



**Office of the Information Commissioner
Queensland**

Prioritising privacy to keep victims safe:

**A review of the disclosure of domestic and family
violence victims' addresses to offenders by the
Queensland Police Service**

Under section 135(1) of the *Information Privacy Act 2009* (Qld)



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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.

Warning

The following report contains references to domestic and family violence and may be distressing to some readers.

Support services and reporting domestic and family violence

Report domestic and family violence

If domestic and family violence is happening now or you are in immediate danger, call Triple Zero (000) and ask for Police.

If there is no immediate emergency, you can report domestic and family violence by phoning Policelink on 131 444.

You can go to your local hospital or emergency department for medical advice.

To make a non-urgent report of domestic and family violence online, use the Report feature on the Queensland Police Service homepage at www.police.qld.gov.au.

Support services

DVConnect Womensline on 1800 811 811

DVConnect Mensline on 1800 600 636

1800 RESPECT on 1800 737 732

13 YARN on 13 92 76

Lifeline on 13 11 14

Kids Helpline on 1800 55 1800

Victim Assist Queensland 1300 546 587

Women's Legal Service

Queensland 1800 957 957



December 2025

The Honourable Patrick Weir MP
Speaker of the Legislative Assembly
Parliament House
George Street
Brisbane QLD 4000

Dear Speaker

I am pleased to present my report, *'Prioritising privacy to keep victims safe: A review of the disclosure of domestic and family violence victims' addresses to offenders by the Queensland Police Service* to the Legislative Assembly.

In December 2024, I exercised powers under section 135(1) of the *Information Privacy Act 2009* (Qld) (**Information Privacy Act**) to commence a review into the Queensland Police Service's handling of personal information of domestic and family violence victim survivors and its compliance with the privacy principles in schedule 3 of the Information Privacy Act (the **Review**).

The Review also considered the privacy complaint handling practices and remedial actions undertaken by the Queensland Police Service to reduce the risk of further unauthorised disclosures.

The Review found the Queensland Police Service contravened three privacy principles and its business practices exposed domestic and family violence victim survivors to risk of further harm, and that further harm did occur.

The report makes specific recommendations to the Queensland Police Service in relation to prioritising information privacy practices. These recommendations will further strengthen the privacy protections of personal information held by the Queensland Police Service including personal information of victims, provide greater guidance to frontline police officers and enhance the support provided to members of the public to make privacy complaints.

In accordance with subsection 193(5) of the Information Privacy Act, I request that you arrange for the report to be tabled in the Legislative Assembly.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Joanne Kummrow', with a long horizontal line extending to the right.

Joanne Kummrow
Information Commissioner

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1 Executive Summary

Duties of the Queensland Police Service

The Queensland Police Service (**QPS**), like other Queensland agencies, must take reasonable steps to protect the personal information it holds from unauthorised disclosure under the *Information Privacy Act 2009* (Qld) (**Information Privacy Act**). The QPS must only use¹ personal information that is necessary to fulfil a particular purpose in connection with its functions.²

In its function to protect all members of the community, the QPS enforces the *Domestic and Family Violence Protection Act 2012* (Qld) under principles that, *'the safety, protection and wellbeing of people who fear or experience domestic violence, including children, are paramount.'*³

Further, the *Human Rights Act 2019* (Qld) establishes a legal right to privacy for all Queenslanders.⁴ This human right includes the right for a person not to have their privacy, family, home or correspondence subject to unlawful interference.

The Information Commissioner's review, conducted under section 135(1) of the Information Privacy Act, found that the QPS released domestic and family violence victim survivors' (**victim**) addresses to offenders. In some cases, this enabled offenders to commit further acts of domestic violence against victims and jeopardised the safety and security of victims seeking to escape violence and pursue justice. While these disclosures by the QPS were unintentional, privacy is paramount for police and the justice system to keep victims safe from further harm by offenders.

This report documents cases occurring between 2020 and 2023 in which the personal information handling practices, procedures or systems of the QPS did not meet its legal obligations under the Information Privacy Act.

Information Commissioner's decision to review the matter

Under the Information Privacy Act, reasonable steps to protect the personal information of an individual, such as their name, address or location, include the use of security

¹ *Information Privacy Act 2009* (Qld) s 23(2).

² Information Privacy Principles 4, 9 and 11.

³ *Domestic and Family Violence Protection Act 2012* (Qld) s 4(1).

⁴ *Human Rights Act 2019* (Qld) ss 11 and 25.

safeguards⁵, such as technical, physical and administrative controls.⁶ An agency needs to determine which safeguards to implement by undertaking formal assessments of the privacy impact of the agency's activities. The security safeguards for personal information held by an agency must be adequate to provide the level of protection that can reasonably be expected given the type of personal information the agency holds. In a situation where a victim's safety is at stake, the community's expectation of the QPS to protect a victim's personal information is '*justifiably high*'.⁷

On 26 July 2024, the then Acting Deputy Police Commissioner told the Queensland Parliament's Estimates Committee that personal information of domestic violence victims had been shared when the QPS's computer system, the Queensland Police Records and Information Management Exchange system (**QPRIME**), automatically imported information in QPRIME directly into forms.⁸ The then Acting Deputy Police Commissioner explained that it was up to police officers to redact victim information.

On 17 December 2024, the Information Commissioner exercised powers under section 135 of the Information Privacy Act to commence a review (the **Review**) into the QPS's handling of personal information of victims and its compliance with its legal obligations under the Information Privacy Act and the Privacy Principles.⁹ This included consideration of the QPS's personal information handling practices, including technologies, programs, systems, policies and procedures.

In summary, the Review found that the QPS's business practices exposed domestic violence victims to risk of further harm, and that further harm did occur.

Failure to meet privacy obligations under law

The Review found that the QPS's policies, procedures and systems failed at both a technical and administrative level.

For example, when a perpetrator commits an act of domestic violence using a telecommunication device (for example, a mobile phone), police officers may make a record in QPRIME that the location of the offence was the victim's address. QPRIME automatically draws information from its database and imports it into QPS generated

⁵ Information Privacy Principle 4(2).

⁶ Office of the Information Commissioner, '*Interpreting the legislation – Information Privacy Act 2009, Protection and security of personal information (IPP 4)*' (19 July 2013), 1
<https://www.oic.qld.gov.au/__data/assets/pdf_file/0020/70427/guideline-security-and-protection-of-personal-information.pdf>.

⁷ *ZIL v Queensland Police Service* [2019] QCAT 79 [46].

⁸ Community Safety and Legal Affairs Committee, Parliament of Queensland, *Estimates—Attorney-General and Justice; Prevention of Domestic and Family Violence* (26 July 2024), 48
<https://documents.parliament.qld.gov.au/events/han/2024/2024_07_26_EstimatesCSLC.pdf>.

⁹ *Information Privacy Act 2009* (Qld) s 135(1).

forms that are submitted to the court. It is then up to police officers to manually check court forms and remove information that should not be there.

In the seven cases assessed in the Review, the QPS's manual checking process failed. Police officers did not remove victims' addresses from forms that were later provided to domestic and family violence perpetrators, and which revealed a domestic violence victim's location – previously not known to the perpetrator. The disclosures were not intentional; for example, in one case, the police officer self-reported, and in all seven cases the QPS took action attempting to ensure victims' safety.

An automated system involves privacy risks if it relies on manual checking to prevent the disclosure of personal information by default. The QPS identified 368 forms in its system that include the address of a victim, aggrieved person, respondent or offence location. Further, the QPS identified eight release documents that are routinely disclosed to a defendant during court proceedings. Without manual intervention, these release documents would automatically share these addresses. Therefore, QPRIME did not have sufficient privacy controls and lacked a 'privacy by design' approach.¹⁰

The QPS system did not incorporate prompts instructing users to consider the circumstances of a victim, particularly the need to protect their personal information, such as their current safe location, from the perpetrator. The system failed to protect the personal information of the seven victims whose cases were examined.

The QPS did not have effective written guidance about the personal information required to be included in court forms, resulting in police officers including more information than was necessary. For example, one purpose for listing the location of an offence is to establish jurisdiction for court proceedings. In situations where the offence is committed with a telecommunication device and the victim's full residential address was listed as the location of the offence, the Review has been advised that it may be appropriate to use a partial address, such as the state and suburb, to establish jurisdiction in court proceedings, rather than the full address.

The QPS Operational Procedures Manual (**OPM**) provided guidance and instruction to police officers that covered the release of victims' personal information. However, the sections of the OPM with privacy considerations were not brought to the attention of

¹⁰ *Privacy by design* is an approach that builds privacy up front into the design specifications and architecture of new technologies and business processes. It makes privacy an integral component of the functions being delivered. Privacy by design principles are considered to be 'best practice' and feature in the Office of the Information Commissioner's Guidelines '*Undertaking a Privacy Impact Assessment*' and '*Privacy Champion Policy*'.

police officers at critical points in the process. The OPM was not designed to cross-reference and refer police officers to the necessary privacy sections.

The Review examined training provided to police officers. It was inconclusive whether a lack of training contributed to the disclosures in each case. The review found that training modules reinforced the importance of protecting personal information from disclosures, however, there are opportunities to maximise the impact of messaging about information privacy in practice.

In all but one of the seven cases, the QPS Privacy Unit was not aware of complaints made to the QPS that involved the disclosure of a victim's personal information. The Review identified a need for the QPS to improve the transparency of its complaints handling and to take a more victim-centric approach to ensure, at a minimum, that victims are aware of their privacy rights and complaint processes under the Information Privacy Act.

The QPS's remedial actions

The Review found that the QPS was slow to act and commence initiatives to identify and implement end-to-end solutions to mitigate the risk of further unauthorised disclosure of personal information through QPRIME. For example, the QPS was aware of the risks associated with QPRIME's auto-population function since at least 2017. Mechanisms within the QPS Ethical Standards Command also failed to escalate identified related systemic issues in a timely manner.

Since August 2024, the QPS has acted to address privacy risks and improve complaint handling. Examples of actions include:

- implementing technical controls in QPRIME to redact the address on the Bench Charge Sheet, QP9 and Charge List
- adding warnings to release documents
- coding changes to release documents to partially redact a victim address without the need for manual intervention
- strengthening the OPM
- petitioning the Chief Magistrate to amend the Bench Charge Sheet particulars

- updating the Complaint Resolution Guidelines to formalise information sharing between Ethical Standards Command and Privacy Unit
- centralising assessment and triaging of complaints through Ethical Standards Command.

Findings

The Review found that the QPS acted in contravention of its obligations to comply with the Information Privacy Principles (**IPPs**), namely:

- **IPP 4** – the QPS did not have adequate security safeguards to provide the level of protection for the personal information it was handling that could reasonably be expected to be provided
- **IPP 9** – the QPS did not use only parts of personal information that were directly relevant to fulfilling a particular purpose
- **IPP 11** – the QPS was not satisfied on reasonable grounds that the disclosure of the victims' addresses was necessary for a law enforcement purpose.

Consideration of issuing a compliance notice

The Review findings established grounds for the Information Commissioner to consider issuing the QPS with a compliance notice under section 158 of the Information Privacy Act on the basis that:

- the QPS acted in contravention of its obligation to comply with IPP 4, IPP 9 and IPP 11¹¹
- these acts were a serious contraventions of privacy principles¹²
- these acts also constituted a contravention of the Queensland Privacy Principle requirements.¹³

When determining whether to issue a compliance notice, the Information Commissioner took into account the causes of the privacy principle breaches, and the corrective action taken by the QPS.

After considering the QPS's whole-of-business solutions to minimise the risk of victims' personal information from being disclosed to offenders, the Information Commissioner determined that it was not necessary to issue a compliance notice.

¹¹ *Information Privacy Act 2009* (Qld) s 158(1)(a).

¹² *Information Privacy Act 2009* (Qld) s 158(1)(b)(i).

¹³ *Information Privacy Act 2009* (Qld) s 222(1)(c).

Recommendations

Based on the findings made in the Review, the Information Commissioner has made recommendations to further the improvement of public sector privacy administration by the QPS.¹⁴ The recommendations are set out in Section 2 of this Report.

In summary, the recommendations made in the Review seek to strengthen the personal privacy protections of the personal information of victims held by the QPS. The recommendations also aim to clarify the QPS's processes for handling privacy complaints, including those received by its Ethical Standards Command and referred to the Privacy Unit.

The Information Commissioner welcomes the QPS's commitment to engaging cooperatively with the Office of the Information Commissioner and determining a suitable action plan, including feasibility assessment for the recommendations.

¹⁴ *Information Privacy Act 2009* (Qld) s 135(1)(b).

2 Recommendations

Based on the findings in this report, the Information Commissioner makes the following recommendations that the Queensland Police Service:

Recommendation 1

Within six months,

- a) clarifies its policy position about recording a victim's address as an offence location for an offence where a telecommunication device is used, and the offender's address is unknown
- b) clearly communicates this policy position to Queensland Police Service members
- c) incorporates the policy into induction and ongoing training and awareness for Queensland Police Service members.

Recommendation 2

Within three months,

- a) amends the Queensland Police Records and Information Management Exchange system New Charge Options to require police officers to answer whether the offender is aware of the victim's address
- b) implements a Queensland Police Records and Information Management Exchange system business rule that partially redacts the victim's address.

Recommendation 3

Within three months, updates the sentencing schedule 'prosecutions copy' form to include report parameters giving police officers the opportunity to select what information is imported.

Recommendation 4

Within 18 months, enhances cross-referencing in the Queensland Police Records and Information Management Exchange system User Guide to improve accessibility and enable Queensland Police Service members to quickly locate relevant information across interconnected sections. This cross-referencing should include, but not be limited to topics about information privacy, recording offences, telecommunication

offences, form creation, court document preparation, creating charges and domestic violence.

Recommendation 5

Within 18 months, enhances cross-referencing in policies and procedures, including the Operational Procedures Manual, to improve accessibility and enable Queensland Police Service members to quickly locate relevant information across interconnected sections. This cross-referencing should include, but not be limited to topics about information privacy, recording offences, telecommunication offences, form creation, court document preparation, creating charges and domestic violence.

Recommendation 6

Within six months,

- a) identifies all Queensland Police Service forms that may be at risk of disclosure to third parties that contain personal information of victims, witnesses, or other vulnerable persons
- b) include a warning prompt on all identified forms that requires a Queensland Police Service member to consider the safety of the victim in accordance with the relevant Operational Procedures Manual section.

Recommendation 7

Within 12 months, implements Queensland Police Records and Information Management Exchange system controls to redact the personal information partially or fully from a form that may be at risk of disclosure to a third party.

Recommendation 8

Within 18 months, reviews its information privacy training and awareness program and ensures:

- a) relevant training materials for the production of court documents incorporate information about safeguarding privacy
- b) training materials are consistent, align with, and cross-reference policies, procedures, instructions and practices

- c) the design of training programs supports the effective transfer of privacy knowledge to the trainee, through the frequency and structure of the training sessions or programs, and the use of examples
- d) retention of information privacy knowledge is reinforced through reminders and ongoing awareness programs.

Recommendation 9

Within six months, updates the Police Integrity and Professional Standards system to include a data field to capture systemic issues or lessons learnt during Assessment Inquiries.

Recommendation 10

Within 12 months, completes a review of the effectiveness of existing committees involved in identifying and leading the implementation of whole-of-business improvements.

Recommendation 11

Commencing immediately, promptly records and acknowledges a complaint made to the Queensland Police Service that relates to an individual's personal information as a privacy complaint when the complaint is first received to ensure the correct timeframe for dealing with, or responding to a privacy complaint is adhered to.

Recommendation 12

Within three months,

- a) updates the 'QPS Feedback' webpage to:
 - i) include the definition of a privacy complaint
 - ii) clearly state the options for a person to make a privacy complaint, including the use of an available online form
- b) updates the 'Privacy in the QPS' webpage to:
 - i) include the definition of a privacy complaint
 - ii) clearly state the options available to make a privacy complaint, in addition to the information contained within the QPP Privacy Policy.

Recommendation 13

Within 12 months, updates both online complaint forms to include:

- a) a method such as a tick box or yes / no question which prompts members of the public to consider and select whether they also wish their complaint to be treated as a privacy complaint
- b) advice that when a user selects the tick box to make a privacy complaint, the Queensland Police Service has 45 business days to respond.

Recommendation 14

Within three months,

- a) updates the 'QPS Feedback' webpage to:
 - i) advise the expected response and resolution timeframes for complaints, including privacy complaints
 - ii) outline how privacy complaints are dealt with by the Queensland Police Service
- b) updates the 'Privacy in the QPS' webpage to:
 - i) clearly state the options for making a privacy complaint and advise the expected response and resolution timeframes
 - ii) outline how privacy complaints are dealt with by the Queensland Police Service
 - iii) ensure complainants are aware of their specific rights of review.

Recommendation 15

Within 12 months, and with reference to recommendations 11 and 13, implements a system that automatically notifies the QPS Privacy Unit when a complaint is made by way of the online form and the system registers that a member of the public has made a privacy complaint.

Recommendation 16

Within 12 months, implements a system that automatically notifies the QPS Privacy Unit of the Ethical Standards Command matters that the Complaint Assessment Committee has identified as containing a privacy issue.

Recommendation 17

Within six months,

- a) updates the Complaint Resolution Guidelines to include timeframes for notifying the QPS Privacy Unit about complaints
- b) updates the Complaint Resolution Guidelines to include the meaning of a 'privacy complaint' and 'response period' for a privacy complaint as per sections 164 and 164A of the Information Privacy Act.

Recommendation 18

Within six months, updates the Professional Practice Manager manual to standardise processes and formalise expectations about how information should be shared between the Ethical Standards Command and the QPS Privacy Unit to align with the Complaint Resolution Guidelines.

Recommendation 19

Ensures that at appropriate intervals, the complaint management model, supporting policies and procedures are reviewed and updated in consultation with the QPS Privacy Unit.



3 Background

On 25 July 2024, a free-to-air television channel in Queensland, Channel 9, reported that the Queensland Police Service (**QPS**) had given out the addresses of a domestic and family violence victim survivor (**victim**)¹⁵ to an offender. This was also reported on 26 July 2024 in the Courier Mail, in an article titled '*Victim details exposed in police data system fault*'.

A privacy breach of this nature is a serious privacy breach as it risks serious harm to victims and others, including endangering their physical safety and subjecting them to the risk of other serious harms such as emotional harm.

The matter was discussed in the Queensland Parliament during an Estimates hearing. The Hansard transcript of the Estimates hearing on 26 July 2024 stated that the QPS had provided victim addresses in court documents.¹⁶ The then Acting Deputy Police Commissioner said that the QPS's computer system, the Queensland Police Records and Information Management Exchange system (**QPRIME**), had automatically imported information contained in its database directly into forms. He explained that it was the responsibility of the police officers to redact the victim information from court forms and reports.

This issue had been identified as early as 2017. Later in that year, a QPS working group named the DV Interagency Working Group identified emerging issues where the addresses of victims were being disclosed to offenders during court proceedings. On 15 April 2018, the Brisbane Times published an article titled '*Police blame system error after domestic violence victim's address released*'. This article described the lived experience of a victim who had her address disclosed to an ex-partner by the QPS through court documents. The QPS claimed that the cause was an auto-population function.

The Information Commissioner wrote to the QPS on 28 August 2024 and again on 23 September 2024 to seek information about the disclosures, and the actions the QPS took to remedy the issues and ensure the safety of victims.

¹⁵ The Report uses 'victim' to refer to domestic and family violence victim survivors.

¹⁶ Community Safety and Legal Affairs Committee, Parliament of Queensland, *Estimates—Attorney-General and Justice; Prevention of Domestic and Family Violence* (26 July 2024), 48
<https://documents.parliament.qld.gov.au/events/han/2024/2024_07_26_EstimatesCSLC.pdf>.

The Office of the Information Commissioner (**OIC**) made further preliminary enquiries of the QPS and determined that the issue warranted more formal regulatory action.

On 17 December 2024, the Information Commissioner commenced a review (the **Review**) of the QPS's handling of personal information and compliance with the privacy principles under section 135 of the *Information Privacy Act 2009* (Qld) (**Information Privacy Act**).

3.1 Police functions in domestic violence matters

The QPS plays a critical role in the administration of the *Domestic and Family Violence Protection Act 2012* (Qld) (**DFVP Act**).

The QPS enforces the DFVP Act under the principle *'that the safety, protection and wellbeing of people who fear or experience domestic violence, including children, are paramount.'*¹⁷

The QPS's role includes investigating domestic violence and taking action to protect people from domestic violence. A police officer may take various types of action under the DFVP Act, including applying to a court for a protection order or taking a respondent into custody.¹⁸

The DFVP Act contains provisions to protect the confidentiality of people involved in domestic violence matters.¹⁹ It also guides sharing of information between agencies, including the QPS, in pursuit of the paramount principle of protecting the safety and wellbeing of people who fear or experience domestic violence.²⁰

The QPS is now²¹ governed by the Victims' Charter, prescribed by the *Victims' Commissioner and Sexual Violence Review Board Act 2024*.²² The Victims' Charter states:

*The personal information of an affected victim, including the victim's address and telephone number, will not be disclosed unless authorised by law.*²³

¹⁷ *Domestic and Family Violence Protection Act 2012* (Qld) s 4(1).

¹⁸ *Domestic and Family Violence Protection Act 2012* (Qld) s 100(3).

¹⁹ *Domestic and Family Violence Protection Act 2012* (Qld) Part 5, Division 4.

²⁰ *Domestic and Family Violence Protection Act 2012* (Qld) s 169B.

²¹ *Victims' Commissioner and Sexual Violence Review Board Act 2024* assented to on 9 May 2024.

²² *Victims' Commissioner and Sexual Violence Review Board Act 2024* ss 40 and 41, and Schedule 1.

²³ *Victims' Commissioner and Sexual Violence Review Board Act 2024* Schedule 1, Division 1, s 2.

3.2 Handling personal information

The *Human Rights Act 2019* establishes a right of privacy for all individuals in Queensland.²⁴ This right to privacy includes the right not to have a person's privacy, family, home or correspondence unlawfully interfered with.

Under the Information Privacy Act, as it applied to the matters under review, the QPS must not do an act or engage in a practice that contravenes, or is inconsistent with, a requirement of a privacy principle when collecting and handling personal information of victims. At the time under review, the Information Privacy Act required agencies to comply with 11 Information Privacy Principles (IPPs) set out in Schedule 3 of the Information Privacy Act.²⁵

The IPPs require agencies to adopt practices for the collection, storage, use and disclosure of personal information.

Agencies must ensure that documents containing personal information are protected against:

- loss
- unauthorised access, use, modification or disclosure
- any other misuse.²⁶

To provide the required protection, the agency's obligation is to include the security safeguards at the level of protection that can reasonably be expected. In a situation where a victim's safety is at stake, the level of protection that can be expected is 'justifiably high'.²⁷

Agencies holding personal information must only use the parts of the personal information that are directly relevant to fulfilling the purpose that they are using it for.²⁸

Generally, agencies must not disclose documents containing an individual's personal information.²⁹ There are exceptions. For example, as a law enforcement agency, the QPS may disclose documents containing personal information if the disclosure is

²⁴ *Human Rights Act 2019* (Qld) ss 11 and 25.

²⁵ *Information Privacy Act 2009* (Qld) Schedule 3 and ss 26, 27 (before legislative amendments effective 1 July 2025), except for health agencies for whom the National Privacy Principles applied. Post the legislative amendments made by the *Information Privacy and Other Legislation Amendment Act 2023* (Qld), ss 26 and 27 require agencies, including health agencies, to comply with the Queensland Privacy Principles in Schedule 3 of the *Information Privacy Act 2009* (Qld).

²⁶ Information Privacy Principle 4.

²⁷ *ZIL v Queensland Police Service* [2019] QCAT 79 [46].

²⁸ Information Privacy Principle 9.

²⁹ Information Privacy Principle 11.

authorised or required under a law, or if it is satisfied on reasonable grounds that the disclosure is necessary for a law enforcement activity.³⁰

3.3 Information Commissioner's Review

The Information Commissioner determined to exercise own-initiative powers to commence the Review because of the potential seriousness of the disclosures. The primary aim of the Review was to examine and oversight the QPS's practices in its handling and disclosure of the personal information of victims of domestic violence based on a reasonable belief that the QPS may not be meeting its legal obligations under the Information Privacy Act and the privacy principles.

Under section 135 of the Information Privacy Act, the Information Commissioner may initiate a review into an agency's personal information handling practices to:

- identify privacy related issues of a systemic nature generally
- identify particular grounds for the issue of a compliance notice
- report to the Speaker on the findings of a review, including reporting any recommendations.

A compliance notice is an enforcement action. In a compliance notice, the Information Commissioner may require an agency to take stated action within a stated period for the purpose of ensuring compliance with the privacy principles.³¹

The Information Commissioner may issue a compliance notice if satisfied on reasonable grounds that an agency has:

- contravened the privacy principles, and
- the act or practice which contravenes the privacy principles is:
 - serious or flagrant or
 - has been done at least five times in the last two years.³²

The Review identified seven cases (the **Cases**) where the QPS disclosed a victim's address to a respondent or offender in a court document. The Cases involve disclosures made by the QPS between 2020 and 2023. Four out of the seven Cases had disclosure dates in 2022. The Review examined these Cases in detail to assess whether the QPS's actions contravened the Information Privacy Act.

³⁰ Information Privacy Principle 11.

³¹ *Information Privacy Act 2009* (Qld) s 158(2).

³² *Information Privacy Act 2009* (Qld) ss 158(1).

These Cases occurred before recent amendments to the Information Privacy Act,³³ so the relevant legislative requirements were contained in the IPPs, specifically:

- IPP 4 – Storage and security of personal information
- IPP 9 – Use of personal information only for relevant purpose
- IPP 11 – Limits on disclosure.

Given the recent changes to the Information Privacy Act and the introduction of new Queensland Privacy Principles (**QPPs**) that replace the IPPs, the Review also considered the current requirements in the QPPs, and whether the QPS's actions in these seven Cases would have breached the QPPs. This consideration was relevant to the Information Commissioner's determination as to whether a compliance notice may be issued.³⁴

The Review examined:

- the details of seven Cases where the QPS disclosed a victim's address to an offender, including in information submitted to the court
- the QPS's policies, procedures and practices applying to these seven Cases
- training and guidance the QPS provided to police officers, including the way QPRIME supported officers to generate documents for court
- the QPS's handling of complaints with a privacy component arising from the Cases.

The Review involved the following steps:

- analysis of documentary evidence, including internal QPS records of the incidents, policies, procedures, manuals, training records and training materials
- interviews with QPS members,³⁵ including walkthroughs of the end-to-end processes for managing complaints about personal information handling
- discussions with other service agencies, which provided useful context but did not identify any specific issues directly relevant to the Review.

³³ The *Information Privacy and Other Legislation Amendment Act 2023* (Qld) was passed by the Queensland Parliament on 29 November 2023 and amended the Information Privacy Act and the *Right to Information Act 2009* (Qld) with commencement from 1 July 2025.

³⁴ *Information Privacy Act 2009* (Qld) s 222.

³⁵ The *Police Service Administration Act 1990* s 2.2 (Membership of service) defines a Queensland Police Service member as police officers, police recruits and staff members.

3.4 Identifying cases for the Review

The QPS undertook two separate processes to identify cases where addresses of victims were released to an offender. The QPS:

- reviewed complaints made to the QPS through its Ethical Standards Command (ESC) and Privacy Unit
- conducted an audit of the top 300 Scale of Harm (high risk) domestic and family violence offenders (**Top 300 High Risk DFVO Audit**).

On 18 August 2024, the QPS commenced the Top 300 High Risk DFVO Audit. This involved a process of checking forms generated through QPRIME that may have inadvertently disclosed victim addresses during court proceedings. The QPS used the following method to select the sample:

As at 18 August 2024, there were 5730 Category 1 offenders state-wide. Category 1 offenders (from a total of 4 categories) represent the top 1-2% of offenders based on 9 indicators. A 5% sample of those 5730 Category 1 offenders, represents approximately 300 offenders.³⁶

The Review observed that the Top 300 High Risk DFVO Audit involved the manual review of information held in QPRIME to identify unauthorised disclosures. The QPS Strategy and Performance Officers checked QPRIME files relevant to their Region and reported their findings.³⁷

On 14 November 2024, the QPS Privacy Unit advised the Information Commissioner that the Top 300 High Risk DFVO Audit was finalised in all Regions.³⁸

The Review examined seven cases that were relevant to the scope, that is, involving the unauthorised disclosure of victims' addresses to an offender.

3.5 Limitations

The Review was conducted in accordance with section 135(1) of the Information Privacy Act and relied on the accuracy and completeness of information provided by the QPS to inform its findings.

³⁶ Queensland Police Service Memorandum – Audit of top 300 scale of harm DFV Offenders – Victim Addresses from Deputy Commissioner Regional Operations and Youth Crime to a distribution list (19 August 2024).

³⁷ Letter from Queensland Police Service Privacy Unit to Information Commissioner (13 September 2024).

³⁸ Letter from Queensland Police Service Privacy Unit to Information Commissioner (14 November 2024).

While every effort was made to ensure the accuracy and completeness of the Review, it is important to acknowledge certain limitations. The Review team was dependent on the timeliness, quality, and comprehensiveness of the information and documentation supplied by the QPS.

The Review was subject to certain constraints arising from legal and legislative provisions that restricted access to specific information relevant to the Review. This includes legal professional privilege and confidentiality provisions under the DFVP Act.³⁹

These limitations should be taken into account when considering the findings and recommendations of the Review.

3.6 The QPS's response to the Review

The Review prepared a proposed report, outlining the facts and findings relating to the seven Cases identified for review, and drawing conclusions about whether the QPS contravened the privacy principles.

The proposed report described the two alternatives of:

- presenting a report and recommendations to the Queensland Parliament
- whether to issue a compliance notice to the QPS.

The QPS was provided with a reasonable opportunity to respond to the proposed findings and conclusions in the proposed report.

This report was finalised after giving the QPS's response due consideration. A copy of the QPS's formal response to the final report is at Appendix 1.

The Information Commissioner welcomes the QPS's commitment to engaging cooperatively with the OIC and determining a suitable action plan, including feasibility assessment for the recommendations.

³⁹ *Domestic and Family Violence Protection Act 2012* (Qld) s 160.



4 Queensland Police Service initiatives

At an organisational level, the QPS was slow to act in implementing meaningful change to prevent or mitigate the future disclosure of victims' personal information after this issue was identified in 2017 by the QPS DV Interagency Working Group and attributed to a QPRIME information auto-population function.

In July 2024, the QPS established the Victim Address Working Group (**VAWG**) to lead the identification and implementation of solutions to ensure victims' addresses are not disclosed in forms and court related documents generated from QPRIME.⁴⁰

The VAWG's focus is on progressing and implementing short and medium-term solutions including the review and development of:

- policies and procedures
- systems
- training
- internal communications and awareness.⁴¹

The VAWG initiatives include:

- on 2 August 2024, implementing a manual workaround process in QPRIME, asking police officers to link a new offence location being only state and suburb of where the offence occurred and not the exact address
- updating policies and procedures such as the Operational Procedures Manual (**OPM**) on 26 August 2024, to improve guidance on issues like confidentiality
- adding warning prompts in December 2024 to release documents, asking police officers if they have considered the confidentiality of victims, witnesses and other vulnerable persons before completing forms
- successfully petitioning the Chief Magistrate to approve an amendment to the Bench Charge Sheet in December 2024, where '**Address** of offence' was changed to '**Place** of offence', better aligning the form with section 14 of the *Justices Regulation 2014* (Qld) (**Justices Regulation**)

⁴⁰ Queensland Police Service, Victim Address Working Group 'Terms of Reference' (August 2024).

⁴¹ Queensland Police Service, Victim Address Working Group 'Terms of Reference' (August 2024), 2.

- seeking to confer with the Chief Magistrate in May and July 2025 to clarify the information the court requires in court documents
- in January 2025, coding changes to release documents to partially redact victim addresses without manual intervention from police officers
- implementing electronic controls into QPRIME from 3 September 2025 that partially redact the addresses of victims when preparing Bench Charge Sheets, Charge Lists and Court Briefs.

The Commissioner of Police in Queensland has stated a commitment to a victim-centric approach to domestic and family violence:

Further reform in the DFV space should continue to be victim-centric and evidence based with emphasise a multidisciplinary approach, ensuring that while the police address the legal and safety aspects, social services provide the necessary support and rehabilitation, reflecting a balanced strategy in combating domestic violence.⁴²

⁴² Queensland Police Service, *Commissioner's 100-Day Review of the Queensland Police Service – Final Report* (June 2025), 40 <<https://www.police.qld.gov.au/sites/default/files/2025-10/Commissioners%20100-Day%20Review%20Queensland%20Police%20Service%20Final%20Report.pdf>>.

5 Cases where victims' addresses were disclosed

This section summarises what happened in each of seven Cases assessed in the Review and describes the incidents and factors leading to the release of victims' personal information in each case.

None of the evidence provided to the Review indicates any intention by police officers to disclose victims' personal information inappropriately. To the contrary, evidence shows that the police officers self-reported and engaged with the victims to ensure their safety.

The QPS redacted the names of victims in the information provided to the OIC. The Review has adopted pseudonyms for each Case to protect their identity.

The Review also describes events in general terms to protect against identification of victims. For example, the QPS disclosed information in a range of different court documents. The Review does not specify the exact nature of every document, to guard against the possibility that doing so would identify a specific set of circumstances.

Charlotte

Charlotte was assaulted by an offender who had broken into her home in defiance of a domestic violence protection order. Charlotte relocated multiple times over a period of months in fear of her safety and that of her children. Charlotte notified the QPS of her new address, which was not known to the offender.

The QPS disclosed Charlotte's new home address to the offender in a document included in the offender's copy of a full brief of evidence. Consequently, the offender attended Charlotte's new address. She was so frightened that she did not call the QPS.

The police officer responsible for preparing the full brief of evidence, the supervisor / brief checker and police prosecutor failed to identify and remove or redact Charlotte's personal information from the brief of evidence.

Charlotte made a formal complaint to the QPS Privacy Unit. Before commencing an investigation about the privacy complaint, the Privacy Unit reached out to ESC asking if it had received a current or past complaint. ESC advised that there was no record of a past or current complaint received from Charlotte. Despite ESC being aware of the

complaint at that point, it did not commence an investigation until after the Crime and Corruption Commission Queensland referred the matter five months later.

The QPS apologised to Charlotte for the anguish and stress caused and stated that the address was included in the document in error.

The disclosure of Charlotte's new home address in court documents prepared by the QPS was not necessary for the court proceedings. The Review finds that the QPS disclosed Charlotte's personal information because of:

- inadequacies in the QPS's policies and procedures about identifying and protecting personal information of victims
- uncertainty as to whether the document in question was necessary for the court proceedings
- human error – the QPS's manual mechanisms for preparing and checking a full brief of evidence failed.

Gloria

Gloria and her children suffered emotional abuse and physical violence at the hands of an offender. Gloria received assistance from domestic violence services to relocate. The QPS determined Gloria as being in a high risk category of experiencing domestic violence.

The QPS disclosed Gloria's new home address to the offender in a document used during court proceedings. The offender attended Gloria's home where he committed acts of domestic violence.

The police officer had assumed that the offender was already aware of Gloria's home address. The QPS failed to protect Gloria's personal information.

Gloria's home address was not necessary for the court proceedings. The Review finds that the QPS released the information because of:

- inadequacies in the QPS's policies and procedures about identifying and protecting personal information of victims
- poor design of the document used in the court proceedings including poor privacy protections

- absence of adequate electronic controls in QPRIME to assist police officers in identifying and protecting personal information of victims when preparing court documents
- human error – the police officer assumed that the offender knew Gloria’s new home address and failed to identify the need to protect her personal information that was not necessary for the court proceedings.

Juliette

Juliette and her children were temporarily residing with a relative. The offender breached a domestic and family violence protection order by attempting to contact Juliette. Using a telecommunication device, the offender made threats to find and kill Juliette and her children.

The QPS recorded the relative’s address in full as the offence location when creating the QPRIME occurrence. QPRIME auto-populated the full address of the relative into a Court Brief as the offence location and so disclosed the address to the offender. The relative was fearful and concerned about the offender knowing the address as the offender had made threats to kill.

The relative complained to the QPS, and the QPS’s investigation found that the relative’s address had been used in the Court Brief, but excused it on the basis that:

- it was included due to QPRIME’s auto-population function
- it was not Juliette’s address
- she had not told the QPS ‘*at any time*’ that her address was not to be disclosed.

The QPS advised the relative that the outcome of the investigation was, ‘*No officer has been identified during the inquiries to have disclosed any information at any time.*’

Contrary to the QPS’s investigation, the Review finds that the QPS did disclose the relative’s personal information when it was not required to satisfy the particulars of the offence. The Review found that the QPS released the information because of:

- a practice of recording a victim’s address as the offence location for offences involving telecommunication devices
- no clear guidance in situations where the only offence location information is the victim’s address, for example, whether a partial address such as the suburb or state is sufficient to establish jurisdiction

- inadequacies in the QPS's policies and procedures about identifying and protecting personal information of victims
- absence of adequate electronic controls in QPRIME to assist police officers in identifying and protecting personal information of victims when preparing court documents
- human error – police officers failed to identify and redact the personal information of Juliette's relative and by extension Juliette's location.

The Review notes that the QPS's investigation focussed on the culpability of police officers. It did not seek to progress issues with QPRIME, consider the privacy rights of Juliette and Juliette's relative under the Information Privacy Act or take a victim-centric approach.

Shona

Over a five-month period, Shona was subjected to harassing and menacing telephone calls by an offender in breach of a domestic and family violence protection order. A notification in QPRIME stated that the offender must not be given Shona's home address.

The QPS recorded Shona's home address as the offence location in a form given to the offender on his release on bail from QPS custody. Realising its error, the QPS revoked bail and the offender was taken back into custody.

No complaint was made to the QPS in relation to this matter. However, records indicate that the QPS's Vulnerable Persons Unit were engaged to assist Shona.

The QPS did not need to include Shona's full home address on the form. The Review finds that the QPS disclosed Shona's personal information because of:

- a practice of recording a victim's address as the offence location for offences involving telecommunication devices
- inadequacies in the QPS's policies and procedures about identifying and protecting personal information of victims

- absence of adequate electronic controls in QPRIME to assist police officers in identifying and protecting personal information of victims when preparing court documents
- human error – police officers failed to identify clear cautions/flags informing them that the offender must not know Shona’s home address.

Iris

Iris was subjected to emotional and psychological abuse. The offender used a telecommunication device and social media to harass her and threatened to kill her. The QPS records indicated that this was a high risk domestic violence offender.

The QPS recorded Iris’s home address as the offence location for the contravention of a domestic and family violence protection order that involved the use of a telecommunication device. Iris’s full address was auto-populated into a Court Brief as the offence location and given to the offender. Iris was extremely upset that the QPS had compromised her safety.

The QPS conducted an internal investigation and advised Iris that the disclosure was not intentional.

Iris’s full home address was not necessary to satisfy the particulars of the offence.

The Review finds that the QPS released the information because of:

- a practice of recording a victim’s address as the offence location for offences involving telecommunication devices
- no clear guidance in situations where the only offence location information is the victim’s address, for example, whether a partial address such as the suburb or state is sufficient to establish jurisdiction
- no clear guidance on whether the address of the victim or the address of the offender was more appropriate
- inadequacies in the QPS’s policies and procedures about identifying and protecting personal information of victims

- absence of adequate electronic controls in QPRIME to assist police officers in identifying and protecting personal information of victims when preparing court documents
- human error – police officers failed to protect Iris’s personal information when dealing with a High Risk Domestic Violence Offender.

Chloe

Chloe was in need of protection and the QPS initiated a Temporary Protection Order (**TPO**) to protect her from the respondent. The TPO contained conditions that the respondent must not commit domestic violence against Chloe.

The QPS prepared a domestic and family violence brief of evidence which contained Chloe’s home address. This was given to the respondent, who then committed an act of domestic violence. Chloe told the QPS that she was extremely fearful and anxious after her address was released to the respondent. This caused Chloe to relocate for her own safety.

Chloe did not make a formal complaint to the QPS. However, the QPS knew of the inappropriate disclosure of information and its consequences, but did not commence an investigation until it received a referral from the Crime and Corruption Commission Queensland, four months after the QPS was aware of the disclosure of information.

The release of Chloe’s home address was not necessary and should not have occurred. The Review finds that the QPS released the information because of:

- inadequacies in the QPS’s policies and procedures about identifying and protecting personal information of victims
- human error – QPS’s manual mechanisms for preparing and checking a full brief of evidence failed.

The QPS did not start any investigation on its own initiative. When investigating, it focussed on the culpability of the police officer.

Susanna

Susanna took steps to protect herself and her child from a domestic and family violence offender. This included moving addresses so the offender could not locate them. The offender continued to commit acts of domestic violence by using a telecommunication device to harass and threaten Susanna.

The QPS recorded Susanna's new home address as the offence location for contraventions of a domestic and family violence protection order involving the use of a telecommunication device. Susanna's home address was auto-populated into a Court Brief as the offence location and disclosed to the offender. This occurred even though detailed facts in the Court Brief stated that Susanna was fearful that the offender would kill her if he found her home address.

Susanna's full home address was not necessary to satisfy the particulars of the offence. The Review finds that the QPS released the information because of:

- a practice of recording a victim's address as the offence location for offences involving telecommunication devices
- no clear guidance in situations where the only offence location information is the victim's address, for example, whether a partial address such as the suburb or state is sufficient to establish jurisdiction
- no clear guidance on whether the address of the victim or the address of the offender was more appropriate
- inadequacies in the QPS's policies and procedures about identifying and protecting personal information of victims
- absence of adequate electronic controls in QPRIME to assist police officers in identifying and protecting personal information of victims when preparing court documents
- human error – police officers failed to identify and redact Susanna's personal information.



6 Disclosing victims' addresses breached the privacy principles

The Information Privacy Act contains privacy principles with which all Queensland departments, public sector agencies, local governments, health and hospital services, public universities and statutory authorities must comply. The relevant privacy principles in the Review are the Information Privacy Principles (**IPPs**) in Schedule 3 of the Information Privacy Act which applied until 30 June 2025.

With the commencement of the *Information Privacy and Other Legislation Amendment Act 2023*, which amended the Information Privacy Act on 1 July 2025, the IPPs were replaced by the Queensland Privacy Principles (**QPPs**).

The Review examines cases where personal information was disclosed before 1 July 2025 and therefore focuses on whether the QPS contravened any of the IPPs. However, this report also makes findings on whether the QPS would have breached QPPs if the disclosures occurred after 1 July 2025. These findings are relevant as to whether there are grounds to issue a compliance notice.⁴³

This includes examining any act or practice relating to the QPS's collection, storage, handling, accessing, amendment, management, transfer, use or disclosure of personal information.⁴⁴

The Information Privacy Act contains provisions exempting agencies from certain privacy principles in specific circumstances. For example, a law enforcement agency, like the QPS, can disclose personal information if it is satisfied on reasonable grounds that disclosure is necessary for the performance of its activities related to the enforcement of laws.⁴⁵

⁴³ *Information Privacy Act 2009* (Qld) ss 158 and 222.

⁴⁴ *Information Privacy Act 2009* (Qld) s 27(3).

⁴⁵ *Information Privacy Act 2009* (Qld) s 29(1)(a) and Information Privacy Principle 11.

6.1 What it means to disclose and use personal information

An agency discloses personal information to an entity if:

- the entity does not know the personal information, and is not in a position to be able to find it out; and
- the agency has given the entity the information or places the entity in a position to be able to find it out; and
- the agency ceases to have control over the entity in relation to who will know the personal information in the future.⁴⁶

Unauthorised disclosures occur where there is no exemption or legal basis for the disclosure of personal information.

An entity is an individual, a corporation, or an unincorporated body.⁴⁷ A court or court registry is not an entity for the purpose of the Information Privacy Act in relation to judicial functions.⁴⁸ However, the privacy principles apply to the courts for functions not related to judicial functions. For example, if personal information is not required for a judicial function, its disclosure to the court is unauthorised.

An agency uses personal information if it manipulates, searches or otherwise deals with the information.⁴⁹

6.2 Information Privacy Principles (relevant to the Cases)

IPP 4 – Storage and security of personal information

Agencies must ensure that documents under their control containing personal information are protected against:

- loss
- unauthorised access, use, modification or disclosure
- any other misuse.⁵⁰

To provide the required protection, the agency's obligation is to include security safeguards at the level of protection that can reasonably be expected. In a situation

⁴⁶ *Information Privacy Act 2009* (Qld) s 23(2).

⁴⁷ *Acts Interpretation Act 1954* (Qld) Schedule 1.

⁴⁸ *Information Privacy Act 2009* (Qld) s 18 and Schedule 2.

⁴⁹ *Information Privacy Act 2009* (Qld) s 23(3).

⁵⁰ Information Privacy Principle 4.

where a victim's safety is at stake, the level of protection that can be expected is 'justifiably high'.⁵¹

The Information Privacy Act describes the scope of reviews that could lead to a compliance notice:

*... reviews into personal information handling practices of relevant entities, including technologies, programs, policies and procedures ...*⁵²

This means that compliance with IPP 4 requires documents containing personal information to be protected with physical, technological and administrative security safeguards, programs (such as training programs), policies and procedures.⁵³

The QPS disclosed victims' addresses to the court. As a general principle, these disclosures may have been authorised to the extent that the QPS released personal information to the court that was necessary for a judicial purpose. For example, the QPS argued that it needed to disclose a victim's address to the court as part of providing the particulars of the offence – stating where the offence occurred.

However, in the reviewed Cases, the victims' addresses were not required to properly particularise the offence. For example, the QPS disclosed:

- Charlotte's address to an offender who was before the court for an offence committed at a previous address
- Juliette's full residential address to the offender, thus revealing to him her location, even though the offence was committed using a telecommunication device.

These were unauthorised disclosures.

Given the severity of the potential and realised consequences to victims, the QPS needed to implement strong controls to satisfy requirements for adequate security safeguards against unauthorised disclosure.

The QPS's security safeguards at the time of all seven disclosures were inadequate to protect documents containing personal information from these unauthorised disclosures.

⁵¹ *ZIL v Queensland Police Service* [2019] QCAT 79 [46].

⁵² *Information Privacy Act 2009* (Qld) s 135(1)(a)(i).

⁵³ Office of the Information Commissioner, 'Interpreting the legislation – Information Privacy Act 2009, Protection and security of personal information (IPP 4)' (19 July 2013), 1 <https://www.oic.qld.gov.au/__data/assets/pdf_file/0020/70427/guideline-security-and-protection-of-personal-information.pdf>.

In five of the seven Cases, the QPS did not have system controls embedded into QPRIME to assist police officers to remove or redact a victim's address from court documents.

The Hansard transcript of the Estimates hearing on 26 July 2024 records that the QPS had provided victim addresses in court documents.⁵⁴ The then Acting Deputy Police Commissioner said that QPRIME had automatically imported information contained in its database directly into forms that the QPS presented in court. He explained to the Estimates Parliamentary Committee that it was then up to the police officers to redact the victim information from court forms and reports.

The OPM did not provide adequate security safeguards to protect personal information. For example, section 3.7.2 (Documentation at first appearance) of the OPM instructed arresting police officers to supply a Court Brief to the prosecution and defence with copies of all necessary documents. There were no instructions to the arresting officers within this section of the OPM to consider the personal information of the victim.

Although section 9.14 (Confidentiality of an aggrieved, named persons and respondent to be protected) of the OPM required that QPS members keep personal information confidential, this was not referenced under section 3.7.2.

The Review found that the QPS contravened IPP 4 as the security safeguards were not adequate at the level of protection expected, given the serious harm faced and experienced by victims of unauthorised disclosure of their addresses.

Finding: The QPS breached Information Privacy Principle 4.

IPP 9 – Use of personal information only for relevant purpose

The QPS must only use parts of personal information that are directly relevant to fulfilling a particular purpose. The purpose for which the personal information was being used involved law enforcement activities including:

- the prosecution or punishment of criminal offences
- the preparation for, or conduct of, proceedings before any court.

⁵⁴ Community Safety and Legal Affairs Committee, Parliament of Queensland, *Estimates—Attorney-General and Justice; Prevention of Domestic and Family Violence* (26 July 2024), 48
<https://documents.parliament.qld.gov.au/events/han/2024/2024_07_26_EstimatesCSLC.pdf>.

The QPS used personal information, that is, the victims' addresses, to complete various forms required for court proceedings or law enforcement processes.

In all seven Cases, the Review found that the QPS contravened IPP 9. The QPS used parts of personal information that were not necessary for the QPS's purpose of law enforcement activities. The victims' personal information should have been removed or at least partially redacted from court documents.

In two of the seven Cases, the victims' address was not material to the court proceedings. In the other five Cases, it would have been sufficient for the QPS to disclose only the suburb and state to satisfy the law enforcement requirements.

The Review's finding is supported by the QPS's own initiatives to address issues about the use of victims' personal information in forms. For example, the QPS:

- implemented temporary workarounds in QPRIME, asking police officers to link a new offence location being only state and suburb of where the offence occurred
- introduced system controls to assist police officers to partially redact offence locations from release documents and court forms
- introduced warnings on forms to prompt police officers to consider the need to redact victims' addresses.

Finding: The QPS breached Information Privacy Principle 9.

IPP 11 – Limits on disclosure

There are limitations on the disclosure of personal information by an agency. Generally, an agency having control of a document containing an individual's personal information must not disclose the personal information other than to the individual concerned.

There are exceptions. For example, a disclosure is allowed if the disclosure:

- is one which the individual is or is reasonably likely to have been made aware of, usually through a collection notice in accordance with IPP 2⁵⁵
- is one to which the individual has expressly or impliedly agreed⁵⁶

⁵⁵ Information Privacy Principle 11(1)(a).

⁵⁶ Information Privacy Principle 11(1)(b).

- will mitigate a serious threat to an individual's or the public's life, health, safety or welfare⁵⁷
- is authorised or required under a law⁵⁸
- is necessary for a purpose of a law enforcement agency (and proper notation of the disclosure is made)⁵⁹
- fulfils the stated requirements relating to research or analysis undertaken in the public interest.⁶⁰

To claim the law enforcement exemption, the QPS must be satisfied on reasonable grounds that the disclosure of a victim's personal information is necessary for one or more of the following:

- the prevention, detection, investigation, prosecution or punishment of criminal offences or breaches of laws imposing penalties or sanctions
- the enforcement of laws relating to the confiscation of the proceeds of crime
- the protection of the public revenue
- the prevention, detection, investigation or remedying of seriously improper conduct
- the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of the orders of a court or tribunal.⁶¹

In all seven Cases, the QPS disclosed personal information, resulting in an offender becoming aware of a victim's location.

In each Case, the disclosure was unauthorised.

The QPS did not satisfy themselves on reasonable grounds that the victims' addresses in each Case were necessary for one or more of the law enforcement purposes. The QPS has not argued that any of the exemptions in IPP 11 apply to the disclosures.

⁵⁷ Information Privacy Principle 11(1)(c).

⁵⁸ Information Privacy Principle 11(1)(d).

⁵⁹ Information Privacy Principle 11(1)(e) and 11(2).

⁶⁰ Information Privacy Principle 11(1)(f).

⁶¹ Information Privacy Principle 11(1)(e).

The Review's finding is supported by the QPS's own initiatives to address issues leading to the disclosure of victims' personal information. For example, the QPS:

- successfully petitioning the Chief Magistrate to approve an amendment to the Bench Charge Sheet in December 2024, where '**Address** of offence' was changed to '**Place** of offence', better aligning the form with section 14 of the Justices Regulation
- seeking to confer with the Chief Magistrate in May and July 2025 to clarify the information the court requires in court documents
- implementing electronic controls into QPRIME from 3 September 2025 that partially redact the addresses of victims when preparing Bench Charge Sheets, Charge Lists and Court Briefs.

Finding: The QPS breached Information Privacy Principle 11.

6.3 Queensland Privacy Principles

QPP 6 – Use or disclosure of personal information

QPP 6 sets out the circumstances in which agencies may use or disclose personal information and is the replacement for IPP 11. If the QPS holds personal information about an individual that was collected for a particular purpose (the primary purpose), the QPS must not use or disclose the information for another purpose (the secondary purpose) unless:

- the individual has consented to the use or disclosure of the information; or
- the QPS reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement-related activities.

The QPS would have breached QPP 6. The victims did not provide consent for the QPS to disclose their full residential address to the offender in court documents. The QPS did not reasonably believe that the disclosure of the victims' personal information was necessary for the prosecution or punishment of criminal offences.

QPP 10 – Quality of personal information

Under QPP 10, which is a replacement of IPP 9, agencies must take reasonable steps to ensure personal information they collect is accurate, up to date, and complete. When using or disclosing this information, agencies must ensure it is relevant to the purpose of the use or disclosure.

The QPS would have breached QPP 10 by disclosing victims' full addresses in court briefs, which were neither relevant nor necessary for the enforcement-related activity.

QPP 11 – Security of personal information

QPP 11 sets out the QPS's obligations relating to the protection and destruction or de-identification of personal information it holds and is the replacement for IPP 4.

The QPS must take reasonable steps to protect personal information from:

- misuse, interference or loss
- unauthorised access, modification or disclosure.

The QPS would have breached QPP 11 by not taking reasonable steps to protect victims' information from unauthorised disclosure. Given the serious harm faced and experienced by victims, legal and community expectations of the QPS to protect the information is justifiably high, as the safety, protection and wellbeing of victims is paramount.⁶²

⁶² *Domestic and Family Violence Protection Act 2012* (Qld) s 4(1).

7 How the breaches came about

When the QPS prosecutes a person for an offence, the QPS must advise the court and the defendant of the particulars of an offence, for example, where, when and how the offence occurred. The place of the offence is essential:

- so that a defendant knows exactly what is being alleged and can adequately address the charge
- to ensure the case is heard by the correct court, in the correct jurisdiction.

To establish where an offence occurred, the QPS needs to sufficiently address either:

- the 'act' – where the offender committed the offence
- the 'event' – where the consequence of the offender's actions occurred.

When an offence is committed by a telecommunication device, the QPS could use the location of the offender to avoid importing unnecessary personal information, and the accompanying risk of harm to the victim.

However, if the location of the offender is unknown (or cannot be ascertained), the location of the victim may be considered a viable alternative, with appropriate protections in place. For example, the QPS may decide to use the victim's address if it can show that there is an urgent need to prioritise finalising the investigation to bring the offender before the courts without delay and so prevent further harm.

7.1 Using a victim's address as the location of an offence

In three of the seven Cases, the ESC investigation reports revealed that police officers were uncertain as to whether it was proper to record the victim's address as an offence location. Further, the ESC identified that there was either limited or no guidance regarding the recording of addresses.

Recommendation 1

The Information Commissioner recommends that the Queensland Police Service:

Within six months,

- a) clarifies its policy position about recording a victim's address as an offence location for an offence where a telecommunication device is used, and the offender's address is unknown
- b) clearly communicates this policy position to Queensland Police Service members
- c) incorporates the policy into induction and ongoing training and awareness for Queensland Police Service members.

The QPS has started to clarify the courts' requirements for details of offence locations in court documents. In August 2024, the QPS adopted a temporary workaround to mitigate the risk of disclosing a victim's location to an offender:

*Action Officers and those officers responsible for checking and approval of all release documents are to ensure, under circumstances where the address of an aggrieved or victim is sensitive and needs to be protected, that **the offence location displayed in the release document only includes the Suburb, or broadened to State should geographical circumstances require.***

*In circumstances where the offence location is the same as the victim's address which is sensitive and should not be released to the offender, upon creating the charge, **officers should link a new offence location being only the suburb/state of where the offence occurred and not the exact address. By doing this, documentation such as Bench Charge Sheets, Charge Lists, QP9s, Adult Cautions, Juvenile Cautions and release forms will populate with the suburb/state only.***

[emphasis added]⁶³

⁶³ Internal Queensland Police Service memorandum to a service-wide distribution list from the Deputy Commissioner Regional Operations and Youth Crime (2 August 2024).

This temporary workaround relied on police officers to remember and manually update the offence location. The VAWG has been working on identifying and implementing an automated end-to-end solution.

7.2 QPRIME reliance on manual controls increased risk of error

Data is a valuable commodity in policing. The QPS explicitly recognises the value of the data it collects and the need to protect its integrity.⁶⁴ QPRIME supports that process. It is an integrated policing information and records management computer system.⁶⁵ It holds and manages crime data (including personal details of victims) and can be used to generate reports and forms. QPRIME can improve efficiency so that police officers can focus more on frontline policing.

The QPS told the Estimates Committee hearing on 26 July 2024 that QPRIME had automatically imported information contained in its database directly into forms that the QPS presented in court.⁶⁶ The then Acting Deputy Police Commissioner explained to the Estimates Committee that it was then up to the police officers to redact the victim's address.

The QPS informed the Review that QPRIME's auto-population functions were working correctly, in that it did not draw information from areas that it should not.⁶⁷ The Review found that the auto-population function operated without built-in controls to assist police officers.

In four of the seven Cases, the victim's address was recorded as the offence location. This created the risk of the victim's address being recorded and disclosed in court documents. This practice jeopardised the victim's privacy and safety, particularly for victims who relocated to escape domestic violence.

The QPS mitigated the risk with its temporary workaround, using only the suburb or state when the offence location is the victim's address.

However, this workaround relied heavily on the police officers remembering to update the offence location to only include the suburb and state before producing court documents. It

⁶⁴ Queensland Police Service, *Management Support Manual* (Issue 59 Public Edition, 1 September 2025), s 5.9.2 <<https://www.police.qld.gov.au/sites/default/files/2025-09/Management-Support-Manual.pdf>>.

⁶⁵ Queensland Police Service, *Service Manuals Definitions* (6 October 2020), 26 <https://www.police.qld.gov.au/sites/default/files/2020-04/Service%20Manuals%20Definitions_0.pdf>.

⁶⁶ Community Safety and Legal Affairs Committee, Parliament of Queensland, *Estimates—Attorney-General and Justice; Prevention of Domestic and Family Violence* (26 July 2024), 48 <https://documents.parliament.qld.gov.au/events/han/2024/2024_07_26_EstimatesCSLC.pdf>.


⁶⁷ Letter from Office of the Deputy Commissioner Regional Operations to Information Commissioner (2 July 2025).

was a manual control rather than an automated control built into QPRIME. Given the high workload of police officers, relying on those officers to link a new offence location was not sufficient. Existing manual controls demonstrably failed in all Cases.

An automated control in QPRIME, embedding business rules and technical controls, would protect victim information from the outset, particularly during the creation of occurrence reports or documents.

The controls in QPRIME did not match the ease of data importation which can be done at the click of a button. **Figure 1** provides an example:

Figure 1 **Import data function**

6. Click the **Import Data**  button on the toolbar to populate fields in the form designed to import existing data from the QPRIME database.

Source: Queensland Police Service

The QPS has improved QPRIME's electronic controls.

On 3 September 2025, the QPS released QPRIME enhancements (New Charge Options). The QPS amended auto-population settings to include electronic controls for the purpose of partially redacting a victim's address when creating a Bench Charge Sheet.⁶⁸

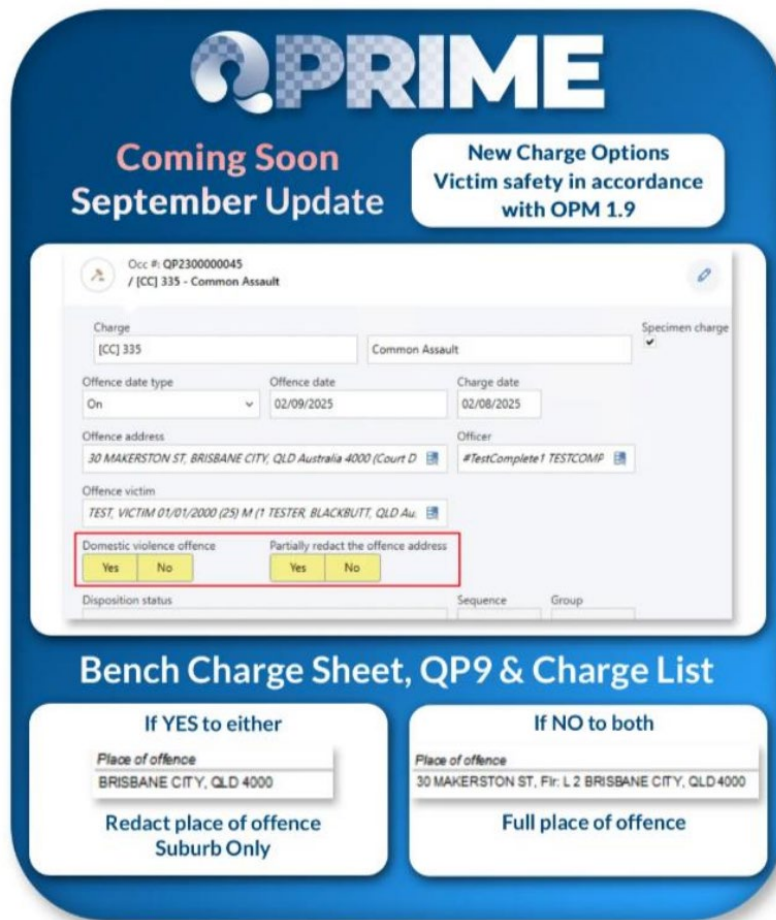
The police officers must answer whether the charge relates to a domestic violence offence and if the offence address should be partially redacted. If the officer answers 'Yes' to either, QPRIME redacts the address on the Bench Charge Sheet, QP9 and Charge List to only show the suburb and state. **Figure 2** is part of the internal update provided to the police officers.

Recording the victim's address as the offence location for offences involving the use of a telecommunication device has broader implications beyond domestic violence.

Other offences involving telecommunication devices, such as breaches of section 474.17 (Using a carriage service to menace, harass or cause offence) of the *Criminal Code Act 1995* (Cth), may also result in the victim's address being disclosed.

⁶⁸ Memorandum from Deputy Commissioner Regional Operations to a distribution list (1 September 2025).

Figure 2
New Charge Options



Source: Queensland Police Service

The QPRIME New Charge Options controls are not limited to domestic violence matters. Police officers may select 'Yes' to partially redact a victim's address for all offence types. The QPS should consider amending the charge option controls so that officers are prompted to consider whether the offender is aware of the victim's address to better safeguard victim information.

Recommendation 2

The Information Commissioner recommends that the Queensland Police Service:

Within three months,

- a) amends the Queensland Police Records and Information Management Exchange system New Charge Options to require police officers to answer whether the offender is aware of the victim's address
- b) implements a Queensland Police Records and Information Management Exchange system business rule that partially redacts the victim's address.

The QPS's efforts to identify and implement system controls continue. Additional controls are being proposed through various bodies and progressed to QPRIME Core Systems Frontline and Digital Division for completion.

As of 17 September 2025, the QPRIME Core Systems Frontline and Digital Division are yet to introduce report parameters when police prosecutors print a sentencing schedule 'prosecution copy' form. Once these parameters are implemented, police prosecutors will be able to select what information QPRIME imports into the form, for example, the victim's name and address. This report explores forms in more detail under section 7.4.

Since 2009, police prosecutors have been able to prepare a sentencing schedule 'defence copy' which removes personal information of a victim from the form.

Recommendation 3

The Information Commissioner recommends that the Queensland Police Service:

Within three months, updates the sentencing schedule 'prosecutions copy' form to include report parameters giving police officers the opportunity to select what information is imported.

QPRIME User Guide

The Review examined the platform's instructions - QPRIME User Guide.⁶⁹ It is a large technical guidance document containing thousands of files. An effective User Guide assists people to use a computer system to achieve an appropriate result.

In a general sense, the QPRIME User Guide provides this guidance to police officers. For example, the QPRIME User Guide highlights factors to check in the Custody, Charging and Bail topic. This could be a good and practical mitigation strategy in the User Guide at an initial stage of data entry into QPRIME. However, including a check specific to 'domestic violence' or providing a link to the domestic violence topic in the User Guide would strengthen the checking mechanism.

Other sections in the QPRIME User Guide describe circumstances where a victim's address is not to be disclosed, including in the QPRIME User Guide's sections about sentencing schedules, locations and charge fields. These are good operational safeguards.

The QPRIME User Guide has a number of sections that recognise that data can be imported, linked to, and populated into forms and reports. The Review found examples of good practice and user advice, including in the generation of a Police Protection Notice reproduced in **Figure 3** below.

Figure 3
User Guide: Police Protection Notice

16. Must enter *Should the Aggrieved's address be withheld from the Respondent (confidential)?* click the drop-down arrow and select **Yes or **No**.**

Note: *If the aggrieved's address is to be kept confidential from the respondent, select **Yes**. This means the **address will not import** into the **PPN**. If the application is transferred electronically to the court, the address will be sent in the electronic message to the courts and will advise the court it is confidential. This replaces the need for the **QP 0932 DV Aggrieved Confidential Address Form**.*

Source: Queensland Police Service

⁶⁹ The Review examined version v05.08.2025 of the QPRIME User Guide. Generally, the Review understands there was no version control of the QPRIME User Guide up until August / September 2024. The Review has proceeded with an assessment of the sections of the QPRIME User Guide that seem most likely to be relevant. The Review cannot confirm that these sections were in force at the time of the disclosures of a victim's address.

The functionality is a practical and time efficient approach. However, it is not without risk, if appropriate safeguards are not available to prompt users, including for example:

- insufficient or inconsistent checks, reminders or barriers (like the example above) for members to consider before selecting an automatic import of data. This gap increases risk even where the Operational Procedures Manual orders that a victim's address must not be disclosed
- inconsistency in providing reminders at the point of generating forms.

The QPRIME User Guide contains relevant information to guide police officers. Opportunities exist to cross-reference relevant information so that the right information gets to the right people at the right time.

Recommendation 4

The Information Commissioner recommends that the Queensland Police Service:

Within 18 months, enhances cross-referencing in the Queensland Police Records and Information Management Exchange system User Guide to improve accessibility and enable Queensland Police Service members to quickly locate relevant information across interconnected sections. This cross-referencing should include, but not be limited to topics about information privacy, recording offences, telecommunication offences, form creation, court document preparation, creating charges and domestic violence.

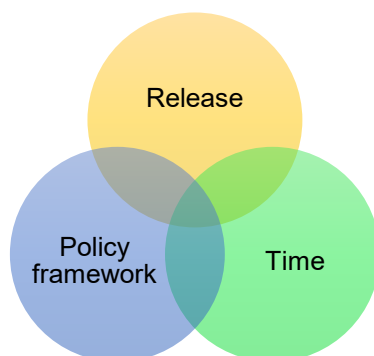
7.3 Policies and procedures not fully aligned or cross-referenced

Good agency information privacy practices rely on a robust guidance, instruction, policy and procedure framework (collectively, the QPS **policy framework**). The policy framework must be consistent, accurate and up to date with legislative requirements. Bedding down this support is essential to drive and shape effective agency behaviour.

The QPS policy framework engages with its members about recording and releasing personal particulars. As it should, it has evolved over time to respond to operational need and community expectations. This includes procedures and considerations about the release of a victim's personal information. It means the QPS does and can adapt.

The Review assessed whether the policy framework provided effective support to police officers at critical time junctures – that is, whether, at relevant times, the policy framework was (and is) adequate to prevent or mitigate the unauthorised release of a victim’s address. **Figure 4** below, represents this interaction.

Figure 4
Interaction elements



Source: Office of the Information Commissioner

The QPS provided the Review with key documents from its policy framework. There are many. The Review identified and assessed selected key documents.⁷⁰

Operational Procedures Manual

The QPS Operational Procedures Manual (**OPM**) is a service wide document that provides ‘members with guidance and instruction for operational policing’, and all QPS members are required to familiarise themselves with its content ‘in order to carry out the Service’s functions and deliver an effective level of policing to the community.’⁷¹

The OPM is a substantial document. The current version is 1,437 pages. Sections of it are publicly available. The Review examined a number of versions of the OPM to consider the guidance available to police officers at the time of the disclosures in the Cases.

Multiple sections provide instructions about release of a victim’s personal details (such as an address). Often, these sections link to various operational QPS forms for completion.

⁷⁰ The Review also examined other Queensland Police Service policies and procedures, including for example, various versions of Queensland Police Service, *Management Support Manual*.

⁷¹ Queensland Police Service, *Operational Procedures Manual* (Issue 106.1 Public Edition, 18 July 2025), 3.

The OPM recognises that the QPS holds a critical place in providing support to victims of violence or domestic violence offences. Section 2.12 of the OPM places the needs and protections of the victim as a priority. It explicitly states that a victim's address must not be disclosed unless there is authorisation to do so.⁷² Provisions in the OPM provide a level of guidance and instruction to the QPS members that should have prevented, or at least mitigated, release of at least some of the victims' addresses.⁷³

For example, at the relevant times, section 3.7.5 of the OPM (Checking of Court Briefs (QP9)) provided the QPS members with instruction to ensure that contact details of a victim were not disclosed.

Over time, the section has been broadened and strengthened. **Figure 5** shows these amendments.

Figure 5
Amendments to section 3.7.5 OPM

OPMs 2020, 2022, 2023	Current OPM 2025
<p><i>(iv) ensure the contact details of any aggrieved, complainant, victim of crime or prosecution witnesses are not disclosed within the QP9 unless the contact details are materially relevant to the charge (see OPM s. 3.4.17);</i></p>	<p><i>(iv) ensure that the QP9 or any associated documentation (submitted with the QP9) does not contain personal particulars such as the address, telephone, or next of kin details relating to a victim or witness unless the information is required to prove the particulars of the offence. See also section titled 'Copies of statements and documentary exhibits' in s. 3.4.13: 'Supply of copies of Court Brief (QP9), particulars, statements and reports' in this chapter;</i></p>

Source: Office of the Information Commissioner

⁷² **General rights of victims**

In accordance with the Charter, members are to:

...

(ii) ensure a victim's personal information, including the victim's address and telephone number, are not disclosed unless authorised by law and the provisions of s. 5.6: 'Release of information' of the MSM [Management Support Manual], are complied with in relation to releasing information to persons and organisations external to the Service; and

The *Charter of Victims' Rights* is in Schedule 1 of the *Victims' Commissioner and Sexual Violence Review Board Act 2024 (Qld)* <<https://www.legislation.qld.gov.au/view/whole/html/asmade/act-2024-021>>. The Charter also appeared in the repealed *Victims of Crime Assistance Act 2009 (Qld)*.

⁷³ For example, Queensland Police Service, *Operational Procedures Manual* (Issue 106.1 Public Edition, 18 July 2025), s 9.14.

The above shows that after July 2024, the QPS recognised the need to explicitly instruct police officers about the types of contact details that should not be included in a QP9, including a victim's address.

However, at the time of the disclosures, section 3.7.2 (Documentation at first appearance) did not contain privacy considerations. This section instructed arresting officers to supply a QP9 to prosecution and defence and to include copies of all necessary documentation.⁷⁴ The QPS has since amended section 3.7.2 to include privacy considerations. It now orders arresting officers to ensure the QP9 does not contain personal particulars, such as the address of a victim unless required to prove particulars of an offence.

Additional amendments have been made to clarify and strengthen instructions to police officers, emphasising the importance of not disclosing a victim's contact details, such as an address. For example, on 26 August 2024 the QPS added section 1.9 (Confidentiality of information related to victims, witnesses and other vulnerable persons) and amended Appendix 3.2 (Procedure to be adopted when checking briefs of evidence).

QP 0324 Full brief of evidence comment sheet

A brief of evidence is a compilation of evidence that the prosecution uses to make its case against an accused person in criminal proceedings. Section 3.8.15 of the OPM sets out requirements for checking briefs of evidence by a brief checker,⁷⁵ including completion of QP 0324 *Full brief of evidence comment sheet* (**Comment sheet**).

The Comment sheet is meant to ensure that the evidence that the prosecution uses to build its case against an accused person in criminal proceedings complies with the OPM. The Comment sheet will only be effective to the extent that the OPM is effective.

The Review found in the assessment of the OPM that its coverage was not strong at critical points. For example, in 2024, a victim was informed by the QPS that there was a three-step process for checking that her address was not disclosed – and she was incorrectly told that a disclosure simply could not occur. These checks were at the

⁷⁴ Queensland Police Service, *Operational Procedures Manual* (Issue 85.1, 21 December 2021).

⁷⁵ 'A brief checker means an officer who has successfully completed either:

(i) a prosecutors training course; or

(ii) a brief managers or brief checkers course; and

(iii) any other officer appointed as a brief checker by an officer in charge of a station or establishment.'

Queensland Police Service, *Service Manuals Definitions* (6 October 2020), 6

<<https://www.police.qld.gov.au/sites/default/files/2020-10/Service%20Manuals%20Definitions.pdf>>.

arresting officer, brief checker and prosecutor levels. However, the OPM sections about checking briefs of evidence at the time of the reviewed disclosures did not have explicit instructions and guidance about these checks to ensure that a victim's address was not disclosed.

This was reflected in the Comment sheet at the time. The Comment sheet did not require arresting officers, brief checkers or prosecutors to ensure that a victim's address, or contact details, were not disclosed.

In November 2023, the Comment sheet was amended to require the arresting officer, brief checker and prosecutor to check that *'Personal information of Witnesses [is] redacted from Briefs of Evidence'*.

The amendment is a marked improvement. However, the terminology does not specify 'victim'. This may be an opportunity for improvement.

Recommendation 5

The Information Commissioner recommends that the Queensland Police Service:

Within 18 months, enhances cross-referencing in policies and procedures, including the Operational Procedures Manual, to improve accessibility and enable Queensland Police Service members to quickly locate relevant information across interconnected sections. This cross-referencing should include, but not be limited to topics about information privacy, recording offences, telecommunication offences, form creation, court document preparation, creating charges and domestic violence.

7.4 Forms had insufficient safeguards

In six of the seven Cases, QPRIME auto-populated the victim's full address into a form which the QPS disclosed to the offender. The QPS should have ensured that all forms supported provision of required information and protected against unauthorised disclosure.

From July 2024, the QPS's VAWG has led the identification and implementation of solutions to protect personal information of victims.

In September 2024, on its own initiative, the QPS engaged the Department of Justice and Attorney-General (**DJAG**),⁷⁶ Strategic Policy and Legislation, and Courts Services teams to discuss address requirements within court forms.⁷⁷

At this meeting, the QPS and the DJAG discussed irregularities between the Justices Regulation and QPS forms. Specifically, that the Justices Regulation requires '*adequate particulars*' of the offence location to be supplied, while the Bench Charge Sheet sought more detail by requiring police officers to record the '*address of offence*'.

A proposal to amend the Bench Charge Sheet form was progressed to the Chief Magistrate. On 1 November 2024, the Chief Magistrate advised the QPS to go ahead and amend the form to require '*place of offence*' instead of '*street address*'. This wording aligned better with the requirements of the Justices Regulation.⁷⁸

On 6 December 2024, the QPS updated the Bench Charge Sheet to reflect '*place of offence*'. However, the Bench Charge Sheet form reverted back to '*street address*' for three months before the error was noticed and rectified.

Whilst a step in the right direction, VAWG recognised more work was yet to be done. This included a review of forms to ensure the forms addressed privacy risk.

The VAWG's form review identified 912 forms generated through QPRIME, including the Bench Charge Sheet, Court Brief QP9 and Notice of Caution.⁷⁹ The QPS split the forms into groups of high, medium, low and no perceived risk. The QPS identified 368 forms that included the address of a victim, aggrieved, respondent or offence location.

Out of the 368 forms, the QPS identified eight release documents⁸⁰ that may be routinely disclosed to the defendant during court proceedings.

In December 2024, the QPS began adding warning prompts to the release documents reminding police officers to consider the victim's confidentiality in accordance with OPM 1.9. For example, **Figure 6** depicts an amendment to Form 7 – Bench Charge Sheet, with a warning.

⁷⁶ The department was renamed as the Department of Justice in November 2024.

⁷⁷ Letter from Office of the Deputy Commissioner Regional Operations and Youth Crime to Director-General Department of Justice and Attorney-General (19 September 2024).

⁷⁸ Email from Manager, Reform and Support Services, Courts and Tribunals, Department of Justice and Attorney-General to Director, Prosecution Services Support Unit, Queensland Police Service (1 November 2024).

⁷⁹ Letter from Office of the Deputy Commissioner Regional Operations and Youth Crime to Director-General Department of Justice and Attorney-General (19 September 2024).

⁸⁰ Release documents are forms that are created when a person is charged, and before an offender attends court that may contain the victim's address.

Figure 6 Bench Charge Sheet

Date Charged:	27/11/2024	Occurrence No.:	QP1701566991
Police Reference:	[REDACTED]	CORE SYSTEMS	
*Place of Offence:	30 MAKERSTON ST, BRISBANE CITY, QLD 4000		
<i>*Prior to release of this address, have you considered the victims safety in accordance with OPM 1.9</i>			

Source: Queensland Police Service

The QPS has introduced warning prompts into the following release documents:

- Form 7 – Bench Charge Sheet
- Form 3 – Notice to person granted bail by deposit of money
- Form 14 – Release notice
- Form 24 – Release notice (by police officer)
- Form 27 – Order as to bail
- Form 007 – Undertaking as to bail
- QP1150 – Notice of adult caution
- Form 3 – Notice of caution (juvenile).

This provides a basic minimum level of control on key forms. The QPS should satisfy itself that it has embedded warning prompts into all forms containing personal information that may be at risk of disclosure to third parties.

Recommendation 6

The Information Commissioner recommends that the Queensland Police Service:

Within six months,

- a) identifies all Queensland Police Service forms that may be at risk of disclosure to third parties that contain personal information of victims, witnesses, or other vulnerable persons
- b) include a warning prompt on all identified forms that requires a Queensland Police Service member to consider the safety of the victim in accordance with the relevant Operational Procedures Manual section.

This type of action is a good start but is not enough to ensure the forms have adequate privacy safeguards. Some forms may require a complete redesign. An additional layer of complexity is the evolution from printed forms to digital forms.

The QPS has introduced a technical control that automatically redacts victims' addresses into the release documents. This coding change limits the information being auto-populated into the form to suburb and state. Police officers are not required to manually redact the victim's address.⁸¹

In minutes dated 27 August 2025, the VAWG closed its involvement in the forms review. The VAWG considered that the QPRIME New Charge Options⁸² enhancement was the solution to redact victims' addresses applicable to all offences.

External to the VAWG, the QPS's Strategy and Digital Division will continue to progress work in relation to '*... the development of an understanding of terms and how we manage QPS forms ie. Reviewing architecture data.*'⁸³

The QPS should consider continued oversight from an effective, permanent committee or working group (like VAWG) which may be necessary to set priorities and ensure change is undertaken in a timely manner.

For example, in one of the reviewed Cases, the QPS's internal investigations identified that the sentencing schedule 'prosecution copy' form was not in a format preferred by the court, contributing to the disclosure of a victim's address. On 19 December 2022, a Professional Practice Manager (**PPM**) stated in a report that the form required immediate change to omit any reference to an address of the victim.

The QPS's Prosecution Innovations Program was given approval on 19 March 2025 to amend the sentencing schedule 'prosecutions copy' form to omit any automatic inclusion of a victim's address. The proposed changes to QPRIME to omit inclusion of a victim's address gives police officers the opportunity to set the reporting parameters when generating the form. Police officers will have the ability to choose what information will be imported into the printed form by way of tick boxes.

As of 17 September 2025, the QPS's QPRIME Core Systems Frontline and Digital Division are yet to implement this change to the form as the Software Development Group team is presently completing other priorities.

⁸¹ The Review has not examined the application of the coding change. As such, the Review is unable to provide an assessment on its effectiveness.

⁸² New Charge Options is explored in section 7.2 of the report.

⁸³ Queensland Police Service, Victim Address Working Group, 'Minutes' (27 August 2025).

It has been almost three years since a PPM raised this issue.

The QPS should ensure all forms are fit for purpose and prioritise 'privacy by design' to protect victim's personal information. This approach includes adopting system controls that will assist busy frontline police officers to act in accordance with guidance, instructions, and Orders.

Recommendation 7

The Information Commissioner recommends that the Queensland Police Service:

Within 12 months, implements Queensland Police Records and Information Management Exchange system controls to redact the personal information partially or fully from a form that may be at risk of disclosure to a third party.

7.5 QPS training

The Review considered whether lack of training contributed to the disclosures within scope. Agencies must have reasonable safeguards to protect against loss, misuse, unauthorised use and disclosure of personal information it holds.⁸⁴ Current and high-quality training is essential to provide the necessary clarity and direction for police officers performing complex tasks.

The Review did not determine conclusively that a lack of training contributed to the disclosure in all seven Cases. Each police officer had completed training that contained information about the Information Privacy Principles on at least one occasion.

Examples of current QPS training materials were reviewed and compared with versions effective in January 2022. At both relevant times, the training materials acknowledged that a victim's personal information should not be unnecessarily disclosed. For example, the learning summary for Court Brief (QP9) training contains the following:

Police prosecutors should also ensure statements and other materials disclosed to the defence do not contain information about a person's personal particulars. It is absolutely imperative that witness and victim contact details be obliterated from these items by the prosecuting officer before they are disclosed to the defence.

⁸⁴ Information Privacy Principle 4(2).

*If such details were to be disclosed it could have a detrimental impact on the victim. Police prosecutors must not disclose personal details of victims of crime.*⁸⁵

The language in this training excerpt is strong and the messaging clear. Numerous other references within the Court Brief, and other training modules reinforce the importance of protecting personal information from disclosure.

The QPS has an extensive training library and officer training program. An effective training program should be designed to ensure the successful transfer of knowledge to trainees. To maximise the impact of messaging about information privacy in practice, it should be integrated into a diverse range of training products and:

- included as a learning outcome⁸⁶
- included in the training overview
- highlighted within the core content of the material
- reinforced with examples about how victims, including domestic and family violence victims, may be impacted if a disclosure occurs⁸⁷
- linked to underlying legislative requirements, Orders or manuals.⁸⁸

Training should include role-based instruction and learning so that the police officer knows how to perform the role appropriately, and the training should be supplemented with frequent reminders to raise ongoing awareness of the topics.

The QPS Privacy Unit have developed a new mandatory online learning product to compliment the recent *Information Privacy and Other Legislation Amendment Act 2023* changes. This Information Privacy training highlights that protecting privacy is an individual responsibility. The training includes examples about disclosures of personal information of victims, and how police officers can identify and report privacy complaints and data breaches.

⁸⁵ Queensland Police Service, 'QCP047_03 Court Brief (QP9)' training (versions effective in January 2022 and current).

⁸⁶ For example, The Review was provided with the brochure for 'QC0407_04 Briefs of Evidence and the Presentation of Evidence for First Year Constables' training. Topics include QP9s, full brief of evidence and QPRIME. Knowledge of how information privacy relates to their role and duties specific to this training could be added to the learning outcomes to embed understanding of privacy principles and obligations.

⁸⁷ For example, the 'QCP047_03 Court Brief (QP9)' training includes a writing tip to trainees to: 'Take care with victims' addresses and personal particulars'. 99. This guidance would be strengthened by providing context and examples of how unauthorised disclosures may put victims at risk and what tools are available to support the protection of information in preparing documents for court purposes.

⁸⁸ For example, Operational Procedures Manual sections 1.9 and 9.14 are relevant to content within the new 'QC2138_01 Information Privacy' training but are not present in the current version provided to the Review.

Opportunities exist for the QPS to improve training as a control to safeguard personal information. Examples are:

- contextualising privacy principles within the operational environment, for example ensuring that privacy issues are incorporated into operational training materials
- reviewing training to ensure it is up-to-date and linked to clear policies and guides, such as sections of the OPM.

Recommendation 8

The Information Commissioner recommends that the Queensland Police Service:

Within 18 months, reviews its information privacy training and awareness program and ensures:

- a) relevant training materials for the production of court documents incorporate information about safeguarding privacy
- b) training materials are consistent, align with, and cross-reference policies, procedures, instructions and practices
- c) the design of training programs supports the effective transfer of privacy knowledge to the trainee, through the frequency and structure of the training sessions or programs, and the use of examples
- d) retention of information privacy knowledge is reinforced through reminders and ongoing awareness programs.

7.6 Systems to improve business operations

The QPS was aware of problems with QPRIME and its court forms well before 2024, as QPS members had raised the issues through the official channels.

The ESC's case officers prepared internal Assessment Inquiries and Investigation Reports. These reports were reviewed by a PPM responsible for managing each Case. The reports made recommendations about how to resolve individual allegations of misconduct. In addition, the reports identified systemic⁸⁹ issues and areas for business improvement.

⁸⁹ *Macquarie Dictionary* (2nd edition, 1991) 'systemic' (definition 2).

In 2022, a case officer investigating a disclosure identified that the process for generating a sentencing schedule 'prosecution copy' form required refinement. The case officer's report said prosecutors required prompts to specifically review those documents to ensure the documents did not inadvertently disclose personal information.

In May 2023, an Assessment Inquiry Report highlighted that limited or no guidance within business rules, policies and procedures about recording addresses had contributed to offenders being given victims' addresses.

This issue was escalated to the ESC's Professional Practices Committee (**PPC**) in April 2024. The PPC decided that a member of the ESC would prepare a report to articulate the identified issues for progression through the chain of command and to the relevant areas to be addressed.

On 28 July 2024, PPM Coordinators escalated a report to the PPC about incidents where QPRIME auto-populated the address of a victim into a Court Brief as the offence location.

The ESC member's report to the PPC had two recommendations about enhancing policies and procedures to appropriately record an occurrence address. On 30 October 2024, the PPC referred the matter to the VAWG to consider interim and permanent solutions.

PPMs who are responsible for managing investigations of alleged misconduct should escalate systemic issues through to the PPC. There are mechanisms in place to facilitate this escalation:

- a portal for PPM submissions
- monthly governance meetings between PPMs and PPM Coordinators.

These mechanisms, designed to facilitate the escalation of systemic issues, failed to ensure that such issues were addressed in a timely manner. The Review identified that a high turnover of PPMs meant that not all PPMs may have been aware of the portal to escalate issues. Further, the PPM Coordinators do not review every Assessment Inquiry or Investigation Report.

The Review acknowledges that the QPS has recently taken positive steps to address barriers to identifying, implementing and embedding business improvements across the organisation.

These include:

- updating report templates to include an area for recording supervisor, management, or organisational issues
- increasing the QPS members' awareness of the PPC and the PPM Portal for escalating issues
- engagement with the QPS Privacy Unit to encourage cross-team communication.

The QPS can do more to build its capacity to address failures which require coordination or broader organisational change. Opportunities for improvement include:

- managing the risks associated with high member turnover so that internal investigators are aware of their responsibility to report potential systemic issues
- clarifying roles and responsibilities to improve accountability for actioning reported potential systemic failures
- increasing training and privacy-specific knowledge for case officers and PPMs so they know how to report potential systemic issues
- implementing software improvements to support reporting of potential systemic issues and enable consistent recording of data.

The QPS's Police Integrity and Professional Standards (**PIPS**) is an information and record management system used by the ESC to record and manage complaints of misconduct. PIPS enables reporting of systemic issues or lessons learnt during Investigations, but not Assessment Inquiries. This limits the opportunities in PIPS to formally record systemic issues or lessons learnt. Creating this recording function in PIPS is one potential opportunity to support police officers to report systemic issues.

Recommendation 9

The Information Commissioner recommends that the Queensland Police Service:

Within six months, updates the Police Integrity and Professional Standards system to include a data field to capture systemic issues or lessons learnt during Assessment Inquiries.

The QPS is a large organisation. It employs over 19,000 staff.⁹⁰ It provides services at 518 locations across Queensland.⁹¹ In addition to frontline policing, the QPS has a range of specialist units. It is an organisation with complicated internal and external stakeholder relationships.

In an environment like this, a concerted effort is required to cut through existing systems, generate and harness energy for reform, and overcome the status quo to effect real change.

The QPS implemented policies and systems to encourage individuals to raise potential systemic issues so that the issues could be resolved. The Review observed in the Cases that individual QPS members raised concerns through these processes, but the issues they raised were not addressed.

The Review observed that the QPS has made efforts to address systemic flaws. However, these efforts have been slow.

Positively, the QPS established a special committee, the VAWG, to bring together internal groups, identify what needed to change and to implement those changes. The VAWG has had success in addressing the issues, for example by clarifying court requirements, embedding enhancements into QPRIME, improving forms design and raising awareness of privacy.

The QPS is able to identify and implement solutions to mitigate risk of disclosure of victim information. There are initiatives that are still underway and some to commence.

The VAWG does not have permanent or ongoing oversight over whole-of-business improvements.

Recommendation 10

The Information Commissioner recommends that the Queensland Police Service:

Within 12 months, completes a review of the effectiveness of existing committees involved in identifying and leading the implementation of whole-of-business improvements.

⁹⁰ Queensland Police Service Annual Report 2024-25, 'The QPS workforce comprises more than 19,000 paid employees including police officers and staff members', 67.

<<https://www.police.qld.gov.au/sites/default/files/2025-09/QPS%20Annual%20Report%202024-25.pdf>>.

⁹¹ Queensland Police Service Annual Report 2024-25, 19, not including 47 Marine Rescue Queensland bases and support services and 305 State Emergency Services depots and offices.



8 Complaints handling

Victims may feel overwhelmed and have no prior experience when dealing with disclosures that involve their personal information.⁹² The QPS's procedures require a victim-centric approach to ensure transparency when dealing with complaints.

Under the Information Privacy Act, a member of the public can make a privacy complaint if they believe an agency has dealt with their personal information in a way that is not consistent with the privacy principles.⁹³

Evidence suggests that the QPS's priority was to investigate allegations of misconduct by QPS members, through an ESC investigation, before investigating as a privacy complaint.⁹⁴ This led to delays in identifying or dealing with privacy complaints. For the Cases considered in the Review, the average time taken to complete an ESC investigation was 85 days.⁹⁵

For complaints about privacy, not directly received by the Privacy Unit, the QPS would not treat it initially as a privacy complaint. Once the ESC misconduct investigation was complete, and the investigating officer had identified an unlawful disclosure, they may notify the Privacy Unit of the outcome. The Privacy Unit would then contact the complainant and ask them if they would like to make a privacy complaint.

Significant delays in informing complainants that they can make a privacy complaint means that members of the public are less likely to make a privacy complaint due to fatigue with the system.

A complaint to the QPS by a member of the public about the QPS's handling of their personal information should be recorded and acknowledged in the complaints management system as a privacy complaint when it is first received. The QPS should clearly inform the complainant that if their complaint meets the definition of a privacy complaint, it will treat their complaint as both a complaint about a QPS member or service, and a privacy complaint.

⁹² Office of the Victims' Commissioner, *A guide to the Charter of Victims' Rights* (3rd edition) <https://www.forgov.qld.gov.au/_data/assets/pdf_file/0031/535549/a-guide-to-the-charter-of-victims-rights.pdf>.

⁹³ *Information Privacy Act 2009* (Qld) s 164.

⁹⁴ Queensland Police Service, *Privacy Complaint Process*, response to second notice (28 July 2025).

⁹⁵ The Review was able to calculate the number of days elapsed between when the Assessment Inquiry or Investigation was commenced and signed off for five of seven cases within scope of the Review.

Recommendation 11

The Information Commissioner recommends that the Queensland Police Service:

Commencing immediately, promptly records and acknowledges a complaint made to the Queensland Police Service that relates to an individual's personal information as a privacy complaint when the complaint is first received to ensure the correct timeframe for dealing with, or responding to a privacy complaint is adhered to.

How can members of the public make a privacy complaint?

The Review considered how members of the public are supported to make a privacy complaint. Members of the public are able to contact the QPS Privacy Unit directly, with phone and email contact details provided on the 'Privacy in the QPS' webpage. This page contains a link to make a complaint or provide feedback on the 'QPS Feedback' webpage.

The Review found the 'QPS Feedback' webpage:

- provides an online form for making a complaint about either a QPS Service or QPS Member
- does not have a standalone online form for privacy complaints
- does not explain what a privacy complaint means
- lacks guidance about which complaint form (about a member or service) a member of the public should use to make a privacy complaint.

Recommendation 12

The Information Commissioner recommends that the Queensland Police Service:

Within three months,

- a) updates the 'QPS Feedback' webpage to:
 - i) include the definition of a privacy complaint

Recommendation 12

The Information Commissioner recommends that the Queensland Police Service:

- ii) clearly state the options for a person to make a privacy complaint, including the use of an available online form
- b) updates the 'Privacy in the QPS' webpage to:
 - i) include the definition of a privacy complaint
 - ii) clearly state the options available to make a privacy complaint, in addition to the information contained within the QPP Privacy Policy.

In the meantime, and in the absence of a standalone online form for privacy complaints, the 'QPS Feedback' webpage should give reasonable help to individuals to put their complaint in writing.⁹⁶

Recommendation 13

The Information Commissioner recommends that the Queensland Police Service:

Within 12 months, updates both online complaint forms to include:

- a) a method such as a tick box or yes / no question which prompts members of the public to consider and select whether they also wish their complaint to be treated as a privacy complaint
- b) advice that when a user selects the tick box to make a privacy complaint, the Queensland Police Service has 45 business days to respond.

The Review found that the QPS website does not provide prominent information to members of the public about what to expect after making a privacy complaint. This could affect a complainant's awareness of their rights, for example, their right to bring a privacy complaint to the OIC if the QPS does not action it within 45 business days.⁹⁷

⁹⁶ *Information Privacy Act 2009* (Qld) s 166A(3).

⁹⁷ *Information Privacy Act 2009* (Qld) ss 164 to 166A.

Effective from 1 July 2025, the QPS's QPP Privacy Policy provides guidance on making privacy complaints and what to expect.⁹⁸ However, it says:

The QPS has 45 business days from the date of receipt to resolve a privacy complaint. We take your complaints seriously so please be patient while we investigate all aspects of your complaint.

*If you are not satisfied with the outcome you can refer your privacy complaint to the Office of the Information Commissioner...*⁹⁹

This is not explicit about a complainant's right to complain to the OIC after the 45 business days elapses. The QPP Privacy Policy is not linked or cross-referenced from the webpage for giving feedback, compliments or complaints, however it is found as a linked document on the 'Privacy in the QPS' webpage.

The QPS should give members of the public more detail about the privacy complaint handling process.¹⁰⁰

This information should be easily accessible on the 'QPS Feedback' webpage.

Recommendation 14

The Information Commissioner recommends that the Queensland Police Service:

Within three months,

- a) updates the 'QPS Feedback' webpage to:
 - i) advise the expected response and resolution timeframes for complaints, including privacy complaints
 - ii) outline how privacy complaints are dealt with by the Queensland Police Service

⁹⁸ Queensland Police Service, *QPP Privacy Policy* (30 June 2025) <https://www.police.qld.gov.au/sites/default/files/2025-07/QPP%20Privacy%20Policy_0.pdf>.

⁹⁹ Queensland Police Service, *QPP Privacy Policy* (30 June 2025), 9 <https://www.police.qld.gov.au/sites/default/files/2025-07/QPP%20Privacy%20Policy_0.pdf>.

¹⁰⁰ Guidance about public sector complaint management is provided by the Queensland Ombudsman, including the Queensland Public Service Customer Complaint Management Guideline. While the legislative definition may exclude Queensland Police Service from the scope of the government guideline, it nonetheless provides valuable best practice principles that are broadly applicable and should be considered by all agencies in the implementation of an effective complaint handling framework.

Recommendation 14

The Information Commissioner recommends that the Queensland Police Service:

- b) updates the 'Privacy in the QPS' webpage to:
 - i) clearly state the options for making a privacy complaint and advise the expected response and resolution timeframes
 - ii) outline how privacy complaints are dealt with by the Queensland Police Service
 - iii) ensure complainants are aware of their specific rights of review.

Issues with internal complaint handling between teams

The QPS ESC handles public complaints and investigates allegations of police misconduct.

The QPS Privacy Unit, amongst other things, is responsible for responding to concerns about the QPS's handling of personal information.

The Review considered how the ESC and Privacy Unit intersected when the ESC investigated the Cases. Overall, the Review identified several issues with the internal complaint management process between teams including:

- insufficient knowledge about identifying privacy complaints and breaches among non-privacy specialist QPS members
- high member turnover for PPMs and case officers due to internal movements within regions or districts and promotional opportunities, leading to loss of knowledge about complaint handling requirements
- lack of detail in guidelines about who is responsible for information sharing between teams
- absence of clear, automated or reliable procedures for sharing information between teams.

Information sharing between the ESC and the QPS Privacy Unit

The Review considered whether the ESC and the Privacy Unit communicated effectively and were supported by clear processes and controls. When ESC

categorised a complaint as 'Misuse Information'¹⁰¹ or identified a privacy concern, it did not always notify the Privacy Unit.

The Review found that in one Case, the Privacy Unit received a privacy complaint directly. The Privacy Unit reached out to ESC to establish whether it knew about the issue as it involved an allegation of 'Misuse Information'. The ESC was not aware of the complaint, nor did it take any steps to investigate after the Privacy Unit brought it to the ESC's attention. Five months after the Privacy Unit advised the ESC of the matter, the QPS received a referral concerning the conduct complained of from the Crime and Corruption Commission Queensland. It was at this point that the ESC began an investigation.

The Review finds that there has been a breakdown of communication between the ESC and the Privacy Unit. The ESC failed to refer complaints that involved victims' personal information to the Privacy Unit.

Information sharing between the ESC and the Privacy Unit is heavily reliant on individuals with varying levels of experience and privacy-specific knowledge.

Where possible, automatic notification to the Privacy Unit by way of a technical or system control is preferential to relying on manual notification processes.

Recommendation 15

The Information Commissioner recommends that the Queensland Police Service:

Within 12 months, and with reference to recommendations 11 and 13, implements a system that automatically notifies the QPS Privacy Unit when a complaint is made by way of the online form and the system registers that a member of the public has made a privacy complaint.

The Complaint Management Unit (**CMU**) within the ESC triages and assess complaints. The CMU prepare and present complaints for hearing at the Complaint Assessment Committee (**CAC**). This assessment process is an opportunity for the CMU to identify if

¹⁰¹ The Queensland Police Service's Ethical Standards Command adopts and applies allegation types in line with the Crime and Corruption Commission Queensland's categories of alleged conduct. The Crime and Corruption Commission Queensland define 'Misuse of confidential information' allegations as accessing or disclosing official information without a legitimate reason, unintentionally disclosing official information, falsifying information or records, acquiring or retaining information or records illegally, or inadequately safeguarding information, <<https://www.ccc.qld.gov.au/corruption/corruption-allegations-data-dashboard/glossary-terms>>.

a complaint has a privacy component. The QPS should look for opportunities to automate a referral to the QPS Privacy Unit once it has assigned an Assessment Inquiry or Investigation with a 'Misuse Information' allegation type.

Recommendation 16

The Information Commissioner recommends that the Queensland Police Service:

Within 12 months, implements a system that automatically notifies the QPS Privacy Unit of the Ethical Standards Command matters that the Complaint Assessment Committee has identified as containing a privacy issue.

The Review considered whether communication between the ESC and the Privacy Unit was supported by training and guidance materials. It found that the Complaint Resolution Guidelines (**CRG**), a key document, had not been updated since 2022 and lacked references to the QPS Privacy Unit or the Information Privacy Act.

In six of the seven Cases, the ESC did not notify the QPS Privacy Unit of the complaint involving alleged unlawful or unauthorised access to, or release of, personal information.

As part of a Discipline Reform Project, the CRG underwent a major review and was updated on 1 October 2025. As well as multiple references to the Privacy Unit and the Information Privacy Act, the updated CRG explicitly requires that the Privacy Unit be notified of complaints involving allegations of unlawful or unauthorised access to, or release of, personal information.

The CRG may also go further to provide:

- expectations about timeframes for notifying the Privacy Unit
- reference to the legislated response period for privacy complaints to contextualise the requirements for acting quickly.

This will help to ensure delays in notifying the Privacy Unit are minimised and explain legislative requirements for response times for privacy complaints.

Recommendation 17

The Information Commissioner recommends that the Queensland Police Service:

Within six months,

- a) updates the Complaint Resolution Guidelines to include timeframes for notifying the QPS Privacy Unit about complaints
- b) updates the Complaint Resolution Guidelines to include the meaning of a 'privacy complaint' and 'response period' for a privacy complaint as per sections 164 and 164A of the Information Privacy Act.

In two of the seven Cases, the ESC's PPM (responsible for overseeing an investigation) was assigned responsibility to advise the Privacy Unit of the matter, but it did not.

The QPS have developed the PPM manual. However, the PPM manual does not yet contain any information or guidance about a PPM's responsibility to engage with the Privacy Unit.

Recommendation 18

The Information Commissioner recommends that the Queensland Police Service:

Within six months, updates the Professional Practice Manager manual to standardise processes and formalise expectations about how information should be shared between the Ethical Standards Command and the QPS Privacy Unit to align with the Complaint Resolution Guidelines.

Recent changes made by the QPS

On 1 September 2025, the QPS implemented a significant change to its complaints handling model. The change centralises triaging of all complaints received by the QPS to the CMU within the ESC.¹⁰² This includes complaints received by phone, email,

¹⁰² Prior to 1 September 2025, complaints received by phone or by the online form were triaged, assessed and in some cases, assigned for local resolution by Policelink assessment officers. Policelink is a separate unit to the Queensland Police Service's Ethical Standards Command.

online forms and internal referrals. The CMU is responsible for identifying whether a complaint relates to information privacy and if so, notifying the Privacy Unit. A person receiving a complaint enters it manually into a complaint management system for triaging among CMU officers. This change is designed to improve consistency of outcomes for complaint assessment.

Due to the recent timing of the changes, the Review was not able to assess the impact of these changes on the QPS's complaint handling processes.

Recommendation 19

The Information Commissioner recommends that the Queensland Police Service:

Ensures that at appropriate intervals, the complaint management model, supporting policies and procedures are reviewed and updated in consultation with the QPS Privacy Unit.



9 Whether to issue a compliance notice

Under the Information Privacy Act, the Information Commissioner may give an agency a notice requiring the agency to take stated action within a stated period to ensure compliance with an obligation. An agency that is given a compliance notice under the Information Privacy Act must take all reasonable steps to comply with the notice.¹⁰³

The Information Commissioner may issue a compliance notice if satisfied on reasonable grounds that an agency:

- (a) ***has done an act or engaged in a practice in contravention of a relevant obligation; and***
- (b) *the act or practice—*
 - i. *is a **serious** or flagrant contravention of the obligation; or*
 - ii. *is of a kind that has been done or engaged in by the agency on at least 5 separate occasions within the last 2 years. [emphasis added]*¹⁰⁴

The Information Commissioner may conduct a review to examine whether there are reasonable grounds to issue a compliance notice.¹⁰⁵

The Information Commissioner may also report on reviews to the Speaker of the Queensland Parliament, making recommendations to the reviewed agency in the report.¹⁰⁶ Recommendations can address compliance shortfalls, and pursue good practice beyond minimum compliance.

¹⁰³ *Information Privacy Act 2009* (Qld) s 160, with a penalty up to a maximum of 100 penalty units for non-compliance.

¹⁰⁴ *Information Privacy Act 2009* (Qld) s 158(1).

¹⁰⁵ *Information Privacy Act 2009* (Qld) s 135.

¹⁰⁶ *Information Privacy Act 2009* (Qld) s 135(1)(e).

Under transitional provisions in the Information Privacy Act, the Information Commissioner may issue a compliance notice for failure to comply with the former privacy principles if:

- the agency had done an act or engaged in a practice in contravention of the privacy principles under the former Information Privacy Act
- the Information Commissioner had not yet given a compliance notice to the agency in relation to the act or practice
- the act or practice also constitutes a contravention of the new privacy principle requirements.¹⁰⁷

9.1 Grounds to issue a compliance notice

The Review findings established grounds for the Information Commissioner to consider issuing the QPS with a compliance notice under section 158 of the Information Privacy Act on the basis that:

- the QPS acted in contravention of its obligation to comply with IPP 4, IPP 9 and IPP 11¹⁰⁸
- these acts were a serious contraventions of privacy principles¹⁰⁹
- these acts also constituted a contravention of the new privacy principle requirements of QPP 6, QPP 10 and QPP 11.¹¹⁰

The QPS's contraventions of the privacy principles exposed domestic and family violence victims to risk of further harm, and, in some circumstances, further harm did occur. In a situation where a victim's safety is at stake, the community's expectation of the QPS to protect a victim's personal information is '*justifiably high*'.¹¹¹

9.2 Information Commissioner's decision

When determining whether to issue a compliance notice, the Information Commissioner took into account the causes of the privacy principle breaches, and the corrective action taken by the QPS.

¹⁰⁷ *Information Privacy Act 2009* (Qld) s 222.

¹⁰⁸ *Information Privacy Act 2009* (Qld) s 158(1)(a).

¹⁰⁹ *Information Privacy Act 2009* (Qld) s 158(1)(b)(i).

¹¹⁰ *Information Privacy Act 2009* (Qld) s 222(1)(c).

¹¹¹ *ZIL v Queensland Police Service* [2019] QCAT 79 [46].

Since the establishment of VAWG in July 2024, the QPS has made a concerted and comprehensive effort, on its own initiative, to implement whole-of-business solutions, including:

- implementing electronic controls into QPRIME that partially redact the address of victims when preparing Bench Charge Sheets, Charge Lists and Court Briefs
- coding changes to release documents that partially redact victim addresses without manual intervention from police officers
- adding warning prompts to release documents, reminding police officers to consider the confidentiality of victims, witnesses and other vulnerable persons
- strengthening policies and procedures, such as the OPMs so that information about privacy and confidentiality gets to the right people at the right time
- successfully petitioning change to the Bench Charge Sheet, better aligning the form with the Justices Regulation.

After considering the QPS's whole-of-business solutions to minimise the risk of victims' personal information from being disclosed to offenders, the Information Commissioner decided that it was not necessary to issue a compliance notice.



10 Appendix 1 – Agency response



QUEENSLAND POLICE SERVICE

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Our Ref.:

Your Ref.:

9 December 2025

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

Final report following review under section 135 of the *Information Privacy Act 2009* (Qld)

Dear Ms Kummrow

Thank you for your letter dated 1 December 2025 and for providing the Queensland Police Service (QPS) with the opportunity to provide comment, following the review conducted by the Office of the Information Commissioner (OIC), on the OIC's Final Report into the QPS's handling of domestic and family violence victims' personal information and its compliance with the privacy principles under section 135 of the *Information Privacy Act 2009* (Qld) (Review).

The QPS acknowledges the importance of the matters raised in the Final Report and appreciates the OIC's recognition of the significant steps taken by the QPS to protect the personal information of victims of domestic and family violence. The QPS has consistently prioritised and taken proactive measures to mitigate harm and prevent further improper releases of information, while focusing on ensuring the safety and well-being of members of the public including victims of domestic and family violence.

Victim Address Working Group

On Friday, 26 July 2024, concerns about the release of domestic and family violence victims' personal information were raised at the 2024 Estimates Hearing, and the QPS Commissioner committed to the timely revision of QPS

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systems and processes to eliminate future risk. Since then, the QPS worked tirelessly to create permanent, whole of business, solutions designed to prevent the release of victims' personal information.

As acknowledged in the Final Report, these significant achievements include:

- The immediate establishment of a dedicated high-level committee, the Victim Address Working Group (VAWG).¹
- Immediate discussions to identify and implement short- and medium-term solutions, including policy updates in August 2024 and warning prompts in December 2024;
- Engagement with the Chief Magistrate to amend the Bench Charge Sheet in December 2024, where 'Address of offence' was changed to 'Place of offence', to bring the form in line with the requirements of section 14 of the *Justices Regulation 2014* (Qld).
- Long term changes completed in QPRIME for all offences to redact victims' personal information, including:
 - o Forms that may be routinely disclosed to the defendant during court proceedings are coded such that any address relating to the victim is automatically redacted when the form is produced within QPRIME except for the Bench Charge Sheet.
 - o In respect of Bench Charge Sheets, Charge List and Court Briefs, electronic controls have been implemented into QPRIME that partially redact the address of victims.
 - o Separately, the forms also contain a red writing prompt to consider section 1.9 of the Operational Procedures Manual (OPM) and the confidentiality of witnesses.
- Long term retention of solutions such as the warning prompts to release documents; reminding police officers to consider the confidentiality of victims, witnesses and other vulnerable persons; and the strengthening of policies and procedures, such as the OPM so that information about privacy and confidentiality gets to the right people at the right time.

The VAWG has, since inception, also expanded beyond the issues identified in the Review and has engaged in discussions and solutions for a wider range of victim protection safeguards and initiatives. The VAWG's efforts to protect victims continue today.

¹ Membership of the VAWG includes the Deputy Commissioner Regional Operations and Youth Crime, Representatives from Ethical Standards Command and Legal Division, QPS Principal Privacy Officer, Chief Information Officer, Chief Digital Officer, Representatives from Core Systems and Data Strategy.

Privacy

The QPS, through its Privacy Unit, has promoted a culture of privacy best practice throughout the QPS by performing a range of essential functions that support QPS' compliance with the *Information Privacy Act 2009*.

For example, the Privacy Unit conducted a comprehensive redevelopment of the QPS information privacy training and released a brand new, bespoke privacy Online Learning Product (OLP) on 1 July 2025. While this release coincided with the commencement of significant legislative reforms, the scope of the rewrite was intentionally designed to exceed baseline statutory obligations, creating a robust and effective training program that prioritises participant outcomes using victim-centric case studies and practical scenarios. Further, the OLP is structured to enhance participant outcomes by incorporating 'knowledge checks' throughout the modules, enabling participants to apply principles in practice and reinforce understanding as they progress.

The completion of the Information Privacy OLP is a mandatory requirement for all QPS members, regardless of their rank, level or role in the organisation. At completion stage of the OLP, participants are invited to complete a survey which assists the Privacy Unit to capture data on whether learning objectives are being met and supports continuous improvement.

The Information Privacy OLP is one of several QPS training products also being updated to include the new section 1.9 of the QPS OPM: 'Confidentiality of Information Related to Victims, Witnesses and Other Vulnerable Persons'.

In addition, the Privacy Unit provides tailored on-demand training designed to address privacy considerations relevant to a business unit's specific function. In 2025 multiple tailored presentations were delivered to a variety of business units across the QPS including Ethical Standards Command (ESC), Media and Public Affairs, Human Resources Division, and the Transformation Office. In addition to mandatory and tailored training packages the Privacy Unit has developed a suite of accessible, practical privacy materials and tools designed to promote privacy awareness across the QPS.

The Privacy Unit and ESC have also collaborated to create a robust Privacy referral arrangement. In late 2024, a new process was established, that integrates Privacy referrals within the existing ESC complaints management process. This process directly resolves several of the concerns that were

subsequently identified in the cases that were the subject of the Review, such as the reliance on individuals' varying degree of knowledge, and the inconsistent referral of complaints to the Privacy Unit.

The new Privacy referral process is now embedded as a requirement in the QPS Complaint Resolution Guidelines (CRG). Supplementary detail is currently being drafted for the Professional Practice Manager (PPM) Manual to support members' understanding of privacy and application of the process. The Privacy Unit and ESC continue to strengthen cooperative engagement to advance the effectiveness of the internal referral processes. Recently, the Privacy Unit delivered targeted information sessions to both the PPM Conference and the Staff Member Investigations Group to consolidate staff understanding and application of referral protocols.

The Review

The QPS values and prioritises a robust relationship with the privacy regulator, demonstrated by its respectful co-operative engagement with OIC, prior to and during this Review.

On 2 August 2024, the QPS voluntarily notified the Acting Privacy Commissioner about the release of QPS information, as known at the time. The QPS committed to keeping the OIC informed of its progress. The QPS voluntarily engaged with the OIC prior to the formalising of the Review in December 2024, including proactively reviewing and identifying the matters the subject of the Review, and conducting a system walkthrough with the OIC.

Between March to October 2025, information was released to the OIC on at least 14 separate occasions, with over 650 documents provided, and in addition, five in person 'walk throughs' of QPS processes comprising of 9 hours of interviews with QPS business areas.

Additionally, the QPS proactively progressed the various short, medium and long-term system changes during this time, without awaiting the Final Report outcome.

The Final Report

The QPS thanks the OIC for the 19 recommendations made in its Final Report. The QPS is committed to ongoing meaningful evolution and improvement of its systems and processes. It is also noted that some recommendations are technical in nature and will require feasibility assessment. The QPS will consider the Final Report and recommendations in closer detail to determine

a suitable action plan. The QPS is committed to engaging cooperatively with the OIC.

Summary

The QPS welcomes suggestions for continual improvement from the OIC and looks forward to continuing its positive and strong engagement with the OIC as the QPS further considers the recommendations and develops strategies and systems to better improve victim safety and privacy.

The QPS is fully committed to improving victim safety and to best practice in compliance with its information privacy obligations and remains committed to ensuring the personal information of victims is appropriately and lawfully protected. As outlined in the Final Report and this correspondence, the QPS has taken significant steps to ensure the protection of the personal information of victims of domestic and family violence and will continue to do so.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Steve Gollschewski', with a large loop at the end.

STEVE GOLLSCHESKI APM
COMMISSIONER



