**

QPS has:

- implemented governance structures and policy and procedural frameworks to manage strategic recommendations
- improved the website so that access to information, right to information and information privacy sections are visible, prominent, accurate and up-to-date; and
- addressed systems for handling applications for information under the RTI Act and IP Act, in particular improving communication with applicants.

#### **3.3.2. Work still to be done**

OIC acknowledges QPS has advised that significant changes over the last 12 months have influenced the timing and capability to fully complete some recommendations. While all recommendations were required to be implemented by November 2012, OIC has enabled the QPS to report on recent progress to 11 October 2013 due to anticipated developments, and taken such actions into account in finalising this report.

With respect to recommendations that are not fully implemented:

#### **Recommendation Three**

Recommendation Three required QPS to provide active leadership through the Information Steering Committee (ISC) and the Information Champion in 2011/12 and in subsequent years to improve the availability and accessibility of information and to progress the RTI reform process, in accordance with the Queensland Government Enterprise Architecture guidelines with respect to the RTI and IP reforms, the legislation and the Ministerial Guidelines.

Given the statements in principle of ISC support, and the establishment of the Information Management Steering Committee (**IMSC**), this recommendation for active leadership of RTI and IP through the ISC and Information Champion was addressed in part.

QPS advised that the ISC approved the establishment of an Open Data Working Group. OIC notes also that QPS advises the QPS executive has provided continuous leadership and direction in relation to the QPS Open Data Strategy, and initiatives relating to implementation of that strategy to date.

QPS advised in September 2013 that the ISC has been dissolved as a result of the QPS Renewal – Corporate Governance Review. A new Demand and Resource Committee is now responsible to ensure that information governance leadership at a strategic level is addressed within the new QPS Corporate Governance Framework. QPS also advised that a new QPS ICT strategic and work plan is being developed, and that the new plans would ‘seek to incorporate initiatives with an information availability/access/push model focus’. OIC considers that implementation of this recommendation will be complete when the new ICT strategic and work plan is finalised and clearly addresses improving the availability and accessibility of information and obligations under the RTI and IP legislation and QGEA guidelines.

Implementation of this recommendation is in progress.

### **Recommendation Eight**

Recommendation Eight required that QPS develop and implement strategic performance monitoring measures to track the progress of implementing RTI and IP across the QPS. QPS was also required to publish the measures, including collected data over time, in accordance with the legislation.

Efforts to develop and implement strategic performance monitoring measures commenced, however this has not progressed. OIC notes that QPS reported that this task will be completed by mid-2014.

Implementation of this recommendation is in progress.

### **Recommendation Twelve**

Recommendation Twelve required that QPS publish in the QPS publication scheme information and datasets identified by stakeholders listed in the appendix to the report, where the information or datasets were held by QPS and did not contain personal information.

Stakeholders identified information and data that they would like QPS to publish, including:

- crime statistics
- warrants, fines, defaults and debts
- use of equipment and methods such as tasers, breath testing, DNA testing, capsicum spray, apprehension interviews, move on directions and cautions, body searches and telephone intercepts
- advance notice of activities that might result in an influx of a particular type of work to other service providers
- Queensland Police Academy curriculum
- responses to external reviews recommendations; and
- complaints received, the QPS response and outcomes.

QPS have launched the Online Crime Statistics Portal, linked to geospatial information and available in machine-readable format. The Online Crime Statistics Portal is a significant achievement specifically recommended by OIC in the review report and consistent with the Queensland Government Open Data Initiative.

The Publication Scheme has been updated, and includes significant information in the categories outlined by stakeholders, for example, policies on warrants and apprehension. Other information is available elsewhere on the QPS website, but is not accessible through the Publication Scheme, for example, information on the use of tasers.

Full implementation of this recommendation is important to realise opportunities identified by stakeholders during the review, ensure legislative compliance and give effect to the government's commitment to the open data initiative. In considering this recommendation, OIC acknowledges the challenges in safeguarding information for some aspects of operational policing. QPS advised in September 2013 the balance of the work required to fully implement this recommendation will be scoped and addressed at executive level (including the Information Champion) for determining prioritisation and allocation once the new organisation structure and resources have been established.

Implementation of this recommendation is in progress.

### **Recommendation Twenty-Six**

OIC confirmed that the process of reviewing all forms to include collection notices as needed is in progress, as reported by QPS. In September 2013, QPS advised that a further 82 forms had been formally reviewed in addition to the 553 forms reported as reviewed August 2012, and that the issue of Privacy Collection Statements on QPS forms was now an ongoing forms management principle. OIC acknowledges that this is an ongoing process, however significant progress has been made.

Implementation of this recommendation is in progress.

## Appendix A – Comments Received

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In accordance with the Office of the Information Commissioner's *Charter, Policy and Procedures* for the conduct of reviews, Queensland Health and Queensland Police Service were asked to provide information as to their views on the progress of the implementation of the recommendations. Their comments are attached.





Enquiries to: Bob McDonald  
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Governance Branch  
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File Ref: DG072138

04 NOV 2013

Ms Rachael Rangihaeata  
Information Commissioner  
Office of the Information Commissioner  
PO Box 10143  
Adelaide Street  
BRISBANE QLD 4000

Dear Ms Rangihaeata

Thank you for your letter dated 21 October 2013, regarding the Follow-up Right to Information (RTI) and Information Privacy (IP) Compliance Review Report.

I very much appreciate you affording this department the opportunity for a formal response to the report, prior to it being tabled in Parliament.

Given the substantial organisational change this department has experienced since the 2011 RTI/IP Compliance Review by your office, it is pleasing to note that all but three of the recommendations have been implemented. I am also encouraged to see that the three remaining recommendations are in progress, pending finalisation of the information management governance framework for the department.

As such, I am happy to accept your report and also undertake to ensure that the remaining three recommendations are progressed in the 2013/2014 year.

Finally, I would like to take this opportunity to thank Karen McLeod of your office for her professionalism during the follow-up review.

Should you require further information, the Department of Health contact is Mr Bob McDonald, Chief Governance Officer, Governance Branch on telephone (07) 3235 9082.

Yours sincerely

A handwritten signature in black ink, appearing to read "Ian Maynard".

**Ian Maynard**  
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Our Web

Your File

5 November 2013

Ms Rachael Rangihaeata  
Information Commissioner  
PO Box 10143  
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Brisbane Qld 4000

Dear Ms Rangihaeata

I refer to your letter of 21 October 2013, where you provide a copy of the final Follow-up Right to Information and Information Privacy Compliance Review Report (the Report) and request a formal response to the Report.

As detailed in the Report, the QPS has completed 23 of the 28 recommendations with significant efforts being made to finalise the remaining recommendations. I can advise that outstanding Recommendation 6 'Actively manage intranet' is finalised with all documents on the QPS intranet now up-to-date.

It should be noted that as a result of the commencement of the Public Safety Business Agency (PSBA) on 1 November 2013, action to finalise these recommendations will be conducted jointly between the QPS and PSBA.

I thank you and your staff for their ongoing support and assistance to the QPS.

Yours sincerely

  
IAN STEWART  
COMMISSIONER

QUEENSLAND POLICE SERVICE