Office of the Information Commissioner
Queensland

Communication, Engagement and Training

Strategy

2020–2022

Purpose

The Communication, Engagement and Training (CET) Strategy has been developed to assist staff across the organisation make decisions and allocate resources in order to accomplish key service objectives. Our approach contains a set of guiding principles that define the action staff can take and the things they should prioritise in order to achieve the desired outcomes.

Background

As we strive to build trust through transparency, our decisions and actions affect our stakeholders. Engaging effectively with them to increase understanding about us, why we exist, how we can support them and why right to information (RTI) and information privacy (IP) is so important helps us to operate more effectively and efficiently. In turn, this leads to a more informed and aware public service that values RTI and privacy; and agencies that seek to improve practices, make better decisions and uphold transparency and accountability. This helps to build trust and confidence in government. On top of this, implementing an effective CET strategy has positive flow-on effects to other business areas within the Office of the Information Commissioner (OIC) as well, such as service delivery to agencies and the community.

While all four OIC strategic pillars underpin our CET strategy, two are particularly relevant:

- Maximising Effectiveness
- From regulator to enabler

Like many organisations, we work in a climate of increasing expectations and change, notwithstanding the current challenges of a global pandemic.

As a small office with limited resources, we face additional challenges to create the desired impact and behavioural change on our stakeholders who, in turn, also have their own pressures and priorities. Looking to the future, we must continue to harness new technology and explore innovative new approaches for engaging with stakeholders and creating sustainable change.

Scope

We are an independent office, with statutory functions that include:

- promoting awareness and understanding of the RTI and IP Acts in the community and Queensland government agencies, including by providing training and education programs
- providing guidance on the interpretation of the *Right to Information Act 2009* (RTI Act) and *Information Privacy Act 2009* (IP Act)
- as well as review, audit and complaint management responsibilities under the RTI and IP Acts.

Our stakeholders are diverse, from individual members of the community and community organisations, to government agencies (including departments, hospital and health services, local governments, universities and other public authorities) and Ministers.

We operate in a broader regulatory and policy environment that is complex and evolving at local, national and international levels.

Objectives

- Enable agencies to release information proactively or administratively in a privacy respectful way.
- Encourage public service agencies to foster work cultures that value information access and privacy rights.
- Enable the community to understand their information access and privacy rights through simple and meaningful messaging.
- Utilise contemporary practices to deliver effective, efficient and targeted activities that support our service objectives.
- Undertake a whole-of-organisation approach to our CET activities in order to maximise resources and efforts.
- Use consistent messaging and branding that reflects a professional independent authority focused on information access and privacy rights and responsibilities.
- Leverage key partnerships to strengthen messaging and maximise reach and influence with stakeholders.
- Deliver accessible training in various formats that address identified issues and emerging trends.

Our approach
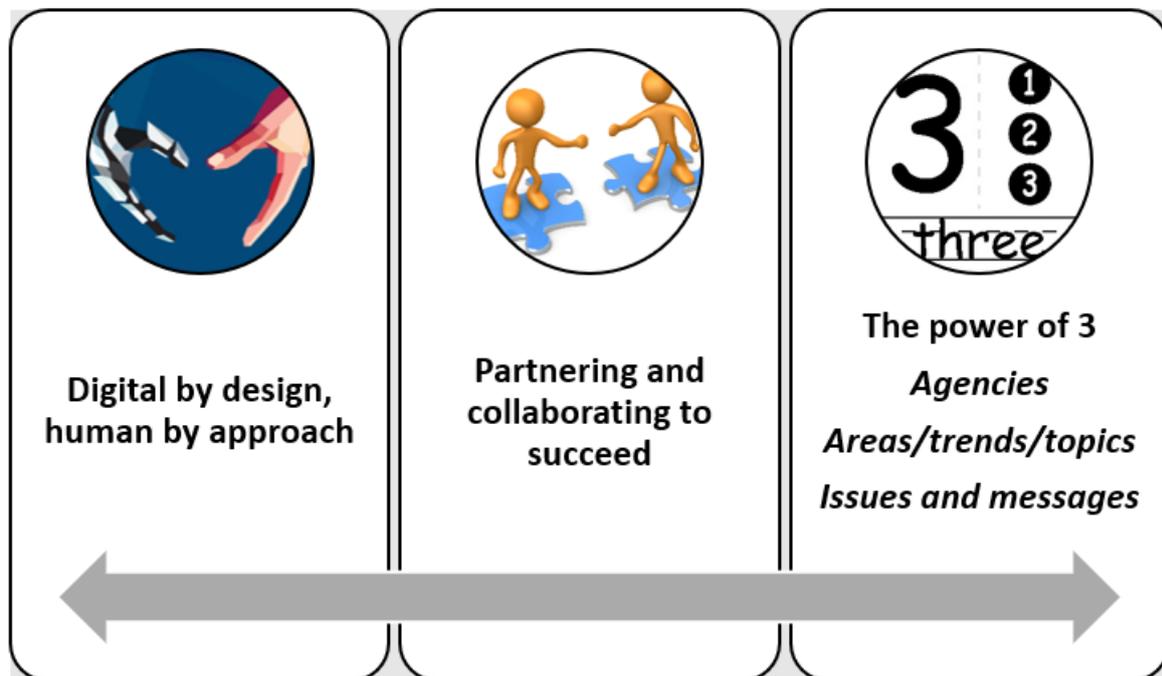
Digital by design, human by approach

- Use technology to increase reach and accessibility.
- Influence behaviour and improve information access and privacy practices where technology and government services intersect.
- Tailor training content and delivery methods to meet the audience's needs.
- Confer with others to gain insights on how stakeholders use technology and what's most effective or beneficial for them.
- Use digital tools and channels to enhance interactivity, dialogue and engagement.
- Adopt a user centric approach when developing initiatives, projects and campaigns.
- Maintain consistent and professional branding across all OIC's communication collateral and activities.

Partnering and collaborating to succeed

- Consider a co-design approach to training sessions and communication campaigns.
- Identify 3 key agencies, 1 key issue, and a maximum of: 2 key audiences, 3 key messages and 3 solutions/tactics with input from OIC teams, including OIC's Executive Leadership Team.
- Work with key agency managers/teams (e.g. comms, practitioners, governance) to understand the issues, challenges and opportunities so we can maximise engagement and message traction and retention.
- Explore joint approaches with other integrity agencies
- Cross promote activities where key messaging and campaign objectives align e.g. 'Get Ready' campaign.
- Strengthen networks, participate in established activities and communicate with the target audience in the most effective and efficient manner.
- Leverage opportunities and maximise reach by identifying and maintaining strategic partnerships with agencies.

The power of 3 – a clear focus to help build capability, trust and accountability

- Nominate 3 key agencies annually to build a targeted program of RTI and Privacy engagement and training. There may be crossover with our audit work program, however, consideration will be given to developing a separate campaign for audit reports to ensure clear and targeted messaging.
- Within key agencies consider targeting 1 key issue, 2 key audiences, 3 key messages and 3 solutions/tactics.
- Cascade messages from top to bottom to encourage shared understanding of the importance of transparency and trust with the community and stakeholders
- Build capability via targeted training, advice and resources.
- Use clear and meaningful messaging for privacy champions to improve understanding and encourage them to share with others in their agency.
- Focus on key agency leadership to influence culture and behaviour and manage risk.

Tactics

Communication and engagement may include:

- Meeting with chief executive officers, mayors, councillors and senior leaders to discuss information access rights and responsibilities, including the role leadership plays in influencing an agency's information access and privacy culture.
- Engaging with key agency stakeholders, partnering on and co-designing initiatives that support agencies to engage meaningfully with their stakeholders about information access and privacy.
- Collaborating with Queensland integrity agencies and interstate information access and privacy agencies to maximise opportunities, raise awareness and share resources.
- Delivering major campaigns – partner with agencies and share resources promoting Privacy Awareness Week and International Access to Information Day including the Solomon Lecture.
- Delivering mini-campaigns – leverage other events or campaigns that support access to government-held information and the protection of personal information to maximise reach and exposure.
- Undertaking speaking opportunities at conferences and events that support access to government-held information or the protection of personal information.
- Engaging the media by releasing statements and seeking interviews to raise awareness of OIC's role, functions and information access and privacy rights and responsibilities.
- Undertaking 'push' and 'pull' marketing through OIC's social media channels, namely Twitter YouTube and LinkedIn.
- Promoting events, resources and activities via OIC's website and news feed.
- Promoting and delivering practitioner forums to discuss current trends and promote good practice in information access and privacy.
- Publishing articles or running advertisements in print and electronic media/publications.
- Participating in key initiatives or events that support a more open, transparent and accountable government or that provide direct access to a particular target audience.

Training may include:

- Face-to-face training
  - ❖ General awareness RTI and IP
  - ❖ Access application handling
  - ❖ Privacy Impact Assessments
  - ❖ Privacy complaint management
  - ❖ Pick apart a privacy impact assessment
  - ❖ Considering privacy in policy and legislation development
  - ❖ Responding to privacy complaints
  - ❖ Identifying privacy risks in digital service delivery
  - ❖ Responding to a privacy breach
  - ❖ Masterclass – Dealing with high conflict personalities
  - ❖ Masterclass – Substantial and Unreasonable Diversion of Resources.

- Webinars
  - ❖ Privacy Impact Assessments
  - ❖ Privacy Complaint Management
  - ❖ Privacy Bites session

- ❖ Managing and responding to a privacy complaint
- ❖ Access application handling
- ❖ Consulting with a relevant third party
- ❖ Masterclass – Dealing with high conflict personalities
- ❖ Responding to a privacy breach
- ❖ What to do with documents after a MOG change.

- eLecture/video
  - ❖ Privacy Impact Assessment
  - ❖ Privacy Complaint Management
  - ❖ Substantial and Unreasonable Diversion of Agency Resources
  - ❖ Managing high conflict behaviour recorded webinar
  - ❖ Privacy Impact Assessments for Health Agencies
  - ❖ Internal auditing - assessing agency obligations contained in the RTI Act and IP Act
  - ❖ Legal Professional Privilege (three-part series)
  - ❖ Decision writing
  - ❖ Law Enforcement and Public Safety (two-part series)
  - ❖ Information sharing and the IP Act
  - ❖ The Basics: Third party consultation
  - ❖ Consulting with a relevant third party
  - ❖ The interplay between the human right to privacy under the *Human Rights Act 2019* and the right to have personal information dealt with in accordance with the *Right to Information Act 2009.*

- Online training modules (ongoing)
  - ❖ General awareness RTI
  - ❖ General awareness IP
  - ❖ General awareness IP for health agencies
  - ❖ Privacy complaint management
  - ❖ Access training for decision-makers (3 x modules).

Evaluation

Communication and engagement success may be determined by measures such as:

- number of resource downloads
- number of general information access and privacy video views
- number of meetings conducted (in person or virtual)
- number of website page views
- number of Twitter referrals
- number of social media impressions
- number of event attendees
- number of partner agencies
- number of agency events/activities
- number of written and verbal enquiries handled
- number of awareness activities conducted
- participation in regional visits and information sessions (in person and virtual)
- number of advices and meetings
- number of consultations and submissions conducted

- percentage of agencies satisfied with the quality of the information resources provided (80%)
- percentage of agencies satisfied with the enquiries service (80%)
- community attitudes survey results.

Training success may be determined by the:

- change in participants level of understanding after attending a training session
- level of satisfaction with the range of information provided during training session
- level of satisfaction with the training facilitator/s
- level of satisfaction with the quality of information provided during training session
- number of training activities conducted
- number of agencies, including regional, trained
- number of people trained
- number of training videos views
- percentage of training participants satisfied with sessions (75%).