

Appendix 9 – List of electronic audit items by topic

The results of the analysis of the questions in the electronic audit have been reported in topics. Topics are groups of related questions. Topics do not match the arrangement of questions in electronic audit tool. The number of questions in each topic varies.

Table 9.1 Topic Summary

Topic	Number of Questions
Administrative access	7
Adopting a push model to maximise disclosure	3
Application handling	19
Community consultation	4
Complaint handling	3
Continuous improvement	5
Disclosure log	18 ¹
Engagement with applicants	5
External review	4
Governance	11
Internal review	5
Performance monitoring	10
Policy development and oversight	5
Privacy	35
Publication scheme	17
Record keeping	7
Roles, responsibilities, delegations and authorisation	13
Staffing resources	1
Training and resources	10
Total questions considered by topic:	182 ²
Questions not included in reporting on topics	3
Total questions in electronic audit:	185

¹ 13 questions considered in disclosure log reporting as 6 questions have been reported as a single question in the topic.

² 177 questions considered in topic reporting as 6 questions under disclosure log have been reported as a single question in the topic.

Question Number	Criteria Question
Administrative Access	
114	Have any new administrative access schemes been introduced since the commencement of the RTI Act?
115	Has any new information been introduced into existing administrative access schemes since the commencement of the RTI Act?
116	Are there mechanisms in place to evaluate the viability of administrative access schemes (e.g. a review of information requests).
117	Are there indicators that the administrative access schemes are used first.
118	Publicly available administrative access schemes are readily accessible (e.g. button on home page).
119	Multiple avenues of access are available (e.g. HTML, open formats or hard copy on request).
120	If appropriate, web site design is user friendly and compliant with the Consistent User Experience CUE standard (e.g. well organised, reviewed quarterly and up to date, information rich).
Adopting a push model to maximise disclosure	
55	More information is in the public domain e.g. additional data sets are now available to the public.
56	More information is available via the publication scheme than was previously available under the Statement of Affairs.
57	Department only question. GOCs, local government, and other agencies please disregard. Using the Information Asset Register as a guide, the agency has achieved maximum disclosure of publishable information assets. <i>(This is a requirement for departments. It is not a requirement for GOCs, local governments or other agencies, and they are not required to respond to this question.)</i>
Application handling	
69	Decisions are made promptly and parties informed as soon as possible.
70	Level of satisfaction by the parties with the communication about time issues.
121	The agency uses the approved form, as per the RTI and IP Acts, for applications for information.
122	The agency has a procedure for obtaining evidence of the identity of the applicant within 10 business days e.g. a checklist of steps to be undertaken for each application.
123	The agency has procedures in place for dealing with problems with the application, including proof of identity, a change of Act under which the application has been made or seeking an extension of time for the decision. For example, RTI officers might have a standard approach to these matters.
124	The agency has procedures in place to issue charges estimates notices and the accompanying schedule of documents under the RTI Act.
125	The agency tracks time frames for handling charges estimates notices and schedules of documents.

Question Number	Criteria Question
Application handling (cont)	
126	The agency has procedures in place for dealing with third party consultation e.g. a checklist of steps to be undertaken for each application.
127	The agency has a procedure to track timeframes for third party consultations.
128	The agency has procedures in place for transferring an application to another agency e.g. a checklist of steps to be undertaken for each application.
129	The agency has checked applicable fees and charges and ensured procedures are correct.
130	The agency has procedures for deciding whether or not an application is outside the scope of the Act e.g. consideration of questions of scope are file noted.
131	The agency has procedures for ensuring applicants are notified if their application is outside the scope of the Act, within 10 business days and in the prescribed form, including reasons for the decision.
132	If access or amendment is refused, the agency has steps to ensure the decision is according to the legislation, particularly balancing public interest factors under the RTI Act and applied by IP Act.
133	If access or amendment is refused, the agency has steps to ensure that the notification is in the prescribed form, and that notification is made within time and with reasons for the decision.
134	The agency has procedures to provide access to information in the requested format and within time e.g. a checklist of steps to be undertaken for each application.
135	The agency routinely meets statutory timeframes.
136	If access is not given in the requested format or it is deferred, the agency has procedures for recording the reasons for the difference in formats or the deferral, and that no additional charges are levied.
137	The agency has procedures for ensuring the information goes to the correct person, for example, correctly to an agent or parent.
Community consultation	
2	Agency policy frameworks describe how the community is to be included in development of policies affecting external operations.
3	The agency has a mechanism for identifying the information that its industry stakeholders would find useful, for example, a consultation strategy.
4	The agency has a mechanism for providing the information to industry stakeholders that the industry stakeholders have identified as being useful to them, for example, a procedure for publishing information that industry stakeholders have identified as being useful to them.
14	The agency has an external communications strategy to ensure consumers and stakeholders are aware of their RTI rights.
Complaint handling	
44	Complaint handling procedures capture opportunities for improvement in RTI/IP implementation of reforms.
86	A complaints procedure is in place to enable people to make complaints when information is not available from the publication scheme.

Question Number	Criteria Question
Complaint handling (cont)	
181	Privacy complaint handling is timely and the complainants are generally satisfied with the response given.
Continuous improvement	
45	Opportunities for improvement in RTI/IP implementation of reforms are recorded and actions on them are tracked.
46	Opportunities for improvement are actioned and result in improvements to systems for the release of information or information privacy.
182	There is a clear process for complaint handlers to advise agency officers when practices that need changing are identified.
183	There is a clear process to action identified changes.
184	Identified reforms to agency processes have been implemented.
Disclosure log	
92	Agency has a disclosure log.
93	The disclosure log is readily accessible (e.g. within three mouse clicks from the home page).
94	Web site design is user friendly (e.g. well organised, reviewed quarterly and up to date, information rich).
95	Information released under the RTI Act is listed in the disclosure log unless there is a clear reason not to do so.
96	The disclosure log has an appropriate list of documents, for example, by comparison with the number of applications for non-personal information that have been granted.
97	The agency has a process in place to ensure documents are listed on the agency's disclosure log not sooner than 24 hours after the applicant accesses the document.
98	The agency has a process in place to ensure documents are listed on the agency's disclosure log no later than 5 business days after the applicant accesses the document.
99	Where an applicant has not accessed a document within the access period, and where it is appropriate to do so, the agency provides access details to the document (including any applicable charges) in the agency's disclosure log.
100	Documents published to the disclosure log are accompanied by brief text with a summary and the context of the information.
101	If documents are not included in a disclosure log, the details of the decision and reasons are documented in the agency's internal records.
102	An agency officer has a responsibility to ensure the disclosure log is maintained and up-to-date and in accordance with ministerial guidelines.

Question Number	Criteria Question
Disclosure log (cont)	
103 to 108	<p>The disclosure log does NOT contain information that:-</p> <ul style="list-style-type: none"> - Is prevented by law from disclosure. - May be defamatory. - If released would breach the Information Privacy Act 2009. - Contains or alludes to information received in confidence from a third party or which is protected by contract. - Would otherwise cause substantial harm if disclosed. - Is the personal information of the applicant. <p>Note: Agencies supplied identical responses for all these questions and thus they have been reported as a single question within this topic.</p>
138	The agency has procedures for ensuring that applications under the RTI Act are considered for inclusion in the disclosure log in accordance with the RTI Act.
Engagement with applicants	
64	Applicants are assisted through negotiation, either prior to making an application or once an application is made, to clarify and particularise their requests.
65	For every application received, the agency considers calling the applicant as soon as practicable on receipt of the application to clarify the applicant's information request and explore options for providing the information.
66	Open communication exists between the agency and the parties.
67	Level of satisfaction by the parties with the communication in general.
68	The agency is responsive and open to requests for information.
External review	
144	The agency has a procedure to seek more time from the Information Commissioner to process the application if a deemed decision is being externally reviewed.
145	The agency understands that the onus is on the agency to show that the reviewable decision was justified.
146	The agency understands and meets its obligations to assist the Information Commissioner.
148	The agency routinely meets set timeframes in external reviews.
Governance	
1	The agency has a culture open to the release of information.
8	<p>Department only question. GOCs, local government, and other agencies please disregard.</p> <p>An SES level Information Champion is appointed, and active in the role. (This is only a requirement for departments. GOCs, local governments and other agencies are not required to respond to this question.)</p>
9	<p>Department only question. GOCs, local government, and other agencies please disregard.</p> <p>A formal information governance body is established (as per QGEA guidelines). (This is only a requirement for departments. GOCs, local governments and other agencies are not required to respond to this question.)</p>

Question Number	Criteria Question
Governance (cont)	
10	RTI and IP reforms are managed or have been managed by governance mechanisms which provide for development (e.g. planning for implementation).
11	RTI and IP reforms are managed or have been managed by governance mechanisms which provide for implementation and accountability (e.g. identifying who is responsible for implementing actions and by when).
12	RTI and IP reforms are managed or have been managed by governance mechanisms which provide governance mechanisms for review (e.g. mechanisms for reporting on achievements).
13	An explicit statement of commitment to RTI and IP is readily available within the agency, for example, in a policy document or as a policy statement on the agency's website.
22	<p>Department only question. GOCs, local government, and other agencies please disregard.</p> <p>The agency maintains an Information Asset Register either independently or as part of an existing register (as required by Information Standard 44). <i>(This is a requirement for departments. It is not a requirement for local government, GOCs or other agencies, and they are not required to respond to this question.)</i></p>
91	<p>Department only question. GOCs, local government, and other agencies please disregard.</p> <p>The information governance body has considered the development of the elements of the authorising and accountability environment, which may include:</p> <ul style="list-style-type: none"> - policies - business processes (e.g. internal approval processes for release upon request or publication in a publication scheme) - procedures - roles and responsibilities (e.g. who approves release) - supporting tools and systems.³ <p>For example, the meeting agenda or minutes indicate these issues have been considered. <i>(This is a requirement for departments. It is not a requirement for GOCs, local governments or other agencies, and they are not required to respond to this question.)</i></p>

³ From QGEA Guideline *Implementing Information Governance*

Question Number	Criteria Question
Governance (cont)	
112	<p>Department only question. GOCs, local government, and other agencies please disregard.</p> <p>The information governance body has considered the development of the elements of the authorising and accountability environment, which may include:</p> <ul style="list-style-type: none"> - policies - business processes (e.g. internal approval processes for release upon request or publication in a publication scheme) - procedures - roles and responsibilities (e.g. who approves release) - supporting tools and systems.⁴ <p>For example, the meeting agenda or minutes indicate these issues have been considered.</p> <p><i>(This is a requirement for departments. This is not a requirement for GOCs, local governments or other agencies and they are not required to respond to this question.)</i></p>
113	<p>Department only question. GOCs, local government, and other agencies please disregard.</p> <p>Schemes generally conform to QGEA guidelines.</p> <p><i>(This is a requirement for departments. This is not a requirement for GOCs, local governments or other agencies and they are not required to respond to this question.)</i></p>
Internal Review	
139	The agency has a procedure for tracking the timeframes for internal review applications e.g. a checklist of steps to be undertaken for each application.
140	The agency uses the prescribed written notice for notifying the applicant of the result of the internal review, including provision of reasons.
141	The agency has a procedure for tracking the timeframes for internal review decision making.
142	The agency has a process in place to ensure internal review decisions are notified to the applicant within 20 business days from receipt of application.
143	Written notices of internal review decisions are provided to the applicants.
Performance monitoring	
6	The agency tracks the type of person seeking information under the RTI Act or IP Act (for example, individuals, companies, journalists, lobby / community groups, politicians, legal representatives, agents, prisoners or government agencies).
7	Over time, the data is showing an increase in diversity in the type of person seeking information.
47	The agency has internal systems and procedures for reviewing the effectiveness of the right to information and information privacy functions.
48	Performance measurement for the RTI implementation across the agency is in place.
49	Performance measurement for the RTI implementation across the agency is used.

⁴ From QGEA Guideline *Implementing Information Governance*.

Question Number	Criteria Question
Performance monitoring (cont)	
50	Performance measurement for the RTI implementation across the agency is useful.
51	Performance measurement for the IP implementation across the agency is in place.
52	Performance measurement for the IP implementation across the agency is used.
53	Performance measurement for the IP implementation across the agency is useful.
54	Review and reporting mechanisms are embedded at all levels of the organisation.
Policy development and oversight	
5	When developing RTI and IP policy, the agency conducts appropriate internal consultation, for example, with decision makers.
15	The agency's RTI and IP policies and procedures give effect to the legislation, for example, as a standalone policy or as part of an information management framework.
16	The agency's RTI and IP policies and procedures as per 3.3 are fully implemented.
18	RTI and IP policies are complete and easy to understand.
19	RTI and IP policies are reviewed on a regular basis.
Privacy	
20	Privacy policies apply to the information of officers, for example, personnel records, as well as to the information of the public.
21	The agency has a system to ensure it meets its obligations when entering into contracts with suppliers who provide services involving personal information.
61	If relevant, the agency has procedures in place for transfer of personal information outside Australia only in accordance with s33 of the IP Act. (Note: Not required for local government until 1 July 2010)
147	The agency understands and accepts its obligations to take any action required by a compliance notice issued under s158 of the IP Act.
149	Personal information handling practices have not raised concerns or resulted in the issue of any compliance notices.
150	Collection of information is appropriate.
151	Security safeguards are appropriate.
152	Processes are in place to ensure personal information is as accurate as possible.
153	The agency is open about its processes for collecting, using and disclosing personal information.
154	The agency use and disclosure of information is appropriate.
155	Privacy breaches and complaints are managed effectively.
156	The agency identifies why it is collecting personal information.

Question Number	Criteria Question
Privacy (cont)	
157	The agency provides a collection notice ⁵ to individuals from whom personal information is being collected.
158	The agency has determined how much and the kind of personal information it needs to collect.
159	The amount of personal information collected is no more than is necessary and relevant for the purpose for which it is required.
160	The agency collects personal information lawfully and fairly.
161	The agency has taken steps to ensure the information collected is accurate.
162	Personal information held by the agency is protected against unauthorised access, use, modification or disclosure.
163	Personal information held by the agency is protected against loss or misuse.
164	The agency has adopted physical, technical and administrative safeguards to protect personal information.
165	Security safeguards are appropriate given the sensitivity of the information.
166	Processes are in place to record access to electronic records and datasets containing personal information.
167	Processes are in place to ensure that disposal of personal information does not allow unauthorised access.
168	Processes are in place for people to amend their personal information if it is incorrect.
169	Processes are in place to record when and where key personal information was collected, including when it was updated.
170	The agency makes information available about its personal information policies and procedures.
171	The agency tells people why it collects, how it uses and when it discloses their personal information at the time of collection.
172	There is a person that members of the public can contact about privacy issues.
173	The agency tells people how they can access and amend their personal information.
174	The agency provides details to the public of the categories of personal information it holds.
175	The agency uses information only for the purpose for which it was collected, unless an exception in IPP10 or NPP2 applies.
176	The agency discloses information only where the person was advised when it was collected unless an exception in IPP11 or NPP2 applies.
177	The agency has procedures in place to ensure that use or disclosure of personal information under IPP10, IPP11 or NPP2 is noted on the personal information where required.

⁵ Note that the term 'collection notice' does not appear in the *Information Privacy Act 2009*. It is a generic term encompassing the obligation to make individuals generally aware of the facts listed in IPP 2.

Question Number	Criteria Question
Privacy (cont)	
178	There is a documented process for managing privacy breaches and privacy complaints.
185	There are no recurrences of privacy breaches.
Publication scheme	
71	Seven classes of information are published (About us, Our services, Our finances, Our priorities, Our decisions, Our policies, Our lists).
72	Information in the publication scheme is significant (key initiative and policy documents).
73	Information in the publication scheme is appropriate (having regard to legislation, privacy principles and security issues).
74	Information in the publication scheme is accurate.
75	Significant documents are not excluded by irrelevant factors e.g. embarrassment to the agency, misunderstanding by the applicant, mischievous conduct by the applicant or the seniority of an author (Part 1, Schedule 4 Right to Information Act 2009).
76	Schemes are readily accessible (e.g. a link on home page).
77	Direct links to documents suitable for online publication are provided. (Documents might be unsuitable for online publication if they are too large, or not in a suitable format.)
78	All documents referred to in the publication scheme are accessible centrally from the publication scheme.
79	Documents linked to the publication scheme are no more than 3 mouse clicks away.
80	If a direct link to a document is impractical, e.g. due to the size of the document, a summary of the document is provided and access arrangements are described.
81	The publication scheme sets out the terms on which information is available including any applicable fees/charges.
82	Charges for administrative release of documents are minimised.
83	Alternative formats of documents are available.
84	Web site design is user friendly (e.g. well organised, reviewed quarterly and up to date, information rich).
85	An agency officer has a responsibility to ensure the publication scheme is maintained and up-to-date.
87	Quality of scheme from the agency's perspective.
89	Changes and approvals to the publication scheme are documented. ⁶
Record keeping	
58	Overall sufficiency of search e.g. the number of times sufficiency of search is an issue in internal or external review matters.

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

Question Number	Criteria Question
Record keeping (cont)	
59	Additional documents located during external review.
62	Record keeping systems allow efficient location of records relevant to RTI and IP requests.
63	Accurate records exist to document the processing of requests.
90	The documents describing changes to the publication scheme are kept as public records. ⁷
110	Changes and approvals to the disclosure log are documented. ⁸
111	Documents describing changes to the disclosure log are kept as public records. ⁸
Roles, responsibilities, delegations and authorisation	
26	Department only question. GOCs, local government, and other agencies please disregard. RTI and IP functions are independent of the Minister's office. (This is not a requirement for GOCs, local governments or independent statutory authorities. These agencies are not required to respond to this question.)
27	RTI and IP functions are independent of media and communications.
28	RTI and IP functions report as closely as possible to the DG / CEO.
29	Agency administrative delegations have been updated to incorporate right to information handling and information privacy handling.
30	There is a clear authorisation process for agency staff to assess and approve information for public release.
31	The Principal Officer has appropriately delegated authority to deal with right to information and information privacy applications.
32	Roles and responsibilities of the Principal Officer or the Principal Officer's delegates are clearly defined.
33	There is a person who has responsibility for maintaining a system of recording, tracking and monitoring applications and reviews.
34	Internal reviews are conducted by an officer different to the officer who made the reviewable decision.
35	The officer conducting the internal review is more senior to the officer who made the reviewable decision.
60	Level of satisfaction by RTI Unit or decision maker with documentation received from other staff.
88	Changes to the publication scheme are formally approved. ⁷
109	Changes to the disclosure log are formally approved. ⁸
Staffing resources	
23	Resourcing to IP and RTI functions is appropriate.

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

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

Question Number	Criteria Question
Training and resources	
17	The agency's RTI and IP policies as per 3.3 are readily available to all staff e.g. easy to find on the agency's intranet.
36	The agency can meet requirements to report on Freedom of Information, Right to Information and Information Privacy statistics
37	The agency uses redaction technologies to assist in its decision making processes. <i>(NB "Redaction technology" allows an original hard-copy document to be scanned, and then text to be electronically blocked out of the scanned copy - for example, personal information can be removed.)</i>
39	Agency staff are trained as to their level of authority to release information administratively.
40	The agency has procedures in place to ensure new/existing staff are given appropriate training/awareness raising in relation to right to information handling and information privacy obligations.
41	RTI/IP is mentioned in induction.
42	Training for RTI/IP staff with respect to the RTI/IP function is effective.
43	General staff training in RTI/IP is effective.
179	This process is documented and available to agency officers.
180	This process, or a version of it, is available to the public.
Not included in topic analysis	
24	The number of staff members in the RTI/IP Unit or performing RTI/IP functions (might be a percentage of one person's time).
25	If the RTI/IP staff undertake other functions, estimate the percentage of time spent by the unit on RTI and IP functions.
38	Number of agency staff who attended RTI or IP training, or any training containing information about RTI or IP during the year.