Introduction

The *Right to Information Act 2009* (RTI Act) and the *Information Privacy Act 2009* (IP Act) aim to ensure that government information is made available, while at the same time protecting individual privacy and other public interests. Under the legislation, the Office of the Information Commissioner (OIC) is the agency responsible for monitoring and reporting on agencies in relation to the operation of the RTI and IP Acts, including compliance with specific aspects of the legislation. OIC's role also extends to assisting agencies to maximise disclosure and informing applicants of their rights under the Acts.

OIC undertakes regular self-assessed electronic audits to measure agencies' performance in relation to each of their obligations under the RTI and IP Acts. This is the third time OIC has conducted this audit with the assistance of the Queensland Government Statistician's Office, Queensland Treasury. The previous audits were conducted in 2010 and 2013.

Purposes and uses of the Electronic Audit

This self-assessed electronic audit assists agencies to monitor their own compliance with the RTI and IP Acts, and identify areas which require further attention. It also provides information to OIC about legislative compliance across the public sector.

About the Electronic Audit

OIC acknowledges the continued efforts made by many agencies to proactively release information and provide open data, and towards managing personal information with respect for individual privacy. OIC is also appreciative of agency co-operation with OIC reviews, including surveys and this self-assessed electronic audit. If there are areas in which your agency is yet to achieve compliance, you are encouraged to provide comments, for example on your agency's plans for implementation.

Wherever possible, the self-assessed electronic audit will indicate questions that do not apply to the agency. At the start of the self-assessed electronic audit there are 'gateway' questions in order to identify and filter out questions which do not need to be answered by your agency, thereby reducing the administrative burden of completing the self-assessed electronic audit.

Results of the Electronic Audit

All data collected is strictly confidential and will be de-identified before publication. Overall results, including for specific sectors, will be reported to the Legal Affairs and Community Safety Parliamentary Committee, in accordance with requirements on OIC under the RTI and IP Acts. Results are also published on OIC's website and key findings documented in its Annual Report.

Instructions on how to complete this Electronic Audit

1. A printable list of the questions your agency may be required to answer is provided on the OIC website at <u>www.oic.qld.gov.au</u>. You may find it useful to review the questions, and seek specific information from others in your agency, before beginning to complete the audit.

2. Please select the appropriate answer box next to the relevant question. Additional comments may be included but are, in the main, limited to 250 characters.

3. The design of the questionnaire means that some questions may not be relevant to your agency. Some of these questions will be skipped depending on your agency's responses to 'gateway' questions. Some of these questions might still be presented, and if so, these questions will be clearly marked by instructions in the self-assessed electronic audit.

4. Questions regarding implementation of right to information and information privacy obligations apply to agency adoption of the overall principles of right to information and information privacy, not only formal application handling under the RTI Act or IP Act.

5. For enquiries regarding the content of the audit, please contact Karen McLeod, Office of the Information Commissioner on 07 3405 3076.

For enquiries regarding the online lodgement of the audit, for example, selecting options or submitting responses online, please contact the Queensland Government Statistician's Office on telephone 1800 068 587.

Gateway questions

	Criteria Question	Yes	No	Notes
1.	Has this agency received any RTI or IP applications since 1 July 2013?			If 'No' skip sections D5, D6 and D7 If 'No', some questions throughout the audit will be automatically completed with a default response, which can be amended if necessary.
2.	Has this agency received any RTI or IP Internal Review applications since 1 July 2013?			If 'No' skip section D8.1 If 'No', some questions throughout the audit will be automatically completed with a default response, which can be amended if necessary.
3.	Has this agency received notice that any RTI or IP External Review applications have been made regarding a decision of your agency since 1 July 2013?			If 'No' skip section D8.2 If 'No', some questions throughout the audit will be automatically completed with a default response, which can be amended if necessary.
4.	Does this agency have a publication scheme?			If 'No' skip section D2
5.	Does this agency have a disclosure log?			If 'No' skip section D3
6.	Are there any documents included on the disclosure log? (If you answered "No" in the previous question please select "No" here.)			If 'No' skip items D3.11 and D3.12
7.	Does this agency have any administrative access schemes?			If 'No' skip section D4
8.	Does this agency have policies or procedures to give effect to the RTI and IP legislation, for example, as a standalone policy or as part of an information management framework?			If 'No' skip section A3.3 to A3.7
9.	Does this agency have documented RTI and/or IP policies and procedures? (If you selected "No" in the previous question please select "No" here.)			If 'No' skip section A3.3 to A3.7

Section A – Leadership

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

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

	Criteria Question	Yes	IP	ld	No	Optional comments (Max 250 characters)
1.	Open government	•				
1.1	The agency has a culture open to the release of information.					
1.2	Agency policy frameworks describe how the community is to be included in development of policies affecting external operations.					
1.3	The agency has a mechanism for identifying the information that its industry stakeholders would find useful, for example, a consultation strategy.					
1.4	The agency has a mechanism for providing the information to industry stakeholders that the industry stakeholders have identified as being useful to them, for example, a procedure for publishing information that industry stakeholders have identified as being useful to them.					
1.5	When developing RTI and IP policy, the agency conducts appropriate internal consultation, for example, with decision makers.					
1.6	The agency tracks the type of person seeking information under the RTI Act or IP Act (e.g. individuals, companies, journalists, lobby / community groups, politicians, legal representatives, agents, prisoners or government agencies).					
1.7	Over time, your agency has noticed an increase in diversity in the type of person seeking information. (If your agency has not received any RTI or IP applications since 1 July 2013 please select "No" here.)		-	-		

Section A – Leadership

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

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

	Criteria Question	Yes	IP	ld	No	Optional comments (Max 250 characters)
2	The agency actively manages its responsibiliti	es throug	h good ge	overnanc	e	
2.1	RTI and IP implementation is managed or has been managed by governance mechanisms which provide for development (e.g. planning for implementation).					
2.2	RTI and IP implementation is managed or has been managed by governance mechanisms which provide for implementation and accountability (e.g. identifying who is responsible for implementing actions and by when).					
2.3	RTI and IP implementation is managed or has been managed by governance mechanisms which provide for review (e.g. mechanisms for reporting on achievements).					
2.4	Department only question. An executive level Information Champion is appointed, and active in the role. (<i>This is only an issue for departments. GOCs,</i> <i>local governments and other agencies are not</i> <i>required to respond to this question.</i>)					
2.5	Department only question. A formal information governance body is operating (as per QGEA guidelines). (<i>This is only a requirement for departments.</i> <i>GOCs, local governments and other agencies</i> <i>are not required to respond to this question.</i>)					

Section A – Leadership

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

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

	Criteria Question	Yes	IP	ld	No	Optional comments (Max 250 characters)
3	The agency actively manages information					
3.1	An explicit statement of commitment to RTI and IP is readily available within the agency, for example, in a policy document or as a policy statement on the agency's website.					
3.2	The agency has an external communications strategy to ensure consumers and stakeholders are aware of their RTI rights.					
quest	: Agencies that do not have policies or procedures ion 8), or do have policies or procedures but have no Questions 3.3 to 3.7.)					
3.3	You said earlier your agency has policies or procedures to give effect to the RTI and IP legislation, for example, as a standalone policy or as part of an information management framework. These policies are fully implemented.					
3.4	The agency's policies or procedures that give effect to the RTI and IP legislation, for example, as a standalone policy or as part of an information management framework, are readily available to all staff (e.g. easy to find on the agency's intranet).					
3.5	RTI and IP policies are complete and easy to understand.					
3.6	RTI and IP policies are reviewed on a regular basis.					
3.7	Privacy policies apply to the information of officers, for example, personnel records, as well as to the information of the public.					
3.8	The agency has a system to ensure it meets its obligations when entering into contracts with suppliers who provide services involving personal information.					

Section A – Leadership

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

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

	Criteria Question	Yes	IP	ld	No	Optional comments (Max 250 characters)	
3	The agency actively manages information						
3.9	Department only question. The agency maintains an Information Asset Register either independently or as part of an existing register (as required by Information Standard 44).						
	(This is a requirement for departments. It is not a requirement for local government, GOCs or other agencies, and they are not required to respond to this question.)						
4	Organisational structure and resourcing to the RTI a	nd IP fu	nctions	is appr	opriate		
4.1	Total RTI and IP The total number of staff and full time equivalent of the number of staff performing RTI and IP functions in your agency, including:	.,	rt whole	er of stat number		Optional comments (Max 250	
	- all staff in a dedicated RTI/IP unit, and	characters) of staff reported above					
	- all other staff performing RTI and IP functions. (For example, if three staff members work on RTI or IP functions at least part of their time enter 3 in the first box. If the first staff member works full time on RTI and IP, the second staff member works half of the time on RTI (this is 0.5 FTE) and the last staff member works only one day a week on IP (0.2 FTE) then the total FTE for the three staff members is $1 + 0.5 + 0.2 = 1.7$).						
4.2	Split between RTI and IP and Other. Thinking only of the staff included in your answer to the previous question, please estimate the percentage of the total FTE time which is spent on RTI, IP and any other non- RTI/IP functions. (Percentages must add to 100. If no time is spent on a	Time spent (%) RTI IP Other functions		:(%) (M	optional comments lax 250 characters)		
	function please enter "0".) (For example, with the previous 3 staff, if the first staff member works half the time on RTI and half on IP, the second half their time on RTI only and the third .2 on IP only, then	9					
	RTI = .5 + .5 FTE out of 3 FTE = 33%						
	IP = .5 + .2 FTE out of 3 FTE = 23%						
	Non RTI or IP = .5 + .8 FTE out of 3 FTE = 44% if other rounded up so % totals 100%).						

	Criteria Question	Yes	IP	ld	No	Optional comments (Max 250 characters)
4.3	Resourcing to IP and RTI functions is appropriate.					
4.4	Department only question. RTI and IP functions are independent of the Minister's office. (This is not a requirement for GOCs, local governments or independent statutory authorities. These agencies are not required to respond to this question.)					
4.5	RTI and IP functions are independent of media and communications.					
4.6	RTI and IP functions report as closely as possible to the DG / CEO.					
4.7	Agency administrative delegations for RTI handling and IP handling are up to date.					
4.8	There is a clear authorisation process for agency staff to assess and approve information for public release.					
4.9	The Principal Officer has appropriately delegated authority to deal with RTI and IP applications. (If no or few RTI and IP applications are received and the applications are dealt with by the Principal Officer answer this question 'Yes'.)					
4.10	Roles and responsibilities of the Principal Officer or the Principal Officer's delegates are clearly defined.					
4.11	There is a person who has responsibility for maintaining a system of recording, tracking and monitoring applications and reviews, as needed. (If your agency has not received any RTI or IP applications since 1 July 2013 please select 'Yes' here.)					
4.12	Internal reviews are conducted or would be conducted by an officer different to the officer who made the reviewable decision. (If your agency has not received any internal review applications since 1 July 2013 please select "Yes" here.)					
4.13	Any officer conducting internal reviews is at least the same level or more senior to the officer who made the reviewable decision. (If your agency has not received any internal review applications since 1 July 2013 please select "Yes" here.)					
4.14	The agency can meet requirements to report on RTI and IP statistics.					
4.15	The agency uses redaction technologies or would use redaction technologies as needed to assist in its decision making processes. (NB "Redaction technology" allows an original hard-copy document to be scanned, and then text to be electronically blocked out of the scanned copy - for example, personal information can be removed.)					
	(If your agency has not received any RTI or IP applications since 1 July 2013 please select "Yes" here.)					

Section A – Leadership

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

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

	Criteria Question	Yes	IP	ld	No	Optional comments (Max 250 characters)
5	Training					
5.1	Number of agency staff who attended RTI or IP training, or any training containing information about RTI or IP during the last 12 months.	0 1 2 3 4 11 - 30 - 50 - 100 how mai	29 49 99 or more (p	blease spe	cify	
5.2	Agency staff are trained as to their level of authority to release information administratively.					
5.3	The agency has procedures in place to ensure new/existing staff are given appropriate training/awareness raising in relation to RTI and IP obligations.					
5.4	RTI and IP are mentioned in induction.					
5.5	Training for RTI and IP staff with respect to the RTI and IP functions is effective.					
5.6	General staff training in RTI and IP is effective.					

Section B - Accountability requirements ¹

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

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

	Criteria Question	Yes	IP	ld	No	Optional comments (Max 250 characters)
1	Complaint handling procedures capture opportunities for improvement in RTI and IP functions.					
2	Opportunities for improvement in RTI and IP functions are recorded and actions on them are tracked.					
3	Opportunities for improvement are actioned and result in improvements to systems for the release of information or information privacy.					
4	The agency has internal systems and procedures for reviewing the effectiveness of the RTI and IP functions.					
5	Review and reporting mechanisms on the effectiveness of the RTI and IP functions are embedded at all levels of the organisation.					
6	Performance measurement for the RTI functions across the agency is in place. (If 'No' or 'Identified' skip B8 and B9)					
7	Performance measurement for the IP functions across the agency is in place. (If 'No' or 'Identified' skip B10 and B11)					
8	Performance measurement for the RTI functions across the agency is used.					
9	Performance measurement for the RTI functions across the agency is useful.					
10	Performance measurement for the IP functions across the agency is used.					
11	Performance measurement for the IP functions across the agency is useful.					

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

Section C - Maximum Disclosure

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

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

Criteria question		Asses	sment	Optional comments	
	Yes	IP	ld	No	(Max 250 characters)
1. More information has been placed in the public domain over the last two years (e.g. additional data sets are now available to the public).					
2. More information is continuously being made available via the publication scheme.					
Department only question. 3. Using the Information Asset Register as a guide, the agency has achieved maximum disclosure of publishable information assets. (<i>This is a requirement for departments. It is not a requirement for GOCs, local governments or other agencies, and they are not required to respond to this question.</i>)					

Section D - Compliance

D.1 Detailed questions about active management of agency responsibilities²

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

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

Criteria question		Asse	ssmer	nt	Optional comments
			(Max 250 characters)		
1. Active management of responsibilities – managing the process					
1.1 Searches					
1. How often is overall sufficiency of search raised as an issue by applicants.					
(Note: Sufficiency of search is whether or not the agency has taken all reasonable steps to locate all documents that fall within the terms of the access application.)	Often		ome- nes	Rarely	
(If your agency has not received any RTI or IP internal or external review applications since 1 July 2013 please select "Rarely" here.)					
2. How often are additional documents located during external review.	Often		ome- nes	Rarely	
(If your agency has not received any RTI or IP external review applications since 1 July 2013 please select "Rarely" here.)		[
3. What is the level of satisfaction by the RTI Unit or decision maker with documentation received from other staff.	Low	Me	dium	High	
(If your agency has not received any RTI or IP applications since 1 July 2013 please select "High" here.)					
1.2 Transfer of information					
1. The agency has procedures in place for transfer of personal information outside Australia only in accordance with s33 of the IP Act, for example, if personal information is posted on the agency's website.	Y	IP	ld	N	
(If your agency does not transfer personal information outside Australia please select "Yes" here.)					
1.3 Record Keeping					
1. Record keeping systems allow efficient location of records relevant to RTI and IP requests or would allow efficient location of records relevant to RTI and IP requests if any were received.	Y	IP	Id	N	
(If your agency has not received any RTI or IP applications since 1 July 2013 please select "Yes" here.)					
2. Accurate records exist to document the processing of any requests received.	Y	IP	ld	N	
(If your agency has not received any RTI or IP applications since 1 July 2013 please select "Yes" here.)					

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

Section D - Compliance

D.1 Detailed questions about active management of agency responsibilities³

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

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

Criteria question		Asses	ssment		Optional comments
					(Max 250 characters)
2. Active management of responsibilities – assisting and advising the parties					
2.1 Negotiation					
 Applicants are or would be assisted through negotiation, either prior to making an application or once an application is made, to clarify and particularise their requests. (If your agency has not received any RTI or IP applications please answer this question regarding the current extent of the agency's general use of negotiation strategies with the general public.) 	Y	IP	ld	N	
2.2 Communication					
1. For every application received, the agency considers or would consider calling the applicant within a week of receipt of the application to clarify the applicant's information request and explore options for providing the information.	Y	IP	ld	N	
 Open communication exists between the agency and the parties to any communication seeking information, whether informal or formal (for example phone or email). (If your agency has not received any RTI or IP applications since 1 July 2013 please select "Yes" 	Y	IP	Id	Z	
here.) 3. The agency is responsive and open to any requests for information, whether made informally, including through an administrative access scheme or through a formal application under the legislation.	Y	IP	ld	N	
4. Level of satisfaction by the parties with the communication in general.(If your agency has not received any RTI or IP applications since 1 July 2013 please select "High" here.)	Low	Mec	lium	High	
2.3 Decision communication					
1. Decisions are made promptly and parties informed as soon as possible, or would be if applications were made. (If your agency has not received any RTI or IP applications since 1 July 2013 please select "Yes" here.)	Y	IP	Id	N	

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

Criteria question	As	sessment		Optional comments
			(Max 250 characters)	
2.4 Timeliness				
1. Level of satisfaction by the parties with the communication about time issues.	Low	Medium	High	
(If your agency has not received any RTI or IP applications since 1 July 2013 please select "High" here.)				

Section D - Compliance

D.2 Requirements for Publication Schemes⁴

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

(Note: Agencies that do not have a publication scheme (i.e. 'No' to Gateway question 4), are skipped over Section D2.)

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

Criteria question	Assessment		Optional comments		
	Yes	IP	ld	No	(Max 250 characters)
1. Seven classes of information are published (About us, Our services, Our finances, Our priorities, Our decisions, Our policies, Our lists).					
2. Information in the publication scheme is significant (key initiative and policy documents).					
3. Information in the publication scheme is appropriate (having regard to legislation, privacy principles and security issues).					
4. Information in the publication scheme is accurate.					
5. Significant documents are not excluded by irrelevant factors (e.g. embarrassment to the agency, or the seniority of an author (<i>Part 1, Schedule 4 Right to Information Act 2009</i>)).					
6. Schemes are readily accessible (e.g. a link on home page).					
7. Direct links to documents suitable for online publication are provided and maintained. (Documents might be unsuitable for online publication if they are too large, or not in a suitable format.)					
8. All documents referred to in the publication scheme are accessible centrally from the publication scheme.					
9. Documents linked to the publication scheme are no more than 3 mouse clicks away.					
10. If a direct link to a document is impractical (e.g. due to the size of the document), a summary of the document is provided and access arrangements are described.					

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

Section D - Compliance

D.2 Requirements for Publication Schemes⁵

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

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

Criteria question	Assessment				Optional comments
	Yes	IP	ld	No	(Max 250 characters)
11. The publication scheme sets out the terms on which information is available including any applicable fees/charges.					
12. Charges for administrative release of documents are minimised.					
13. Alternative formats of documents are available.					
14. Website design is user friendly (e.g. well organised, reviewed quarterly and up to date, information rich).					
15. An agency officer has a responsibility to ensure the publication scheme is maintained and up to date.					
16. A complaints procedure is in place to enable people to make complaints when information is not available from the publication scheme.					
17. Changes to the publication scheme are formally approved. ⁶					
18. Changes and approvals to the publication scheme are documented. ⁷					
19. Documents describing changes to the publication scheme are kept as public records. ⁸					

 ⁵From *Ministerial Guidelines, Operation of Publication Schemes and Disclosure Logs* issued pursuant to section 21(3) and section 78(2) of the *Right to Information Act 2009.* ⁶ Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether

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

⁷ Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether or not a publication scheme should be maintained as a public record.

⁸ Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether or not a publication scheme should be maintained as a public record.

Section D - Compliance

D.2 Requirements for Publication Schemes⁹

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

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

Criteria question		Asses	ssmen	t	Optional comments
	Yes	IP	ld	No	(Max 250 characters)
Department only question.					
20. The information governance body has considered the development of the elements* of the authorising and accountability environment for publication schemes.					
 *These elements may include: Policies Business processes (e.g. internal approval processes for publication in a publication scheme) Procedures Roles and responsibilities (e.g. who approves release) Supporting tools and systems¹⁰. For example, the meeting agenda or minutes indicate these issues have been considered. (<i>This is an issue for departments. It is not a requirement for GOCs, local governments or other agencies, and they are not required to respond to this question.</i>) 					
21. What quality is the publication scheme from the agency's perspective.	Low	Me [dium	High	

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

¹⁰From QGEA Guideline Implementing Information Governance.

Section D - Compliance

D.3 Requirements for Disclosure Logs¹¹

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

(Note: Agencies that do not have a disclosure log (i.e. 'No' to Gateway question 5), are skipped over Section D3.)

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

Criteria question	Assessment			Optional comments					
	Yes	IP	ld	No	(Max 250 characters)				
You informed us earlier that your agency has a disclosure lo	You informed us earlier that your agency has a disclosure log. The following questions are in regards to this disclosure log.								
References to documents are limited to documents that do r	not contai	n the per	rsonal inf	ormation	of the applicant.				
1. The disclosure log is a readily accessible part of the agency's website (i.e. within three mouse clicks from the home page).									
2. Website design is user friendly (e.g. well organised, reviewed quarterly and up to date, information rich).									
3. Documents released under the RTI Act are listed in the disclosure log unless there is a clear reason not to do so.									
4. The agency has a process in place to ensure documents are listed on the agency's disclosure log as soon as practicable after the applicant accesses the document.									
5. Where an applicant has not accessed a document within the access period, and where it is appropriate to do so, the agency provides access details to the document (including any applicable charges) in the agency's disclosure log.									
6. If documents are not included in a disclosure log, the details of the decision and reasons are documented in the agency's internal records.									
7. An agency officer has a responsibility to ensure the disclosure log is maintained and up to date and in accordance with ministerial guidelines.									
8. Changes to the disclosure log are formally approved. ¹²									

¹¹ From *Ministerial Guidelines, Operation of Publication Schemes and Disclosure Logs* issued pursuant to section 21(3) and section 78(2) of the *Right to Information Act 2009.*

¹² Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether or not a disclosure log should be maintained as a public record.

Section 4 - Compliance

D.3 Requirements for Disclosure Logs¹³

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

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

Criteria question	Assessment			:	Optional comments
	Yes	IP	ld	No	(Max 250 characters)
9. Changes and approvals to the disclosure log are documented. ¹⁴					
10. Changes to the disclosure log are documented and kept as public records. $^{\rm 15}$					
11. The disclosure log has an appropriate list of documents, for example, by comparison with the number of applications for non-personal information that have been granted.					Note: Not asked of agencies that do not have any documents on their disclosure log i.e. those that answered 'No' to Gateway question 6.
12. Documents published to the disclosure log are accompanied by brief text with a summary and the context of the information.					Note: Not asked of agencies that do not have any documents on their disclosure log i.e. those that answered 'No' to Gateway question 6.
13. The agency has a system for checking that documents or information released on the disclosure log:-	Y	es	1	10	
(a) - are not prevented by law from publication			[
(b) - are not defamatory			[
(c) - if included in the disclosure log would not unreasonably invade an individual's privacy			[
(d) - are not or do not allow to be ascertained, information of a confidential nature that was communicated in confidence by a person other than the agency			[
(e) - would not otherwise cause substantial harm to an entity if disclosed.	Ľ				

¹³ From Ministerial Guidelines, Operation of Publication Schemes and Disclosure Logs issued pursuant to section 21(3) and section 78(2) of the Right to Information Act 2009.

¹⁴ Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether or not a disclosure log should be maintained as a public record.

¹⁵ Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether or not a disclosure log should be maintained as a public record.

Section 4 - Compliance

D.3 Requirements for Disclosure Logs¹⁶

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

Criteria Question	Assessment				Optional Comments
	Yes	IP	ld	No	(Max 250 characters)
Department only question.					
14. The information governance body has considered the development of the elements* of the authorising and accountability environment for disclosure logs.	Y	IP	ld	N	
 *These elements may include: Policies Business processes (e.g. internal approval processes for publication in a publication scheme) Procedures Roles and responsibilities (e.g. who approves release) Supporting tools and systems¹⁷. 					
For example, the meeting agenda or minutes indicate these issues have been considered.					
(This is an issue requirement for departments. This is not a requirement for GOCs, local governments or other agencies and they are not required to respond to this question.)					
Department only question.					
15. The department has a system for including in the disclosure log the details of the information sought by the applicant and the date of the application as soon as practicable after each valid application is made, except where specific information is required to be deleted.	Y □	IP	ld	N	
(This is a requirement for departments. This is not a requirement for GOCs, local governments or other agencies and they are not required to respond to this question.)					
Department only question.					
16. The department has a system for including the following in the disclosure log as soon as practicable after the applicant has accessed the document, except where specific information is required to be deleted.	Y	es	N	lo	
(This is a requirement for departments. This is not a requirement for GOCs, local governments or other agencies and they are not required to respond to this question.)					
(a) - a copy of any document that does not include personal information of the applicant that the department released in relation to the application					
(b) - the applicant's name					
(c) - the name of any entity benefiting from or using the document					

¹⁶ From *Ministerial Guidelines, Operation of Publication Schemes and Disclosure Logs* issued pursuant to section 21(3) and section 78(2) of the *Right to Information Act 2009.*

¹⁷ From QGEA Guideline Implementing Information Governance.

Section D - Compliance D.4 Administrative Access Schemes

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

(Note: Agencies that do not have any administrative access schemes (i.e. 'No' to Gateway question 7), are skipped over Section D4.)

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

Criteria question		Asses	sment	Optional comments	
	Y	IP	ld	Ν	(Max 250 characters)
1. Have any new administrative access schemes been introduced since the commencement of the RTI Act?					
2. Has any new information been introduced into existing administrative access schemes since the commencement of the RTI Act?					
3. Are there mechanisms in place to evaluate the viability of administrative access schemes (e.g. a review of information requests)?					
4. Are there indicators that the administrative access schemes are used first?					
5. Publicly available administrative access schemes are readily accessible (e.g. button on home page).					
6. Multiple avenues of access (e.g. HTML, open formats or hard copy on request) are available from information obtained through an administrative access scheme.					
7. Website design is user friendly and compliant with the Consistent User Experience CUE standard (e.g. well organised, reviewed quarterly and up to date, information rich).					
Department only question.					
8. Schemes generally conform to QGEA guidelines.					
(This is a requirement for departments. This is not a requirement for GOCs, local governments or other agencies and they are not required to respond to this question.)					

Section D - Compliance D.5 Receipt of applications¹⁸

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

(Note: Agencies that have not received any RTI or IP applications since 1 July 2013 (i.e. 'No' to Gateway question 1), are skipped over Sections D5, D6 and D7)

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

Criteria question		Asses	sment	Optional comments	
	Y	IP	ld	N	(Max 250 characters)
1. The agency uses the approved form, as per the RTI and IP Acts, for applications for information.					
2. The agency has a procedure for obtaining evidence of the identity of the applicant within 10 business days (e.g. a checklist of steps to be undertaken for each application).					
3. The agency has procedures in place for dealing with problems with the application, including proof of identity, a change of Act under which the application has been made, an application which does not provide all the information required by the legislation, or seeking an extension of time for the decision. For example, RTI officers might have a standard approach to these matters.					
4. The agency has procedures in place to issue charges estimates notices and the accompanying schedule of documents under the RTI Act.					
5. The agency tracks time frames for handling charges estimates notices and schedules of documents.					
6. The agency has procedures in place for dealing with third party consultation (e.g. a checklist of steps to be undertaken for each application).					
7. The agency has a procedure to track timeframes for third party consultations					
8. The agency has procedures in place for transferring an application to another agency (e.g. a checklist of steps to be undertaken for each application).					
9. The agency has checked applicable fees and charges and ensured procedures are correct.					

¹⁸Taken from the requirements in the Right to Information Act 2009 and Information Privacy Act 2009.

D.6 Deciding how to deal with applications¹⁹

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

(Note: Agencies that have not received any RTI or IP applications since 1 July 2013 (i.e. 'No' to Gateway question 1), are skipped over Sections D5, D6 and D7)

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

Criteria question	Assessment			Optional comments	
	Y	IP	ld	Ν	(Max 250 characters)
1. The agency has procedures for deciding whether or not an application is outside the scope of the Act (e.g. consideration of questions of scope are file noted).					
2. The agency has procedures for ensuring applicants are notified if their application is outside the scope of the Act, within 10 business days and in the prescribed form, including reasons for the decision.					
3. If access or amendment is refused, the agency has steps to ensure the decision is according to the legislation, particularly balancing public interest factors under the RTI Act and applied by IP Act.					
4. If access or amendment is refused, the agency has steps to ensure that the notification is in the prescribed form, and that notification is made within time and with reasons for the decision.					

¹⁹Taken from the requirements in the Right to Information Act 2009 and Information Privacy Act 2009.

Section D - Compliance

D.7 Granting access to or amendment of documents²⁰

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

(Note: Agencies that have not received any RTI or IP applications since 1 July 2013 (i.e. 'No' to Gateway question 1), are skipped over Sections D5, D6 and D7)

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

Criteria question	Assessment			Optional comments	
	Y	IP	ld	Ν	(Max 250 characters)
1. The agency has procedures to ensure that written notices giving access to documents accord with the legislative requirements and that information is provided in the requested format and within time (e.g. a checklist of steps to be undertaken for each application and templates which reflect the statutory requirements).					
2. The agency routinely meets statutory timeframes.					
3. If access is not given in the requested format or it is deferred, the agency has procedures for recording the reasons for the difference in formats or the deferral, and that no additional charges are levied.					
4. The agency has procedures for ensuring the information goes to the correct person, for example, correctly to an agent or parent.					
5. The agency has procedures for ensuring that applications under the RTI Act are considered for inclusion in the disclosure log in accordance with the RTI Act, as needed.					
(If your agency does not operate a disclosure log please select "Yes" here.)					

²⁰Taken from the requirements in the *Right to Information Act 2009* and *Information Privacy Act 2009*.

D.8 Internal and External Review²¹

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

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

Criteria question	Assessment Optional comme			Optional comments				
	Y IP Id N (Max 250 characters)							
1. Internal Review								
	(Note: Agencies that have not received any RTI or IP Internal Review applications since 1 July 2013 (i.e. 'No' to Gateway question 2), are skipped over Section D8.1.)							
1.1 The agency has a procedure for tracking the timeframes for internal review applications (e.g. a checklist of steps to be undertaken for each application).								
1.2 The agency uses the prescribed written notice for notifying the applicant of the result of the internal review, including provision of reasons.								
1.3 The agency has a procedure for tracking the timeframes for internal review decision making.								
1.4 The agency has a process in place to ensure internal review decisions are notified to the applicant within 20 business days from receipt of application.								
1.5 Written notices of internal review decisions are provided to the applicants.								
2. External Review and Compliance Notices								
(Note: Agencies that have not received notice that any regarding a decision of their agency (i.e. 'No' to Gatew								
2.1 The agency has a procedure to seek more time from the Information Commissioner to process the application if a deemed decision is being externally reviewed.								
2.2 The agency understands that the onus is on the agency to show that the reviewable decision was justified.								
2.3 The agency understands and meets its obligations to assist the Information Commissioner.								
2.4 The agency routinely meets set timeframes in external reviews.								
2.5 The agency understands and accepts its obligations to take any action required by a compliance notice issued under s158 of the IP Act.								

²¹ Taken from the requirements in the *Right to Information Act 2009* and *Information Privacy Act 2009*.

Section D - Compliance

D.9 Detailed requirements for adoption of privacy principles²²

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

(Note: Government Owned Corporations are not required to adopt the Privacy Principles, and are therefore not required to respond to the questions in Section D9.)

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

Criteria question	Assessment			Optional comments	
	Y	IP	ld	Ν	(Max 250 characters)
1. General					
1.1 Personal information handling practices have not raised concerns or resulted in the issue of any compliance notices.					
1.2 Collection of personal information is appropriate.					
1.3 Security safeguards for personal information are appropriate.					
1.4 Processes are in place to ensure personal information held by your agency is as accurate as possible (e.g. clients can update their details via the agency's website, by telephone or in person, your agency audits information for completeness and accuracy, where possible data is corrected automatically, clients are contacted when issues are found, duplicate and redundant records are removed or archived).					
1.5 The agency is open about its processes for collecting, using and disclosing personal information.					
1.6 The agency use and disclosure of personal information is appropriate.					
1.7 Privacy breaches and complaints are managed effectively.					
2. Collection					
2.1 The agency identifies why it is collecting personal information.					
2.2 The agency provides a collection notice ²³ to individuals from whom personal information is being collected.					

²²From Schedule 3 of the Information Privacy Act 2009.

²³ Note that the term 'collection notice' does not appear in the *Information Privacy Act 2009*. It is a generic term encompassing the obligation to make individuals generally aware of the facts listed in IPP 2.

Section D - Compliance

D.9 Detailed requirements for adoption of privacy principles²⁴

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

(Note: Government Owned Corporations are not required to comply with the privacy principles, and need not complete this section.)

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

Criteria question	Assessment			Optional comments	
	Y	IP	ld	Ν	(Max 250 characters)
2. Collection (cont)					
2.3 The agency has determined how much and the kind of personal information it needs to collect.					
2.4 The amount of personal information collected is no more than is necessary and relevant for the purpose for which it is required.					
2.5 The agency collects personal information lawfully and fairly.					
2.6 The agency has taken steps to ensure the information collected is accurate (e.g. collection forms are well designed and approved, questions are clear, staff are trained, procedures are consistent across the agency, help is available for clients that need it, source documentation is consulted where appropriate).					
3. Security					
3.1 Personal information held by the agency is protected against unauthorised access, use, modification or disclosure.					
3.2 Personal information held by the agency is protected against loss or misuse.					
3.3 The agency has adopted physical, technical and administrative safeguards to protect personal information.					
3.4 Security safeguards are appropriate given the sensitivity of the information.					
3.5 Processes are in place to record access to electronic records and datasets containing personal information.					
3.6 Processes are in place to ensure that disposal of personal information does not allow unauthorised access.					

²⁴From Schedule 3 of the Information Privacy Act 2009.

Section D - Compliance

D.9 Detailed requirements for adoption of privacy principles²⁵

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

(Note: Government Owned Corporations are not required to adopt the Privacy Principles, and need not complete this section.)

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

Criteria question	Assessment			Optional comments	
	Y	IP	ld	Ν	(Max 250 characters)
4. Accuracy					
4.1 Processes are in place for people to amend their personal information if it is incorrect.					
4.2 Processes are in place to record when and where key personal information was collected, including when it was updated.					
5. Openness					
5.1 The agency makes information available about its personal information policies and procedures.					
5.2 The agency tells people why it collects, how it uses and when it discloses their personal information at the time of collection.					
5.3 There is a person that members of the public can contact about privacy issues.					
5.4 The agency tells people how they can access and amend their personal information.					
5.5 The agency provides details to the public of the categories of personal information it holds.					
6. Use and disclosure					
6.1 The agency uses information only for the purpose for which it was collected, unless an exception in IPP10 or NPP2 applies.					
6.2 The agency discloses information only where the person was advised when it was collected unless an exception in IPP11 or NPP2 applies.					
6.3 The agency has procedures in place to ensure that use or disclosure of personal information under IPP10, IPP11 or NPP2 is noted on the personal information where required.					

²⁵From Schedule 3 of the Information Privacy Act 2009.

Section D - Compliance

D.9 Detailed requirements for adoption of privacy principles²⁶

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

(Note: Government Owned Corporations are not required to adopt the Privacy Principles, and need not complete this section.)

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

Criteria question	Assessment		Optional comments		
	Y	IP	ld	Ν	(Max 250 characters)
7. Breaches and complaints					
7.1 There is a documented process specifically for managing privacy breaches and privacy complaints. (<i>If 'Y' or 'IP' skip 7.2</i>)					
7.2 There is a documented process for managing general complaints. (If 'Id' or 'N' skip 7.3 and 7.4)					
7.3 This process is documented and available to agency officers.					
7.4 This process, or a version of it, is available to the public.					
7.5 There is a clear process for privacy complaint handlers to advise agency officers when practices that need changing are identified.					
7.6 There is a clear process for agency officers to action changes to practices arising from complaints.					
7.7 In the last two years your agency has received privacy complaints. (If 'N' skip 7.8 to 7.11)	Yes 🗌		No 🗌		
7.8 Privacy complaint handling is timely.					
7.9 Complainants are generally satisfied with the response given.					
7.10 In the last two years privacy complaint handlers have advised agency officers that practices need to change. (<i>If 'N' skip 7.11</i>)			No 🗌		

²⁶From Schedule 3 of the Information Privacy Act 2009.

Section D - Compliance

D.9 Detailed requirements for adoption of privacy principles²⁷

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

(Note: Government Owned Corporations are not required to adopt the Privacy Principles, and need not complete this section.)

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

Criteria question		Asses	sment	Optional comments	
	Y	IP	ld	Ν	(Max 250 characters)
7. Breaches and complaints (cont)					
7.11 Approved reforms to agency processes identified by complaint handlers have been implemented.					
7.12 There have been privacy breaches in the last two years. (If 'N' skip 7.13)	Yes 🗌		No 🗌		
7.13 The same type of breach has occurred two or more times in the last two years.	Yes 🗌		No 🗌		

²⁷From Schedule 3 of the Information Privacy Act 2009.

Section E – Additional Questions

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

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

Criteria question		Asses	sment	Optional comments	
	Y	IP	ld	Ν	(Max 250 characters)
 8.1 The agency uses redaction technologies or would use redaction technologies as needed to assist in its decision making processes involving digital video recordings. (NB "Redaction technology" allows an original video to be electronically altered to remove specific items from the recording - for example, personal information such as an individual's face can be removed.) (If your agency has not received any requests for digital video recordings please select 'Yes', 'In 					
Progress' or 'Identified', depending on the current extent to which your agency has access to video redaction technology.)					
8.2 The agency has adopted the privacy principles in its operation of fixed camera surveillance systems.					
8.3 The agency has adopted the privacy principles in its operation of mobile camera surveillance systems, including body worn cameras, drones, iPads and smartphones.					
8.4 The agency engages with the applicant, third parties, relevant business units and any other relevant stakeholders to explore options for providing information prior to making a decision on the access application.					
You now have completed the audit. Do you have any final comments?		(This comments box is not limited to 250 characters. Effectively it is unlimited.)			

Most questions within the audit use these response options.

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

Audit Items

Gateway questions

- 1. Has this agency received any RTI or IP applications since 1 July 2013.
- 2. Has this agency received any RTI or IP Internal Review applications since 1 July 2013.
- 3. Has this agency received notice that any RTI or IP External Review applications have been made regarding a decision of your agency?
- 4. Does this agency have a publication scheme?
- 5. Does this agency have a disclosure log?
- 6. Are there any documents included on the disclosure log? (If you answered "No" in the previous question please select "No" here.)
- 7. Does this agency have any administrative access schemes?
- 8. Does this agency have policies or procedures to give effect to the RTI and IP legislation, for example, as a standalone policy or as part of an information management framework?
- 9. Does this agency have documented RTI and/or IP policies and procedures? (If you selected "No" in the previous question please select "No" here.)

Section A – Leadership

1. Open government

- 1.1 The agency has a culture open to the release of information.
- 1.2 Agency policy frameworks describe how the community is to be included in development of policies affecting external operations.
- 1.3 The agency has a mechanism for identifying the information that its industry stakeholders would find useful, for example, a consultation strategy.
- 1.4 The agency has a mechanism for providing the information to industry stakeholders that the industry stakeholders have identified as being useful to them, for example, a procedure for publishing information that industry stakeholders have identified as being useful to them.
- 1.5 When developing RTI and IP policy, the agency conducts appropriate internal consultation, for example, with decision makers.

- 1.6 The agency tracks the type of person seeking information under the RTI Act or IP Act (e.g. individuals, companies, journalists, lobby / community groups, politicians, legal representatives, agents, prisoners or government agencies).
- 1.7 Over time, your agency has noticed an increase in diversity in the type of person seeking information. (If your agency has not received any RTI or IP applications please select "No" here.)

2. The agency actively manages its responsibilities through good governance

- 2.1 RTI and IP implementation is managed or has been managed by governance mechanisms which provide for development (e.g. planning for implementation).
- 2.2 RTI and IP implementation is managed or has been managed by governance mechanisms which provide for implementation and accountability (e.g. identifying who is responsible for implementing actions and by when).
- 2.3 RTI and IP implementation is managed or has been managed by governance mechanisms which provide for review (e.g. mechanisms for reporting on achievements).

2.4 **Department only question.**

An executive level Information Champion is appointed, and active in the role.

(This is only an issue for departments. GOCs, local governments and other agencies are not required to respond to this question.)

2.5 **Department only question.**

A formal information governance body is operating (as per QGEA guidelines).

(This is only a requirement for departments. GOCs, local governments and other agencies are not required to respond to this question.)

3. The agency actively manages information

Questions 3.3 to 3.7 will not be asked if you answered "No" to Gateway question 8 "Does this agency have policies or procedures to give effect to the RTI and IP legislation, for example, as a standalone policy or as part of an information management framework?"

Questions 3.3 to 3.7 will not be asked if you answered "No" to Gateway question 9 "Does this agency have documented RTI and/or IP policies and procedures?"

- 3.1 An explicit statement of commitment to RTI and IP is readily available within the agency, for example, in a policy document or as a policy statement on the agency's website.
- 3.2 The agency has an external communications strategy to ensure consumers and stakeholders are aware of their RTI rights.

(Note: Agencies that do not have policies or procedures to give effect to the RTI and IP legislation (i.e. 'No' to Gateway question 8), or do have policies or procedures but have not documented them (i.e. 'No' to Gateway question 9) are skipped over Questions 3.3 to 3.7.)

3.3 You said earlier your agency has policies or procedures to give effect to the RTI and IP legislation, for example, as a standalone policy or as part of an information management framework. These policies are fully implemented.

- 3.4 The agency's policies or procedures that give effect to the RTI and IP legislation, for example, as a standalone policy or as part of an information management framework, are readily available to all staff (e.g. easy to find on the agency's intranet).
- 3.5 RTI and IP policies are complete and easy to understand.
- 3.6 RTI and IP policies are reviewed on a regular basis.
- 3.7 Privacy policies apply to the information of officers, for example, personnel records, as well as to the information of the public.
- 3.8 The agency has a system to ensure it meets its obligations when entering into contracts with suppliers who provide services involving personal information.

Government departments only

3.9 The agency maintains an Information Asset Register either independently or as part of an existing register (as required by Information Standard 44).

(This is a requirement for departments. It is not a requirement for local government, GOCs or other agencies, and they are not required to respond to this question.)

4. Organisational structure and resourcing to the RTI and IP functions is appropriate

4.1 <u>Total RTI and IP</u> The total number of staff and full time equivalent of the number of staff performing RTI and IP functions in your agency, including:

- all staff in a dedicated RTI/IP unit, and

- all other staff performing RTI and IP functions.

(For example, if three staff members work on RTI or IP functions at least part of their time enter 3 in the first box. If the first staff member works full time on RTI and IP, the second staff member works half of the time on RTI (this is 0.5 FTE) and the last staff member works only one day a week on IP (0.2 FTE) then the total FTE for the three staff members is 1 + 0.5 + 0.2 = 1.7).

4.2 <u>Split between RTI and IP and Other</u>. Thinking only of the staff included in your answer to the previous question, please estimate the percentage of the total FTE time which is spent on RTI, IP and any other non-RTI/IP functions.

(Percentages must add to 100. If no time is spent on a function please enter "0".)

(For example, with the previous 3 staff, if the first staff member works half the time on RTI and half on IP, the second half their time on RTI only and the third .2 on IP only, then

RTI = .5 + .5 FTE out of 3 FTE = 33%

IP = .5 + .2 FTE out of 3 FTE = 23%

Non RTI or IP = .5 + .8 FTE out of 3 FTE = 44% if other rounded up so % totals 100%)

4.3 Resourcing to IP and RTI functions is appropriate.

4.4 **Department only question.**

RTI and IP functions are independent of the Minister's office.

(This is not a requirement for GOCs, local governments or independent statutory authorities. These agencies are not required to respond to this question.)

- 4.5 RTI and IP functions are independent of media and communications.
- 4.6 RTI and IP functions report as closely as possible to the DG / CEO.
- 4.7 Agency administrative delegations for RTI handling and IP handling are up to date.
- 4.8 There is a clear authorisation process for agency staff to assess and approve information for public release.
- 4.9 The Principal Officer has appropriately delegated authority to deal with RTI and IP applications. (If no or few RTI and IP applications are received and the applications are dealt with by the Principal Officer answer this question 'Yes'.)
- 4.10 Roles and responsibilities of the Principal Officer or the Principal Officer's delegates are clearly defined.
- 4.11 There is a person who has responsibility for maintaining a system of recording, tracking and monitoring applications and reviews, as needed.

(If your agency has not received any RTI or IP applications since 1 July 2013 please select 'Yes' here.)

- 4.12 Internal reviews are conducted or would be conducted by an officer different to the officer who made the reviewable decision. (If your agency has not received any internal review applications since 1 July 2013 please select "Yes" here.)
- 4.13 Any officer conducting internal reviews is at least the same level or more senior to the officer who made the reviewable decision. (If your agency has not received any internal review applications since 1 July 2013 please select "Yes" here.)
- 4.14 The agency can meet requirements to report on RTI and IP statistics.
- 4.15 The agency uses redaction technologies or would use redaction technologies as needed to assist in its decision making processes. (NB "Redaction technology" allows an original hard-copy document to be scanned, and then text to be electronically blocked out of the scanned copy for example, personal information can be removed.)

(If your agency has not received any RTI or IP applications since 1 July 2013 please select "Yes" here.)

5. Training

- 5.1 Number of agency staff who attended RTI or IP training, or any training containing information about RTI or IP during the last 12 months.
- 5.2 Agency staff are trained as to their level of authority to release information administratively.
- 5.3 The agency has procedures in place to ensure new/existing staff are given appropriate training/awareness raising in relation to RTI and IP obligations.
- 5.4 RTI and IP are mentioned in induction.
- 5.5 Training for RTI and IP staff with respect to the RTI and IP functions is effective.

5.6 General staff training in RTI and IP is effective.

Section B - Accountability requirements¹

- 1 Complaint handling procedures capture opportunities for improvement in RTI and IP functions.
- 2 Opportunities for improvement in RTI and IP functions are recorded and actions on them are tracked.
- 3 Opportunities for improvement are actioned and result in improvements to systems for the release of information or information privacy.
- 4 The agency has internal systems and procedures for reviewing the effectiveness of the RTI and IP functions.
- 5 Review and reporting mechanisms on the effectiveness of the RTI and IP functions are embedded at all levels of the organisation.
- 6 Performance measurement for the RTI functions across the agency is in place. (If 'No' or 'Identified' skip B8 and B9)
- 7 Performance measurement for the IP functions across the agency is in place (If 'No' or 'Identified' skip B10 and B11)
- 8 Performance measurement for the RTI functions across the agency is used.
- 9 Performance measurement for the RTI functions across the agency is useful
- 10 Performance measurement for the IP functions across the agency is used
- 11 Performance measurement for the IP functions across the agency is useful

Section C - Maximum disclosure

- 1. More information has been placed in the public domain over the last two years (e.g. additional data sets are now available to the public).
- 2. More information is continuously being made available via the publication scheme.

Department only question.

3. Using the Information Asset Register as a guide, the agency has achieved maximum disclosure of publishable information assets.

(This is a requirement for departments. It is not a requirement for GOCs, local governments or other agencies, and they are not required to respond to this question.)

Section D - Compliance

D.1 Detailed questions about active management of agency responsibilities²

1. Active management of responsibilities - Managing the process

1.1 Searches

1. How often is overall sufficiency of search raised as an issue by applicants.

(Note: Sufficiency of search is whether or not the agency has taken all reasonable steps to locate all documents that fall within the terms of the access application.)

(If your agency has not received any RTI or IP internal or external review applications since 1 July 2013 please select "Rarely" here.)

2. How often are additional documents located during external review.

(If your agency has not received any RTI or IP external review applications since 1 July 2013 please select "Rarely" here.)

3. What is the level of satisfaction by the RTI Unit or decision maker with documentation received from other staff.

(If your agency has not received any RTI or IP applications since 1 July 2013 please select "High" here.)

1.2 Transfer of information

1. The agency has procedures in place for transfer of personal information outside Australia only in accordance with s33 of the IP Act, for example, if personal information is posted on the agency's website.

(If your agency does not transfer personal information outside Australia please select "Yes" here.)

1.3 Record keeping

1. Record keeping systems allow efficient location of records relevant to RTI and IP requests or would allow efficient location of records relevant to RTI and IP requests if any were received

(If your agency has not received any RTI or IP applications since 1 July 2013 please select "Yes" here.)

2. Accurate records exist to document the processing of any requests received.

(If your agency has not received any RTI or IP applications since 1 July 2013 please select "Yes" here.)

2. Active management of responsibilities - assisting and advising the parties

2.1 Negotiation

1. Applicants are or would be assisted through negotiation, either prior to making an application or once an application is made, to clarify and particularise their requests.

(If your agency has not received any RTI or IP applications please answer this question regarding the current extent of the agency's general use of negotiation strategies with the general public.)

2.2 Communication

- 1. For every application received, the agency considers or would consider calling the applicant within a week of receipt of the application to clarify the applicant's information request and explore options for providing the information.
- 2. Open communication exists between the agency and the parties to any communication seeking information, whether informal or formal (for example phone or email).

(If your agency has not received any RTI or IP applications since 1 July 2013 please select "Yes" here.)

- 3. The agency is responsive and open to any requests for information, whether made informally, including through an administrative access scheme or through a formal application under the legislation.
- 4. Level of satisfaction by the parties with the communication in general.

(If your agency has not received any RTI or IP applications since 1 July 2013 please select "High" here.)

2.3 Decision communication

1. Decisions are made promptly and parties informed as soon as possible, or would be if applications were made.

(If your agency has not received any RTI or IP applications since 1 July 2013 please select "Yes" here.)

2.4 Timeliness

1. Level of satisfaction by the parties with the communication about time issues.

(If your agency has not received any RTI or IP applications since 1 July 2013 please select "High" here.)

D.2 Requirements for Publication Schemes³

These questions will not be asked if you answered "No" to Gateway question 4 "Does this agency have a publication scheme?"

- 1. Seven classes of information are published (About us, Our services, Our finances, Our priorities, Our decisions, Our policies, Our lists).
- 2. Information in the publication scheme is significant (key initiative and policy documents).
- 3. Information in the publication scheme is appropriate (having regard to legislation, privacy principles and security issues).
- 4. Information in the publication scheme is accurate.
- 5. Significant documents are not excluded by irrelevant factors (e.g. embarrassment to the agency, or the seniority of an author (*Part 1, Schedule 4 Right to Information Act 2009*)).
- 6. Schemes are readily accessible (e.g. a link on home page).

- Direct links to documents suitable for online publication are provided and maintained.
 (Documents might be unsuitable for online publication if they are too large, or not in a suitable format)
- 8. All documents referred to in the publication scheme are accessible centrally from the publication scheme.
- 9. Documents linked to the publication scheme are no more than 3 mouse clicks away.
- 10. If a direct link to a document is impractical (e.g. due to the size of the document), a summary of the document is provided and access arrangements are described.
- 11. The publication scheme sets out the terms on which information is available including any applicable fees/charges.
- 12. Charges for administrative release of documents are minimised.
- 13. Alternative formats of documents are available.
- 14. Website design is user friendly (e.g. well organised, reviewed quarterly and up to date, information rich).
- 15. An agency officer has a responsibility to ensure the publication scheme is maintained and up to date.
- 16. A complaints procedure is in place to enable people to make complaints when information is not available from the publication scheme.
- 17. Changes to the publication scheme are formally approved.²⁸
- 18. Changes and approvals to the publication scheme are documented.²⁹
- 19. Documents describing changes to the publication scheme are kept as public records. ³⁰

Department only question.

20. The information governance body has considered the development of the elements* of the authorising and accountability environment for publication schemes.

*These elements may include:

- Policies
- Business processes (e.g. internal approval processes for publication in a publication scheme)
- Procedures
- Roles and responsibilities (e.g. who approves release)
- Supporting tools and systems³¹.

For example, the meeting agenda or minutes indicate these issues have been considered.

(This is an issue for departments. It is not a requirement for GOCs, local governments or other agencies, and they are not required to respond to this question.)

²⁸ Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether or not a publication scheme should be maintained as a public record.

²⁹ Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether or not a publication scheme should be maintained as a public record.

³⁰ Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether or not a publication scheme should be maintained as a public record.

³¹ From QGEA Guideline *Implementing Information Governance*.

21.

What quality is the publication scheme from the agency's perspective.

D.3 Requirements for Disclosure Logs³

These questions will not be asked if you answered "No" to Gateway question 5 "Does this agency have a disclosure log?"

Questions 11 and 12 will not be asked if you answered "No" to Gateway question 6

"Are there any documents included on the disclosure log?"

References to documents are limited to documents that do not contain the personal information of the applicant.

- 1. The disclosure log is a readily accessible part of the agency's website (i.e. within three mouse clicks from the home page).
- 2. Website design is user friendly (e.g. well organised, reviewed quarterly and up to date, information rich).
- 3. Documents released under the RTI Act are listed in the disclosure log unless there is a clear reason not to do so.
- 4. The agency has a process in place to ensure documents are listed on the agency's disclosure log as soon as practicable after the applicant accesses the document.
- 5. Where an applicant has not accessed a document within the access period, and where it is appropriate to do so, the agency provides access details to the document (including any applicable charges) in the agency's disclosure log.
- 6. If documents are not included in a disclosure log, the details of the decision and reasons are documented in the agency's internal records.
- 7. An agency officer has a responsibility to ensure the disclosure log is maintained and up to date and in accordance with ministerial guidelines.
- 8. Changes to the disclosure log are formally approved. ³²
- 9. Changes and approvals to the disclosure log are documented. ³³
- 10. Changes to the disclosure log are documented and kept as public records. ³⁴
- 11. The disclosure log has an appropriate list of documents, for example, by comparison with the number of applications for non-personal information that have been granted.
- 12. Documents published to the disclosure log are accompanied by brief text with a summary and the context of the information.
- 13. The agency has a system for checking that documents or information released on the disclosure log:-
 - (a) are not prevented by law from publication
 - (b) are not defamatory

³² Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether or not a disclosure log should be maintained as a public record.

³³ Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether or not a disclosure log should be maintained as a public record.

³⁴ Email advice from Queensland State Archives to the Department of Premier and Cabinet, dated 27 October 2009 regarding whether or not a disclosure log should be maintained as a public record.

- (c) if included in the disclosure log would not unreasonably invade an individual's privacy
- (d) are not or do not allow to be ascertained, information of a confidential nature that was communicated in confidence by a person other than the agency
- (e) would not otherwise cause substantial harm to an entity if disclosed.

Department only question.

14. The information governance body has considered the development of the elements* of the authorising and accountability environment for disclosure logs.

*These elements may include:

- Policies
- Business processes (e.g. internal approval processes for publication in a publication scheme)
- Procedures
- Roles and responsibilities (e.g. who approves release)
- Supporting tools and systems³⁵.

For example, the meeting agenda or minutes indicate these issues have been considered.

(This is an issue for departments. This is not a requirement for GOCs, local governments or other agencies and they are not required to respond to this question.)

Department only question.

15. The department has a system for including in the disclosure log the details of the information sought by the applicant and the date of the application as soon as practicable after each valid application is made, except where specific information is required to be deleted.

(This is a requirement for departments. This is not a requirement for GOCs, local governments or other agencies and they are not required to respond to this question.)

Department only question.

16. The department has a system for including the following in the disclosure log as soon as practicable after the applicant has accessed the document, except where specific information is required to be deleted.

(This is a requirement for departments. This is not a requirement for GOCs, local governments or other agencies and they are not required to respond to this question.)

- (a) a copy of any document that does not include personal information of the applicant that the department released in relation to the application
- (b) the applicant's name
- (c) the name of any entity benefiting from or using the document

³⁵ From QGEA Guideline Implementing Information Governance.

D.4 Administrative Access Schemes

These questions will not be asked if you answered "No" to Gateway question 7 "Does this agency have any administrative access schemes?"

- 1. Have any new administrative access schemes been introduced since the commencement of the RTI Act?
- 2. Has any new information been introduced into existing administrative access schemes since the commencement of the RTI Act?
- 3. Are there mechanisms in place to evaluate the viability of administrative access schemes (e.g. a review of information requests)?
- 4. Are there indicators that the administrative access schemes are used first?
- 5. Publicly available administrative access schemes are readily accessible (e.g. button on home page).
- 6. Multiple avenues of access (e.g. HTML, open formats or hard copy on request) are available from information obtained through an administrative access scheme.
- 7. Website design is user friendly and compliant with the Consistent User Experience CUE standard (e.g. well organised, reviewed quarterly and up to date, information rich).

Department only question.

8. Schemes generally conform to QGEA guidelines.

(This is a requirement for departments. This is not a requirement for GOCs, local governments or other agencies and they are not required to respond to this question.)

D.5 Receipt of Applications⁶

These questions will not be asked if you answered "No" to Gateway question 1 "Has this agency received any RTI or IP applications since 1 July 2013?"

- 1. The agency uses the approved form, as per the RTI and IP Acts, for applications for information.
- 2. The agency has a procedure for obtaining evidence of the identity of the applicant within 10 business days (e.g. a checklist of steps to be undertaken for each application).
- 3. The agency has procedures in place for dealing with problems with the application, including proof of identity, a change of Act under which the application has been made, an application which does not provide all the information required by the legislation, or seeking an extension of time for the decision. For example, RTI officers might have a standard approach to these matters.
- 4. The agency has procedures in place to issue charges estimates notices and the accompanying schedule of documents under the RTI Act.
- 5. The agency tracks time frames for handling charges estimates notices and schedules of documents.
- 6. The agency has procedures in place for dealing with third party consultation (e.g. a checklist of steps to be undertaken for each application).
- 7. The agency has a procedure to track timeframes for third party consultations

- 8. The agency has procedures in place for transferring an application to another agency (e.g. a checklist of steps to be undertaken for each application).
- 9. The agency has checked applicable fees and charges and ensured procedures are correct.

D.6 Deciding how to deal with applications⁶

These questions will not be asked if you answered "No" to Gateway question 1 "Has this agency received any RTI or IP applications since 1 July 2013?"

- 1. The agency has procedures for deciding whether or not an application is outside the scope of the Act (e.g. consideration of questions of scope are file noted).
- 2. The agency has procedures for ensuring applicants are notified if their application is outside the scope of the Act, within 10 business days and in the prescribed form, including reasons for the decision.
- 3. If access or amendment is refused, the agency has steps to ensure the decision is according to the legislation, particularly balancing public interest factors under the RTI Act and applied by IP Act.
- 4. If access or amendment is refused, the agency has steps to ensure that the notification is in the prescribed form, and that notification is made within time and with reasons for the decision.

D.7 Granting access to or amendment of documents⁶

These questions will not be asked if you answered "No" to Gateway question 1 "Has this agency received any RTI or IP applications since 1 July 2013?"

- 1. The agency has procedures to ensure that written notices giving access to documents accord with the legislative requirements and that information is provided in the requested format and within time (e.g. a checklist of steps to be undertaken for each application and templates which reflect the statutory requirements).
- 2. The agency routinely meets statutory timeframes.
- 3. If access is not given in the requested format or it is deferred, the agency has procedures for recording the reasons for the difference in formats or the deferral, and that no additional charges are levied.
- 4. The agency has procedures for ensuring the information goes to the correct person, for example, correctly to an agent or parent.
- 5. The agency has procedures for ensuring that applications under the RTI Act are considered for inclusion in the disclosure log in accordance with the RTI Act, as needed.

(If your agency does not operate a disclosure log please select "Yes" here.)

D8. Internal and External Review⁶

1. Internal review

These questions will not be asked if you answered "No" to Gateway question 2 "Has this agency received any RTI or IP Internal Review applications since 1 July 2013?"

- 1.1 The agency has a procedure for tracking the timeframes for internal review applications (e.g. a checklist of steps to be undertaken for each application).
- 1.2 The agency uses the prescribed written notice for notifying the applicant of the result of the internal review, including provision of reasons.
- 1.3 The agency has a procedure for tracking the timeframes for internal review decision making.
- 1.4 The agency has a process in place to ensure internal review decisions are notified to the applicant within 20 business days from receipt of application.
- 1.5 Written notices of internal review decisions are provided to the applicants.

2. External Review and Compliance Notices

These questions will not be asked if you answered "No" to Gateway question 3 "Has this agency received notice that any RTI or IP External Review applications have been made regarding a decision of your agency"

- 2.1 The agency has a procedure to seek more time from the Information Commissioner to process the application if a deemed decision is being externally reviewed.
- 2.2 The agency understands that the onus is on the agency to show that the reviewable decision was justified.
- 2.3 The agency understands and meets its obligations to assist the Information Commissioner.
- 2.4 The agency routinely meets set timeframes in external reviews.
- 2.5 The agency understands and accepts its obligations to take any action required by a compliance notice issued under s158 of the IP Act.

D.9 Detailed requirements for adoption of privacy principles⁷

These questions are not required for Government Owned Corporations (GOCs)

1. General

- 1.1 Personal information handling practices have not raised concerns or resulted in the issue of any compliance notices.
- 1.2 Collection of personal information is appropriate.
- 1.3 Security safeguards for personal information are appropriate.
- 1.4 Processes are in place to ensure personal information held by your agency is as accurate as possible (e.g. clients can update their details via the agency's website, by telephone or in person, your agency audits information for completeness and accuracy, where possible data is corrected automatically, clients are contacted when issues are found, duplicate and redundant records are removed or archived).
- 1.5 The agency is open about its processes for collecting, using and disclosing personal information.
- 1.6 The agency use and disclosure of personal information is appropriate.
- 1.7 Privacy breaches and complaints are managed effectively.

2. Collection

- 2.1 The agency identifies why it is collecting personal information.
- 2.2 The agency provides a collection notice³⁶ to individuals from whom personal information is being collected.
- 2.3 The agency has determined how much and the kind of personal information it needs to collect.
- 2.4 The amount of personal information collected is no more than is necessary and relevant for the purpose for which it is required.
- 2.5 The agency collects personal information lawfully and fairly.
- 2.6 The agency has taken steps to ensure the information collected is accurate (e.g. collection forms are well designed and approved, questions are clear, staff are trained, procedures are consistent across the agency, help is available for clients that need it, source documentation is consulted where appropriate).

3. Security

- 3.1 Personal information held by the agency is protected against unauthorised access, use, modification or disclosure.
- 3.2 Personal information held by the agency is protected against loss or misuse.
- 3.3 The agency has adopted physical, technical and administrative safeguards to protect personal information.
- 3.4 Security safeguards are appropriate given the sensitivity of the information.
- 3.5 Processes are in place to record access to electronic records and datasets containing personal information.
- 3.6 Processes are in place to ensure that disposal of personal information does not allow unauthorised access.

³⁶ Note that the term 'collection notice' does not appear in the *Information Privacy Act 2009*. It is a generic term encompassing the obligation to make individuals generally aware of the facts listed in IPP 2.

4. Accuracy

- 4.1 Processes are in place for people to amend their personal information if it is incorrect.
- 4.2 Processes are in place to record when and where key personal information was collected, including when it was updated.

5. Openness

- 5.1 The agency makes information available about its personal information policies and procedures.
- 5.2 The agency tells people why it collects, how it uses and when it discloses their personal information at the time of collection.
- 5.3 There is a person that members of the public can contact about privacy issues.
- 5.4 The agency tells people how they can access and amend their personal information.
- 5.5 The agency provides details to the public of the categories of personal information it holds.
- 6. Use and disclosure
- 6.1 The agency uses information only for the purpose for which it was collected, unless an exception in IPP10 or NPP2 applies.
- 6.2 The agency discloses information only where the person was advised when it was collected unless an exception in IPP11 or NPP2 applies.
- 6.3 The agency has procedures in place to ensure that use or disclosure of personal information under IPP10, IPP11 or NPP2 is noted on the personal information where required.
- 7. Breaches and complaints
- 7.1 There is a documented process specifically for managing privacy breaches and privacy complaints. (If 'Y' or 'IP' skip 7.2)
- 7.2 There is a documented process for managing general complaints. (If 'Id' or 'N' skip 7.3 and 7.4)
- 7.3 This process is documented and available to agency officers.
- 7.4 This process, or a version of it, is available to the public.
- 7.5 There is a clear process for privacy complaint handlers to advise agency officers when practices that need changing are identified.
- 7.6 There is a clear process for agency officers to action changes to practices arising from complaints.
- 7.7 In the last two years your agency has received privacy complaints. (If 'N' skip 7.8 to 7.11)
- 7.8 Privacy complaint handling is timely.
- 7.9 Complainants are generally satisfied with the response given.
- 7.10 In the last two years privacy complaint handlers have advised agency officers that practices need to change. (If 'N' skip 7.11)
- 7.11 Approved reforms to agency processes identified by complaint handlers have been implemented.
- 7.12 There have been privacy breaches in the last two years. (If 'N' skip 7.13)
- 7.13 The same type of breach has occurred two or more times in the last two years.

8. Additional questions

8.1 The agency uses redaction technologies or would use redaction technologies as needed to assist in its decision making processes involving digital video recordings. (NB "Redaction technology" allows an original video to be electronically altered to remove specific items from the recording - for example, personal information such as an individual's face can be removed.)

(If your agency has not received any requests for digital video recordings please select 'Yes', 'In Progress' or 'Identified', depending on the current extent to which your agency has access to video redaction technology.)

- 8.2 The agency has adopted the privacy principles in its operation of fixed camera surveillance systems.
- 8.3 The agency has adopted the privacy principles in its operation of mobile camera surveillance systems, including body worn cameras, drones, iPads and smartphones.
- 8.4 The agency engages with the applicant, third parties, relevant business units and any other relevant stakeholders to explore options for providing information prior to making a decision on the access application.

You now have completed the audit. Do you have any final comments?