



OFFICE OF THE  
**Information  
Commissioner**  
QUEENSLAND

**Let's get digital: A review of online proactive  
disclosure practices by government agencies**

**June 2026**

**Report No. 3 to the Queensland Legislative Assembly for 2025–2026**

## Acknowledgement of Country

The Office of the Information Commissioner acknowledges Aboriginal and Torres Strait Islander peoples as the First Australians and recognises their culture, history, diversity and their deep connection to the land, waters and seas of Queensland and the Torres Strait.

We acknowledge the traditional custodians of the lands on which we operate and wish to pay our respects to their Elders past and present.



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June 2026

Mr Martin Hunt MP  
Chair  
Justice, Integrity and Community Safety Committee  
Parliament House  
George Street  
Brisbane Qld 4000

Dear Chair,

I am pleased to present a report to the Queensland Parliament titled, *Let's get digital: A review of online proactive disclosure practices by government agencies*, following a review under section 131 of the *Right to Information Act 2009* (Qld).

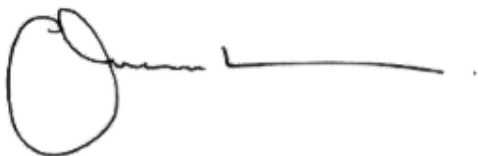
The Office of the Information Commissioner conducted a desktop review of Queensland government agencies to examine their use of websites, social media and digital tools to publish government-held information and promote openness in government in line with Parliament's intent as outlined in the *Right to Information Act 2009* (Qld).

The review identified that almost all of the 20 government agencies reviewed have a reasonable suite of proactive disclosure strategies. However, one third of agencies do not have adequate online practices to effectively support the community to navigate and access government-held information.

The report makes five recommendations to all Queensland government agencies to improve their online proactive disclosure practices and ensure the community is kept informed of government's operations, and information under the government's control is a public resource.

In accordance with subsection 184(5) of the *Right to Information Act 2009* (Qld), I respectfully request the report be tabled in the Legislative Assembly.

Yours sincerely



Joanne Kummrow  
**Information Commissioner**



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# Executive summary

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The *Right to Information Act 2009* (Qld) (**RTI Act**) reflects Parliament's intent that government-held information is a public resource and should be made available to ensure open government and enhance accountability, and to inform the community about the operations of government and increase public participation in democratic processes.<sup>1</sup>

While the RTI Act establishes a legal framework for public access to government-held information, at its core the Act intends that formal Right to Information (**RTI**) requests submitted to Queensland government agencies should be necessary only as a last resort. Rather the Act requires agencies to prioritise administrative release of information to the public, including proactive release.

## **Community expectations**

A community attitudes survey of Queenslanders found that 95% of participants consider the right to access government information is important or very important, and 91% agree that public access to government-held information is necessary to maintain transparency and accountability.<sup>2</sup>

From a community standpoint, timely and easy access to government-held information aligns with the reasonable expectation that, in a digital world, information should be publicly accessible via government websites and online tools. When government websites and online tools are well-designed and used to proactively release information, community members can 'self-serve' to find information about an agency's operations.

## **RTI requests increasing**

Between the financial years 2018–19 to 2023–24,<sup>3</sup> there was a notable 27% increase in the number of RTI requests lodged with Queensland government agencies.

While the specific factors contributing to this upward trend have not yet been fully analysed, it is evident that there is a growing demand within the community to exercise their right to access government-held information, particularly personal information. This increase in RTI requests places significant pressure on the limited resources of government agencies, which are required to process RTI requests within the statutory timeframe of 25 business days.<sup>4</sup>

When the rising demand for formal access to information is not able to be met with appropriate resourcing, delays in processing requests are likely to occur. Such delays can result in extended waiting periods for community members to obtain information requested.

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<sup>1</sup> Section 1 of the preamble to the RTI Act.

<sup>2</sup> Office of the Information Commissioner, *Information Access – Community Study Report*, (August 2025), pages 7 and 9, viewable at <https://www.oic.qld.gov.au>.

<sup>3</sup> The latest statistics about RTI applications are available in the *Right to Information and Information Privacy Annual Report 2023–2024*, viewable at <https://www.parliament.qld.gov.au/Work-of-the-Assembly/Tabled-Papers/docs/5825T1174/5825t1174.pdf>.

<sup>4</sup> Described in section 18 of the RTI Act, 'Meaning of *processing period*', which also describes specific circumstances for an additional period that can apply to an application.

In some cases, this may lead to deemed refusals, which can trigger external review processes and further prolong the time required until individuals can access government-held information.<sup>5</sup>

Public confidence and trust in government and its processes can be detrimentally impacted when individuals cannot access the information they need, when they need it.

### ***Committing to a culture of openness***

Proactive release of government-held information builds public trust and confidence and reduces the need for RTI requests. It also provides for more efficient and timely access by the community to information.

Agencies that proactively share non-personal information through their websites, rather than requiring individuals to request it via formal RTI requests, demonstrate a strong commitment to fostering a culture of transparency. This approach aligns with the objectives of the RTI Act and reflects Parliament's intent to promote open and accountable government.

### ***Putting openness into practice***

Putting this into practice involves government agencies taking the lead by proactively publishing information and data using online tools and platforms. In today's digital age, agency websites and social media platforms are efficient and effective tools for facilitating proactive disclosure, enhancing public trust and improving service delivery. Other mechanisms include publication schemes, disclosure logs and informal or administrative access schemes or procedures.

### ***Review of proactive release of information***

The Information Commissioner is responsible for monitoring compliance by Queensland public sector agencies with the RTI Act,<sup>6</sup> including the proactive release of information.

The review assesses the extent to which 20 Queensland government agencies across four sectors (government departments, hospital and health services, statutory authorities and local governments) are using online platforms to meet their obligations under the RTI Act and promote proactive disclosure. A list of the agencies reviewed is in **Appendix 1**.

## **Key findings**

Key findings from the review are based on a sample size of 20 Queensland government agencies across four sectors. Noting Queensland has a total of more than 240 agencies, the sample size provides an indicative picture of agency commitment and approaches to proactive release of information and their utilisation of online platforms. The key findings are summarised below.

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<sup>5</sup> If an agency does not process an application in time, including any additional period allowed beyond the 25 business days, the RTI Act 'deems' that the agency is taken to have decided to refuse access to the requested documents (section 46 of the RTI Act). Once a decision is deemed to be refused by an agency, the applicant can make an application to the Office of the Information Commissioner for an external review of the deemed refusal decision (section 85 of the RTI Act).

<sup>6</sup> Section 131 of the RTI Act.

## Overall performance

The review found that **63% of agency ratings** met or exceeded the expected minimum standard for proactive disclosure, with 8% demonstrating innovative or excellent practices. However, **37% of agency ratings** fell below the expected minimum standard, with 9% showing significant non-compliance with the RTI Act.

The **hospital and health service sector** performed the strongest, with 80% of ratings meeting or exceeding the minimum standard.

The **local government** and **statutory authority sectors** had the lowest compliance rates, with 56% and 52% of ratings meeting or exceeding the minimum standard, respectively.

## Leadership, culture and social media

Public sector and agency leaders play a key role in advancing the objects of the RTI Act, including creating an authorising environment for their agency to proactively and administratively release information.

The review identified that none of the 20 agencies reviewed demonstrated innovative or excellent practices in leadership commitment to proactive disclosure.

While **50% of agencies** met the expected minimum standard, 45% had significant gaps or shortfalls against expected standards.

Overall, the review found that agencies are underutilising social media as a tool to promote transparency and proactive disclosure of their agency's information and data.

## Publication schemes

The review found that **75% of agencies** have not updated their publication schemes to comply with the *Information Privacy and Other Legislation Amendment Act 2023* (Qld) (**IPOLA Act**) amendments to the RTI Act, which introduce new requirements for publication schemes from 1 July 2025.

Of the 20 agencies reviewed, **12 agencies** met the expected minimum standard, while **three agencies** failed to meet the standard, including one agency with no publication scheme available online.

## Disclosure logs

In relation to the use of disclosure logs, the review found that **70% of agencies** met or exceeded the expected minimum standard for disclosure logs, with one agency demonstrating innovative practices. However, **three agencies** lacked a disclosure log, while others had significant gaps, such as missing URL<sup>7</sup> links to documents or outdated entries.

## Administrative access

The review found that **75% of agencies** met or exceeded the expected minimum standard for administrative access arrangements, with five agencies demonstrating innovative practices. Although, the review identified that many agencies of the 20 agencies reviewed did not promote their administrative access arrangements effectively, missing opportunities to reduce reliance on formal RTI applications.

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<sup>7</sup> A URL (Uniform Resource Locator) is a web address used to locate specific resources on the internet.

## ***Right to Information webpages***

The review found that all 20 agencies reviewed had a Right to Information or RTI webpage, with **60% meeting or exceeding the expected minimum standard**.

Common issues identified by the review included outdated content, broken links, and inconsistent advice about legislative application processes.

The **department sector** performed best, while the **local government sector** had the most significant gaps.

## **Recommendations**

To address the identified gaps and improve agency compliance with the RTI Act, the Information Commissioner makes the following **five recommendations** to all Queensland public sector agencies:

### ***Recommendation 1: Leadership commitment***

Queensland public sector agency leaders within **12 months**:

- Communicate and promote transparency, proactive disclosure, and a commitment to the right to information through tailored online content, including websites, social media and annual reports.

### ***Recommendation 2: Publication schemes***

Queensland public sector agencies within **12 months**:

- Develop and publish an up-to-date and operable online publication scheme that complies with the current requirements of section 21 of the *Right to Information Act 2009* (Qld), as amended by the *Information Privacy and Other Legislation Amendment Act 2023* (Qld).
- Where online publication is not practicable, provide clear guidance on how the public can access the publication scheme.

### ***Recommendation 3: Disclosure logs***

Queensland public sector agencies within **12 months**:

- Review and revise their disclosure logs to ensure they are up-to-date, compliant with the *Right to Information Act 2009* (Qld), and include direct links to documents wherever practicable.

### ***Recommendation 4: Administrative access***

Queensland public sector agencies within **12 months**:

- Publish dedicated administrative access webpage content that:
  - Identifies and links to the types of information available through administrative access arrangements.
  - Incorporates online portals or interactive forms to facilitate access.
  - Includes direct contact details for community enquiries.

### **Recommendation 5: Right to Information webpages**

Queensland public sector agencies within **12 months**:

- Conduct a review of their online RTI content to ensure:
  - Compliance with the *Right to Information Act 2009* (Qld), including amendments introduced by the *Information Privacy and Other Legislation Amendment Act 2023* (Qld).
  - Links to RTI resources are appropriate for the agency and consistent.
  - Online pathways lead to a single, accurate and up-to-date source of information.

## **Conclusion**

This review highlights the critical role of online platforms in achieving the objectives of the RTI Act and fostering public trust in government. While many agencies meet the minimum standards for proactive disclosure, significant gaps remain, particularly in leadership commitment, publication schemes, and the promotion of administrative access arrangements.

Addressing these gaps will require a concerted effort across the Queensland public sector, including by public sector and agency leaders who can lead from the top in ensuring their agency adopts a culture of openness and transparency by creating an authorising environment for the proactive and administrative release of government-held information supported by well-designed online tools and practices.

By implementing the recommendations outlined in this report, Queensland public sector agencies can enhance their compliance with the RTI Act, improve service delivery and access to government-held information outside of the requirement to make an RTI application, and strengthen community confidence in government transparency and accountability.



# 1 Background

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The *Right to information Act 2009 (Qld) (RTI Act)* creates a legally enforceable right and promotes timely access to government-held information.<sup>8</sup> Queensland public sector agencies are required to release government information as a matter of course, unless there is a good reason not to.<sup>9</sup>

In our technologically enabled world, agency online platforms are a key tool to enable proactive release of information, and offer several benefits including resource efficiencies, service delivery and community engagement. Uncomplicated online access to information supports agency transparency and accountability. It improves community confidence and trust in government agencies.<sup>10</sup>

The Information Commissioner is empowered to monitor, audit, review and report on agency compliance with the RTI Act.<sup>11</sup> In a desktop review, the Information Commissioner can examine online practices, to assess compliance with the RTI Act, and whether agencies are addressing the objects of the RTI Act through good practice.

This review examines agency online platforms, including websites and social media, to assess the ease of finding and using online information.

Ten years ago, the Information Commissioner examined local government websites.<sup>12</sup> That review focused on agency compliance with legislative requirements, for example, use of publication schemes and disclosure logs. It found that approximately two thirds of local governments maintained publication schemes and disclosure logs online, with variable rates of compliance.

In 2018–19, the Information Commissioner obtained self-reported compliance assessments from all Queensland government agencies.<sup>13</sup> The report analysed agency progress in implementing the RTI Act and *Information Privacy Act 2009 (Qld)* across the 10 years since the legislation commenced. That review highlighted emerging trends and challenges. Worryingly, it found a decline in adoption of the push model to maximise disclosure compared to the previous self-assessment, as shown in **Figure 1**.

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<sup>8</sup> Section 3 of the RTI Act.

<sup>9</sup> Section 2 of the preamble to the RTI Act.

<sup>10</sup> Edelman Trust Institute, *2026 Edelman Trust Barometer: Global Report, Trust Amid Insularity*, (2026), viewable at [https://www.edelman.com/sites/g/files/aatuss191/files/2026-01/2026%20Edelman%20Trust%20Barometer%20Global%20Report\\_Final.pdf](https://www.edelman.com/sites/g/files/aatuss191/files/2026-01/2026%20Edelman%20Trust%20Barometer%20Global%20Report_Final.pdf).

<sup>11</sup> Section 131 of the RTI Act.

<sup>12</sup> Office of the Information Commissioner, *Desktop Audits 2014–16 Website Compliance with Right to Information and Information Privacy – Local Governments and Hospital Foundations*, (Report No. 1 to the Queensland Legislative Assembly for 2016–17), viewable at <https://www.oic.qld.gov.au>.

<sup>13</sup> Office of the Information Commissioner, *10 years on: Queensland government agencies' self-assessment of their compliance with the Right to Information Act 2009 (Qld) and the Information Privacy Act 2009 (Qld)*, (Report No. 5 to the Queensland Legislative Assembly for 2018–19), viewable at <https://www.oic.qld.gov.au>.

**Figure 1**  
**Key findings from 10 years of self-assessments**

### Adopting a push model to maximise disclosure

*Is information released proactively and informally and are formal applications a last resort?*



Source: Office of the Information Commissioner

Since that time, the Information Commissioner has continued to conduct reviews targeting specific online activities. The 2024–25 review *‘Responding to access requests for government-held information’* found that agency websites were critical tools to direct information access requests to the appropriate pathway:

*All government agencies could consider enhancing their websites to better assist people seeking information and enhance service delivery. For example, they could:*

- *set up clear pathways to direct people to information already published on the website*
- *provide administrative access in real time, for example release an extract from a database quickly and automatically*
- *develop an interactive portal for making a formal application for information.*<sup>14</sup>

That report also identified that strong leadership commitment to openness and transparency is vital to improving information access and outcomes for individuals and the community. Two recommendations were made to agencies about the effective use of websites and other online tools.

*The Information Commissioner recommends all Queensland public sector agencies:*

- 1. design, manage and monitor their approach to information management so that they:*
  - a. promote and embed a culture of openness, accountability and service delivery*
  - b. take a strategic and well-planned approach to information governance, for example by employing the principles of ‘Open by Design’ and ‘Privacy by Design’*
  - c. deliver a good service to the public in response to requests for information*

<sup>14</sup> Office of the Information Commissioner, *Audit Report: Responding to access requests for government-held information*, (Report No. 4 to the Queensland Legislative Assembly for 2024–25), page 24, viewable at <https://www.oic.qld.gov.au>.

- d. *comply with the requirements of the legislation.*
2. *maximise the use of proactive disclosure and have a process to direct requests for information to the most appropriate and streamlined pathway, for example online resources or systems, or administrative access arrangements, with formal applications for information as a last resort.*<sup>15</sup>

Other reviews have identified that to realise the objects of the RTI Act:

- administrative access arrangements should be well-designed, well-supported, efficient and part of everyday business operations<sup>16</sup>
- disclosure logs should be easy to find, easy to use, up-to-date and meaningful.<sup>17</sup>

## 1.1 Objective

The objective of this desktop review is to assess the extent to which a sample of Queensland government agencies representing four sectors are using their websites and other online platforms to proactively release and promote disclosure of government-held information and data.

The review uses a test program, similar to a checklist, to examine content and functionality of the websites and online tools of the agencies.

The number and sectors of agencies represented in this review are:

- five government departments
- five hospital and health services
- five statutory authorities
- five local governments.

A list of the 20 agencies reviewed is in **Appendix 1**.

The review assesses the agencies' online content and framework for:

- online expressions of commitment to the community's right to information and proactive disclosure in each agency's
  - website
  - selected agency social media platforms
  - latest annual report

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<sup>15</sup> Office of the Information Commissioner, *Review Report: Responding to access requests for government-held information*, (Report No. 4 to the Queensland Legislative Assembly for 2024–25), page 9, viewable at <https://www.oic.qld.gov.au>.

<sup>16</sup> Office of the Information Commissioner, *Administrative access to medical records Right to Information Act 2009 (Qld) and Information Privacy Act 2009 (Qld)*, (Report No. 2 to the Queensland Legislative Assembly for 2024–25), viewable at <https://www.oic.qld.gov.au>.

<sup>17</sup> Office of the Information Commissioner, *Disclosure logs – Queensland Government departments*, (Report No. 2 to the Queensland Legislative Assembly for 2020–21), viewable at <https://www.oic.qld.gov.au>. We generalise these findings to all online publications.

- compliance with legislative requirements for proactive disclosure tools, including publication schemes and disclosure logs
- good practice for proactive disclosure, including in online administrative access arrangements
- accurate and helpful advice about the right to information and formal access requirements under the RTI Act.

The review assesses whether information published online is easy to find, easy to use, up-to-date, meaningful and meets agencies' obligations under the RTI Act. The review also identifies points of comparison across sectors.

The assessment uses the ratings described below at **Figure 2**.

**Figure 2**  
**Agency online presence ratings**

Rating	Description
Features proactive disclosure by design	Is effective and optimised, with evidence of better-practice initiatives.
Incorporates proactive disclosure practices	Information is generally easy to find and use, up-to-date and useful – meets the expected minimum standard.
Includes elements of proactive disclosure	Has some elements of good practice, with significant gaps or shortfalls against expected standards.
Has limited proactive disclosure	No or negligible evidence of any of the expected practices, significant non-compliances.

Source: Office of the Information Commissioner

The *Incorporates proactive disclosure practices* rating is the expected minimum standard, and treated as a 'benchmark' standard equivalent to basic compliance.

The rating *Features proactive disclosure by design* reflects good practice initiatives where an agency has gone beyond minimum requirements.

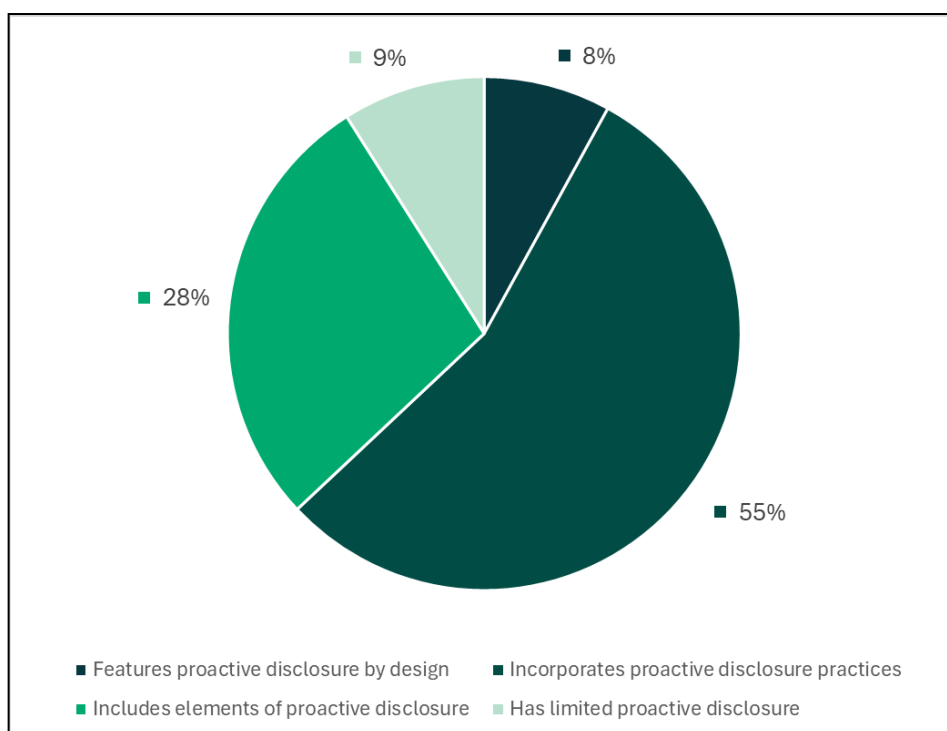
After completing the assessment, each agency received a scorecard describing the findings for the individual agency, and inviting comment. Seventeen out of twenty agencies responded. All respondents acknowledged or accepted the findings. Some agencies signalled how they propose to address the findings.

## 2 Overall aggregate and sector performance

### 2.1 Overall aggregate performance

Figure 3 below shows the overall aggregate performance ratings across the four sectors and five areas examined in the review.<sup>18</sup>

**Figure 3**  
**All agency performance across each area**



Source: Office of the Information Commissioner

Almost two thirds (63%) of all ratings for the agencies across each of the five areas reviewed are at the expected minimum standard (55%)<sup>19</sup> or better (8%).<sup>20</sup>

However, this means that over a third of agencies do not have adequate online practices in place to effectively support the community to navigate and access information.

In fact, 28% of agency ratings show some elements of good practice, but with significant gaps or shortfalls against expected standards.<sup>21</sup>

<sup>18</sup> Each of the agencies had five ratings – one for each area, for example the publication scheme. Each sector had a combined 25 ratings across their five agencies. Across the four sectors, there are 100 ratings in total across all areas and agencies reviewed.

<sup>19</sup> Rating: Incorporates proactive disclosure practices.

<sup>20</sup> Rating: Features proactive disclosure by design.

<sup>21</sup> Rating: Includes elements of proactive disclosure.

Of greater concern, for almost one tenth of agency ratings (9% or nine ratings), there is not sufficient evidence of agencies meeting expected minimum standards or there is evidence of non-compliance.<sup>22</sup>

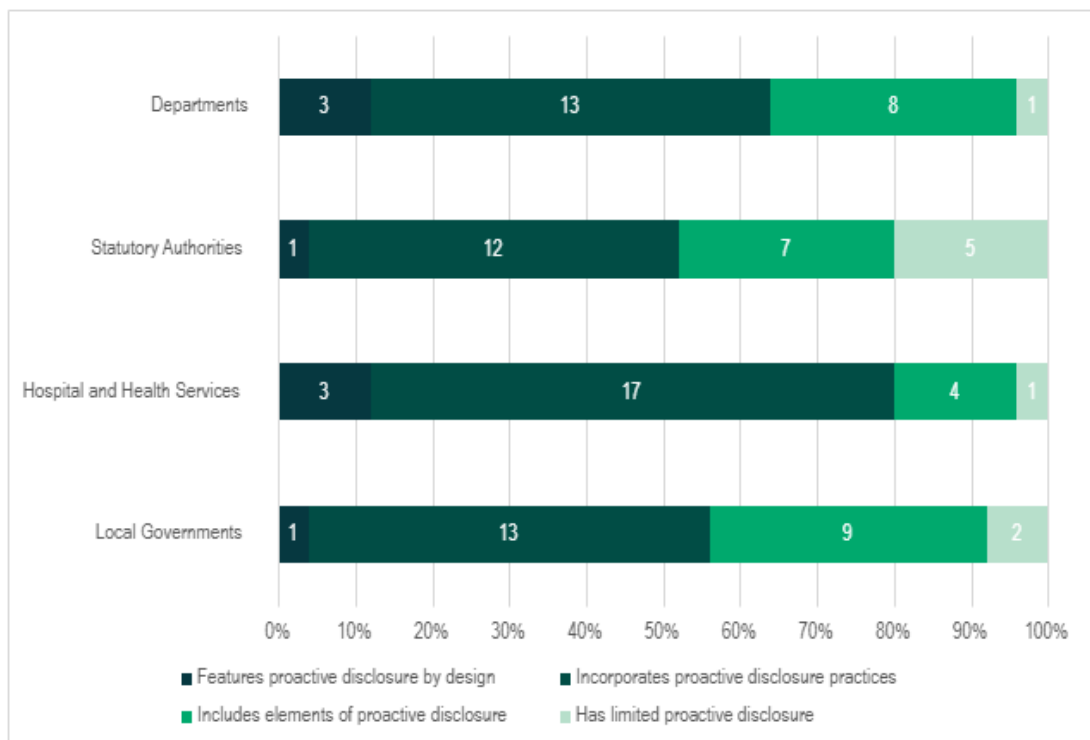
Although a significant majority (91%) of agency areas demonstrate at least some elements of good practice, too many agencies are not fully adopting the expected proactive disclosure processes.

All agencies should review practices and ensure their websites advance the legislative intent, by adopting proactive disclosure tools to optimise scarce public resources and provide effective information services.

## 2.2 Aggregate sector performance

**Figure 4** captures the number of ratings for each of the four sectors examined in the review. For example, the five departments have three ratings of *Features proactive disclosure by design* across the five areas assessed (three of the 25 ratings (12%) for departments are for innovative or excellent practices).

**Figure 4**  
**Aggregate sector performance**



Source: Office of the Information Commissioner

Some sectors perform better than others at using their websites and other online platforms to proactively disclose government-held information and data.

<sup>22</sup> One statutory authority was responsible for five of the nine ratings: Has limited proactive disclosure, that is, no, or negligible, evidence of standard practices or evidence of significant non-compliance.

The sector average does not necessarily equate to individual agencies having effective performance in some or any of the five areas examined in this review.

## Hospital and health services

The hospital and health service sector shows the strongest performance for the combined assessment areas. The sector has the equal highest number of ratings for *Features proactive disclosure by design* (three ratings), the assessment which recognises that the agency has gone beyond standard requirements to achieve innovative solutions or excellence in service delivery. Two of these three ratings are for administrative access.

The hospital and health service sector also has the highest number of this review's ratings for meeting expected minimum standards – *Incorporates proactive disclosure practices* rating (17 ratings). The sector has only one *Has limited proactive disclosure* rating, which is for one hospital and health service without a disclosure log on their website.

In total, 80% of the hospital and health service sector ratings (20 of 25 ratings) achieve the expected minimum standard or above.

## Departments

Like the hospital and health service sector, the department sector has three *Features proactive disclosure by design* ratings, which recognise that the agency has gone beyond expected minimum standard requirements to achieve innovative solutions or excellence in service delivery. One agency from the sector has two of these highest ratings.

The department sector has 13 ratings at the expected minimum standard. This means that 64% of the department sector ratings (16 of 25 ratings) are at the expected minimum standard or above.

However, the sector has nine ratings (36% of 25 ratings) below the expected minimum standard. Four of these ratings are *Includes elements of proactive disclosure* ratings for *Leadership, culture and social media*. The sector should review online practices, particularly to demonstrate agency leaders' commitment to proactive disclosure and right to information online.

## Local governments

The local government sector has ratings at the expected minimum standard or above for 56% of its ratings (14 of 25 ratings).

All five local governments have the lower rating *Includes elements of proactive disclosure* for their Right to Information webpages (five out of nine ratings lower than the benchmark are for Right to Information webpages.) These ratings are for activities with only some elements of good practice, and significant gaps or shortfalls against expected standards.

The local government sector has two ratings of *Has limited proactive disclosure*, meaning no or negligible evidence of any of the expected practices, or significant non-compliances.

These results suggest that the sector can make appreciable gains by reviewing their website access, use and content to strengthen proactive disclosure practices.

## **Statutory authorities**

Just over half of the ratings (52% or 13 of 25 ratings) for the statutory authority sector are at the expected minimum standard or above – marginally less than the local government sector. This means that 48% of ratings fall below the expected minimum standard.

The issue for this sector is the disparity between individual agencies. Due to the small sample size, two of the five agencies account for the low ratings for the sector overall.

The other three statutory authorities achieve the expected minimum standard or above for 80% of their ratings.

This sector would perform better if there was a consistent minimum standard of performance across all statutory authorities.

## 3 Leadership, culture and social media

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### 3.1 Introduction

Public sector leaders and heads of agencies play an important role in driving and shaping their agency's commitment, culture and practices in relation to right to information, proactive disclosure, and open government.

A public and visible commitment to transparency, open government and the right to information is an effective way to advance the objectives of the RTI Act. Leadership commitment influences agency posture on proactive disclosure of information, which ensures that factual, credible government-held information is available to the community.<sup>23</sup>

The Organisation for Economic Co-operation and Development (OECD) routinely conducts surveys to measure levels of trust in public institutions. In its report *Government at a Glance 2025*, it notes:

*Similarly, improved trust in the civil service is most strongly associated with improved perceptions of legitimate data use, fair treatment and public satisfaction with administrative services<sup>24</sup>*

This is an essential service for Australians, who believe the ability to identify misinformation is important, but are not confident that they can do so.<sup>25</sup>

Australians need sources of information they can trust.

An agency's website, annual report, public statements and social media presence provide agency leaders with tangible tools and opportunities to promote a commitment to the proactive release information and data.

The review examines agency social media; significant communication tools which can be used to proactively release information. The OECD reports:

*A 2023 study of 16 countries from around the world – all of which scheduled to hold elections within the subsequent year – found that 56% of internet users frequently use social media as their primary source of news, surpassing television at 44%<sup>26</sup>*

Strong leadership can improve service delivery for the benefit of Queenslanders and government agencies. If an agency demonstrates strong leadership that

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<sup>23</sup> Professor Peter Coaldrake AO, *Let the sunshine in: Review of culture and accountability in the Queensland public sector*, (Final report, 28 June 2022), page 27, viewable at <https://www.coaldrakereview.qld.gov.au/>.

<sup>24</sup> Organisation for Economic Cooperation and Development, *Government at a Glance 2025*, (2025), page 46, viewable at [https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/06/government-at-a-glance-2025\\_70e14c6c/0efd0bcd-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/06/government-at-a-glance-2025_70e14c6c/0efd0bcd-en.pdf).

<sup>25</sup> Western Sydney University, *Opinion: Less than half of Australian adults know how to identify misinformation online*, (14 April 2021), viewable at <https://www.westernsydney.edu.au/news-centre/stories/2021/opinion-less-than-half-of-australian-adults-know-how-to-identify-misinformation-online>.

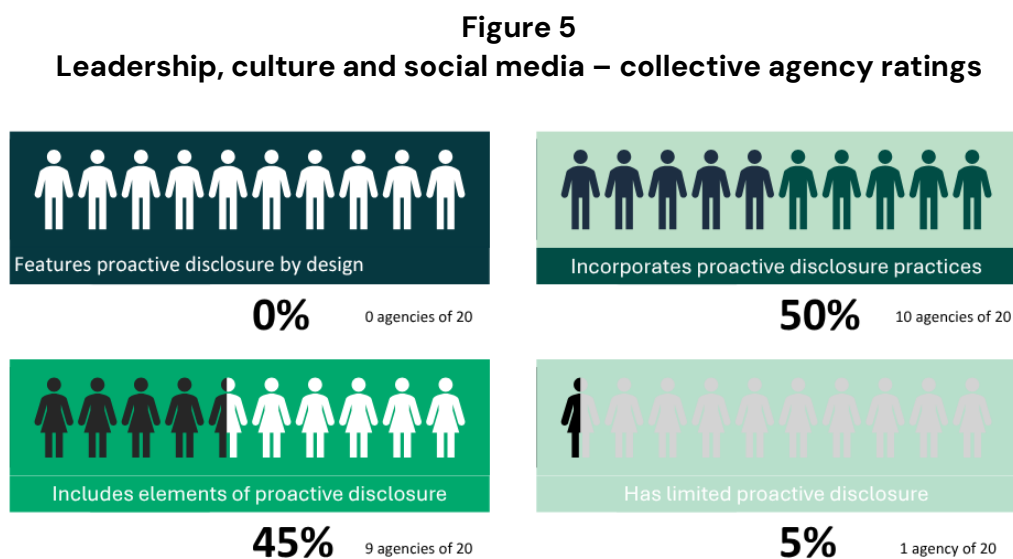
<sup>26</sup> Organisation for Economic Cooperation and Development, *Facts not Fakes: Tackling Disinformation, Strengthening Information Integrity*, (March 2024), page 30, viewable at [https://www.oecd.org/en/publications/facts-not-fakes-tackling-disinformation-strengthening-information-integrity\\_d909ff7a-en.html](https://www.oecd.org/en/publications/facts-not-fakes-tackling-disinformation-strengthening-information-integrity_d909ff7a-en.html). The Australian Election Study found similar results for Australia, reported in *Trends in Australian Political Opinion – Results from the Australian Election Study, 1987–2025* (November, 2025), page 8, viewable at <https://australianelectionstudy.org/>.

promotes an open and transparent organisational culture, this will be evidenced in the agency’s public commitments and digital presence. Such an approach also advances a ‘customer-centric’ mindset.

### 3.2 Findings

Leadership of proactive disclosure of information is the strategic, intentional, and cultural commitment by senior executives and managers to promote and communicate support for proactive release of government information. It is a cornerstone of open government, aimed at increasing transparency, accountability, and public trust while reducing the administrative burden of handling information.

**Figure 5** shows the ratings for the 20 reviewed agencies’ leadership commitment to online right to information and proactive disclosure.



Source: Office of the Information Commissioner

The review does not identify any online evidence of agency leaders going beyond the expected minimum standard, that is, visibly adopting innovative online practices or initiatives that demonstrate excellence in service delivery on their websites or online platforms (that is, there were no ratings of *Features proactive disclosure by design*).

Half of agency websites and online platforms met the expected minimum standard for consistent online messaging from agency leadership committing to and promoting proactive disclosure (ratings of *Incorporates proactive disclosure practices*).

Another 45% of agency websites have elements of leadership of proactive disclosure (ratings of *Includes elements of proactive disclosure*). One agency website demonstrates almost no leadership of proactive disclosure (a rating of *Has limited proactive disclosure*).<sup>27</sup>

Agency leaders should express a commitment to proactive disclosure online, as described in Recommendation 1.

<sup>27</sup> This is a statutory authority with limited ratings across the board.

### 3.3 Results



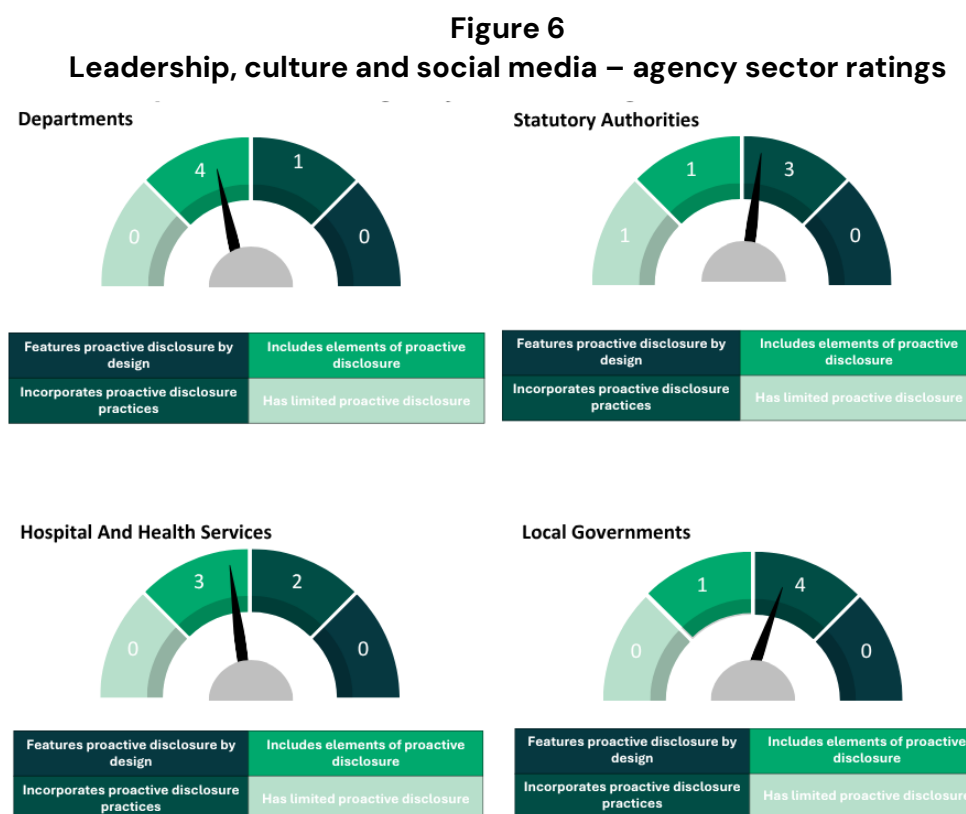
No agency achieved the highest available rating for visible online leadership of proactive disclosure which represents a missed opportunity.

While 50% of agencies achieve the expected minimum standard, this mostly occurs through agency webpages and annual reports.

The review found that agencies do not use social media to explicitly promote and commit to proactive disclosure generally or by the leaders specifically.

### Sector performance

Figure 6 shows the ratings for each sector.



Source: Office of the Information Commissioner

The local government sector performs the best overall in the *Leadership, Culture and Social Media* area, with four ratings of *Incorporates proactive disclosure practices*. The review finds this sector meets the expected standard for tailored strategic, intentional, and cultural commitment to proactive disclosure mechanisms and transparency concepts.

The local government and statutory authority sectors are the only sectors to achieve a majority of ratings at the expected minimum standard for visible online leadership of commitment to proactive disclosure. Department and hospital and health service sectors lag behind.

All sectors would benefit from lifting their online leadership commitment to proactive disclosure, in terms of building community trust and encouraging the agency to improve efficiency and effective delivery of information services.

## Agency performance

A robust proactive disclosure framework requires agency leadership to actively promote and drive the community's right to information. The review assesses the agency's online expressions of commitment to openness and transparency in each agency's website, selected social media platforms and latest annual report.

A majority of agencies provide a direct online commitment to right to information. Some agencies express this commitment with greater ownership, strength and clarity, for example, express it as an agency commitment to openness rather than as a government requirement they must meet.

Three quarters of the agencies demonstrate their online commitment to the community's right to information and proactive disclosure, for example:

*We're committed to being open and transparent and allow access to information held by our [agency].*

*You have a right to know how we work and what we do. Find out how you can access information that we hold.*

*Under the Right to Information Act 2009 (RTI Act), the [agency name] will provide access to documents it holds, unless, on balance, it is contrary to the public interest to provide that information.*

*The [agency name] is committed to providing open access to information about our services, activities and business operations in accordance with the Right to Information Act 2009 and the Information Privacy Act 2009.*

Some agencies provide a qualified commitment, describing the community's right to information as a principle adopted by the Queensland government that the agency must comply with. This does not demonstrate that agency leaders have internalised a commitment to a proactive disclosure culture within the agency.

The review also reports on whether agencies expressed commitment to proactive disclosure or principles of openness and transparency in annual reports and social media.

## Annual reports

Ten agencies (50%) express some connection to right to information or proactive disclosure in their annual reports. Two agency chief executives make broad commitments to transparency and accountability, one of these agencies also commenting in the body of the annual report. Eight agencies provide some comment in the body of the annual report about right to information related concepts, such as openness or transparency.

## **Social media**

All agencies use social media platforms, such as Instagram, LinkedIn, Facebook and YouTube. These platforms provide information to the community about the agency, and are used to promote, inform and educate the community about the agency's services.

The agencies do not use these platforms to promote or champion openness, transparency or proactive disclosure.

Agency leaders should consider how to tailor their promotional and educational material to embed messages of openness, access and community engagement online and in social media posts. This would promote community connection to the agency's commitment to transparency and accountability.

### **Recommendation 1: Leadership commitment**

The Information Commissioner recommends Queensland public sector agency leaders within **12 months**:

- Communicate and promote transparency, proactive disclosure, and a commitment to the right to information through tailored online content, including websites, social media and annual reports.



## 4 Publication schemes

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### 4.1 Introduction

The RTI Act requires agencies to publish a list of specific information about the agency and its activities (a **publication scheme**). This must be available to the community.<sup>28</sup> The legislation creates certainty about the location of information prescribed for inclusion by the RTI Act, for example, where to find information about an agency's functions.

The *Information Privacy and Other Legislation Amendment Act 2023 (Qld) (IPOLA Act)* has amended the publication scheme requirements in the RTI Act.

A publication scheme must now contain details about:

- the agency's structure and functions and how the agency's functions affect members of the public
- any arrangements that enable members of the public to engage with the agency's functions
- the types of information held by the agency
- the types of information the agency makes publicly available and how that information is made available
- procedures for asking for information, including, for example, any fee or charge that may be payable.<sup>29</sup>

These requirements significantly advance proactive disclosure and can reduce the administrative burden associated with handling formal access applications. As far as is reasonably practicable, the publication scheme must be on an agency website accessible by members of the public.<sup>30</sup> If it is not practicable to publish the scheme on the agency's website, the agency must advise the public how they can access the publication scheme.<sup>31</sup>

It is good practice for agencies to link from the publication scheme as directly as possible to significant and appropriate information published on the agency website.

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<sup>28</sup> Section 21 of the RTI Act.

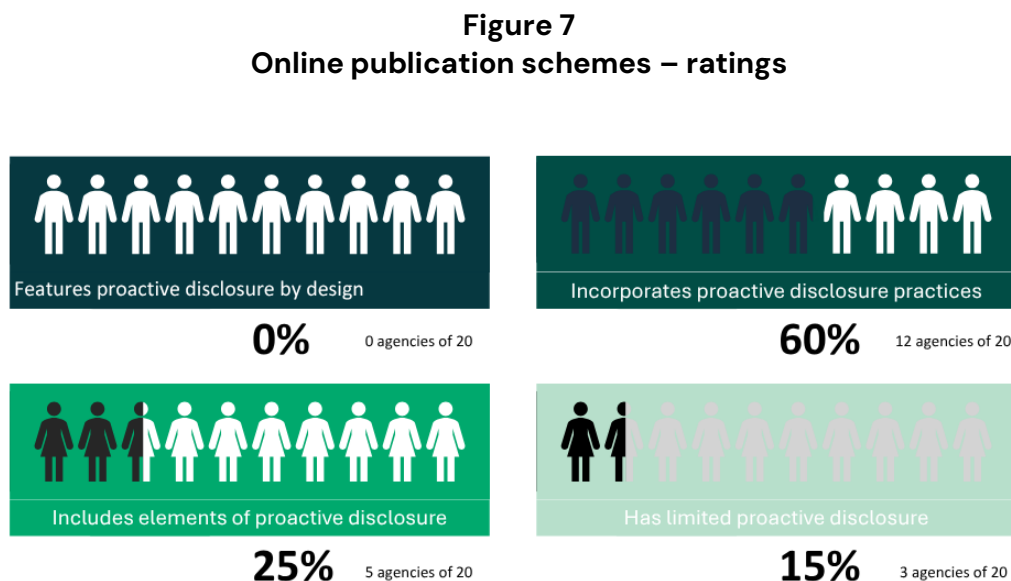
<sup>29</sup> Section 21(1) of the RTI Act.

<sup>30</sup> Section 21(2) of the RTI Act.

<sup>31</sup> Section 21(3) of the RTI Act.

## 4.2 Findings

Figure 7 shows the ratings for the 20 reviewed agencies' publication schemes.



Source: Office of the Information Commissioner

The ratings for this area are affected by agencies organising their publication schemes in accordance with statutory requirements that existed before amendments were made to section 21 of the RTI Act by the IPOLA Act (the review examines the specific question of how publication schemes are organised, and finds 75% of publication schemes are organised under the old headings).<sup>32</sup> These publication schemes do not address the current requirements for the content of publication schemes, and are not up-to-date.

There are examples of agencies meeting current legislative requirements apparently by default. For example, an agency might comply with the current requirement to describe its functions by including a description of its functions under one of the previously required headings.

Over half the agencies demonstrate meeting the expected minimum standard in this way (12 ratings of *Incorporates proactive disclosure practices*).

Five agencies have publication schemes which only include elements of proactive disclosure (five ratings of *Includes elements of proactive disclosure*).

Three agencies do not meet any of the expected standards (three ratings of *Has limited proactive disclosure*):

- one agency has a publication scheme which significantly fails to meet legislative requirements
- one agency website states it has a publication scheme which cannot be located online
- one agency website does not have a publication scheme.

<sup>32</sup> Ministerial Guidelines for the Operation of Publications Scheme and Disclosure Logs, made under previous sections 21, 78, 78A and 78B of the RTI Act, before IPOLA Act amendments.

All agencies should review current legislative requirements since the IPOLA Act amendments and ensure they publish a publication scheme which complies with the RTI Act, as per Recommendation 2.

### 4.3 Results



The IPOLA Act amends publication scheme requirements in the RTI Act. No agencies have explicitly updated their publication scheme to meet these new requirements. As a result, no agency achieved the highest available rating in this area.

Eighteen agencies have a publication scheme available through their website. Two agencies do not have an identifiable publication scheme on their websites.

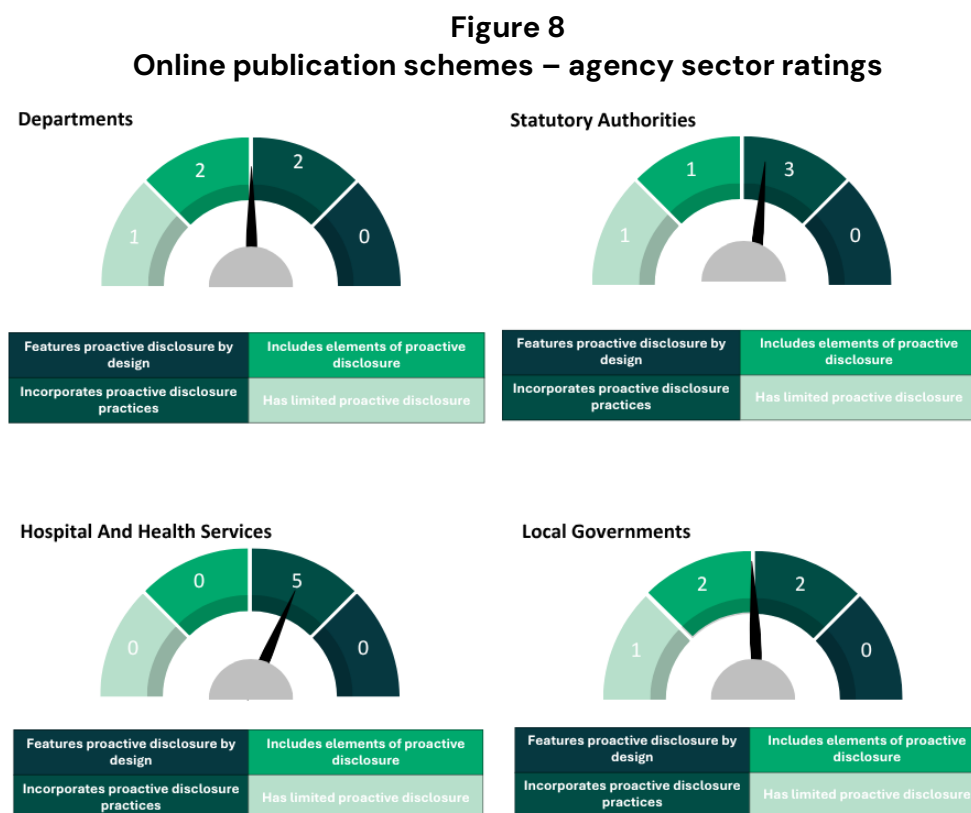
Of the agencies with publication schemes, twelve agencies publish publication schemes that incorporate proactive disclosure practices (ratings of *Incorporates proactive disclosure practices*).

Six agencies with publication schemes are not operating them to meet the expected minimum standard (five ratings of *Includes elements of proactive disclosure* and one rating of *Has limited proactive disclosure*).

The review reports on sector and overall agency performance.

### Sector performance

Figure 8 shows the ratings for the online publication schemes in each sector.



Source: Office of the Information Commissioner

The hospital and health services performed best overall, with each of the five agencies in this sector achieving a rating of *Incorporates proactive disclosure practices*.

The other three sectors performed largely the same with statutory authorities marginally ahead in collective performance. However, all sectors must do more to ensure they publish a publication scheme as required by the RTI Act.

## Agency performance

The critical issue shared by each of the agencies and sectors reviewed, which limited their performance and ratings, is that their publication schemes are out-of-date.

Fifteen out of 20 agencies organise their online publication schemes under all or some of the seven classes of information set out in superseded Ministerial Guidelines,<sup>33</sup> required before IPOLA Act amendments, and no longer applicable.

This suggests that agencies have not reviewed or revised the overall structure and content of their publication schemes since the legislative amendments came into effect on 1 July 2025. This explains why some specific information, which is now required by the RTI Act, is generally not published by the agencies or is difficult to locate.

For example, publication schemes are generally missing a readily identifiable description of the types of information held by the agency and whether or not the information is publicly available.<sup>34</sup> This omission misses an opportunity to assist members of the public to direct searches for information appropriately.

The review notes that positive ratings, where content is meeting current legislative requirements, seems to be achieved by default only, that is, where meeting the old requirements also satisfies the new requirements.

All agencies should review their publication schemes to ensure they meet the RTI Act's current legislative requirements, are up-to-date and meaningful.

The review found that the number of documents and information across the 20 agency publication schemes differs, with some providing access to considerably more documents than others.

There are other positive inclusions. More than three quarters of agencies have direct links to documents or PDF<sup>35</sup> attachments, making it easy to use and access documents. Often documents can be accessed in a variety of formats, promoting access, use and reuse. These and the availability and promotion of direct contact details further community and agency interaction. It builds and signals trust and shows agency initiative.

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<sup>33</sup> *Ministerial Guidelines for the Operation of Publications Scheme and Disclosure Logs*, made under previous sections 21, 78, 78A and 78B of the RTI Act, before IPOLA Act amendments.

<sup>34</sup> Section 21(1)(iv) and (v) of the RTI Act.

<sup>35</sup> 'PDF' stands for *Portable Document Format*, which is a document format designed to present and exchange documents reliably, independent of software, hardware, or operating system. It preserves fonts, images, and layout, making it the standard for sharing final documents, printing, and archiving.

Two agencies do not have a publication scheme. Of these, one agency makes no mention of a publication scheme, and one agency indicates that a publication scheme is available, but it cannot be located online. This presents a significant difficulty and confusion to the community. It does not promote proactive disclosure as the RTI Act requires.

All agencies have a statutory obligation to publish a publication scheme, and should do so in accordance with the RTI Act's requirements.

### Recommendation 2: Publication schemes

The Information Commissioner recommends Queensland public sector agencies within **12 months**:

- Develop and publish an up-to-date and operable online publication scheme that complies with the current requirements of section 21 of the *Right to Information Act 2009* (Qld), as amended by the *Information Privacy and Other Legislation Amendment Act 2023* (Qld).
- Where online publication is not practicable, provide clear guidance on how the public can access the publication scheme.



## 5 Disclosure logs

### 5.1 Introduction

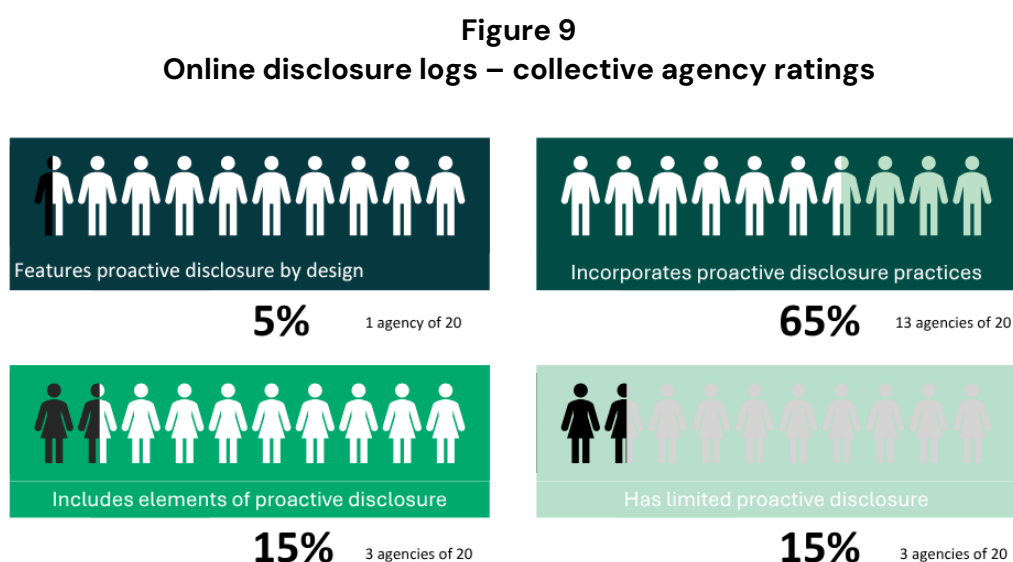
The RTI Act describes the information and features agencies may include in a disclosure log. This is an opportunity for agencies to give the community access to documents released under the RTI Act which do not contain the personal information of an applicant.

The rationale for disclosure logs is that if one person requests access to information which the wider community might be interested in, then publication of information released in response to that request reduces demand for further access requests for that same information.

An effective disclosure log should be easy to find, easy to use, up-to-date and useful. It should be well-populated and link directly to documents.

### 5.2 Findings

Figure 9 shows the ratings for the 20 agencies' online disclosure logs.



Source: Office of the Information Commissioner

Most agencies have a disclosure log available online.

One agency's disclosure log is effective and optimised. Thirteen agencies achieve the minimum expected standard. Collectively, 70% of agency disclosure logs are easy to find and use, up-to-date and useful.

The review finds that the better performing agencies share both website functionality and capability characteristics– that is, they are well designed and supported. Ultimately, these practices assist these agencies to further embed proactive disclosure practices to enable website users to access information easily, quickly, and freely.

Three agencies have some elements of good practice, but significant gaps and shortfalls. Three agencies do not have a disclosure log.

All agencies with a disclosure log should ensure it is up-to-date and complies with the RTI Act, as per Recommendation 3.

### 5.3 Results

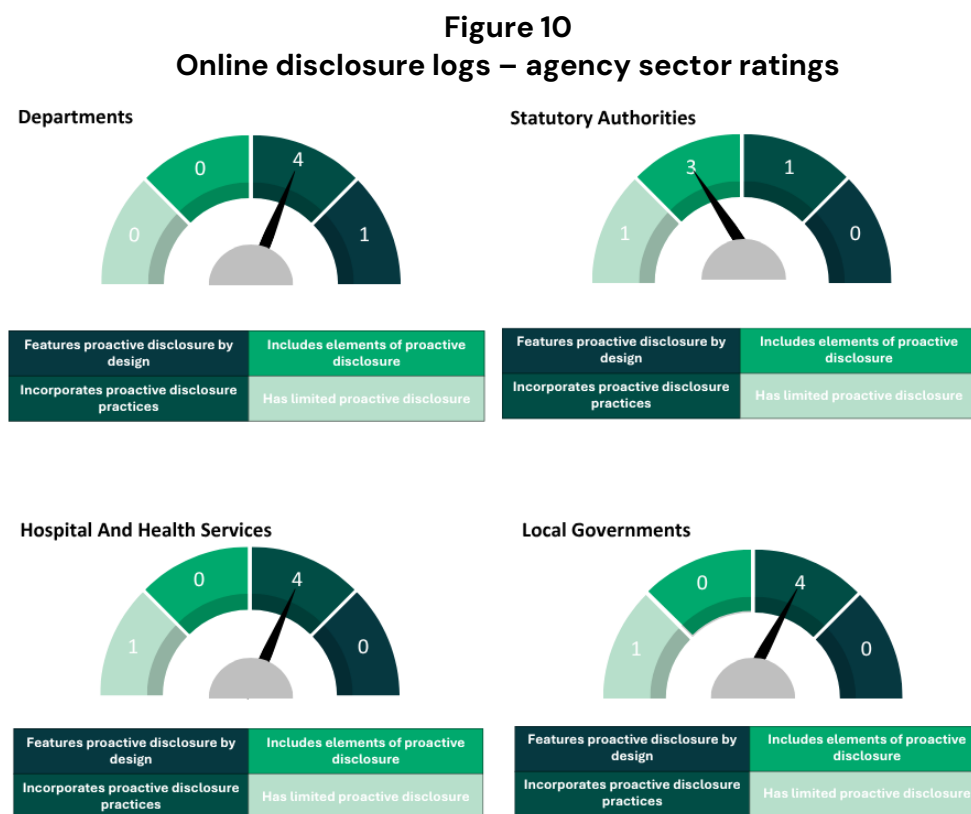


Seventeen agencies have a disclosure log on their website. Each are relatively easy to find and access, mostly through the agency’s Right to Information webpages.

The review reports sector and overall agency performance.

### Sector performance

Figure 10 shows the ratings for the online disclosure logs in each sector.



Source: Office of the Information Commissioner

The department sector performs best overall. One agency achieves the highest available rating – *Features proactive disclosure by design*. This disclosure log is well-described, has contact details, a comprehensive description of each entry and is well-populated. Four departments have ratings of *Incorporates proactive disclosure practices*.

The local government and hospital and health service sectors also demonstrate a majority of good practice characteristics. Statutory authorities show the lowest

levels of proactive disclosure through disclosure logs with significant gaps or shortfalls against expected standards.

## Agency performance

An explanation of the purpose of the disclosure log helps the community understand why disclosure logs are important and necessary. All seventeen agencies with disclosure logs online explain the purpose of the disclosure log.

Good disclosure logs also include details for members of the community to easily understand the nature and content of the documents being made available. They clearly explain how long information will remain on the disclosure log and what community members can do if they seek information already removed.

Some agencies do this better than others. For example, those with effective disclosure logs use simple and easy-to-understand language, outline what the disclosure log does, and advise what information can and cannot be disclosed.

Over three quarters of agencies with disclosure logs provide agency contact details for enquiries about the disclosure log or access to documents in it.

The review finds most disclosure logs to be well-populated. They contain a reasonable number of entries proportionate to the agency functions and the number of applications they receive.

However, less than half of the agencies with disclosure logs have links to documents. Wherever practicable, agencies should provide information on, or linked directly from, the disclosure log for efficiency and to support community self-service.

The review identifies other opportunities for government agencies to improve their disclosure logs' explanatory content:

- explain why blank pages may appear within released documents
- explain why information has been deleted from released documents or documents have been withheld from release
- update disclosure log 'status' recordings – the review found that many disclosure logs include details of the status of an application, for example, state that an application is 'ongoing'. This status appears for a considerable number of entries (including some dating back to 2023). This suggests the disclosure logs may be out-of-date or require review and maintenance.

Agencies should ensure their disclosure logs are up-to-date, helpfully presented, and make it easy for members of the community to access released documents for themselves, for example by directly linking to accessible documents whenever practicable.

### **Recommendation 3: Disclosure logs**

The Information Commissioner recommends Queensland public sector agencies within **12 months**:

- Review and revise their disclosure logs to ensure they are up-to-date, compliant with the *Right to Information Act 2009* (Qld), and include direct links to documents wherever practicable.

## 6 Administrative access

### 6.1 Introduction

Under section 19 of the RTI Act, an agency may make an administrative arrangement for access to documents.

Administrative access may be via an online portal, through registration to a service, through an online application process or any other structured process. If necessary and appropriate a fee can be charged for providing access to documents.

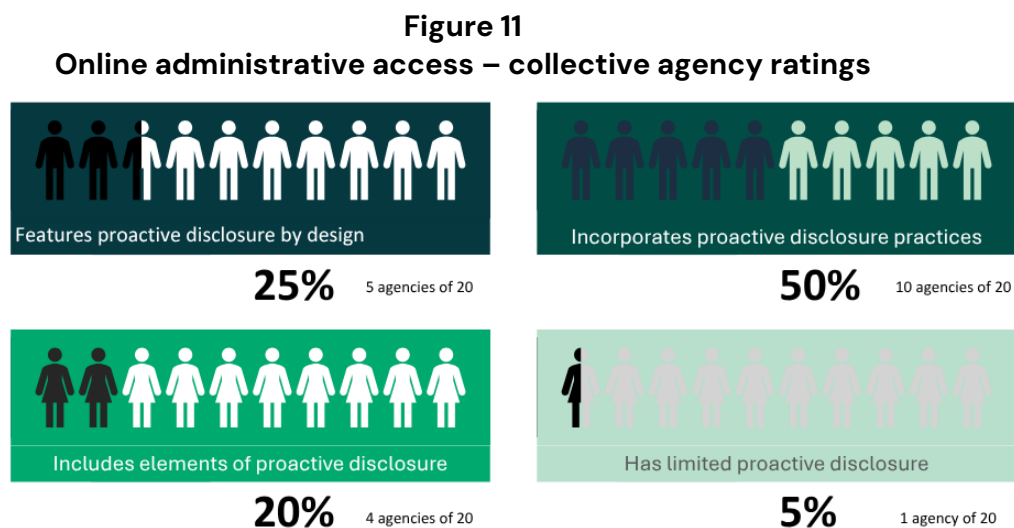
Administrative access arrangements need to be well-designed, and supported by an effective toolkit of policies and procedures for agency staff. An effective administrative access arrangement should be more efficient and timely than a formal application process under the RTI Act. It should be embedded in the everyday customer-service culture of the agency.

Online administrative access arrangements should be easy to find, easy to use, up-to-date and useful.

If an agency has an administrative access arrangement, for example, a portal to a self-service database, then the agency should recognise that as an administrative access arrangement and link to it from the *Right to Information* webpage. This promotes efficiency, for example promotes the use of the administrative access arrangement ahead of making a formal application for information under the RTI Act.

### 6.2 Findings

Figure 11 shows the ratings for the 20 reviewed agencies' online administrative access arrangements.



Source: Office of the Information Commissioner

Overall, most agencies have online administrative access arrangements that work effectively and assist the community to seek information. Agencies can do more to promote these administrative access arrangements to strengthen accessibility, use and effectiveness as a proactive disclosure mechanism under the RTI Act.

Five agencies, across all sectors, have content that is effective and optimised. They show evidence of better practice initiatives (ratings of *Features proactive disclosure by design*).

Half of the agencies have administrative access arrangements that are easy to find and use, up-to-date and useful (ratings of *Incorporates proactive disclosure practices*). All but one of the remaining agencies have elements of proactive disclosure (ratings of *Includes elements of proactive disclosure*).<sup>36</sup>

Although the review finds some good practice across agencies, most would benefit from increasing the prominence of their online administrative access arrangements.

By not making the administrative access arrangements highly visible on their websites, particularly from the Right to Information webpages, agencies forego the benefits of providing information more simply and efficiently than through a legislative application.

Most agencies could review, tighten and expand the description of their current administrative access arrangements to provide more detailed information as to documents that can be released administratively.

All agencies should consider whether advances in technology offer efficiency gains in the deployment of their administrative access arrangements, such as through portals, the use of chat bots, or alternative interactive forms.

Recommendation 4 is formulated to ensure agencies have strong and well promoted administrative access arrangements.

### 6.3 Results



The majority of agencies are providing administrative access in one form or another. Agencies do not always recognise their administrative access arrangements explicitly or consistently in their Right to Information webpages, missing an opportunity to promote these arrangements. While 16 agencies have a dedicated webpage, statement or arrangement about administrative access, approach and practice differ.

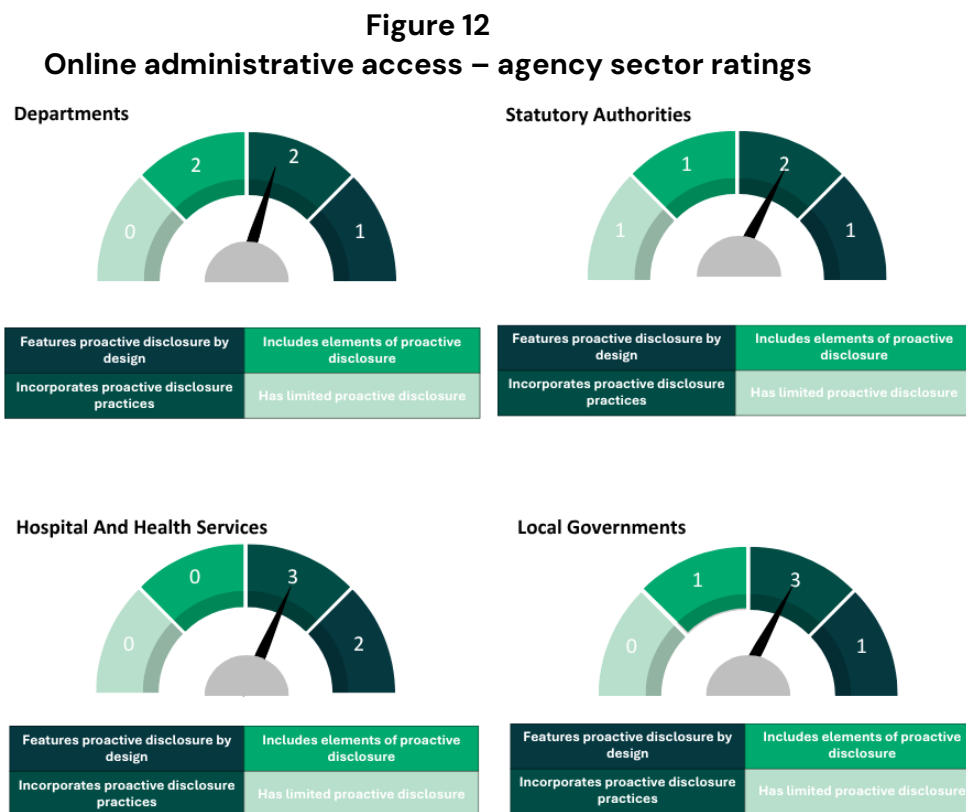
The review reports sector and overall agency performance.

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<sup>36</sup> The one agency with a rating of *Has limited proactive disclosure* is a statutory authority with limited ratings across the board.

## Sector performance

Figure 12 shows the ratings for the online administrative access arrangements in each sector.



Source: Office of the Information Commissioner

The hospital and health service sector performs well in the online administrative access arrangements area. It has two ratings of *Features proactive disclosure by design* and three *Incorporates proactive disclosure practices* ratings. The review finds that the hospital and health services sector meets or goes beyond standard requirements to achieve innovative solutions or excellence in service delivery. The initiatives include particularly clear signposting about ways to access information, and provision of information to support the community in accessing additional, related services.

The local government sector also performs well with 80% at or above the expected minimum standard.

The department and statutory authority sectors do not perform as well as hospital and health services or local governments. Online portals or interactive forms feature less prominently, as do visible and readily available contact details for the administrative access arrangements.

## Agency performance

Although most agencies offer some form of administrative access to documents, they are not necessarily simple and straightforward to locate as a proactive disclosure mechanism under the RTI Act.

Some agencies provide explicit and highly visible statements on their Right to Information webpages about administrative access arrangements. This is good practice. For example:

*Contact us if the information is not already available*

*We'll help determine if the information is accessible through an administrative release process, or we'll advise if you need to make an RTI request to access it.*

Other agencies are less proactive, with some comment on the website about the availability of online administrative access, but no link to the arrangements or information about how to access them from the Right to Information webpages.

Some agencies release documents in a manner consistent with administrative access under the RTI Act, but do not recognise this as an administrative access arrangement.

Overall, there is an opportunity for agencies to promote their administrative access arrangements more visibly on their websites, particularly from the Right to Information webpages.

Three agencies discuss and link to an administrative release policy. Such publicly available policies can assist the community to understand an agency's administrative access posture. However, to be effective and useful, it must be up-to-date. The reviewed policies are out-of-date.

The review finds that ease of use in many cases depends on the administrative access mechanism or platform agencies use or promote.

Good use and promotion of administrative access to information helps build trust. The 2025 cross jurisdictional study by Australian Information Access Commissioners revealed that 50% of Queenslanders are not confident that government will give them access to information about how decisions are made.<sup>37</sup> Agencies can use administrative access arrangements to facilitate easy and fast access to information, and hence increase community confidence in government.

Agencies should clearly describe documents available through administrative access. The review finds almost half the agencies do not promote, describe or set out online the types of documents that may be available for members of the community to access administratively on the Right to Information webpages. Just over half of all agencies do this to some extent.

Agency webpage content would be improved by providing a centralised list, for example on one of its Right to Information webpages, of the types of information that may be available through administrative access arrangements and links or access points to trigger access.

Over half of the agencies provide an online portal or interactive form for users to request access to certain types of documents. Where this is possible and

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<sup>37</sup> Office of the Information Commissioner, *Information Access – Community Study Report*, (August 2025), page 13, viewable at <https://www.oic.qld.gov.au>.

appropriate, online portals or interactive forms support self-service, which is efficient for agencies and community members.

Just over half of all agencies provide clear contact details for the community to request or find out about administrative access arrangement options. Direct and relevant contact details are critical to ensuring that the community can benefit from an agency's administrative access arrangements. All agencies should ensure that appropriate contact details for administrative access arrangements are available and visible.

Agencies should make better use of arrangements for administrative access to information to maximise their efficiency in responding to requests for information, and to provide a customer-focused information service.

#### **Recommendation 4: Administrative access**

The Information Commissioner recommends Queensland public sector agencies within **12 months**:

- Publish dedicated administrative access webpage content that:
  - Identifies and links to the types of information available through administrative access arrangements.
  - Incorporates online portals or interactive forms to facilitate access.
  - Includes direct contact details for community enquiries.



## 7 Right to information webpages

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### 7.1 Introduction

A government website is an opportunity to publish information proactively and direct members of the community to easy, accessible and effective pathways to information or documents.

A website can use a Right to Information webpage as a hub for pathways to:

- proactive disclosure tools, such as a publication scheme, a disclosure log, or a webpage on the agency's website
- advice about how to contact the agency for help
- administrative access arrangements
- making a legislative application under the RTI Act to access information.

Under the RTI Act, government agencies must release information administratively as a matter of course, unless there is a good reason for not doing so. An agency's Right to Information webpage or webpages can promote administrative access to information ahead of the formal application process so that formal right to information applications are necessary only as a last resort.

However, even if other procedures are easier and quicker, a member of the community can choose to make a legislative application at any time. Queensland government agencies should describe the application process on their websites, with clear guidance about procedures, costs, timeframes and information access rights, such as the right to seek review of an agency decision about access to information.

An agency's Right to Information webpage can provide this guidance and information and should be easy to find, easy to use, current and relevant.

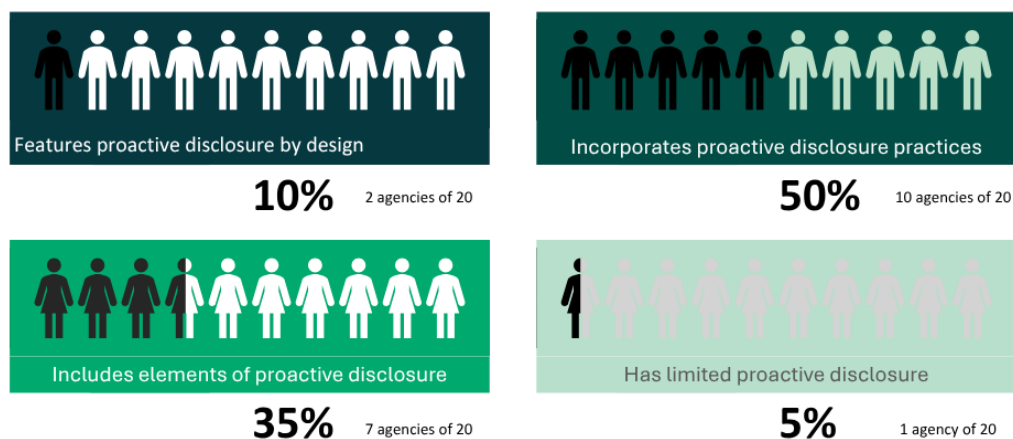
### 7.2 Findings

All reviewed agencies' websites have a Right to information webpage or webpages.

Overall, the majority of agencies' Right to Information webpages achieve the expected minimum standard or above. Many provide multiple pathways to information about right to information, including from the agency website footer. Many also include easy and effective navigational links to other information access pathways, such as the agency's publication scheme, disclosure log and information about administrative access arrangements. Content is largely useful and accurate.

Figure 13 shows the ratings for the 20 reviewed agencies' RTI web pages.

**Figure 13**  
**Right to information webpages – collective agency ratings**



Source: Office of the Information Commissioner

Two agencies have content that is effective and optimised. Their Right to Information webpages are easy to find, use, up-to-date and useful. They show evidence of better-practice initiatives (ratings of *Features proactive disclosure by design*).

Ten agencies' Right to Information webpages incorporate proactive disclosure practices (ratings of *Incorporates proactive disclosure practices*). Their Right to Information webpages are often prominently located and easy to find and use, up-to-date and useful. They incorporate proactive disclosure practices. All but one of the remaining agencies have elements of proactive disclosure (ratings of *Includes elements of proactive disclosure*).<sup>38</sup>

Improvement opportunities include:

- updating Right to Information webpage content to reflect and comply with the IPOLA Act amendments
- more readily promoting informal access to information pathways and doing so explicitly
- strengthening content and accuracy about the formal RTI Act application process
- ensuring that any links to online application portals are appropriate, for example, ensuring that any links to online application forms go to a form that an applicant can use to make an application to the agency.<sup>39</sup>

Recommendation 5 addresses these improvement opportunities for agencies.

<sup>38</sup> The one agency with the lowest rating is a statutory authority with low ratings across the board.

<sup>39</sup> For example, the *Right to Information Online Access Application Form*, accessible from <https://www.smartservice.qld.gov.au/services/information-requests/apply.action>, can only be used to make an application to a Department, Minister's Office or specified business unit or entity. An agency should not link to this form if they are not listed.

## 7.3 Results

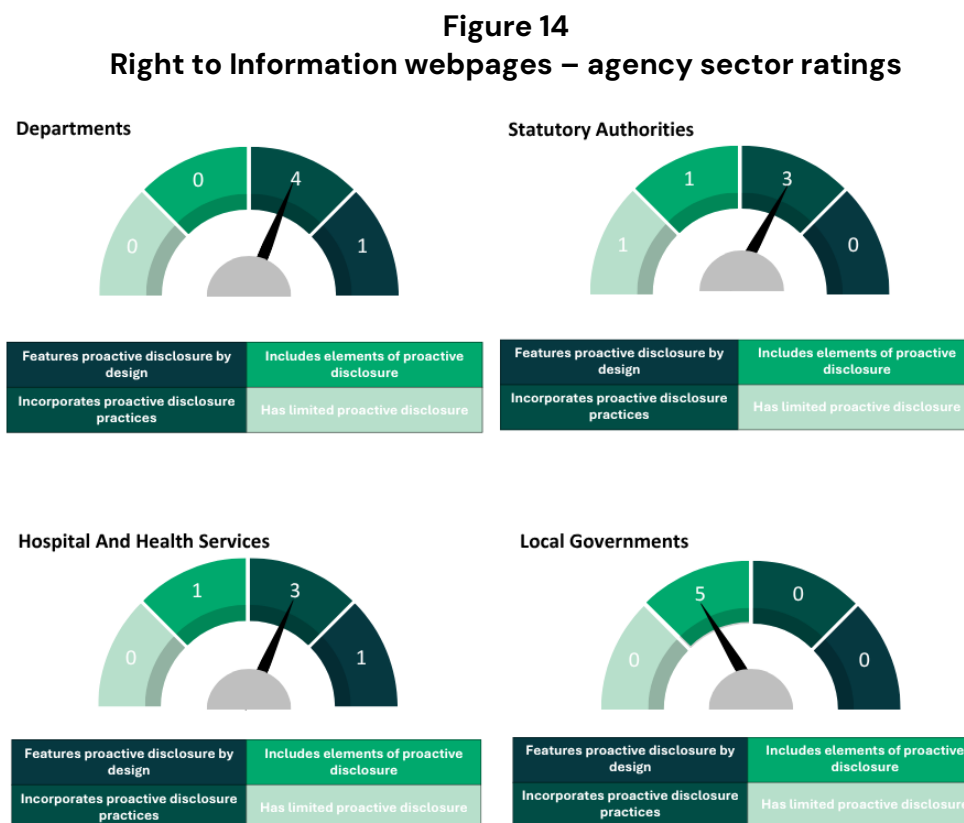


All 20 agency websites reviewed have right to information content. This consists of one or more dedicated webpages about access mechanisms, such as publication schemes, disclosure logs, administrative access or formal application pathways.

The review reports sector and overall agency performance.

### Sector performance

Figure 14 shows the ratings for Right to Information webpages in each sector.



Source: Office of the Information Commissioner

The department sector performs well in the area of Right to Information webpages. All departments in the sector perform to the expected minimum standard or better. The sector has one rating of *Features proactive disclosure by design* and four ratings of *Incorporates proactive disclosure practices*. This shows evidence of better and more consistent practice than other sectors.

The hospital and health service sector also performs reasonably well. All but one agency in the sector is rated above the expected minimum standard.

The statutory authority sector is less consistent. The majority rate above the expected minimum standard. However, two agencies require significant improvement to their Right to Information webpages, one critically, to reach an acceptable standard.

Local governments perform least favourably overall with respect to their Right to Information webpages. The sector shows some elements of good practice, but with significant gaps or shortfalls against expected standards.

## Agency performance

The review finds that 85% (17 out of 20) of agency Right to Information webpages are easy to find and access. There is often a prominent link to Right to Information webpages from within the website's main menu page or through the website footer, or both. Having multiple pathways strengthens the community's ability to find and access information on the agency's website.

Three quarters of agency's Right to Information webpages are easy to use. Often, these Right to Information webpages have clear signposts that make navigation simple, and make it easy to effectively choose an access pathway.

Most agencies (approximately 75%) have at least some information on their Right to Information webpages that promotes or mentions other access pathways before a formal application process. The review finds that those with good advice actively and explicitly encourage people seeking information to contact the agency to ask about options for access to information. The stronger Right to Information webpages include dedicated contact options and links to administrative access options.

More than three quarters of the agencies provide some detail about right to information and what it means. However, there are gaps that weaken agency platforms. For example, over half of all agencies' Right to Information webpages are out-of-date, have not been reviewed for some time, or have broken links to external sources or documents.

There is also an issue with consistency, detail, accuracy and completeness of Right to Information webpages, particularly with respect to making a legislative application. For example, IPOLA Act amendments to the RTI Act and *Information Privacy Act 2009* (Qld) mean all applications, for personal and non-personal information, are now made under the RTI Act.

Several agencies have incorrect advice to users about applications for personal information such as:

*If you are seeking documents that contain your personal information, then apply under the IP Act.*

This suggests that agencies are not consistently updating content to reflect legislative requirements.

Efficient and effective handling of information access applications relies on clear and accurate resources and advice. It must be useful and meaningful and explain to the community the application process, review rights, timeframes and costs. Links to application forms should work properly and assist an applicant to make an application. When these are not in place it increases demand on agencies as community members make enquiries and submit applications incorrectly, requiring additional handling.

The review finds that almost all agencies have some information about formal application processes.

Two agencies have content about legislative applications that is effective and optimised. They show evidence of better practice initiatives. Their Right to Information webpages provide excellent explanations about the application process. They have links to resources that are helpful, correct and accurate. Critically, they also have appropriate contact details for users.

However, other agency Right to Information webpages have issues that reduce or limit their effectiveness in one or more of these ways:

- other ways to access information are not consistently and meaningfully promoted to the community ahead of the formal application process so that formal right to information requests are necessary only as a last resort
- Right to Information webpage content does not reflect current legislative settings
- information is not always present, accurate, substantive and up-to-date about the application process, cost, timeframes, review rights and links to legislation
- agencies do not always link to the *Online RTI Application*<sup>40</sup> and the PDF *Right to Information Access Application Form* appropriately and accurately, for example, the online application form is not usable for every agency and yet some agencies for whom it is inoperable still link to the online form
- Right to Information webpages do not always publish dedicated contact details for business units responsible for the agency's right to information processes.

The review identifies the need for agencies to ensure that they give solid advice about information access pathways.

For example, the hospital and health service sector uses several additional sources of information for right to information and information privacy. These include websites from:

- individual hospital and health services
- Department of Health
- Office of the Information Commissioner
- whole-of-government right to information
- Smart Services Queensland.

The hospital and health service sector have managed these multiple sources in different ways, including relying on other websites to provide relevant information about right to information and information privacy, such as information about fees and charges.

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<sup>40</sup> Queensland Government, viewable at <https://www.smartservice.qld.gov.au/services/information-requests/apply.action>.

It may be efficient to rely on a non-hospital and health service sector website for generic information that is regularly updated, such as fees and charges.

However, generic links may not be appropriate for all topics, particularly if the website has both generic links and specific links for the same area.

Having multiple pathways and links creates a risk that applicants will be directed to multiple sources of information, which may not be consistent, and may be confusing or misleading.

For example, the review identifies hospital and health services with pathways to information about how to make an application in the body of the website and website footer.

These pathways sometimes lead to different procedural advice within the one website about how to make an application. For example, the body of the webpage might direct an applicant to the hospital and health service while the footer might direct an applicant to Queensland Health. An applicant following incorrect advice might experience delay while the procedure is corrected, for example, while the application is transferred from Queensland Health to the hospital and health service.

All Queensland public sector agencies should review and update their Right to Information webpages and ensure that all online pathways to specified information lead to one source of information, providing appropriate and up-to-date information.

#### **Recommendation 5: Right to Information webpages**

The Information Commissioner recommends that all Queensland public sector agencies within 12 months:

- Conduct a review of their online RTI content to ensure:
  - Compliance with the *Right to Information Act 2009* (Qld), including amendments introduced by the *Information Privacy and Other Legislation Amendment Act 2023* (Qld).
  - Links to RTI resources are appropriate for the agency and consistent.
  - Online pathways lead to a single, accurate and up-to-date source of information.

## 8 Appendices

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## 8.1 Appendix 1 – Agencies reviewed

The review examined 20 Queensland government agencies:

- five government departments
- five hospital and health services
- five statutory authorities
- five local governments.

The agencies are listed below in **Figure 15**.

**Figure 15**  
**Reviewed agencies**

<b>Departments</b>
Customer Services, Open Data and Small and Family Business
Environment, Tourism, Science and Innovation
Natural Resources and Mines, Manufacturing and Regional and Rural Development
Primary Industries
State Development, Infrastructure and Planning
<b>Hospital and health services</b>
Wide Bay Hospital and Health Service
Townsville Hospital and Health Service
Darling Downs Hospital and Health Service
South West Hospital and Health Service
Children's Hospital Service
<b>Statutory authorities</b>
Racing Queensland
Residential Tenancies Authority
SEQWater
Electoral Commission of Queensland
Queensland Performing Arts Centre

<b>Local governments</b>
Cairns Regional Council
Longreach Regional Council
Mount Isa City Council
Gympie Regional Council
Tablelands Regional Council

## 8.2 Appendix 2 – Review methodology

Agencies were selected for review based on five criteria.

The first was the agencies' risk scores, a quantification of the likelihood of agencies failing to comply with the *Right to Information Act 2009* (Qld).

The Information Commissioner maintains a list of all Queensland public sector agencies, assigned a risk score based on their size, the number of legislative applications the agencies receive each year, the extent to which their decisions are reviewed and other indicators of enhanced risk such as a high percentage of withdrawn applications or decision-making out of time. The review considered agencies with a higher risk score.

The selection of agencies to be reviewed involved consideration of the following factors:

- **Risk scores** – higher risk agencies were prioritised.
- **Size** – aiming for agencies across sectors to be within a similar size range for comparability.
- **Functions** – aiming for agencies with a similar mix of personal and non-personal transactions as much as possible.<sup>41</sup>
- **Location** – ensuring a mixture of **urban and regional** agencies.
- **Recent engagement** – the agency had not been the subject of a **recent review, audit or investigation** by the Information Commissioner.

The Information Commissioner has a standard 'test program', which is a list of:

- legislative obligations, such as the requirement to have a publication scheme
- indicators of good practice, such as the positioning of information on the Right to Information webpage to promote informal access to information pathways ahead of legislative applications.

The Information Commissioner publishes two checklists on the Office of the Information Commissioner's website which capture the items in the test program, enabling agencies to self-assess.

The review examined each agency's website, and looked for evidence to assess the extent to which the website addresses the items in the test program.

The review examined agency annual reports to identify any mentions or promotions of right to information, transparency or openness.<sup>42</sup>

The review searched agency social media platforms, including Facebook, Instagram, TikTok, X, LinkedIn and YouTube and assessed the extent to which right to information, openness and transparency are mentioned or promoted online.

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<sup>41</sup> Hospital and Health Services are an exception as they necessarily deal almost entirely with personal information.

<sup>42</sup> The review looked at the 2023-24 annual report, to enable comparison with the latest annual statistics about RTI applications.

Each item in the test program was assessed according to objective criteria.

Each agency ended up with five ratings, one for each area reviewed:

- leadership, culture and social media
- publication scheme
- disclosure log
- administrative access
- Right to Information webpage.

These ratings were on a four point rating scale.

- **Features proactive disclosure by design** – this rating recognises initiatives that are innovative or demonstrate a level of excellence. It is the highest possible rating.
- **Incorporates proactive disclosure practices** – this rating represents website features that meet legislative requirements for compliance or expected minimum standards of practice.
- **Includes elements of proactive disclosure** – this rating is applied to websites that have some expected features, and some significant gaps or shortfalls.
- **Has limited proactive disclosure** – this rating is applied where the website is non-compliant, does not meet or barely meets any of the expected standards.

Ratings were aggregated across each of the sectors and agencies reviewed.



