Office of the Information Commissioner

Queensland

Administrative access to information

How the Department of Education manages access to documents held in schools

Report No. 2 to the Queensland Legislative Assembly for 2021-22

We thank the staff of the Queensland government Department of Education for their support and cooperation.

March 2022

Mr Peter Russo MP
Chair
Legal Affairs and Safety Committee
Parliament House
George Street
BRISBANE QLD 4000

Dear Mr Russo

I am pleased to present

> '*Administrative access to information*
> *How the Department of Education manages access to documents held in*
> *schools*'.

This report is prepared under section 131 of the *Right to Information Act 2009* (Qld).

The report outlines how the Department of Education manages its administrative access arrangement to documents held in schools. The report makes recommendations for improvement.

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

Yours sincerely

Rachael Rangihaeata
Information Commissioner

Table of contents

1. Summary

The community should be able to access government-held information quickly and easily as a matter of course, unless there is a good reason for government agencies to safeguard the information. Applications to access information under the *Right to Information Act 2009* should be the last resort.[1]

The Act describes a number of ways agencies can release information. One of them is an administrative access arrangement.[2] 'Administrative access' refers to releasing information by means other than a formal access application under the legislation.

Administrative access arrangements are generally reactive (responding to requests for information). But they also include proactive schemes for disseminating information regardless of requests, such as through publication schemes, libraries, open data and websites.

A key benefit of these arrangements is that the community has access to information faster and at a lower cost. In turn, quick and easy access to information supports open, transparent and accountable government and helps build trust.

The Department of Education has developed an administrative access arrangement for requesting access to documents held in schools. The audit sought to determine whether the department manages the arrangement effectively and examined how a small number of schools respond to requests for information.[3]

Conclusions

The schools we visited were generally unaware of the department's administrative access arrangement for documents held in schools. As a result, they have developed their own practices to respond to requests for information. The schools' lack of awareness of the department's administrative arrangement indicates the department is not promoting the arrangement effectively.

The schools said that most requests they receive are for student related information. The department, regional offices and schools have a relatively mature approach to such

---

1. Applications for information can be made under the *Information Privacy Act 2009*. This audit focuses on the *Right to Information Act 2009* available on https://www.legislation.qld.gov.au/
2. Section 19, *Right to Information Act 2009*
3. The appendices include the audit methodology.

requests. The schools take the students' safety, wellbeing and privacy seriously when deciding whether to release information.

Requests for non-student related information are rare. The schools said they contact regional offices for assistance with unusual requests. It is unclear whether there are few requests for non-student related information because the community is not interested or because it is unaware of administrative access to information.

Principals were also unaware of specific legislative requirements for managing privacy and confidentiality when giving administrative access to information. Despite a strong commitment to privacy, the lack of policy and procedural clarity about legislative requirements exposes the department to a risk of privacy breaches.

The department's central office needs to update and clarify the relevant policies, procedures and training about administrative release of information to better equip regional offices in their work with schools. The current process is not as efficient as it could be. There is a risk that different regions advise inconsistent practices about administrative access to documents held in schools.

Given how infrequent requests for non-student information are at individual schools, the most efficient place to build departmental capability is the regional office. The regional office can then support schools to respond appropriately to unusual requests for information.

The department had identified some of these issues before the audit and commenced work on addressing them.

Findings

Schools receive requests for information about students all the time, mostly from parents and carers. The schools we visited have their own practices to respond to requests for information. They aim to strike the right balance between releasing the information and protecting personal information particularly about students.

Principals usually check who is making the request and why. They may also ask for the request to be in writing.

The schools and regional offices that we visited work well together to deal with unusual requests for information. However, interviewees commented regional offices across the state differ in terms of consistency and quality of advice.

Schools and regional offices report that they mainly approach the department's specialist teams for help with ad hoc requests requiring legal, media or policy interpretation.

The department has documented its administrative access arrangement in two documents that overlap in places:

- Access to records held in schools and its schedules

- Administrative Access Scheme for Central and Regional Offices.

The arrangement covers all regions and state schools, including small schools in remote locations and large schools in densely populated urban communities.

Their approach is similar. A person seeking access to documents held in schools can contact the school directly and request the documents. Principals are responsible for deciding whether to release the information.

However, it is not always clear which procedure applies to which requests for information. Both documents are out-of-date and sometimes inconsistent with each other. The principals we interviewed said that policies and procedures were not easy to find and use. They were unsure what information they can, or should, release as a matter of course.

These issues are not unique to Queensland. The Office of the Victorian Information Commissioner also found a disconnect between central office policy positions and practice in schools. The commissioner examined how the Victorian Department of Education considers children's privacy when choosing digital learning tools. The report concluded:

> *Whilst DET have accurate, clear and concise resources that are available to schools with respect to issues of privacy and data protection, some schools had difficulty accessing them.*[4]

We agree with the department's proposals to update its policies and training about access to information. The department advised that it is considering re-establishing an information access officer network to support regions and schools more effectively.

---

4   *Examination into the use of apps and web-based learning tolls in Victorian government primary schools*, Office of the Victorian Information Commissioner, 2020, page 6.

The department could also do more to promote publication of information and proactive release of information. Websites are an important primary resource for the community for significant, appropriate and accurate information. This includes advising the community about administrative access as a pathway to information.

The department accepts these findings and the recommendations. Its response and action plan are attached in the appendices.

Recommendations

We recommend that within 12 months, the department supports its administrative access arrangement with

1. clear and up-to-date draft policies and procedures that are easy to find and use, and adaptable to different circumstances

2. clarity about what information regions and schools can make available routinely and who is authorised to release it

3. an updated program of targeted accessible training

4. a regional office information officer network that can

    a. promote consistency across regional offices

    b. raise awareness of access to information

    c. improve the quality of regional office advice and assistance

    d. be a pathway for feedback to central office to continuously improve departmental policies and procedures

5. promotion so that the community is aware it can seek access to student and non-student information and knows how to do so.

We recommend that within 2 years, the department:

6. consults with stakeholders and implements the policies and procedures developed under recommendation 1.

2. Context

The department

Queensland's Department of Education is large and diverse. In 2020-21, it supported over 575,000 students in 1254 schools across the state.[5] As of 30 June 2021, the department employed over 95,000 people. Schools can vary from one-teacher schools in remote locations to urban schools with hundreds of staff and thousands of students.[6] The communities in which they operate are diverse too.

The department has offices in seven regions – Central Queensland, Darling Downs South West, Far North Queensland, Metropolitan, North Coast, North Queensland and South East. The central office in Brisbane supports these regions with centralised services on policy, legal, financial, technology, infrastructure, people, media and communications. The regional offices help principals and schools improve performance and outcomes. Staff from regional offices regularly visit school principals to give them support and guidance. The offices also have specialist staff that schools can contact for advice.

Schools use OneSchool to record and manage information, including student information. OneSchool is the department's central operating software suite. It creates a profile for each Queensland state school student. It supports teachers, administrators and students in managing student information, curriculum and assessment, finance and asset management and performance reporting and analysis.

Access to information

Administrative access offers a way to access documents more easily than applying for information under the *Right to Information Act 2009* or the *Information Privacy Act 2009.* A key benefit of these arrangements is that they give access to information faster and at a lower cost. The legislative process should be a last resort.[7]

There are a number of ways the community can access information held by the department. The department publishes information online, for example, details about individual schools and state-wide education statistics.[8]

---

5   Schools Directory and *2020-2021 Annual Report*, Department of Education, page 9, available on
     https://qed.qld.gov.au/
6   *2020-2021 Annual Report*, Department of Education, page 7 available on https://qed.qld.gov.au/
7   Consistent with the Preamble to the *Right to Information Act 2009*.
8   Department of Education Schools Directory.

Consistent with '*a student-centred approach to learning and wellbeing*'[9] the department operates an online portal for student information called QParents. Parents and carers can access information about their child's school attendance, timetable, report cards and payment history through this channel.

It also operates an administrative access arrangement for requesting documents held in schools. It is this arrangement the audit sought to assess. We considered general circumstances of requests to access information administratively and the department's practice in response.

---

9   Strategic plan 2021-25, Department of Education, objective 'Every student succeeding', page 2, available on available on https://qed.qld.gov.au/ Consistent with its obligations under the *Education (General Provisions) Act 2006*.

3. Department

Introduction

The department's central office is responsible for policy development, planning and system performance, funding and purchasing and consistent statewide delivery of corporate services.

The central office supports regional offices to assist principals and schools improve performance and outcomes. The department states:

> *To help regional directors deliver on their accountabilities, the*
> *relationships within and between regional offices and central office*
> *must remain strong.*[10]

The department has procedures and supporting documents about administrative access to information held in schools. It is also responsible for developing training and other awareness activities.

Conclusions

The department's central office could support administrative access to documents held in schools better. It needs to update and clarify the relevant policies and procedures to assist regional offices and schools. A training module on administrative access is available online but is out-of-date.

The central office responds to requests for assistance. However, it does not provide routine guidance to regional offices, to equip them in their work with schools and administrative release of information. This means the process is not as efficient as it could be and there is a risk that regions promote inconsistent practices about administrative access to documents held in schools.

---

10   *DETE Renewal, Regional Operating Framework,* page 7.

Policies and procedures

The department outlines its policy for administrative access to documents held in schools in two documents:

- Access to records held in schools and its schedules

- Administrative Access Scheme for Central and Regional Offices.

While the procedures have different steps, their approach is similar – a person seeking access to documents held in schools can contact the school directly and request the documents. The request should be writing.

A principal will consider the request and is responsible for deciding whether access is granted in each particular case. Principals seek advice from the regional office or departmental central office as needed.

Access to records held in schools is the lynchpin procedure for administrative access to records held in schools. It is meant to authorise and guide school principals through administrative release of certain types of documents held in schools in response to requests. Other documents, including for special circumstances and a template letter and form, support the procedure.

The related schedule *Documents held in schools – access and requests* lists a range of information and whether access should be granted administratively or through the legislative process.

Figure 1

Extract from the Schedule (reproduced)

Information	Request only from, with the consent of, or on behalf of, the person to whom the information relates		Request from any other person	
	Administrative Access	Statutory Access	Administrative Access	Statutory Access
Excluding: • Medical Reports, except where originally provided by the applicant • Reports of non-government agencies, professionals or other government departments, except where originally provided by the applicant		* *		
Staff records *	*			*
Volunteers' records *	*			*
Parent records	*			*
Curriculum Provision			*	
School Management, including financial management			*	

Source: Department of Education, 'Documents held in schools – access and requests', a schedule to the procedure 'Access to records held in schools'

The second procedure states it applies to central office and regional offices. It has a *Document classification table* which lists types of information and identifies who can approve release of the information. The list includes information about schooling such as student management, schools management, curriculum provision and educational marketing.

Figure 2
Extract from the Document classification table

Information Classification	Applicant seeking their own personal information	Applicant seeking non-personal information, or personal information about someone else
5.3. Legal services	N/A	RTI
5.4. Strategic management	N/A	Administrative Access with Level 2 Approval
6. Schooling		
6.1. Student management	Administrative Access with Level 1 Approval	RTI
6.2. Schools management	Administrative Access with Level 1 Approval	Administrative Access with Level 2 Approval
6.3. Curriculum provision	Administrative Access with Level 1 Approval	Administrative Access with Level 2 Approval
6.4. Educational marketing	Administrative Access with Level 1 Approval	Administrative Access with Level 2 Approval
7. Vocational training		
7.1. Student management	Administrative Access with Level 1 Approval	RTI
7.2. VET management	Administrative Access with Level 1 Approval	Administrative Access with Level 2 Approval
8. Early Childhood		
8.1. Early childhood management	Administrative Access with Level 1 Approval	RTI

Source: Department of Education, Administrative Access Scheme for Central Office and Regional Offices: A way of providing the public with access to information', Attachment 1: Document classification table

There is ambiguity about which procedure applies to which requests for information. They are out-of-date and sometimes inconsistent with each other. For example, one procedure indicates school staff can seek access to their own records administratively from a school principal. The other states requests for a person's own human resources records must go to human resources.

There is an array of policies and procedures principals may need to consider when deciding to release documents, for example about information sharing between agencies.

The principals we spoke to said:

- policies and procedures are not easy to find and use

- they are unsure who should publish or release what information as a matter of course

- departmental messaging is unstructured and does not identify priorities

- business systems are not designed to work well from a practical standpoint.

The department is aware of these issues. It advised that aspects of the current system originated in different business units.

It now seeks to bring the system under one point of control, remove overlap and support decision-makers with simple, clear policies and procedures:

The department is undergoing a review of all departmental Policies and Procedures. This review includes the public access to relevant policies and procedures. Duplication and removal of rescinded material is to be included as part of this review.

We support this review. We recommend that within 12 months, the department supports its administrative access arrangement by developing clear and up-to-date draft policies and procedures that are easy to find and use, and adaptable to different circumstances. We recommend that within 2 years, the department consults with stakeholders and implements these policies and procedures.

We also recommend that within 12 months the department clarifies what information regions and schools can make available routinely and who is authorised to release it.

Training

The department advised that there is optional training available to staff. The online *Keys to Managing Information* training specifically mentions '*Processing administrative release requests*'.

The module on administrative access requests would have been useful when first drafted but is now out-of-date. In particular, it refers to an Information Access Officer network which no longer operates. Regional and school staff would not necessarily be aware of the online training.

One region developed training which includes a summary of departmental information about administrative access. This is a good resource to assist schools to navigate departmental policy. However, it also identifies the gaps and inconsistencies that need explanation. This training is unique to this region.

The department has work to do to:

- clarify the roles of central office and the regional offices in designing and delivering this training

- update online training about administrative access

- ensure that people working in schools are aware of training and can access it.

Good practice would be to consult regional offices and schools before updating the training, to ensure that the update captures and addresses practical concerns.

We recommend that within 12 months, the department supports its administrative access arrangement with an updated program of targeted accessible training.

Guidance and support

The relationship between regional offices and schools works well in the schools we visited. Interviewees stated this is not necessarily the case in all regions. An independent review of the department's service delivery model in 2013 found:

> *a need for greater alignment and consistency across the department,*
> *and more collaboration and sharing of practice.*[11]

The department developed a new operating model in 2014, defining the role of central office in its *Regional Operating Framework* [at page 4]:

> *central office is responsible for policy development, planning and*
> *system performance, funding and purchasing, and consistent statewide*
> *delivery of corporate services.*

When examining the administrative access arrangement we expected to find:

- coordination across policies and procedures, particularly from a perspective of practical application of policies and procedures to specific circumstances

- dialogue between central office and regions about how administrative access policy works, to continuously improve policy and practice

- planned and structured strategies for increasing staff awareness, for example, staff networks that might include administrative access as a topic for discussion.

Interviewees agreed there is not a well-defined relationship between central office and regional offices about the specific issue of administrative access to information. There are ad hoc connections between regional offices and specialised teams in central office. For example, regional office interviewees reported the legal and media teams respond to requests for assistance. However, there is no routine assistance from central office to regional offices to support them to manage administrative access to documents held in schools.

---

11 *DETE Renewal - Regional Operating Framework*

The department advised that it is considering re-establishing an information access officer network to support regions and schools. It states that the proposed network would provide:

- a link between central office subject matter experts and regional support staff

- training, mentoring and coaching.

We recommend that within 12 months, the department supports its regional offices with an information officer network that can

a. promote consistency across regional offices

b. raise awareness of access to information

c. improve the quality of regional office advice and assistance

d. be a pathway for feedback to central office to continuously improve departmental policies and procedures.

Interviewees also mentioned that better business systems would support administrative access to information. For example, a record keeping system would assist in discovering documents and keeping track of different types of requests received and their resolution. This data would enable the department to identify common topics and consider proactive publication strategies for those topics. However, this is beyond the scope of this audit.

4. Schools and regional offices

Introduction

A school is an integral part of its community. It interacts with parents, students and past students, and the wider community in which it operates. Schools also exchange information with local businesses and take part in community events.

There are a number of pathways to information. Schools actively communicate with their community in a range of ways, for example, through Parents and Citizens' (P&C) Associations,[12] events, newsletters and online portals like the school website or QParents.

A person can also seek access to documents held at schools through the administrative access arrangement. Or, as a last resort they can apply for access under the *Right to Information Act 2009* or the *Information Privacy Act 2009*.

To discover what schools do if someone requests access to documents, we interviewed principals and staff at six schools in the Metropolitan and Darling Downs South West regions, and regional office staff. We also talked to representatives of the Queensland Secondary Principal's Association and the Queensland Association of State School Principals. We acknowledge that the information we obtained from these interviews does not necessarily represent practices in all schools. Nevertheless, we identified some common themes.

We summarise interview comments for the six schools we visited without corroboration, assessment or endorsement.[13] We present this information as a useful insight into perceptions, reported experience and opinions.

Conclusions

The schools we visited were generally unaware of the department's administrative access arrangement for documents held by schools. As a result, they have developed their own practices to respond to requests for information. They were also unaware of specific legislative requirements for managing privacy and confidentiality when giving

---

12 Parents and Citizens' (P&C) Associations are established under the *Education (General Provisions) Act 2006* and Education (General Provisions) Regulation 2017. P&Cs work in partnership with school principals to provide feedback on school policies and activities, assist in providing resources to the school and contribute to activities like fundraising, school functions, and tuckshops.
13 Without independent, objective verification, we present this information with 'limited assurance' under the auditing standards and our assurance engagement methodology.

access to information administratively. Despite a strong commitment to privacy, particularly student privacy, safety and wellbeing, the lack of policy and procedural clarity about legislative requirements exposes the department to a risk of privacy breaches.

Regional offices and schools have a relatively mature and consistent approach to requests for student information. They carefully consider the students' safety, wellbeing and privacy when deciding whether to release information.

Schools are not as well equipped to handle requests for non-student related information but these are infrequent. Schools said they contact regional offices for assistance with unusual requests.

It would not be efficient to create a new schools-based system for requests of non-student related information. A better strategy would be to equip regional offices so that they can effectively support and give consistent quality advice to schools responding to requests for information.

It is unclear why schools receive few requests for non-student related information. However, as they are not aware of the administrative access arrangement, the schools are not able to promote it to their communities.

Schools' comments about requests for information

Generally, schools seek to have a free flow of information and engage positively with their community. Principals reported using a range of methods to push information to the community.

The schools we visited said that most of the requests they receive are about student information. Administrative access is a possible channel for requesting student information.

Schools have their own practices to respond to requests for information. They all said that they manage requests for student information carefully and consider student safety, wellbeing and privacy.

The principals' usual approach is for the school to check the requests for information before deciding whether to release information. They said the school starts by identifying who is making the request and why and responds accordingly. For example, if the

requestor is known to the school and asking a simple, general question, the school might answer in conversation.

Generally, schools ask for requests to be in writing, for example by email. If the requestor is unknown to the school and the request unusual, the school might seek help from the regional office or central office, and give a considered, written response.

They rely on OneSchool records when deciding how to respond, in particular when the request is about student information. For example, the schools check whether a requestor is registered in the system and entitled to information or blocked from getting information. Schools log these requests and their response on the student file in OneSchool.

Principals said they aim to identify the right balance between releasing the information and protecting personal information, particularly about students or other information they think is sensitive. They err on the side of caution, and might not release information that could be released. If they have any concerns, they contact the regional office for advice.

The principals we talked to were generally unaware of the departmental administrative access procedure. As a result, they did not use its templates. They were also unaware of specific legislative requirements for managing privacy and confidentiality when giving access to information administratively. This exposes the department to a risk of privacy breaches.

We had originally intended to verify verbal reports by examining documents and other records of requests for information. However, the schools and regional offices we visited do not collate records or statistics of these requests.

Schools' and regional offices' comments about departmental support

Schools we visited describe strong relationships with their regional offices. The six schools view them as essential partners in navigating responses to requests for information, particularly for any request out of the ordinary.

Schools and regional offices can connect to central office for specific matters, for example, legal, policy or media questions.

While schools value central office input, there is not usually a direct relationship between schools and central office. This reflects the department's model where the primary relationship is between a school and its respective regional office, and then the regional offices and central office.

Interviewees said that regional offices do not give consistent advice about requests for information, and the quality of advice is variable. They could not identify a statewide mechanism where central office actively supports regional offices on administrative access and equips them to assist schools as needed.

Schools and regional offices state that central office publishes procedures and guidelines but does not always proactively explain how to use them. The department advised that procedures and training about administrative access have been published and accessible for years. The training has not been mandatory for approximately five years.

Schools and regional office staff told us they do not want more information. They would like to see existing information and support better structured, planned and organised and more accessible. For example, they reported they were unable to find policies and procedures and unaware of online training.

The department recognises the need to improve communication channels:

> *There are multiple channels the department uses to message schools,*
> *regions and staff. A review of these channels is currently being*
> *undertaken by the Strategic Communications Unit to provide more*
> *targeted communications to affected/interested business units.*

Promoting administrative access

It is unclear whether schools receive few requests for non-student related information because the community is:

- not interested, or

- unaware that it can ask for access to information and does not know how to do so.

The department operates multiple websites. The corporate website[14] acts as a hub for three websites for areas within the department:

- Education

- Early Childhood

- Office of Industrial Relations

A person can access a webpage titled *'How do I access information?'* through the right to information footer on the corporate website and the education website. This page contains links to the procedures on administrative access. The footer in each standard school website also links to the departmental webpage for right to information and hence to the procedures.

To give information access more prominence, schools could use menu options in the body of their websites. For example, the standard school websites have a menu tab '*Support and resources*' which links to a range of documents, covering topics like complaints management. Information about administrative access could sit there.

Additionally, if schools knew more about administrative access, they would be able to raise community awareness about right to information through other communication channels.

The department could consult schools about existing and expected non-student requests. This could help identify common requests for information across schools and inform the general promotion and awareness strategy.

We recommend that within 12 months, the department supports its administrative access arrangement with promotion so that the community is aware it can seek access to student and non-student information and knows how to do so.

---

14   https://qed.qld.gov.au/

5. Appendices

Agency response and action plan

Queensland
Government

Office of the
Director-General

Department of
Education

2 3 MAR 2022

Ms Rachael Rangihaeata
Information Commissioner
Office of the Information Commissioner
Email: audit@oic.qld.gov.au

Dear Ms Rangihaeata

Thank you for your email 8 March 2022 regarding the Office of the Information Commissioner's audit into the Department of Education's arrangement for administrative access to documents held in schools, under the *Right to Information Act 2009*.

The department is committed to *Advancing Queensland's Priorities* and making government services easier to use.

I believe that the areas for improvement identified in the body of the report are a true reflection of the current state. These are areas which the department has previously identified as requiring attention. Therefore, the department accepts all the recommendations in the audit report. Please find enclosed the department's action plan to address the audit recommendations.

Mr Neil McCarthy, Director, Information Management, will be leading the implementation of the recommendations identified in the audit report. Should you wish to discuss this matter further, I invite you to contact Mr McCarthy by email at neil.mccarthy@qed.qld.gov.au or on (07) 3513 5367.

Thank you for this opportunity to provide comments on the audit report.

Yours sincerely

MICHAEL DE'ATH
Director-General

Ref: 22/151260

Enc

We recommend that within 12 months the department supports its administrative access arrangement with:		Department of Education response and proposed action
No.	Recommendation	
1	clear and up-to-date draft policies and procedures that are easy to find and use, and adaptable to different circumstances	**Response**: The department accepts this recommendation.
		Proposed management action: Given that work is about to commence to implement a more logical framework of Information and Technology policies and procedures, including the rewriting of most policies, procedures and supporting documents, it is proposed that: a) Policies and procedures relating to right-to-information, and administrative access to information, be prioritised for rewriting; b) Policies and procedures relating to right-to-information, and administrative access to information be published as the documents become available, rather than on their scheduled publication date. The order of rewriting policies and procedures are to be amended; c) Subject matter experts (SMEs) including representatives from legal services to be consulted on the development of policies, procedures and supporting documents, related to this audit finding.
		Nominated owner: Neil McCarthy, Director, Information and Governance Management
		Nominated completion date: 31/05/2023

We recommend that within 12 months the department supports its administrative access arrangement with:		Department of Education response and proposed action
No.	Recommendation	
2	clarity about what information regions and schools can make available routinely and who is authorised to release it	**Response**: The department accepts this recommendation.
		Proposed management action: a) Consult with key information asset owners / stakeholders regarding information that may be routinely released. b) Create educational material informing regions and schools, as to what information can be released and under which authority to release it. c) Corporate communications team to coordinate a communications plan to ensure information is distributed efficiently and at regular intervals.
		Nominated owner: Neil McCarthy, Director, Information and Governance Management
		Nominated completion date: 31/03/2023

We recommend that within 12 months the department supports its administrative access arrangement with:		Department of Education response and proposed action
No.	Recommendation	
3	an updated program of targeted accessible training	**Response**: The department accepts this recommendation.
		Proposed management action: a) Establish a project within Information Management Unit to develop new training material, review existing training and updated as appropriate. b) Develop modules that utilise a variety of styles (videos; online learning; face- to-face; fact sheets; infographics) to appeal to all audiences
		Nominated owner: Neil McCarthy, Director, Information and Governance Management
		Nominated completion date: 31/05/2023

	We recommend that within 12 months the department supports its administrative access arrangement with:		Department of Education response and proposed action
No.	Recommendation		
4	a regional office information officer network that can a. promote consistency across regional offices b. raise awareness of access to information c. improve the quality of regional office advice and assistance d. be a pathway for feedback to central office to continuously improve departmental policies and procedures		**Response**: The department accepts this recommendation.
			Proposed management action: a) Create a 'Regional officer information network'; b) Appoint, or allocate and train, a centrally based coordinator, to coordinate and provide advice to the regional office, and central office, information officer networks; c) Allocate one 'regional information officer' per region to provide consistent advice and support to schools; d) Central office to provide educational materials (See Ref 3); communications, and promotional material that is consistent, for distribution across the network; e) Central office to provide ongoing advice and support for network.
			Nominated owner: Neil McCarthy, Director, Information and Governance Management
			Nominated completion date: 31/03/2023

We recommend that within 12 months the department supports its administrative access arrangement with:		Department of Education response and proposed action
No.	Recommendation	
5	promotion so that the community is aware it can seek access to student and non-student information and knows how to do so.	**Response**: The department accepts this recommendation.
		Proposed management action: a) Consultation with subject-matter experts, corporate communications and web services; b) Consultation and agreement from state school representatives, state schooling division, corporate communications and legal services unit; c) Development of public-facing webpages, communications and consistent messaging, to appear on all school, corporate and public-facing websites.
		Nominated owner: Neil McCarthy, Director, Information and Governance Management
		Nominated completion date: 31/01/2023

We recommend that within 2 years the department:		Department of Education response and proposed action
No.	Recommendation	
6	consults with stakeholders and implements the policies and procedures developed under recommendation 1.	**Response**: The department accepts this recommendation.
		Proposed management action: a) Internal and external consultation conducted during development of policies and procedures; b) Communications plan developed to ensure stakeholders are aware of implementation of new policies and procedures.
		Nominated owner: Neil McCarthy, Director, Information and Governance Management
		Nominated completion date: 31/05/2024

Audit methodology

The audit objective was:

To determine whether the Department of Education effectively manages the administrative arrangement for community access to documents held in schools.

We addressed the objective through the following lines of inquiry:

- The department has appropriate systems in place to manage the administrative access arrangement effectively.

- The department operates the administrative access arrangement effectively.

The audit did not examine:

- legislative access, for example, access to documents agencies publish in a publication scheme or disclosure log under the *Right to Information Act 2009*, or access under other Acts (for example, access to employee records under the Public Service Regulation 2008 (Qld), or the *Education (General Provisions) Act 2006* (Qld), which specifies documents schools must give students and parents/carers, such as report cards)

- information made available through mobile apps, for example QParents or QSchools.

We selected a sample of six schools in two regions, the Metropolitan and Darling Downs South West region, to get a mixture of schools:

- small and large

- state schools and state high schools

- urban and regional.

We used departmental statistics and consultation with the department and the regional offices to assist us in selecting schools, particularly around the timing of the audit. Given the small number of schools, we will not name the schools, to protect their identity.

We obtained departmental documentation about policies, procedures and training. We visited schools and regional offices in person and interviewed the six school principals, and in some cases their staff.