



Office of the Information Commissioner
Queensland

Audit Report

Responding to access requests for government-held information

Report No. 4 to the Queensland Legislative Assembly for 2024-25

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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Office of the Information Commissioner

Level 11, 53 Albert Street, Brisbane, Qld 4000

PO Box 10143, Adelaide Street, Brisbane, Qld 4000

Phone +61 7 3234 7373 or Freecall 1800 OIC QLD (1800 642 753)

Email administration@oic.qld.gov.au

Web www.oic.qld.gov.au

ISBN: 978-0-6489306-7-9



June 2025

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 an audit report prepared by the Office of the Information Commissioner (**OIC**), '*Responding to access requests for government-held information*', which is prepared under section 131 of the *Right to Information Act 2009* (Qld) (**RTI Act**). The audit fieldwork was conducted between May 2022 and June 2024.

In the financial years 2021-22 and 2022-23, government agencies received respectively 16,909 and 16,845 legislative requests for information. The majority of these requests were made by individuals seeking access to their personal information, including medical records, criminal history or incident information. The Department of Justice reported that in both financial years, 3% of these requests were not processed or decided within the timeframes prescribed by the RTI Act or the *Information Privacy Act 2009* (Qld) (**IP Act**).

The audit examined the practices and challenges in three agencies presenting with higher than average rates of delay at that time: Brisbane City Council, Cairns and Hinterland Hospital and Health Service and Queensland Police Service.

The audit report identifies key factors contributing to delays in responding to access requests. I note that since the audit, the three agencies have taken steps to address the findings and reported improved service delivery in giving access to information.

The report makes general recommendations to all Queensland government agencies on how to improve service delivery in responding to access requests for government-held information.

I respectfully request that you arrange for the audit report to be tabled in the Legislative Assembly in accordance with section 184(5) of the RTI Act and section 193(5) of the IP Act.

Yours sincerely,

Joanne Kummrow
Information Commissioner



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Summary

Information in the government's possession is a public resource. The *Right to Information Act 2009* (Qld) (**RTI Act**) and the *Information Privacy Act 2009* (Qld) (**IP Act**) make clear Parliament's intention to give the Queensland community a right of access to government-held information unless, on balance, there is a good reason not to give access, and to make formal access requests a last resort.

Section 21 of the *Human Rights Act 2019* (Qld) provides Queenslanders with the right to freedom of expression, which incorporates an individual's right to seek access to and receive government-held information.

These information rights are fundamental to transparency, accountability and integrity in public administration. Open and transparent government builds public trust in the public sector and government.

Under Queensland's pro-disclosure access to information legislation, government agencies must release information proactively or administratively as a matter of course, with formal applications for information under the RTI Act or IP Act (**formal applications for information**) to be a last resort.

If an agency receives an application for information, it has 25 business days to make a decision or otherwise handle the application (for example by transferring it to the right agency). This time period may be extended in certain circumstances.

When an agency fails to make a decision on a valid application for information within the time allowed, this is known as a '**deemed decision**' to refuse access.¹ The proportion of deemed decisions across the Queensland public sector increased from 1% in 2017-18 to 3% in 2022-23.

Applicants have increasingly sought an external review by the Office of the Information Commissioner (**OIC**) due to agency delays in deciding applications for information, with 7% in 2017-18 rising to 24% in 2022-23.

Delays in handling or finalising applications for information can have a significant impact on individuals and communities. The impact is particularly felt when people are unable to access their personal information in a timely and straightforward manner (eg. their medical record, criminal history), or information of public interest about local roads, education, housing or other community issues.

¹ Section 46, RTI Act. The deeming provision empowers an applicant to take further action. It gives them a 'decision' which they can seek to review, either internally within the agency or externally by the Office of the Information Commissioner.

To examine the factors contributing to increases in delays in responding to applications for information and deemed refusals, we determined to audit three agencies:

- Brisbane City Council (**BCC**)
- Cairns and Hinterland Hospital and Health Service (**CHHHS**)
- Queensland Police Service (**QPS**).

We selected these agencies because they experienced a higher than average proportion of deemed decisions, three or four times the state average in 2020-21 and 2021-22.

Key findings

The key findings reflect the situation at the time we conducted our audit between May 2022 and June 2024.

We acknowledge the improvements the audited agencies made during the course of, and following, our audit. We commend the agencies for implementing a number of initiatives that have significantly improved the timeliness and efficiency of their responses to requests for information. Their co-operation with the audit and successes in achieving better timeliness have elevated our insights into effective application handling.

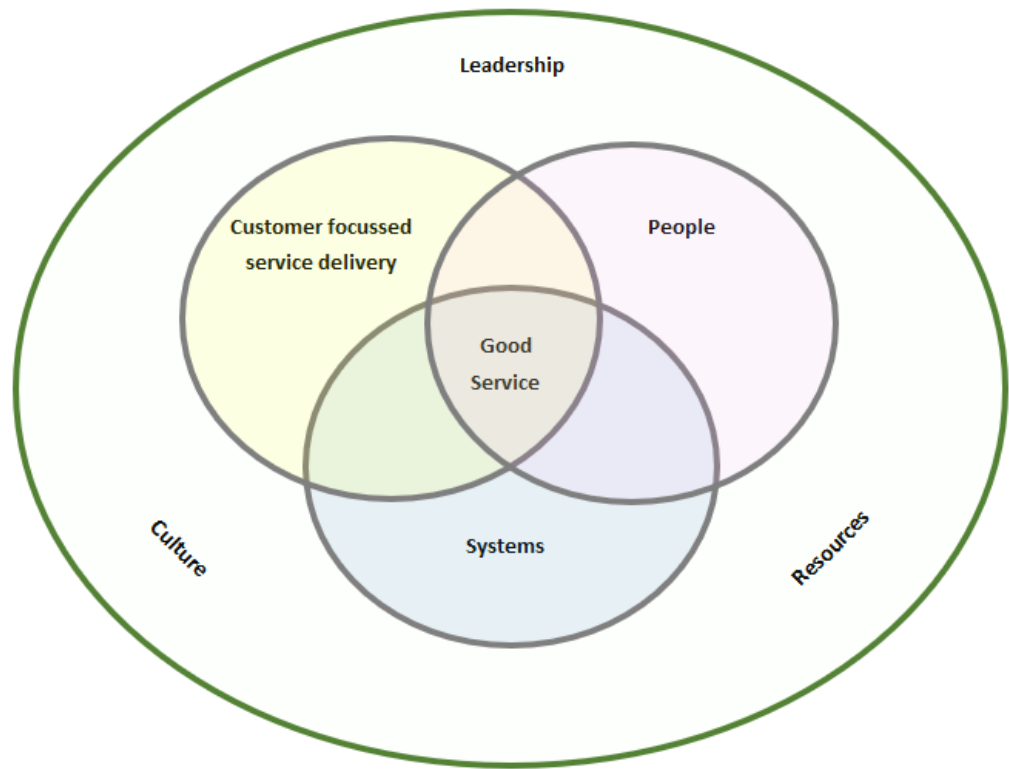
The report makes recommendations to all agencies about timely and efficient handling of requests and meeting their legislative obligations under the RTI and IP Acts.

Our key findings concern the following factors and their interrelationship:

- **Leadership, culture and resources** – the commitment of an agency's senior executive leadership to a culture of openness and transparency is key to providing timely access to information. This includes ensuring there are sufficient and appropriate resources to perform these functions.
- **People** – an agency should have sufficient staff to handle and manage its access requests and ensure its staff have relevant skills and experience to handle access applications and assist applicants in obtaining access in the most timely and efficient way.
- **Customer focused service delivery** – an agency should implement strategies that support timely and efficient access to information and customer focused service delivery.
- **Systems** – an agency should support its people by giving them the tools they need to do the job, including appropriate policies and procedures and fit-for-purpose technological solutions.

Figure 1 illustrates the connections and crossover between factors supporting good service.

Figure 1



Source: Office of the Information Commissioner

Leadership, culture and resources

The commitment of an agency’s senior executive leadership to openness and transparency is critical for timely and easy access to government-held information.

Strong public sector leadership and targeted actions for a customer service focus, people and systems are vital factors in improving information access and outcomes for individuals and the community. These targeted actions require sufficient appropriate resources in order to be effective.

Public sector executive leaders need to lead from the top. They need to champion a positive culture and embrace transparency and openness within their organisation, which involves a mindset that goes beyond mere compliance with the RTI and IP Acts.

They also need to ensure all staff within their agency are committed to facilitating citizens’ legal right to access government information in a timely manner, and providing

access to information through proactive disclosure and administrative release – with applications for information being a last resort.

This can be achieved by setting performance standards and expectations for transparency across an agency, with its executive leadership receiving regular reports on the handling of access to information requests to ensure performance standards are being met. This means that executive leadership will know when delivery falls below expected standards, and can oversight action taken to improve service delivery.

What did our audit find?

When agency leaders became aware of how they could impact service delivery, they took action to remediate and improve practices. In particular, agency leadership prioritised resourcing, both in terms of staffing and systems, when the real-life consequences of inadequate resourcing became apparent.

Customer focussed service delivery

Strong customer focussed service delivery means an agency has implemented a suite of strategies so that if a person is seeking government-held information, they are directed to the easiest and quickest point to access this information. Strategies that an agency can put in place include:

- setting up administrative access arrangements
- publishing and updating information proactively (for example on the agency's website)
- initiating early contact with an applicant to clarify the specific information they are seeking to access
- explaining to an applicant what information is available and how to access it.

These strategies support customer focussed service delivery and can also benefit an agency, for example, by reducing its workload. Initiating early contact with an applicant can help an agency respond to requests for information more efficiently and effectively, and reflects a customer service focussed approach.

Customer focussed service delivery can manage demand, which is cost-effective for an agency and supports the goal of formal applications as a last resort.

What did our audit find?

BCC and QPS operate administrative access schemes that are well-promoted. They have adopted a practice of calling applicants soon after receiving an application for information. As a result, they have been able to identify and suggest quicker pathways to access the requested information, if appropriate.

These agencies have also been more likely to be able to conduct targeted document searches as they understand more clearly the specific information an applicant is seeking, having discussed their application with them.

CHHHS has not been promoting its administrative access scheme for medical records effectively, which may have unnecessarily increased the number of applications for information that this agency receives. It did not call applicants on receipt of applications, and has lost time extracting documents that were not needed. In some cases, it extracted so many documents that it did not proceed with the application, resulting in a deemed decision.

People

For an agency's application handling function to be effective, it needs to ensure:

- it has sufficient staff to handle and manage access requests
- staff have relevant skills and experience to handle access applications and assist applicants in obtaining access in the most timely and efficient way.

A shortage of staff to handle requests for information can have a detrimental effect on staff, applicants and the agency. Insufficient capacity can lead to stress, burn out, delays, non-compliant practices and poor service delivery. For a person requesting access to information, insufficient staffing means they are more likely to experience delays and/or not get the information they are seeking.

RTI business units and RTI staff handle applications for information made under the RTI and IP Acts. They often manage a range of other methods for releasing information, for example administrative access arrangements.

RTI staff require relevant skills and experience and should be supported by appropriate induction and regular training about their roles, RTI and IP legislation and applicable access to the agency's information policies, procedures and performance expectations, including meeting prescribed timeframes to process access requests.

What did our audit find?

All audited agencies experienced delays and service delivery issues due to low staffing levels prior to or at the start of our audit.

Inadequate staff resourcing had a range of negative effects on the performance of each agencies' handling and processing of access requests. There were increasing delays and backlogs because the number of staff could not keep up with the number of applications for information and information requests.

Unit managers in audited agencies were busy handling applications and had limited time to train, guide or support their team and review their work to make sure it was correct.

RTI business units in all three agencies did not have the capacity to conduct staff awareness training regularly. This means other business units within the agencies did not always understand their agency's obligations under the RTI and IP Act.

We saw instances for each of the audited agencies where the RTI business unit sought documents from another agency business unit, and that unit's response was not timely or, in some cases, not responsive to requests to documents search or the provision of documents. This resulted in some applicants receiving their requested information late, or not at all, and some RTI business units having to conduct necessary document searches, which added to their workload and compounded existing pressures on service delivery.

Together, these deficiencies contributed to inefficient, and at times non-compliant practices.

Over the course of our audit, BCC and QPS increased the resources in their RTI business units significantly which enabled them to address most of the staff resourcing issues we identified during our audit. However, we consider there is still room for them to improve the awareness of all staff of their obligations about information access and information privacy. They also need to ensure RTI staff are well-trained and supported with managerial guidance and monitoring and reporting ongoing resource needs.

Systems

All government agencies should have fit-for-purpose, contemporary systems for managing requests for information and delivering services. Systems include policies, procedures and tools, such as templates and fit-for-purpose technology.

Weaknesses in an agency's systems create a significant risk that the processing of a request for information will be subject to inefficient handling and delay in being progressed and finalised. Staff who do not have clear policies and procedures, or do not follow them, can cause instances of non-compliance with the RTI and IP Acts. Templates also play a critical role in streamlining processes for staff and ensuring consistency of approach between different staff handling different types of requests. A lack of appropriate redaction software can result in agencies not being able to grant access to documents or in the adoption of manual and time consuming processes.

While automation and technological solutions may involve upfront financial investment and training for an agency, they can also result in improved services by government agencies to the benefit of the community and the efficiency of the agency.

What did our audit find?

At the start of our audit, the systems in place at the audited agencies had a range of deficiencies. Improvement opportunities included the need to perform an initial assessment of requests for information, investing in new technology and updating policies and procedures.

BCC and QPS reported that they addressed these issues following our audit and are starting to see positive results. For example:

- As the audit progressed, BCC introduced a system of maintaining a 'case note' for each file, which documented the assessment and tracked progress in real time. This enabled anyone involved in an application for information to quickly ascertain what had happened, the current status of the file and take any relevant steps.
- In 2024, QPS created a Validation Team, which ensures each application for information is valid, works with the applicant to clarify scope and discusses the best pathway to provide them with the requested information. As a result, QPS has reported significant success in diverting applications to quicker and more effective pathways to information.

Conclusions

At the start of our audit, the audited agencies experienced a higher than average rate of deemed decisions. The delays in processing formal applications for information stemmed from various gaps or inefficiencies in the areas of customer focus, people and systems.

Our audit identified factors that contribute to efficient practices when processing requests for information. Leadership, culture and resourcing are the key factors underpinning good service delivery and easy access to government-held information.

During, and since the audit, QPS and BCC have implemented a range of strategies. As a result, they have reported significant improvements in the timeliness and efficiency of their application handling practices. Support and commitment from the senior executive leadership is critical to achieving enduring improvements to agency practices.

This shows the positive impact that changes to an agency's resourcing, systems, processes and practices can have in improving its efficiency in responding to requests for information, to the benefit of the community.

Recommendations

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
 - 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.
3. require their right to information business units to contact applicants as soon as practicable on receipt of a request for information to discuss their request, including its scope, logistics and likely outcomes.
4. require their right to information business units to assign an experienced senior officer to assess applications for information on receipt to develop an efficient, customer service-focussed and legislatively compliant 'road map' for proceeding.
5. conduct a systematic review of their current information management and technology to identify if it is fit-for-purpose to support the size of their agency information access function and the volume of information requests received.

Agencies should consider implementing technological upgrades to maximise effective support of proactive disclosure and information access, including but not limited to:

- a. an online interface for information access requests
 - b. internal case management of applications for information
 - c. specific information access software such as redaction software.
6. ensure their right to information business tools are up-to-date and effective, including policies and procedures, templates, and reporting tools.

7. agencies' executive leadership monitor their agency's information access function to ensure it is supported and resourced to perform effectively.
8. ensure all staff are trained, aware of, supported and authorised to meet their obligations to proactively release information, safeguard personal information and be responsive to internal requests for information.
9. ensure that staff in their right to information business unit are appropriately trained and supported to undertake their roles.
10. ensure managers are supported to provide essential management functions, including guidance, supervision, mentoring and reporting.

1 Context

In a free and democratic society, access to government information is fundamental to transparency, accountability and integrity in public administration. Government agencies have a duty of stewardship for the information entrusted to them.

The Queensland Parliament expresses a commitment to openness and accountability in the *Right to Information Act 2009* (Qld) (**RTI Act**).² The RTI Act states a clear intention that government agencies will proactively release information unless there is a good reason not to.

They should be responsive to requests for information and, when appropriate, grant access administratively as a matter of course. Applications under the Act should be necessary only as a last resort.³

The number of applications agencies receive has steadily increased over the years, from 14,870 in 2017-18 to 16,883 in 2022-23 (including access requests and requests to amend personal information). The proportion of deemed decisions - refusal of access when agencies have not processed the applications within the legislative timeframe - has also increased from 1% in 2017-18 to 3% in 2022-23.

Applicants can apply to the Office of the Information Commissioner (**OIC**) for an external review of an agency decision. People have increasingly sought a review because of delay, from 7% in 2017-18 to 24% in 2022-23.

OIC decided to examine delay in application handling by exploring its causes. Based on published and internal statistics, we selected three agencies to help us identify the challenges of responding to requests for information and opportunities for improvement.

Brisbane City Council

Brisbane City Council (**BCC**) is the local government for Brisbane, the capital city of Queensland. It is responsible for city planning, local laws and permits, parking, public transport, bikeways, waste disposal and community service programs.

BCC has a budget of \$2.9 billion and employs approximately 10,000 people.⁴

In 2021-22, the proportion of BCC's applications not made within the time frame required under the RTI Act and the *Information Privacy Act 2009* (Qld) (**IP Act**) was

² Preamble to the RTI Act.

³ Preamble to the RTI Act.

⁴ Brisbane City Council Annual Report 2023-24, pages 96 and 20.

more than four times the state average. BCC finalised 37.5% (445 of 1,187) of the applications finalised by local governments but accounted for 85% of deemed decisions within the local government sector.

Cairns and Hinterland Hospital and Health Service

The Cairns and Hinterland Hospital and Health Service (**CHHHS**) is responsible for the delivery of local public hospital and health services across a large geographic area in north Queensland. The Cairns Hospital is the main referral hospital for Far North Queensland as well as providing specialist outreach services for the Torres Strait and Cape York regions.

CHHHS has a budget of \$1.4 billion and employs 6,091 FTE employees.⁵

In 2021-22, the proportion of CHHHS's applications not made within the time frame required under the RTI and IP Acts was more than three times the state average. While it finalised 278 of 5,731 applications (4.8%) in the health sector, it accounted for nearly half (44.9%) of applications that resulted in a deemed decision refusing access.

Queensland Police Service

The Queensland Police Service (**QPS**) is the primary law enforcement agency for Queensland. It provides assistance to the community, particularly in times of emergency, disaster and crisis.

Under the *Police Service Administration Act 1990* (Qld), the QPS is responsible for:

- preserving peace and good order in all areas of Queensland
- protecting and supporting the Queensland community
- preventing and detecting crime, and bringing offenders to justice
- upholding the law generally
- administering the law that QPS is responsible for fairly and efficiently
- providing help and assistance in emergencies.⁶

QPS has a budget of \$3.5 billion and employs over 18,000 people.⁷

QPS has the single biggest share of information access applications received for any Queensland government department. **Figure 2** illustrates the volume of applications QPS receives compared to other departments. In 2021-22, it received 2,414 RTI requests, comprising over a quarter of all applications to government departments.

⁵ Annual Report 2023-2024 Cairns and Hinterland Hospital and Health Service, Financial Statements – 30 June 2024, pages 3 and 13. The number of employees include full-time and part-time employees measured on a Queensland Health Full Time Equivalent (QHfTE) basis.

⁶ Section 2.3 Functions of service, *Police Service Administration Act 1990* (Qld).

⁷ Annual Report 2023-2024 Queensland Police Service, pages 23 and 67.

In the same period, QPS finalised 3,499 applications and reported that 359 applications resulted in deemed refusals of access.⁸ This was 10.3% of QPS's finalised applications and 15% of applications received.

In 2022-23, QPS received 3,247 applications, an increase of 34% compared to the previous year.⁹

Yet, the rate of deemed refusal decisions dropped to 7% (226 deemed decisions).¹⁰ This is a significant improvement, although it is twice the state average of 3%.

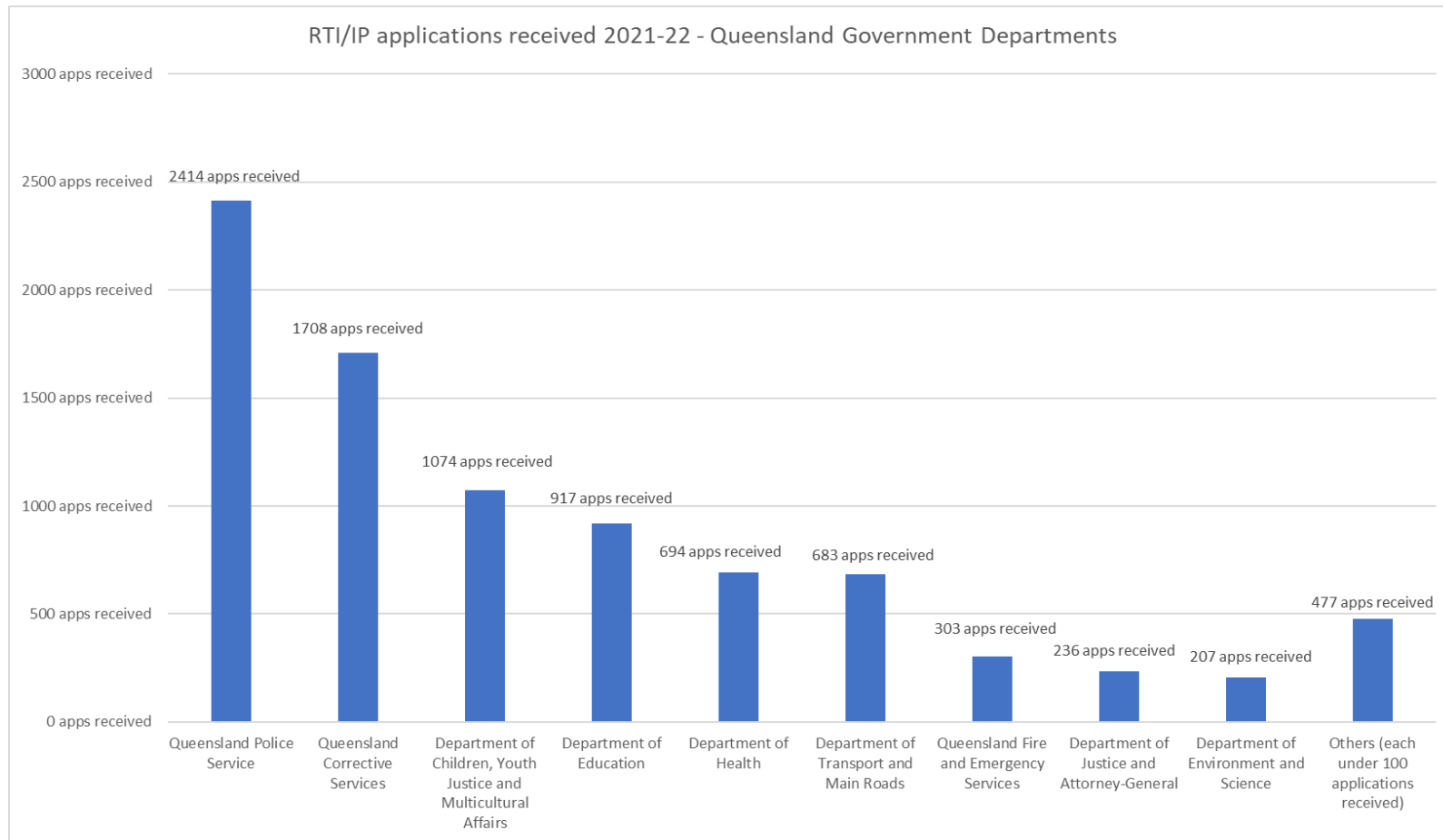
8 Department of Justice *Right to Information Act 2009* and *Information Privacy Act 2009* Annual Report 2021-22, accessible from the Queensland Government *Whole of government Right to Information* website - <https://www.rti.qld.gov.au/>.

9 Department of Justice *Right to Information Act 2009* and *Information Privacy Act 2009* Annual Report 2022-23, accessible from the Queensland Government *Whole of government Right to Information* website - <https://www.rti.qld.gov.au/>.

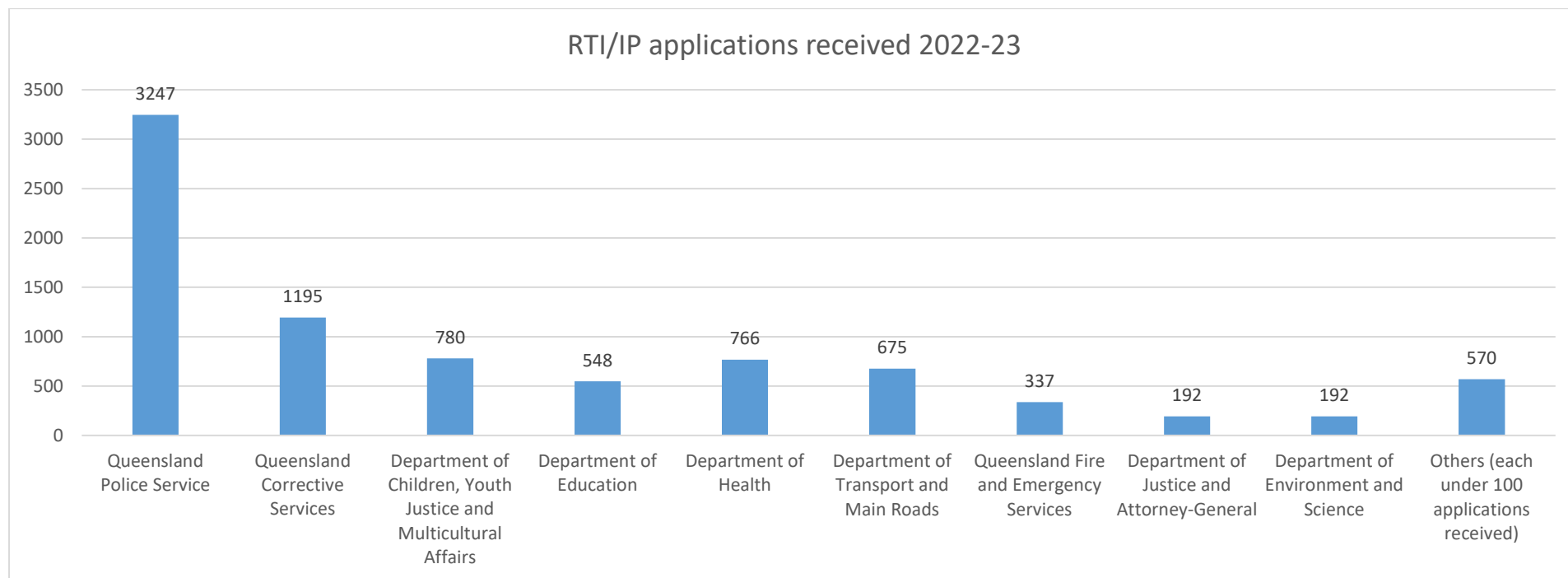
10 *Right to Information Act 2009* and *Information Privacy Act 2009* Annual Report 2022-23, accessible from the Queensland Government *Whole of government Right to Information* website - <https://www.rti.qld.gov.au/>

Figure 2

Number of right to information and information privacy applications received by departments in 2021-22



Source: The data – Department of Justice annual report on right to information and information privacy; Analysis – Office of the Information Commissioner



Source: The data – Department of Justice annual report on right to information and information privacy; Analysis – Office of the Information Commissioner

Audit objective and scope

This audit was conducted under our performance monitoring functions in section 131 of the RTI Act and section 135 of the IP Act.

The objective of the audit was to determine whether the audited agencies handle requests to access information efficiently and in accordance with legislative requirements, particularly prescribed timeframes in the RTI and IP Acts.

We did not review a statistically representative sample of application handling in the selected agencies. The audited agencies handle the majority of applications in time (85% or more).

We selected a sample of the application files that took the longest time to process or that might have yielded relevant information to help us identify any underlying causes of delay.

We invited the agencies to provide examples of their best practice to balance the audit findings and found examples of good practice.

We also reviewed each agency's websites, policies and procedures and other documents, and interviewed staff responsible for handling information requests. Where the agencies amended their practices during the audit, we describe these to assist other agencies to consider these ways of handling requests for information.

The timeframe for our audit was May 2022 to June 2024, during which time we sought evidence of new processes the agencies had introduced to recognise their effort in addressing some of the issues we identified since the commencement of our audit.

We acknowledge the time agency staff invested in the audit and thank them for their assistance and cooperation.

2 Leadership and culture

2.1 Introduction

‘Culture, and a tone set from the top, is critical to giving effect to the spirit of the legislation’.¹¹

– Professor Coaldrake

The object of RTI legislation is to establish information rights where:

‘Government information will be released administratively as a matter of course, unless there is a good reason not to, with applications under this Act being necessary only as a last resort.’

There can be a significant impact on people and communities if they are unable to access relevant government information in a timely and straightforward manner.

In a strategic review of OIC, the reviewer said:

‘delay is the deadliest form of denial’.¹²

Examples of real-life impacts on individuals due to delay in obtaining access to information from government agencies include individuals being unable to get information:

- about their personal medical condition and treatment, including mental health
- about a deceased relative to assist in a person’s grieving process
- about decisions made by government that affect them, eg. a grant application, or the development of a new community facility
- in time for court hearings or other legal proceedings, such as mediation.

The Office of the Information Commissioner (**OIC**), expects that agency executives:

- lead from the top – champion— by championing a positive culture of transparency and privacy that goes beyond compliance
- set standards for transparency and privacy across the organisation
- adopt a ‘Privacy by Design’ and ‘Open by Design’ approach
- monitor service delivery to maintain and improve it.

11 *Let the sunshine in: Review of culture and accountability in the Queensland public sector, Final Report*, 28 June 2022, Professor Peter Coaldrake AO, page 27.

12 *How to let more sunshine in: Strategic review of the Office of the Information Commissioner*, 2022, Final Report, 12 December 2022, Dominic McGann, page 11.

Agency leaders need to visibly commit to right to information and information privacy across their organisation and all functions, for example in strategic and operational plans, performance reports, information governance structure and project management framework.

Information in a government agency's possession or under its control is a public resource. Timely access to information is a **front-line service**, whether it is delivered through proactive publication, administrative access arrangements or formal application under the Acts.

Agency leaders also need to make sure that the necessary resources, systems and training are available to all staff to deliver a good information service.

2.2 Conclusion

Agency leaders need to drive a positive culture of proactive disclosure that goes beyond compliance with RTI and IP legislation, so that applications for information are a last resort.

Strong leadership and targeted actions with a focus on customers, and with appropriately resourced and supported people and systems can improve service delivery for the benefit of Queenslanders and government agencies.

2.3 Findings

Government agencies are dealing with an increasing number of formal applications, from 14,870 in 2017-18 to 16,883 in 2022-23, including access applications and applications to amend personal information.¹³ The number and proportion of applications resulting in **deemed decisions** refusing access to requested information also increased from 133 in 2017-18 to 432 in 2022-23, or 1% and 3% respectively.

In parallel, the proportion of external reviews received by OIC involving an agency's deemed refusal of an RTI request increased from 7% in 2017-18 to 24% in 2022-23.¹⁴

Figure 3 explains 'deemed decisions'.

13 Annual statistics about the right to information and information privacy are published online – <https://www.rti.qld.gov.au/accessing-government-information/annual-reports-rti>.

14 Office of the Information Commissioner Queensland Annual Report 2022-23, page 15.

Figure 3

Explanation of deemed decisions

What is a 'deemed' refusal decision and why does it matter?

A person can apply under the *Right to Information Act 2009* and the *Information Privacy Act 2009* for access to documents at any time.

The Acts require agencies to process valid applications within 25 business days.¹⁵

Agencies may ask an applicant to agree to a further specified period of time to process the application, or take more time in specific circumstances, for example when the agency consults a third party about releasing information.

If an agency does not process an application in time, including any additional time allowed beyond the 25 business days, the Acts 'deem' that the agency is taken to have decided to refuse access to the requested documents.¹⁶

Once a decision is deemed to be refused by an agency, the applicant can make an application to OIC for an external review of the deemed refusal decision.¹⁷

If an agency has a high proportion of applications becoming a deemed refusal of access, it signifies delay in responding to requests for information and possible issues in processing applications effectively or in time.

Source: Office of the Information Commissioner

Agency leaders can improve service delivery by actively:

- facilitating **customer focussed service delivery** for people seeking access to information
- implementing fit-for-purpose **systems** and tools
- training and empowering **people** to release information when appropriate to do so
- providing **leadership** and embracing a **culture** of transparency, with adequate **resources** for business as usual and to address spikes in demand.

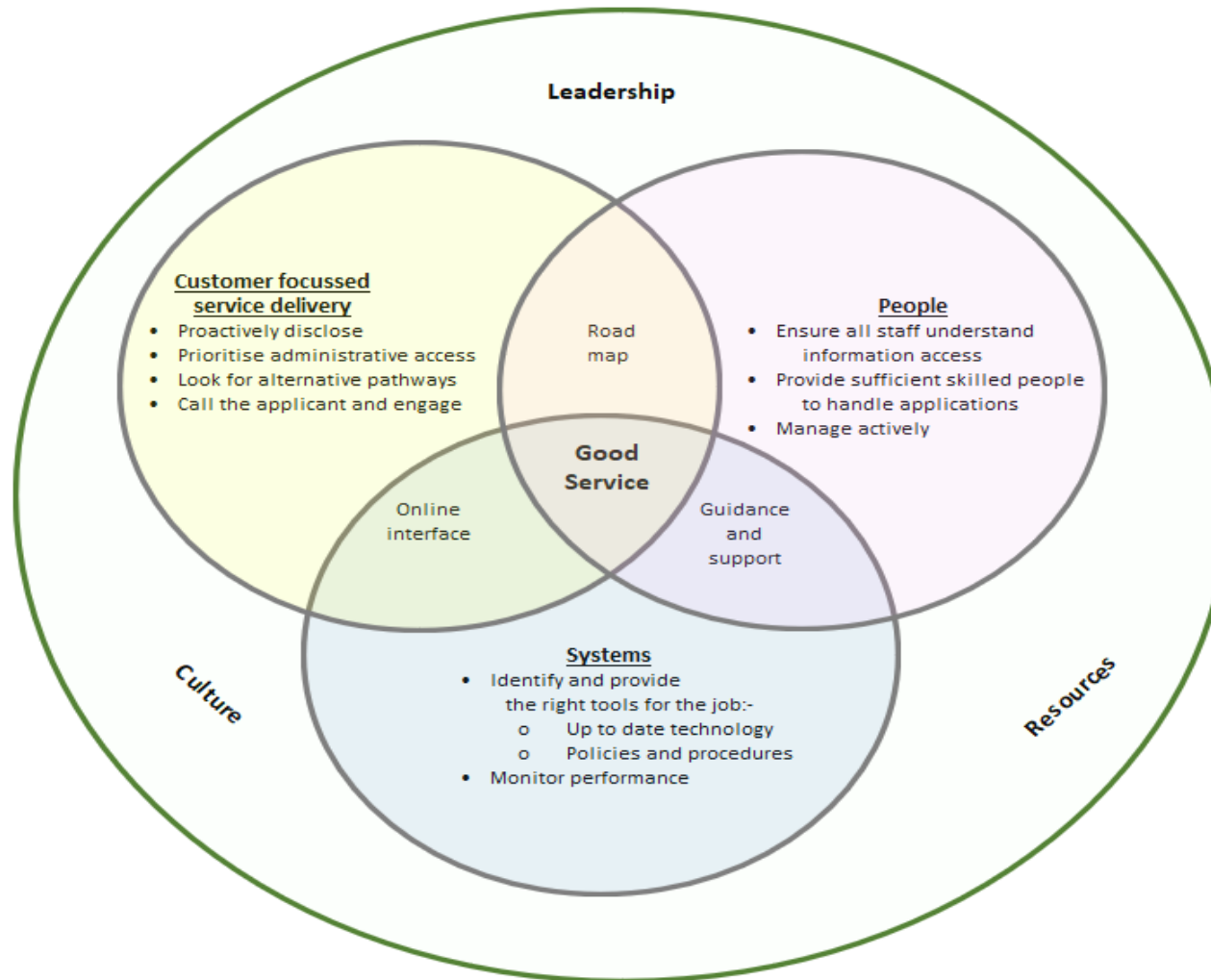
Figure 4 illustrates detailed connections and crossover between factors supporting good service.

¹⁵ Sections 18 and 22, IP Act.

¹⁶ Section 46, RTI Act and section 66, IP Act.

¹⁷ Section 85, RTI Act and section 99, IP Act.

Figure 4



Source: Office of the Information Commissioner

When we selected the Queensland Police Service (**QPS**), Brisbane City Council (**BCC**) and Cairns and Hinterland Hospital and Health Service (**CHHHS**) for the audit in 2022, these agencies had significantly higher rates of deemed refusal decisions compared to the average of all government agencies, as outlined in **Figure 5**.

As the audit progressed, these agencies amended their practices across customer service focus, systems and/or people, which resulted in an increase in the timely processing of applications for information and decisions made within prescribed timeframes under the legislation.

These improvements clearly show that strong leadership and targeted actions can improve performance and service delivery. For example, BCC saw the proportion of deemed decisions drop from 14% to 3% within a year (2021-22 to 2022-23), while receiving only a slightly lower number of applications (518 decreasing to 482) in the same period.

Figure 5
Proportion of applications received
and agency deemed refusal decisions

Deemed decisions as a percentage of applications received each year	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23
All agencies - average	1%	1%	2%	2%	3%	3%
Brisbane City Council	6%	4%	7%	7%	14%	3%
Cairns and Hinterland Hospital and Health Service	1%	3%	4%	7%	12%	10%
Queensland Police Service	1%	2%	5%	8%	15%	7%

Source: Department of Justice and Attorney-General's annual report on right to information and information privacy

Agency leaders need to actively monitor their agency's performance in meeting its obligations under the RTI and IP Acts and take action as needed.

Over a number of years, QPS and BCC submitted regular RTI performance reports to their agency's executive leadership, and these reports were instrumental in achieving leadership support for investment in additional resources and technology systems.

CHHHS's reports to its Board provided numbers for the relevant indicators, but were not accompanied by any trend analysis. Towards the end of the audit, senior management became involved and aware of issues affecting the right of information business unit and started to take corrective action. We will be able to assess the effectiveness of their strategies in a follow-up audit.

3 Customer focus

3.1 Introduction

To best meet the needs of people requesting information, agencies need to direct the requests to the easiest and quickest access to information. For example, by:

- using website technology to filter and direct requests for information to clear pathways, particularly for common requests
- explaining, for example on the website, what information is available and the timeframes for processing requests
- seeking out opportunities to release information proactively and administratively.

These strategies help an individual find information quickly and easily. It can also be cost-effective for an agency as a way to ensure formal applications are the last resort.

This section examines two aspects of customer focussed service delivery more closely:

- directing requests to the right place, for example an administrative access scheme or information published proactively on the agency's website
- calling the applicant soon after a formal request is received and speaking with them directly to clarify any issues regarding their request rather than defaulting to an exchange of emails or letters.

Customer focussed service delivery intersects with 'people'. Engaging with the applicant to better understand what information they are seeking enables the agency to make a 'road map' for processing the request efficiently.

3.2 Conclusion

The three audited agencies operate administrative access schemes. In BCC and QPS, the arrangements we examined are working well and achieve efficiencies for people seeking information and for the agency. CHHHS does not promote its administrative access scheme for medical records effectively. This could unnecessarily increase the number of formal applications this agency receives.

BCC and QPS reported a range of benefits for applicants and to their agency since adopting a practice of calling an applicant soon after they receive an application. It has led to better service and reduced workload. For example, talking to applicants enables the agency to suggest quicker and more effective pathways to information where applicable.

By understanding more clearly what specific information the applicant is seeking, the agency can target searches for documents. Early contact with applicants contributes to a more efficient and effective process of responding to requests for information.

3.3 Findings

Directing requests to the right place

Websites are a critical tool for directing access requests appropriately. They also support the push model and are an important tool for proactive disclosure.

To be effective in enabling access to information, a website needs to be easy to navigate and have clear pathways. Each audited agency has a website publishing a wealth of information.

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.

The NSW police force has a website and online portal which automate several aspects of the application process:¹⁸

- directing people to the most appropriate pathway to seek information
- assisting them to frame their request
- ensuring they understand the practical elements of the application they need to supply (for example payment of an application fee or proof of identity)
- managing applicant expectations
- capturing information about the application in a database.

Promoting and delivering administrative access

Administrative access arrangements are a quick, easy and inexpensive way to release information. We expect agencies to promote administrative access on their websites, and to encourage people to make a formal RTI/IP request as a last resort.

18 New South Wales Police Force Community Portal, <https://portal.police.nsw.gov.au/s/gipa-triage>.

Each audited agency operates administrative access arrangements. Two promote them well on their websites, illustrated by **Figure 6** (QPS) and **Figure 7** (BCC).

Figure 6
Queensland Police Service promotion of administrative access on its Administrative Access Scheme webpage

Search the QPS administrative access scheme	
Court brief (QP9) Find information on obtaining the Court brief (QP9) presented by police.	Crime reports Find information about obtaining a copy of the report made to police, provided you are the complainant.
Prosecutions Find contact details for QPS prosecutors across Queensland, enquire about a current prosecution, or read about the Case Conferencing Protocol for Summary Offences.	Police museum Find information on the police museum, school excursions and the history of the QPS.
Queensland criminal history Find out how you or your legal representative can obtain a copy of your criminal history.	Fingerprints Find more information about obtaining your fingerprints for a foreign passport application or renewal.
Person history Find out how to obtain a record of all the charges brought against you by the Queensland Police Service.	Photographs Find out how to get access to police photographs relating to yourself or a police incident you were involved in.
National police certificate Find out how to apply for a police certificate for employment, study or overseas travel visa purposes.	Operational policies Find copies of our policies and procedures available for public viewing.
Traffic incident reports Find out how to obtain details of a traffic incident you were involved in, or have a bona fide interest in.	Schedule of fees Download a PDF copy of the latest schedule of fees.

Source: Queensland Police Service website, Administrative Access Scheme webpage, <https://www.police.qld.gov.au/rights-information/administrative-access-scheme>, viewed April 2025.

Figure 7

Brisbane City Council promotion of administrative access on its Right to Information (RTI) webpage

If you are seeking information on any of the below topics, follow the relevant links to find out if an information search or inspection of records option is available.

<p>Building related searches</p> <p>Building plans, approvals, certification and property notices.</p>	<p>Previous development applications and approvals</p> <p>View specific development application details using Development.i, Council's development search and tracking tool.</p>
<p>Plumbing/drainage</p> <p>Request copies of plans that show in-ground private sanitary drainage within a property that connects plumbing fixtures within the building to a sewer connection or on-site sewerage facility.</p>	<p>Stormwater and roofwater drainage</p> <p>Request copies of stormwater drainage plans that show Council and non-Council owned stormwater drainage infrastructure.</p>
<p>Inspection of records search</p> <p>For example: current rates position, resident parking permit information, natural assets local law (NALL), flooding reports and information, road acquisitions and study areas, plumbing and drainage information, stormwater network information, property notices and defects, environmental health licences.</p>	<p>Traffic signalling data request or intersection volume counts</p> <ul style="list-style-type: none">• Request electronic intersection data and other traffic signal information such as plans and faults.• Request traffic volume count service for Council-owned and operated traffic light intersections.

Source: *Brisbane City Council website, Right to Information (RTI) webpage, viewed April 2025*

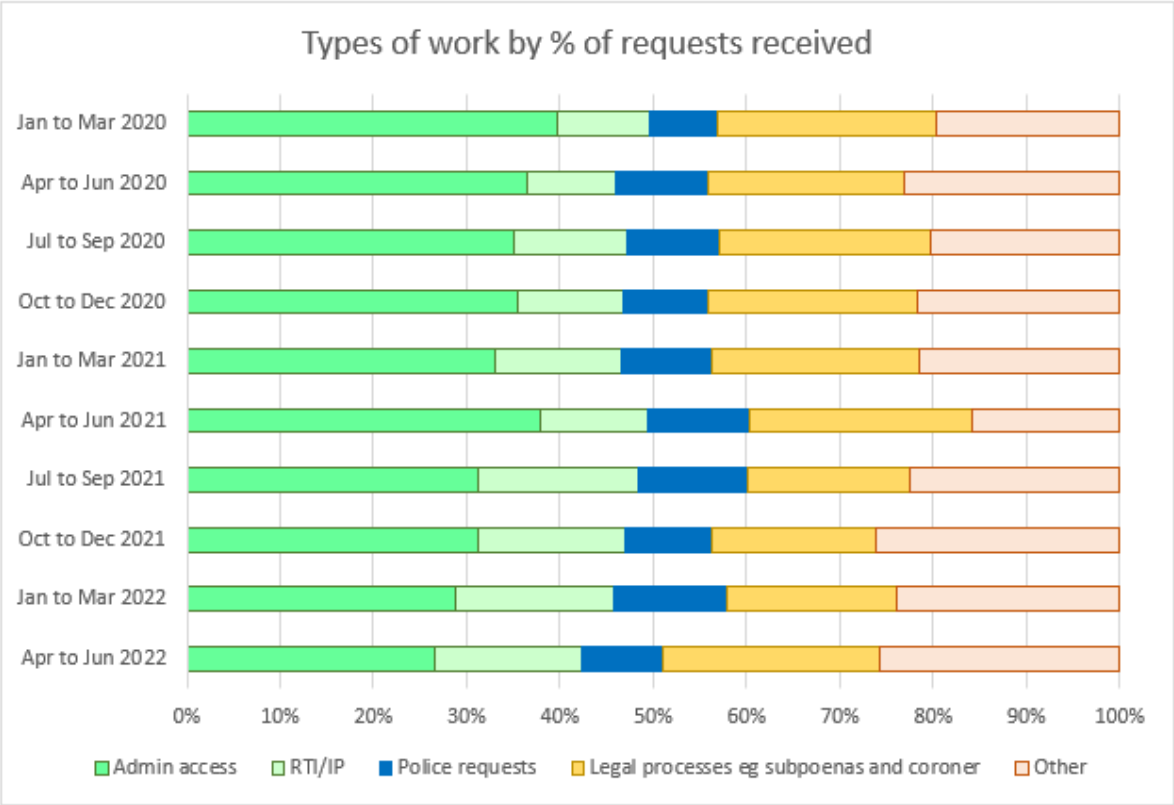
We examined two administrative access arrangements in BCC and one in QPS. They were working well and achieved efficiencies for people seeking information and for the agency. For example, BCC has an online portal; its webpages advise applicants of alternatives to making an RTI/IP application, particularly for CCTV (camera surveillance) footage.

CHHHS has an administrative access scheme for requesting medical records but does not promote it effectively. The link is not prominent on the agency's website.

From early 2020 to June 2022, the proportion of all access requests that CHHHS received through administrative access declined from 40% to 27%.

During the same period, the proportion of RTI/IP applications grew from 10% to 16%. This is illustrated in **Figure 8**.

Figure 8
Types of requests received by Cairns and Hinterland Hospital and Health Service each quarter (2020 to mid-2022)



Source: Cairns and Hinterland Hospital and Health Service provided the data, compiled by the Office of the Information Commissioner

At the start of the audit, the administrative access arrangement took longer than a legislative application for lawyers or organisations. CHHHS advised that it took steps to address this issue during the audit. It reports that administrative access in 2024 is now usually quicker than a legislative application.

Calling an applicant to resolve requests efficiently

Early contact with applicants is a key component to customer focussed service delivery, and to managing workload demand when dealing with applications for information. Sometimes an applicant can obtain their requested information without making a formal application for information.

Agencies that talk directly to applicants soon after receiving an application for information, for example by phoning the applicant as a first step, report many benefits. They understand what information the applicant is requesting which helps ensure the search for documents is targeted and focused on relevant documents.

There may be occasions when it is not appropriate to telephone an applicant on receipt of an application. The applicant may have requested to be contacted in writing only, or the RTI business unit may have reason to believe that a telephone call might be unhelpful. This should be a rare exception to the general rule – that the RTI business unit contacts an applicant shortly after receiving an application for information.

Many of the lengthy files we audited contained unnecessary work that could have been avoided by early contact with the applicant. For example, applicants may request a broad range of information in the hope of capturing some relevant information – a time-consuming and inefficient approach. Where the RTI business unit did not call the applicant, it spent time seeking information unnecessarily or sat on a voluminous request. Sometimes, after a protracted document search, the agency discovered the information was unwanted or had generated too many documents to process.

We identified occasions where the RTI business unit contacted the applicant after a long period of inactivity, only to discover that the applicant could have obtained information efficiently using an alternative pathway. We also saw files where the applicant called the agency to find out what was happening with their application, sometimes on multiple occasions, which compounded the agency's large workload.

QPS and BCC now have a practice of calling an applicant on receiving an application for information and have started to see the positive benefits of doing so.

QPS has also created an intake team led by a senior officer who assesses applications for information on receipt and calls applicants to discuss their information needs. This team has reported significant success in diverting applications to quicker and more effective pathways to obtain information. For example, QPS reports 10% to 20%¹⁹ of applications received are referred to another pathway and/or withdrawn after the Validation Team contacts the applicant.

This is contributing to a decrease in the number of QPS deemed refusal decisions from 15% of applications received in 2021-22 to 7% in 2022-23.

19 20% = 917 out of 4486 applications in 2021-22, 10% = 447 out of 4437 applications in 2022-23, projected 15% = 720 out of 4868 applications in 2023-24.

QPS also reports qualitative benefits:

- improved quality of customer service and trust in the provision of access to information by QPS
- building rapport with applicants by ensuring they are supported throughout the process, which is particularly important for applicants with vulnerabilities.

In relation to all applications received (including straightforward requests), BCC has adopted a new practice of:

- telephoning the applicant as soon as possible after receipt of their request
- maintaining regular communication with the applicant
- maintaining a real-time record of progress in a 'Case Notes' document.

We audited files adopting these practices. On each file, the decision maker contacted the applicant by telephone at the outset and made regular contact with them throughout the course of the file.

BCC reported that this new practice, together with other innovations, has resulted in:

- almost halving the number of RTI requests on hand at the end of each month (from over 100 in 2021 to between 51 and 62 in reported by BCC for 2023-24)
- reducing the percentage of deemed refusal decisions from 14% in 2021-22 to 3% in 2022-23, and potentially 1% as reported by BCC for 2023-24
- receiving positive feedback from applicants
- demonstrating good practice in the quality of file-handling.

CHHHS reported it had started '*sending relevant communications to applicants at a quick turnaround time*'. This statement describes a one-way communication from CHHHS to the applicant, for example by sending out letters or emails. CHHHS has not mentioned calling the applicant for a two-way discussion on receipt of the application. CHHHS has not reported the early one-way communication leading to the same benefits that QPS and BCC reported from early two-way communication with applicants.



4 People

4.1 Introduction

People are critical to service delivery. In a government agency, access to information and privacy are everyone's responsibility, not just the right to information business unit.

Decision makers rely on other business units to fulfill their function. It is important that all staff within an agency understand their obligations about access to information and privacy, and support decision-makers appropriately. This includes timely responses to requests for information, adequate searches for documents and any necessary assistance to the RTI unit to help assess the documents and make a decision.

For the application handling function to be effective, it needs sufficient staff, skilled staff with relevant experience, a well-managed approach and clarity about applicable standards and expectations. This involves:

- measuring workload
- understanding how many people are required and the level of experience they need to deliver the service effectively and efficiently
- ensuring staff are properly trained and supervised, including ongoing training
- ensuring managers organise, supervise and train staff, monitor progress, drive continuous improvement and report upwards about trends and pressure points within their unit.

Team stability also contributes to an effective function, as does active leadership and support from line management.

This section examines three aspects more closely:

- staffing levels
- training, to all agency staff and to decision-makers more specifically
- line management and supervision.

4.2 Conclusion

All audited agencies had experienced delays and service delivery issues due to persistently low staffing levels. Right to information business units in all three agencies did not have the capacity to conduct all staff training regularly. This means the other business units did not understand their obligations and were not responsive to requests to search for and provide documents.

Because of insufficient staffing, unit managers in audited agencies were not always able to train, guide or support their team and review their work, because they were too busy handling applications themselves.

Together, these deficiencies contributed to inefficient, and at times non-compliant practices. As a result, some applicants received the information they were seeking late, or not at all. Also, agency staff were more likely to experience stress and burn out.

4.3 Findings

Staffing levels and workload

When government agencies do not provide sufficient skilled people to handle requests for information, it can significantly affect staff and applicants. Insufficient capacity can lead to stress, burn out, delays, non-compliant practices and poor service delivery in general.

For a person requesting information, insufficient staffing means they are more likely to experience delays and/or not get the information they are seeking.

We found examples on audited files for all three agencies of staff often working long hours, weekends or public holidays. While this shows staff are committed to getting the work done, it is not an appropriate, sustainable or healthy practice.

An agency relying on staff making out-of-hours contributions to maintain a service runs a series of risks. These include degradation in performance, reduced service delivery, and workplace health and safety impacts. These negative consequences were evident on audited application files.

All audited agencies had issues about adequate staffing of their right to information business units:

- One agency had increased staffing to an appropriate level prior to the review and was seeing the benefits in a reduction of backlogs and delays (BCC).
- One agency's right to information business unit had been diligent in reporting upwards for some time and achieved staffing increases during the audit (QPS).
- One agency's business unit and immediate line manager had not reported upwards about resourcing shortfalls. Agency leadership started to take action to increase staffing when this audit brought issues to light (CHHS).

Business units trying to cope with excessive workload demands can adopt practices focussed on short term workflow, rather than effective workload management.

In the CHHHS files we audited, this resulted in unnecessary requests for voluminous documents, mistaken pursuits requiring re-work and missed opportunities to respond to the applicant in a way that would be quicker and easier.

QPS had a significant issue with heavy workload. At the beginning of the audit, staff members were carrying an estimated average of 250 application files per person. Its right to information business unit had a long history of submitting detailed analyses and requests to increase staff capacity, dating back to 2017. Although this process did not garner immediate results, it prepared the way so that when the opportunity came for a breakthrough, the unit eventually secured additional staff.

Insufficient staffing contributes to delays and poor service delivery. When staff have a consistently high workload, they may turn to expedient, but ultimately inefficient or even non-compliant, practices.

Training

All staff in an agency should understand their responsibilities to provide an information service. This means that all staff should be trained at induction, and at regular intervals, about their right to information and information privacy responsibilities, including responding to requests for information. They should be aware of their agency's administrative access arrangements and understand their authority and obligations to release information administratively.

At the start of the audit, agencies did not support staff training and awareness about the right to information. Right to information business units in all three agencies did not have the capacity to conduct staff training regularly, only conducting special sessions or part sessions on request. One agency had removed right to information from its generic orientation training (CHHHS).

As the audit progressed and resourcing levels were improved, two of the agencies started to conduct general awareness training for agency staff (BCC, QPS). This training includes formal sessions and networking meetings.

Working with other business units

When other business units do not understand their obligations when they receive a request to search for and to provide documents, it creates delay, inefficiencies and risk of non-compliance.

We saw instances on the audited files where the right to information business unit sought documents from another business unit, and the other business unit did not respond quickly, appropriately, or at all (BCC, CHHHS, QPS).

In one agency, business units formed their own view about which documents were relevant, rather than sending all responsive documents to the RTI unit unredacted (CHHHS).

RTI business units in all audited agencies managed business unit non-responsiveness by conducting document searches themselves, for example, through agency databases. This added to their workload and compounded existing pressures on service delivery.

BCC has undertaken a significant change management process to shift document searches from the right to information business unit to the responsive business unit. It supported the change by developing and using a structured document search form, to assist the other business units to conduct and document the search.

While this change has taken time to implement, it is driving a range of improvements:

- The responsive business units are better than the right to information business unit at identifying responsive documents, which improves the outcome for the applicant.
- During the audit, responsive business units commented on the importance of knowing which documents were released. This process means they are more aware of the documents considered and released.
- This approach has given the right to information business unit a better grasp on its workload.
- The use of the structured form builds in legislative compliance, and gives the business units an appropriate way to comment on factors affecting release and to make a record of the searches they have undertaken.

When the right to information business unit uses a structured form to request information, it helps other business units to target their searches and respond appropriately. This can prompt the business unit to advise the decision-maker of any contextual factors for the access decision. It can also record other relevant information, for example, to determine the amount of charges payable or assess the sufficiency of the search for documents.

In 2022, CHHHS had a template form for conducting searches which was appropriate. However, files with delays did not use the form. CHHHS has developed a new form for document searches. We note that the previous form had advantages over the new form, for example it prompted the business units to list the places they searched.

The right to information business unit in QPS continues to conduct its own searches, and uses them in conjunction with requests to other business units for information. QPS reports that this is efficient as it assists other business units to find relevant material. QPS has a structured memorandum that assists business units to respond. For the audited files, this form was not always used, which meant the files were not reviewable.

QPS advises that it:

‘seeks to improve case management procedures, particularly standardisation of procedure and general uplift of skill in recordkeeping practices.’

The three audited agencies had provided some training to their right to information staff. However, this was mostly generic, online training. Agencies did not provide concerted active training and support to ensure people handling applications were properly trained.

During, or since, the audit, they have arranged specialist training for decision-makers and practitioners.

Line management

Agency leadership needs to support its managers to manage, so that the information access function can be effective.

A person’s immediate line manager can be a key determinant of their performance at work, and of their experience of the workplace. An effective line manager supports people to do their best. They:

- help and guide staff
- review work to check practices are efficient and correct
- identify and resolve problems
- listen to staff
- coach staff
- make space for staff to suggest ideas and innovations
- create a supportive and safe work environment.

Another avenue for building professional skills is through managerial guidance. Unit managers in audited agencies were not always able to provide training, coaching, guidance or support to staff, because they were too busy handling applications themselves. We saw instances where unit management was unaware of poor staff practices (CHHHS).

Managers in all reviewed agencies need to manage, guide and support their staff in good practice.

In BCC, additional resources enabled the manager to turn around the performance of the unit, leading to better case management, timeliness and customer satisfaction.

In CHHHS, pressure of work meant the line manager focused on getting day-to-day work allocated and done. They did not review the quality and compliance of application handling. The audited files had evidence that the manager was not always aware of other staff practices on files, including practices that were incorrect, caused delay or were not legislatively compliant. For example, the manager thought staff followed the practice of accepting an application that met the legislative requirements even if the applicant did not use the official application form. In fact, staff were returning the application and requiring the applicant to complete the form. CHHHS acknowledges these issues and stated it would review the position.

QPS accepted that at the start of the audit, the unit had not had adequate line management support for some time. QPS said:

'The need to prioritise outcomes to the customer at the expense of our own governance was the central pillar in our submission for resources, which we have recently received.'

QPS reports that now, with additional staff in place, the manager can take an active role as supervisor and mentor. This includes minuted weekly team leader meetings and empowering staff to take on more high-level tasks, such as internal reviews.

The other critical management role is the immediate line manager that the right to information business unit reports to.

This line manager can play a critical role in managing the interface between the right to information business unit and the rest of the agency. They can:

- network with other teams
- advocate for the team and win cooperation and resources
- inform senior managers of the consequences of resource limitations
- reinforce good values and a positive workplace culture when prioritising and problem-solving.

The immediate line managers in two audited agencies were effective in this role (QPS, BCC).

In the third audited agency, we found instances where immediate line management directed staff to do other tasks, such as warrants and subpoenas (with due dates ordered by a court), ahead of processing information requests. This meant that staff sometimes did not process applications at all, allowing them to lapse and become deemed refusal decisions (CHHHS).



5 Systems

5.1 Introduction

Systems include policies, procedures and tools, such as templates and technologies.

All government agencies should have fit-for-purpose, contemporary systems for managing requests for information and delivering services. Such systems support efficient, compliant and consistent practices.

This section examines three aspects more closely:

- making a 'road map'
- having fit-for-purpose technology to process information access requests, including redacting software and a case management system with reporting capabilities
- using standardised procedures and policies.

Systems intersect directly with 'customer focus' for making an online interface, and with 'people' for providing guidance and support to staff.

5.2 Conclusion

At the start of the audit, the systems in place at the three agencies had a range of deficiencies. Improvement opportunities include performing an initial assessment of requests for information, adopting fit-for-purpose technology and updating policies and procedures.

The systems' weaknesses contributed to delays and inefficiencies in processing requests for information. Not following the correct procedures and templates lead to instances of non-compliance. A lack of appropriate redaction software can also result in agencies not being able to grant access to documents. BCC and QPS have addressed these issues and are starting to see results.

While automation and technological solutions may require upfront investment, they can also result in better service to the benefit of the community and the agencies.

5.3 Findings

Make a 'road map'

A 'road map' in the context of requests to access information is an outline of how to respond to a request in the most effective way. It does not need to be a formal document. It is more a 'stop and think' stage where a senior and experienced officer considers what might be involved in processing the application. By doing so, they can ensure the application is directed through the best process. They:

- consider whether the agency can provide the requested information more quickly and easily than by the application process, for example through administrative release
- anticipate procedures that might be necessary, for example, third party consultations
- ensure there is no unnecessary work done, for example, extracting documents that are not needed.

The person conducting this initial assessment of a request needs to understand and have experience with the legislative provisions and application process. They need to use their professional judgement to assess likely complexity and impact on time required to process the application.

At the start of the audit, BCC reported having a system of assessing applications on receipt. This was undocumented on audited files. As the audit progressed, BCC introduced a system of maintaining a 'case note' for each file, which documented the assessment and tracked progress in real time. This enabled anyone involved in application handling to quickly ascertain what had happened, the current status of the file and take any steps that needed to be taken.

Previously, QPS's procedures included a preliminary assessment checklist for people handling applications. We did not observe decision-makers or case managers using the checklist on the assessed files.

This process has changed. In 2024, QPS developed a process for the Validation Team. A flowchart describes how the Validation Team makes sure each application is valid, and works with the applicant to clarify scope and discuss the best pathway to information. QPS did not have fully documented procedures or work instructions for the Validation Team at the end of the audit.

We examined four QPS files processed under the new regime, and confirmed they followed this procedure in practice. However, we did not fully audit the files due to gaps in records on the files that would have ensured the file was complete and reviewable.

The Validation Team was achieving results by the end of the audit. Improvement opportunities include:

- documenting its work consistently and comprehensively
- documenting its procedures
- keeping track of its practices on individual files and collecting and reporting to management on statistics.

This will support consistent and effective team collaboration on applications, ensure reviewability of individual application files and enable the team to demonstrate its achievements in clearcut terms. It will also help the Validation Team to examine its practices and adopt the most effective approach, for example, a default position of making early contact with the applicant.

Technological tools

Automation and information management technologies can make the process of handling requests for information more efficient and effective. They can help:

- automate aspects of application processing, including internal reminders and due dates
- manage multiple concurrent applications by any staff member
- redact documents appropriately, leading to more information being released.

All agencies should make sure their right to information business units are equipped with fit-for-purpose, contemporary technology to deliver the services. This includes redaction software and other software that can assist in managing electronic documents.

Case management system

All agencies should have a system for managing requests for information. The system should prompt the right to information business units to undertake the necessary steps at the right time and hold relevant records.

Good case management is important for reviewability, oversight and accountability. It allows agencies to describe the searches they have undertaken for documents and demonstrate that the search has been thorough.

Agencies could also use their case management system to identify what information applicants regularly request. They could then explore better ways to make that information available more easily and quickly, for example through proactive disclosure or administrative release.

Some agencies, for example those receiving a large number of requests for information, may benefit from investing in a case management system or software package. This solution could help manage multiple concurrent files, recording the documents, the steps or stages in application handling, remind case managers of upcoming deadlines and automate parts of the process. It could support multiple people being able to work on an application file as needed.

There were shortfalls in the case management systems for the three audited agencies. None had a fully fit-for-purpose, automated case management system. They used multiple record keeping systems and workarounds with varying degrees of success. This created duplication and reduced efficiency.

BCC compensated for the lack of an automated case management system by using a spreadsheet and creating a document within each application file that recorded every step taken and all conversations with the applicant.

At the start of the audit, CHHHS used a spreadsheet to record applications including requests for extensions, decision dates and exemptions. This process was ineffective in prompting the team to perform necessary actions on time.

CHHHS advised it subsequently implemented a temporary tracking system, and was considering procuring a case management system. Prior to this audit, CHHHS had approved acquisition of a case management tool, but the approval was rescinded due to funding constraints.

QPS used a case management package but it was not entirely fit-for-purpose. The RTI unit used a free-text 'notes' function to keep track of progress on each application. It also used QPS's agency-level record keeping system for correspondence and interactions with the public. The lack of a fit-for-purpose case management system was a detriment given the consistently high number of RTI requests QPS receives annually.

These workarounds are only as effective as the case manager's diligence in maintaining the workaround. When staff are under workload pressure, they let this type of activity lapse. For example, they do not record due dates or key dates correctly, losing the benefits of file management procedures and contributing to delays or missing deadlines.

While technological solutions require investment, they can also create significant efficiencies and improve service delivery. For example, QPS has used technology to manage demand and streamline administrative access to criminal histories. It reports reducing processing time from 2-6 weeks for each request to 15-30 minutes for approximately 60% of all requests. It says it

‘used to assign 8-9 people to processing requests for Police Certificates / criminal histories. There are now 3 people assigned to this task.’

Redaction software

At the start of the audit, we observed that right to information business units did not have the necessary ICT²⁰ tools to do their job efficiently. For example, in one agency, the business unit did not have software that would automatically convert attachments to PDF format²¹ (QPS).

All decision-makers need to be able to redact sections of the documents before granting access. Good redaction helps grant access to more documents or parts of documents in an efficient and timely manner.

Manual redaction and conversion of documents created delay and inefficiency. Tasks that could be done in minutes with the right tools instead took hours or days (QPS). Manual processing also increased the risk of error, including disclosing exempt information in error.

Similarly, the lack of software to redact or edit video footage, for example, footage taken with body-worn cameras means that *‘the time required to review footage is inordinately large and a big impost’* (QPS).

QPS advised that it now has software to automatically convert attachments to PDF format, as well as software to edit video footage.

BCC is adopting software that uses artificial intelligence to assist in redacting CCTV footage. The council also uses it for audio, and in future aims to use it to automate transcripts of audio recordings.

Standardised procedures

Standardised procedures increase efficiency. They also help to ensure the process is legislatively compliant and consistent. Policies, procedures and templates should be clear, accurate and current.

20 ‘ICT’ stands for Information and Communications Technology, typically software applications

21 ‘PDF’ stands for Portable Document Format, a standard format for presenting and exchanging documents, so that the documents display correctly on any device.

At the start of the audit, the three agencies had policies, procedures and templates about dealing with requests for information. However, the documents needed reviewing and updating for accuracy and currency.

BCC has taken steps to update its procedures. The new procedures are comprehensive, well-written and designed.

CHHHS has standardised procedures and templates that are largely compliant, with some opportunities for improvement. In 2022, CHHHS used two incorrect decision notices, creating significant risk to the applicant. It advises that it has rectified the issue by updating the templates.

QPS has been relying for its procedures on a manual drafted by Crown Law²² which is not tailored for its environment. It advises it will start to work on documenting its procedures. In particular, QPS needs to document procedures for its Validation Team. We assessed a shortlist of templates and found they were fit-for-purpose.

Standardised procedures and templates are effective to the extent they are applied. At the start of the audit, right to information business units did not always follow their procedures or use the forms. Instead, they used unstructured processes, templates or emails. The three agencies attributed this practice to high workloads, for example, preferring to send a quick email rather than opening and completing a structured template.

For QPS, lack of structure led to miscalculating start dates for processing times, and technical errors, such as incorrect advice about review rights, incorrect resolution of files and providing access to documents in a format different to the access requested. These errors created delays for applicants (in one case of several months). This could lead to unnecessary further work for the agency if it identified errors that needed to be corrected.

We considered QPS's errors to have the hallmarks of errors made in haste, and QPS did not dispute this view. QPS advises that with more appropriate caseload levels, it is able to follow procedural requirements.

At CHHHS, serious departures from the procedures lead to non-compliance, delays, missed deadlines and overall poor service delivery.

22 *Decision-makers' Manuals: For applications made under the Right to Information Act 2009 and the Information Privacy Act 2009*, Version 1.3, November 2017 prepared by Crown Law Queensland (the **Crown Law Manual**). It is out of scope for this audit to comment on the accuracy of the Crown Law Manual.

CHHHS also did not use available legislative tools to negotiate the scope of an application. For example, an applicant might be seeking a couple of pages from a relative's medical record and request the entire medical record. The legislation encourages informal resolution, and failing that, achieving a workable scope by issuing notices about:

- the amount of work to process the request – if it is such a substantial and unreasonable diversion of resources that the agency will not deal with the application unless the applicant reduces the scope
- a decision that charges are payable, accompanied by an estimate of how long it would take to process the documents, the corresponding charge that the applicant might need to pay, and that this charge can be negotiated by negotiating scope.

These notices are an opportunity for an applicant to rework the scope of their application so that it is manageable. The audited files contained examples of occasions when a notice may have led to a narrowed scope that CHHHS could process, and hence consider documents for release. CHHHS did not use the tools available. As a result, the applications were unworkable and the applicants did not access documents.

CHHHS has implemented training and a tracking system, but does not comment on any new practices it may have adopted.



6 Appendices

6.1 Agency responses



Dedicated to a better Brisbane

Brisbane City Council ABN 72 002 765 795

Office of the Chief Executive
Brisbane Square, 266 George Street Brisbane
GPO Box 1434 Brisbane Qld 4001
T 07 3403 8888
www.brisbane.qld.gov.au

2 June 2025

Ms Joanne Kummrow
Information Commissioner
Office of the Information Commissioner
PO Box 10143
ADELAIDE STREET BRISBANE QLD 4000
audit@oic.qld.gov.au

Dear Ms Kummrow

Audit conducted under section 131 of the *Right to Information Act 2009* (Qld) – ‘Responding to access requests for government-held information’

I refer to your correspondence dated 7 May 2025 regarding the completed audit ‘Responding to access requests for government-held information’.

I would like to thank you for your invitation to provide comment on the proposed report, prior to your giving it to the Justice, Integrity and Community Safety Committee of the Queensland Parliament for tabling.

Thank you for acknowledging Brisbane City Council’s ongoing efforts throughout the course of the audit to improve the timely processing of information access applications. Council prioritises its obligations and is committed to providing ongoing customer focussed service delivery.

I acknowledge the recommendations made in response to the audit and I confirm Council’s commitment to incorporating them to improve our service to the public. Responsive to the audit, and to the upcoming legislative changes, Council has taken significant proactive steps to promote a culture of openness and awareness of our obligations through organisational training.

I am confident that the work being undertaken by Council during, and following, this audit will result in an ongoing reduction in deemed decisions, notwithstanding the consistent increase in applications being received.

Thank you for your attention to this matter and for the ongoing professional relationship between our agencies.

Yours sincerely

Kerrie Freeman
CHIEF EXECUTIVE OFFICER

Ref: CO05722-2025

Brisbane City Council acknowledges this Country and its Traditional Custodians.
We pay our respects to the Elders, those who have passed into the dreaming;
those here today; those of tomorrow.

Enquiries to: Office of the Chief Financial Officer
Telephone: 07 4226 3226



Cairns and Hinterland
Hospital and Health Service

Joanne Kummrow
Information Commissioner
Office of the Information Commissioner
Level 11, 53 Albert Street, Brisbane QLD 4000
By email: audit@oic.qld.gov.au

Dear Joanne,

**Re: Audit conducted under section 131 of the *Right to Information Act 2009* (Qld) –
'Responding to access requests for government-held information'.**

I write to acknowledge receipt of the audit report titled 'Responding to access requests for government-held information' prepared under section 131 of the *Right to Information Act 2009* (Qld). We welcome the findings and the opportunity the audit has given us to reflect upon and improve our practices.

The Cairns and Hinterland Hospital and Health Service (CHHHS) would also like to acknowledge the work initiated by the Information Access Unit prior to and throughout the OIC audit addressing the recommendations, and would like to share the additional progress that has been made since the completion of this audit:

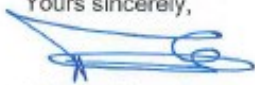
- Additional temporary experienced RTI-IP decisionmakers have been recruited.
- CHHHS RTI-IP decision-makers have adopted a practice of contacting applicants within five business days of receiving an application.
- In most cases a single CHHHS RTI-IP decision-maker will process an application from end-to-end to improve the applicant's experience.
- The team have embedded a case management tool, which assist with tracking the status and details of applications, as well as giving management visibility of key performance metrics.
- All CHHHS RTI-IP decision-makers have information access software including redaction tools and have received training in using these tools.
- RTI-IP templates (including case notes, correspondence, and search certifications) have been reviewed and updated; and are used consistently by all CHHHS RTI-IP decision-makers.
- All CHHHS RTI-IP decision-makers participate in both internal and external RTI-IP practitioner forums, network meetings, OIC training sessions, and information sessions hosted by law firms (i.e. Clayton Utz, Ashurst) on a regular basis.

Executive Offices
85 Spence Street Cairns
PO Box 902 Cairns
Queensland 4870 Australia

Telephone +61 7 422 66000
Website cairns-hinterland.health.qld.gov.au/
ABN 65 959 415 158

We thank your staff for their professional and constructive approach to the audit, and we look forward to working with your office in the future.

Yours sincerely,



Thomas Pamminger
Chief Financial Officer
Cairns and Hinterland Hospital and Health Service
30/5/2025



QUEENSLAND POLICE SERVICE

COMMISSIONER'S OFFICE
200 ROMA STREET BRISBANE QLD 4000 AUSTRALIA
GPO BOX 1440 BRISBANE QLD 4001 AUSTRALIA

Email: commissioner@police.qld.gov.au



Our Ref:

Your Ref:

28 May 2025

Ms Joanne Kummrow
Information Commissioner
Office of the Information Commissioner
PO Box 10143 Adelaide Street
Brisbane 4000 QLD

By email: ic@oic.qld.gov.au

Office of the Information Commissioner (OIC) Audit - 'Responding to access requests for government-held information'

Dear Ms Kummrow

Thank you for your letter of 7 May 2025 advising that your audit is completed, and providing a copy of your findings and report. I note the report fairly identifies the issues and the steps taken prior to the presentation of the report. I acknowledge some of the challenges Queensland Police Service (QPS) faced during the audit period and confirm the ongoing commitment of the QPS to continual improvement.

QPS continues to see benefits from the changes which have been implemented. In particular, there were 87 deemed decisions for the 2023-24 reporting period which represents 2.8% of finalised applications. This represents a further decrease from the figures included in your report, and was achieved in the face of a 13% increase in the number of applications received when compared to the previous year. The downward trend is continuing in this current reporting period.

The QPS continues to draft and refine processes and procedures, and has made further progress in terms of internal training and awareness. Additionally, the Right To Information case management system has been identified as a specific agency risk, and the QPS has initiated a project for its replacement.

I thank your audit team for their professionalism during the audit. If further information is required, I invite them to contact Mr Matt Peate, Director, Right to Information and Privacy Services, on telephone 3364 4666 or via email at rti@police.qld.gov.au.

Thank you for the opportunity to respond to the report.

Yours sincerely

SHANE CHELEPY APM
ACTING COMMISSIONER

QUEENSLAND POLICE SERVICE

