Office of the Information Commissioner
Queensland

Administrative access to documents held in public schools

How the Department of Education implemented our recommendations

Follow-up audit on Report No. 2 for 2021-22

Report No. 3 to the Queensland Legislative Assembly for 2024-25

Acknowledgement of Country

The Office of the Information Commissioner acknowledges Aboriginal and Torres Strait Islander peoples as the First Australians and recognises their culture, history, diversity and their deep connection to the land, waters and seas of Queensland and the Torres Strait.

We acknowledge the traditional custodians of the lands on which we operate and wish to pay our respects to their Elders past and present.

Copies of this report are available on our website at www.oic.qld.gov.au.

April 2025

Mr Martin Hunt MP
Chair
Justice, Integrity and Community Safety Committee
Parliament House
George Street
Brisbane QLD 4000

Dear Chair,

Tabling of Report No. 3 to the Queensland Legislative Assembly for 2024-25

I present for tabling a report prepared by the Office of the Information Commissioner (**OIC**) under section 131 of the *Right to Information Act 2009* (Qld). The report concerns a follow-up audit about the Department of Education's administrative access arrangement for documents held in public schools and the Department's progress in implementing recommendations from OIC's 2021-21 audit.

In 2021-22, OIC made six recommendations to improve the Department's management of and promotion of its administrative access arrangement to reduce reliance on formal information access requests in accordance with the proactive release objectives of the *Right to Information Act 2009* (Qld) (**RTI Act**) and *Information Privacy Act 2009* (Qld) (**IP Act**).

In summary, OIC's 2021-22 audit report recommended the Department:

- update and improve its administrative access policies and procedures – Recommendations 1, 2 and 6

- provide training to staff and promote administrative access arrangements within the community – Recommendations 3 and 5

- provide guidance and support to regional offices on administrative access – Recommendation 4.

The Department accepted all recommendations and agreed to implement them by May 2024.

In June 2024, OIC commenced a follow-up audit to assess the Department's progress in implementing the recommendations.

Our follow-up audit found, that while the Department is making progress in responding to some of the recommendations, none of the recommendations are fully implemented as at February 2025.

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

Yours sincerely

Joanne Kummrow
Information Commissioner

Table of contents

Executive summary

Background

In 2021-22, the Office of the Information Commissioner (**OIC**) conducted an audit into an arrangement put in place by the Department of Education (the **Department**) to facilitate administrative access to documents held in state schools.

Section 19 of the *Right to Information Act 2009* (Qld) (**RTI Act**) outlines ways of accessing information other than through formal applications under the RTI Act or the *Information Privacy Act 2009* (Qld) (**IP Act**) which are a last resort.[1]

Administrative access arrangements enable a person to obtain access to government-held documents more easily than making a formal application under the Acts. A key feature of administrative access arrangements is that they give a person access to information faster and at a lower cost.

The 2021-22 audit sought to determine whether the Department managed its administrative access arrangement to documents held in schools effectively. We reviewed documents, interviewed staff and visited six state schools to assess how the arrangement worked in practice.

The audit report tabled on 29 March 2022 made six recommendations to the Department to improve its management of administrative access arrangement for access to school documents (**Recommendations**).

The Department supported the Recommendations and agreed to implement them by May 2024.

In 2024-25, we conducted a follow-up audit to assess what progress the Department has made in implementing the Recommendations since our 2021-22 audit.

Follow-up audit results and conclusions

The follow-up audit found that, while the Department has made progress in implementing some of the Recommendations, it has not fully or partially implemented any of them. We consider its actions to date are insufficient to improve administrative access to school documents.

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1 Preamble Section 2, RTI Act

Of the six recommendations, we assessed four as 'In progress'. The Department has made limited progress in implementing one recommendation and we are unable to assess the progress of one recommendation based on the information available to us.

Critically, the Department has not implemented Recommendation 1 on developing and implementing clear and up-to-date administrative access policies and procedures that are easy to find and use. However, it is consulting stakeholders in view of finalising a new administrative access policy, procedure and guideline. Completion of this core recommendation affects the implementation of the other five recommendations we made.

We acknowledge that the Department's core functions include delivering high quality early, junior and senior education services to children, students and families. However, all government agencies have an obligation to offer easy and prompt access to information and documents, for example through proactive publication or administrative access arrangements. This is not only a key objective of the RTI Act, but a human right[2] that ensures openness, public scrutiny and trust in the work and operations of government.

While the Department is yet to fully or partially implement our 2021-22 audit recommendations, we recognise that it has taken steps to improve administrative access to information, which are discussed below.

Draft administrative access to information procedure and policy

The Department has drafted a new procedure, '*Administrative Access to Information*' (**Procedure**) and a new guideline, '*Documents held in schools – access and requests'* (**Guideline**) to respond to Recommendation 1. These documents are yet to be finalised, approved or published by the Department.

Once finalised and published, the new Procedure and Guideline will assist teachers, school staff and members of the community to understand what information and documents the Department and state schools have available and how it can be accessed without the need for a formal information access request under the Acts.

The Department commenced a consultation process on its new Procedure and Guideline in November 2024.

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2 Section 21, *Human Rights Act 2019* (Qld)

Training on administrative access to information

The Department provides targeted online mandatory training in administrative access to its staff at management level within its corporate office, regions and schools.

However, the digital platform used to deliver this training does not allow the Department to verify if employees access the webpage links and read the attached material when undertaking the training.

The training also lacks any knowledge-based questions to test a participant's understanding of the topics following completion of the mandatory training.

As the Department has not finalised, approved or published its new Procedure and Guideline, these documents are not reflected in the current online training materials, which will require updating.

Advice for the public on administrative access to information

Information about the Department's original administrative access arrangements is prominently displayed and easy for a member of the public to access on its website.[3]

However, the Department needs to use a wider range of methods to raise the profile of its administrative access arrangements to ensure members of the school and broader community are aware they can seek access to student and non-student information and how to do so. Our 2021-22 audit report suggested communication through 'Parents and Citizens' (P&C) Associations, events, newsletters and online portals like individual school websites or QParents.

Re-establishment of the Information Access Office Network

Five of the Department's eight regions have an active Information Access Officer representative.

The Department's Information Access Officer Network seeks to assist schools and support them in managing information access requests, including RTI and administrative access requests.

While we requested arrangements be made for OIC to visit regional offices during the follow-up audit, the Department did not arrange the requested visits, and we were unable to assess the Network's effectiveness.

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3 https://qed.qld.gov.au/about-us/rti/how-do-i-access-information

More work is needed to ensure the Information Access Officer Network is fully operational and adequately represented across all regions within Queensland.

Department's response to the follow-up audit report

We provided a copy of this follow-up audit report to the Department for its review and invited it to provide a response.

We have considered the Department's response in developing our conclusions and represented them to the extent relevant and warranted in preparing this report.

The Department's comments are in the **Appendix** to this report.

1 Context

1.1 Administrative access arrangements

The object of the *Right to Information Act 2009* (Qld) (**RTI Act**) is to give the community a right to access to government-held information as a matter of course, unless there is a good reason for a government agency to safeguard or refuse access to the requested information.

Section 19 of the RTI Act outlines ways of accessing information other than through formal applications, for example under an agency's administrative arrangements such as its publication scheme or access under another Act. A document may also be available for public inspection or commercially available.

Administrative access offers a quick, easy and informal way for a person to obtain access to government-held documents more easily than making a formal information access request under the RTI Act or the *Information Privacy Act 2009* (Qld) (**IP Act**). A key objective of administrative access arrangements is that they give a person access to information faster and at a lower cost.

The Office of the Information Commissioner (**OIC**) has published[4] a guideline outlining the benefits of administrative access arrangements, as well as a checklist to help government agencies identify information that may be suitable for administrative access, implement an administrative access scheme and monitor performance.

OIC's audit report into administrative access to medical records[5], tabled on 18 February 2025, makes a general recommendation for best practice applicable to all agencies. They should ensure that their administrative access arrangements are:

- **well-designed** – established in response to identified community needs with built-in protections for privacy and boundaries around disclosure, and consistent with the processes for making a formal access application

- supported by a **toolkit** that maximises efficiency and effectiveness, for example, automated procedures, a practice of talking to applicants, and clearly documented policies and procedures, templates and checklists

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4 https://www.oic.qld.gov.au/guidelines/for-government/access-and-amendment/proactive-disclosure/administrative-release-of-information
5 *Administrative access to medical records, Report No. 2 for 2024-25*. Available at https://www.oic.qld.gov.au/about/our-organisation/key-functions/compliance-and-audit-reports/audit-of-administrative-access-to-medical-records-held-in-hospital-and-health-services

- an **efficient alternative** to formal access applications – quick, easy, cost effective, thorough and a reliable pathway to information access

- part of **everyday business** operations – approved by the chief executive, understood across the agency, well-managed, monitored to maintain utility, seamlessly integrated into the suite of information management services, and promoted to the community.

1.2   Department of Education

Queensland's Department of Education (**Department**) is responsible for primary and secondary public school education and schools, and early childhood education and care. It employs a large workforce. As at 30 June 2024, the Department had over 76,000 full-time equivalent employees, of which about 94 per cent are based in schools.[6] A total of 568,129 students were enrolled in Queensland state schools as of August 2024.[7]

The Department has 19 regional offices in its eight regions throughout Queensland – Central Queensland, Darling Downs South West, Far North Queensland, Metropolitan North, Metropolitan South, North Coast, North Queensland and South East. The regional offices play an important role in supporting principals and schools, including through specialist staff who schools can contact for advice on access to information requests.

In 2022-2023, the Department received 79 applications under the RTI Act and 469 applications under the IP Act.[8]

6 *Annual report 2023-2024* Department of Education. Available at www.qed.qld.gov.au.
7 *Department of Education: State school enrolments August 2020–24*. Available at www.qed.qld.gov.au.
8 *Department of Justice, Right to Information Act 2009 and Information Privacy Act 2009 Annual Report 2022-23*. Available at https://www.rti.qld.gov.au/accessing-government-information/annual-reports-rti

2 The audits

Under section 131 of the RTI Act the Information Commissioner has a function to review and report on agencies about the operation of the RTI Act, including by monitoring, auditing and reporting on agencies' compliance with the Act and Chapter 3 of the IP Act.

The Information Commissioner must, as soon as practicable after finishing a review, give a report about the outcome of the review to the parliamentary committee.

2.1 2021-22 audit

In 2021-22, we conducted an audit of how the Department operated administrative access arrangements for information and documents held in state schools.

We considered the circumstances of administrative access requests made to the Department and its practices in response.

The audit report was tabled on 29 March 2022. It is published on our website at https://www.oic.qld.gov.au/about/our-organisation/key-functions/compliance-and-audit-reports/admin-access-to-info-how-the-doe-manages-access-to-documents-held-in-schools

Findings

The Department had developed an administrative access arrangement for requesting access to documents held in schools. The audit sought to determine whether the Department managed the arrangement effectively and examined how a small number of schools respond to requests for information.

In our 2021-22 audit report, we concluded that:

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

We found that the Department had policies, procedures and training about its administrative access arrangement. However, visited schools were generally unaware of these resources. The procedures were out of date and sometimes inconsistent.

Our audit report also noted that:

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

Recommendations

We made six recommendations to the Department to improve and support its administrative access arrangements, namely:

- **Recommendation 1**: Implement clear and up-to-date administrative access to information policies and procedures that are easy to find and use.

- **Recommendation 2**: Clarify what information the Department's regions and schools make routinely available and who is authorised to release it.

- **Recommendation 3**: Provide targeted and accessible training to Department staff on administrative access.

- **Recommendation 4**: Promote the availability of access to student and non-student information held by the Department.

- **Recommendation 5**: Re-establish the Information Access Officer Network to support consistent access to information arrangements across the Department's regions.

- **Recommendation 6**: Consult with stakeholders and implement the policies and procedures developed under Recommendation 1.

Department's response to recommendations

The Department accepted all recommendations and indicated it would implement the recommendations between January 2023 and May 2024.

2.2 Interim progress report

In January 2023, we wrote to the Department seeking an update on its progress in implementing the six recommendations.

In February 2023, the Department advised that five recommendations were in progress and one was partially implemented.

We did not validate the Department's self-assessment of its progress against our recommendations.

2.3 2024-25 follow-up audit

In June 2024, we commenced a follow-up audit under section 131 of the RTI Act to assess what progress the Department had made in implementing the six recommendations in our 2021-22 audit report.

Figure 1 sets out and explains the implementation ratings.

Figure 1

Implementation status ratings

Rating	Description
Fully implemented	The agency has implemented the recommendation substantially or in its entirety.
Partially implemented	The agency has implemented part or parts of the recommendation, but it has not fully satisfied the intent of the recommendation.
In progress	The agency has taken action to implement the recommendation and efforts to complete implementation are ongoing.
Limited progress	The agency has taken preliminary steps to implement the recommendation. Progress is limited and the underlying issues are not yet addressed.

Source: Office of the Information Commissioner

In July 2024, the Department reported its progress in implementing each recommendation and provided supporting evidence. It advised that it had fully implemented Recommendations 2, 3, 4 and 5. The Department said Recommendations 1 and 6 were in progress, having been delayed.

Results

We reviewed the evidence received from the Department and performed risk-based checks to gain assurance on the Department's self-reported actions and implementation status.

In the three years since our 2021-22 audit report was tabled, the Department has made some progress in implementing our recommendations. We assessed:

- Recommendations 1, 2, 3 and 6 as 'In progress'

- Recommendation 5 as the subject of limited progress, and

- Recommendation 4 as not possible to assess its progress.

However, as the Department has not implemented Recommendation 1 by finalising its Procedure and Guideline, it is not able to implement the remaining five recommendations.

In November 2024, the Department started consulting with stakeholders about the draft Procedure and Guideline. Once this process is completed, the Department needs to approve and publish the Procedure and Guideline on its website to satisfy Recommendations 1, 2 and 6.

Figure 2 summarises the Department's progress

Figure 2

Implementation status of recommendations from 2021-22 audit

	Total	Status				
		Fully implemente	Partially implemented	In progress	Limited progress	Unable to assess
Updating and improving policies and procedures	3			3		
Promoting access to information	2			1	1	
Guiding and supporting the regions	1					1
TOTAL	**6**	**0**	**0**	**4**	**1**	**1**

Source: Office of the Information Commissioner, March 2025

Chapters 3, 4 and 5 of this report present our findings on the Department's progress to implement the six recommendations under the following themes:

- **Updating and improving administrative access policies and procedures** – Recommendations 1, 2 and 6

- **Promoting administrative access arrangements within schools and the community** – Recommendations 3 and 5

- **Guiding and supporting regional offices on administrative access** – Recommendation 4.

3 Updating and improving administrative access policies and procedures (Recommendations 1, 2 and 6)

3.1 Introduction

Recommendations 1, 2 and 6 in our 2021-22 audit report concern the Department's policies and procedures to support its administrative access arrangements.

The Department's central office is responsible for policy development, planning and system performance, funding and purchasing and consistent statewide delivery of corporate services. This includes developing and updating policies, procedures and supporting documents about administrative access to information held in state schools. The Department's central office is also responsible for developing training and other awareness activities to be rolled out across all schools within Queensland, and supports regional offices to assist principals and schools improve their performance and outcomes.

In 2021-22, we reported that the Department outlined its policy for administrative access to school documents in two documents:

- Access to records held in schools and its schedules

- Administrative Access Scheme for Central and Regional Offices.

Clear, up-to-date policies, procedures and guidelines are necessary for establishing processes and protocols that:

- assist staff in understanding their roles and responsibilities in the administrative release of information

- create confidence in staff releasing information administratively

- increase agency responsiveness to requests for school information and documents

- ensure the public understands how administrative access works in the Department.[9]

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9 *Administrative release of information guideline* (2 August 2022): Office of the Information Commissioner www.oic.qld.gov.au

3.2   Follow-up audit results and conclusions

The Department has made some progress in implementing the recommendations from our original audit.

However, as it has not yet finalised the new Procedure and Guideline under Recommendation 1, it is not able to fully implement the contingent recommendations.

The Department started consulting with stakeholders about the draft Procedure and Guideline in November 2024. Approving and publishing the Procedure and Guideline on the Department's website will satisfy the requirements of recommendations 1, 2 and 6.

Figure 3 shows the implementation status of Recommendations 1, 2 and 6.

Figure 3

Implementation status of recommendations

concerning policies and procedures

Our 2021-22 audit report recommended the Department:		Status
Recommendation 1	within 12 months, supports its administrative access arrangement with clear and up-to-date draft policies and procedures that are easy to find and use, and adaptable to different circumstances.	In progress
Recommendation 2	within 12 months, clarifies what information regions and schools can make available routinely and who is authorised to release it.	In progress
Recommendation 6	within two years, consults with stakeholders and implement the policies and procedures developed under Recommendation 1.	In progress

Source: Office of the Information Commissioner

Recommendations 1 and 6 – Clear, up-to-date policies and procedures

In our 2021-22 audit, we found the Department outlined its policy for administrative access to documents held in schools in two documents. However, it was unclear which procedure applied to particular types of requests for information (eg: formal access to information requests or informal or administrative access requests). The two documents were out-of-date and sometimes inconsistent.

Principals we spoke with during the audit commented that policies and procedures were not easy to find and use, and they were unsure who should publish or release information as a matter of course.

At the time, the Department advised it was aware of these issues and that it was reviewing all its policies and procedures to remove overlap and assist decision-makers with simple, clear policies and procedures on administrative access to information.

We recommended the Department support its administrative access arrangement with clear and up-to-date policies and procedures that are easy to find and use.[10] We also recommended the Department consult with stakeholders prior to implementing and publishing its new policies and procedures.[11]

In July 2024, the Department advised that it had drafted administrative access procedures and that its Corporate Policy and Procedure team was reviewing them. We examined two documents as part of our follow-up audit:

- the draft procedure on, '*Administrative Access to Information* (the **Procedure**); and

- the supporting, draft guideline on, '*Documents held in schools – access and requests*' (the **Guideline**).[12]

The Procedure is informative. It clearly outlines the role and responsibilities of managers, principals, directors and above in managing an administrative access request and deciding on the release of information. It explains the process for:

- receiving a request

- processing personal and non-personal requests and, if necessary, contacting an Information Access Officer or other records staff within the Department for support

- reviewing the request and determining if the information requested is suitable for release

- making decisions on release which includes a process for approving or refusing a request.

Once implemented, the Procedure should assist Department staff to manage the administrative access request process and provide consistency of practice across the different regions. Publishing the procedure on the Department's website would promote transparency and inform the community of this informal pathway to request and access information.

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10 Recommendation 1.
11 Recommendation 6.
12 We assessed the 'Documents held in schools – access and requests' guideline under Recommendation 2.

The Department also advised that once its Corporate Governance unit approves the Procedure, it will consult with all key stakeholders.

This includes:

- the Department's RTI unit and privacy team

- representatives from all divisions/branches within the Department

- external stakeholders including principal associations and unions.

Consultation on the Procedure with internal stakeholders commenced on 12 November 2024. The Department advised that it is yet to consult externally with principal associations and unions on the Procedure and Guideline.

The Department could not provide a date for when it expects to adopt and publish the Procedure and Guideline although it said that it was aiming for the first half of 2025.

As the Procedure and Guideline have not been approved, they are not available for internal use and have not been published. This means it is likely schools still refer to the documents identified in the original audit.

We assess the implementation status of **Recommendations 1 and 6** as 'In progress'.

Recommendation 2 – Information regions and schools can make routinely available

In 2021-22, we found an array of policies and procedures principals may need to consider when deciding to release documents. School principals we spoke with indicated that they were unsure who should publish or release what information as a matter of course.

We recommended the Department clarify what information regions and schools can make available routinely and who is authorised to release it.

The new Guideline will replace the current *Access to records held in schools: Documents held in schools – access and requests* document available on the Department's website.

It outlines public interest considerations relevant when deciding whether to release documents. If the documents are not suitable for release under the administrative access scheme, staff should refer applicants to the legislative process under the RTI Act or IP Act.

The Guideline describes circumstances when staff can and cannot disclose information. It includes a table outlining the various types of information and ways they may be suitable for release, for example, through administrative access or under the RTI and IP Acts. It covers:

- student records

- staff records

- attendance information (student, staff, volunteers)

- curriculum related documents

- financial information

- school administration.

Users of the Guideline are referred to the Department's '*Administrative access to information*' procedure for information on documents unsuitable for administrative access release.

The draft Guideline meets the requirements of the recommendation in clarifying what information regions and schools can make available routinely and how to do so. It is a notable improvement on the guideline currently in use. There is a more comprehensive list of the types of information schools hold including how the community may access this information.

However, the Department is yet to approve the Guideline. We expect the Department to inform the public by publishing the approved Guideline on its website.

We assess the implementation status of **Recommendation 2** as 'In progress'.

4 Promoting administrative access to information in schools and the community (Recommendations 3 and 5)

4.1 Introduction

Recommendations 3 and 5 in our 2021-22 audit report concern the Department providing accessible and targeted training to Department staff on its administrative access arrangements and promoting administrative access to information within the community.

A school is an integral part of its community. It interacts with parents, students and past students, and the wider community in which it operates. Schools also exchange information with local businesses, take part in community events and in some cases, their facilities are available to the community out of school hours (eg: sporting facilities).

A person can also seek access to documents held at schools through administrative access arrangements. Or they can apply for access under the RTI Act or the IP Act as a last resort or where a formal access request is appropriate given the type of information sought (e.g. if an individual sought access to the school records of another person).

Training is a key component to raise staff awareness of the Department's administrative access arrangements and how they operate.

Effective use of different communication channels in promoting the Department's access arrangements is integral to informing the community about how it can gain access to student and non-student information.

4.2 Follow-up audit results and conclusions

The Department provides training to targeted employees. However, the training does not reflect the administrative access procedures and guidelines developed since our 2021-22 audit, as they are not yet approved.

We have concerns that there is no process to assess an employee's understanding of the training content, nor the ability to monitor whether a participant has accessed and read linked website attachments.

The Department advised it intends to promote the new administrative access Procedure and Guideline once approved and published. However, this does not address the broader context of Recommendation 5 that the Department periodically raise school and non-school

community awareness about routine access to the information and documents held by the Department and schools.

Figure 4 shows the implementation status of Recommendations 3 and 5 which concern providing targeted administrative access training to Department staff and promoting administrative access to information to the community.

Figure 4

Provision of training to Department staff and promoting administrative access to the community

We recommended that the Department of Education:		Status
Recommendation 3	within 12 months, supports its administrative access arrangement with an updated program of targeted accessible training.	In progress
Recommendation 5	within 12 months, supports its administrative access arrangement with promotion so that the community is aware it can seek access to student and non-student information and knows how to do so.	Limited progress

Source: Office of the Information Commissioner

Recommendation 3 – Training Department staff

In our 2021-22 audit, we found that the Department offered, '*Keys to Managing Information*' training which included processing administrative access requests. However, the material on administrative access requests was out-of-date. Also, the training module was no longer mandatory for staff to complete.

We noted that regional and school staff would not necessarily be aware of the online training.

We recommended that the Department support its administrative access arrangement with an updated program of targeted accessible training.

In July 2024, the Department advised that it had developed administrative access training materials and embedded them within the *Keys to Managing Information* and the *Management Foundations* training courses.

The Department advised:

> *The Keys to Managing Information' training course is progressing through the Departmental approval process to seek mandating the course for all new corporate staff and school business managers.*

The *Keys to Managing Information* module contains useful information about formal and informal requests for information. It includes knowledge-based questions to test the employees' understanding of the topics covered in the training.

The Department also advised that it expects to mandate the *Keys to Managing Information* training for new corporate and school manager employees. It is not clear if the training would be part of regular refresher training for these staff.

However, in October 2024, the Department then advised that it was considering offering the training on an optional basis, and broken down into four modules:

- records management

- information security

- privacy

- RTI and administrative access.

The *Management Foundations* training is mandated to all corporate and school based staff at the management level. The Department said that it developed and rolled the training out to targeted staff following our original audit.

The course includes a section on the administrative access scheme and directs participants to the Department's '*How do I access information*' webpage. The webpage includes sections on:

- what information a person can access

- what is administrative access.

While the course includes links to the Departments administrative access information, its effectiveness relies on the user accessing the links to various procedures and guidelines on the webpage and reading these documents.

The Department acknowledges that it is unable to track whether training participants access and read the attached material on the webpage. There is a risk that important information relevant to the topic is missed or overlooked by the participants.

Also, the training has no assessment questions to test employee knowledge and understanding of the training topic.

We assess the implementation status of **Recommendation 3** as 'In progress'.

Recommendation 5 – Promoting administrative access

In our 2021-22 audit, we found that it was unclear whether schools receive few requests for non-student related information because the community is not interested or because it is not aware it can ask for access to information. Additionally, if schools knew more about administrative access, they would be able to raise community awareness about right to information through other communication channels.

We recommended the Department work with schools to promote administrative access so the community is aware it can seek access to student and non-student information and knows how to do so.

In July 2024, the Department advised that all public facing school websites and corporate webpages linked to its 'Right to Information' webpage.[13] This webpage explains the difference between information released via administrative access and formal access under the RTI Act and IP Act. It also includes information about how to seek access to student and non-student information with links to request forms and further resources.

The Department's 'Right to Information' webpage is easy to access from its corporate and school facing websites. Information about the Department's administrative access arrangements is prominently displayed and easy for a member to the public to find, access and understand.

However, the essence of Recommendation 5 is about the Department working with schools to promote its administrative access arrangements through other channels and better inform the community about this informal means of accessing student and non-student information. For example, the Department and schools could promote access to school and non-school information through:

- advertising in school newsletters

- parent information and school handbooks

- digital communication portals and platforms used by schools to communicate and provide information to current students and parents (e.g. Compass)

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13 https://qed.qld.gov.au/about-us/rti

- P&C meetings

- social media platforms.

We received no evidence from the Department as to how it promotes its administrative access arrangements through channels other than its website.

The Department advised it intends to promote the release of its new Procedure and supporting Guideline once they are approved. It proposes to communicate to school communities through school newsletters, the Department's intranet site and via the Information Access Officer Network. The Department's Information and Technologies Branch communication team will facilitate communication about these new documents.

We assess the implementation status of **Recommendation 5** as 'Limited progress'.

5 Guiding and supporting regional offices on administrative access (Recommendation 4)

5.1 Introduction

The Department divides Queensland into eight geographical regions. Regional offices assist principals and schools to improve performance and outcomes. They are a conduit between the central office and local schools.

We recommended the Department support its regional offices with an Information Access Officer Network that could:

    a. promote consistency across regional offices

    b. raise awareness of access to information

    c. improve the quality of regional office advice and assistance

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

5.2 Follow-up audit results and conclusion

Since making our 2021-22 audit, the Department has re-instated the Information Access Officer Network (the **IAO Network**). However, it is not fully operational across each of the Department's eight regions.

The Department is unable to demonstrate how the IAO Network operates to support the regions effectively in raising awareness of access to information and promoting consistent advice and practices across the regions.

Figure 5 shows our assessment of the Department's progress in implementing Recommendation 5 to provide guidance and support to regional offices on administrative access to information.

Figure 5

Guidance and support for regional offices

We recommended the Department:		Status
Recommendation 4	within 12 months, supports its regional offices with an information officer network that can: a. promote consistency across regional offices b. raise awareness of access to information c. improve the quality of regional office advice and assistance d. be a pathway for feedback to central office to continuously improve departmental policies and procedures.	Unable to assess

Source: Office of the Information Commissioner

Recommendation 4 – IAO Network

When examining the Department's administrative access arrangement we expected to find:

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

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

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

In our 2021-22 audit, we found there was no routine assistance from central office provided to regional offices to support them in managing administrative access to documents held in schools. The Department advised it was considering re-establishing an IAO Network to support all regions and schools. It stated the proposed network would provide subject matter experts and regional support staff, training, mentoring and coaching on access to information.

On 23 March 2022, the Department's Executive Leadership Team approved the reinstatement of the IAO Network. The network consists of representatives from the Department's central and regional offices.

The terms of reference for the IAO Network outline its responsibilities, which include to:

- act as a central point of contact to redirect inquiries to the appropriate team to respond to requests for information

- coordinate document searches to respond to formal access requests made under the RTI Act and IP Act

- assist with:
  - o processes to access documents
  - o effective recordkeeping obligations and practices
  - o disposal of records in accordance with guidelines set out by Enterprise Information Services – Strategic Records
  - o identifying and dealing with potential privacy breaches and associated complaints.

Our follow up audit found that five regions had an IAO network member at 30 September 2024. **Figure 6** shows the number of Information Access Officers in the Department.

Figure 6

Information Access Officers by region

Service delivery region	Number of regional offices in region	Number of IAO Network members
1. Central Queensland	5	1
2. Darling Downs South West	4	4
3. Far North Queensland	2	0
4. Metropolitan North	2	0
5. Metropolitan South	2	0
6. North Coast	2	1
7. North Queensland	1	3
8. South East	1	1
TOTAL	**19**	**10**
Central office staff, network coordinators		24
TOTAL IAO NETWORK MEMBERS		**34**

Source: Contact list – Information Access Officer Network – Department of Education (at 30 September 2024)

The Department advised that at 30 September 2024:

- Metro North is a new region and has not yet appointed an Information Access Officer to the region[14]

- Metro South's Information Access Officer has left the Department and it is yet to appoint a new Information Access Officer

- Far North Queensland has not nominated an Information Access Officer to the region.

Given there are 19 regional offices throughout the Department's eight regions, we would expect that most regional offices would appoint an Information Access Officer. In large regions, we would expect more than one Information Access Officer would be appointed to provide adequate coverage.

The Department advised it has given the Information Access Officers awareness training in:

- responding to legislative requests for information

- privacy

- management of privacy breaches and complaints

- records management – records disposal freeze lift

- administrative access scheme associated with the Path to Treaty and Truth-telling and Healing Inquiry for First Nations people.[15]

Figure 7 shows the number of Information Access Officers who attended six training workshops between February and December 2023.

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14 The original report identified seven regions. One was called Metropolitan. The Department established Metropolitan North and Metropolitan South.
15 Following the repeal of the *Path to Treaty Act 2023* (Qld) in November 2024, work on the Path to Treaty, including the Truth-telling and Healing Inquiry and administrative access scheme for First Nations people, have ceased.

Figure 7

Information Access Officers workshop attendance

	Number of all IAOs attending workshop	Number of regional IAOs attending workshop
Workshop 1 – 22 February 2023	25	5
Workshop 2 – 29 March 2023	26	6
Workshop 3 – 3 May 2023	23	4
Workshop 4 – 13 June 2023	18	6
Workshop 5 – 14 September 2023	19	6
Workshop 6 – 7 December 2023	12	6

Source: IAO Network Presentations 2023 – Department of Education

Based on the attendance records for IAOs at the workshop presentations, we consider the attendance level was low with approximately half, or in some cases less than half, of the 45 employees invited attending each workshop.

This means that not all IAOs have received the training necessary to fulfill their responsibilities in raising awareness of access to information and providing quality advice and assistance to schools.

Our recommendation was not just about the Department re-establishing the IAO Network but rather, how the network:

a. promotes consistency across regional offices

b. raises awareness of access to information

c. improves the quality of regional office advice and assistance

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

On 3 October 2024, we approached the Department to organise onsite visits to the North Coast and South East regional offices. The purpose of these proposed visits was to assess how the IAO Network operates in practice and supports the information needs of schools within their regions.

As of 22 November 2024, the Department was unable to confirm a date for our visits. While the Department had organised a contact officer for the South East regional office visit, it

could not give a timeframe for it. It was a similar case for North Coast with no confirmation of a time for our planned visit of the regional office.

This means we are unable to assess how the IAO Network interacts with schools or to determine the extent to which the Department has implemented Recommendation 4.

Accordingly, we rate the implementation status of **Recommendation 4** as 'Not able to assess'.

6 Appendix

In March 2025 and per our policies and procedures, we provided a copy of this report to the Department with a request for it to review and provide a response to our follow-up audit findings.

1 1 APR 2025

Ms Joanne Kummrow
Information Commissioner
Office of the Information Commissioner
Email: audit@oic.qld.gov.au

Dear Ms Kummrow

Thank you for your letter dated 20 March 2025 regarding the *Administrative access to school documents* follow-up audit report, due to be tabled in the Queensland Legislative Assembly in the sitting week commencing 29 April 2025.

The Department of Education acknowledges the importance of enabling access to government-held documents and ensuring access to information is provided quickly and at a lower cost through robust administrative access arrangements where appropriate to do so.

The audit report tabled on 29 March 2022 made six recommendations to the department to improve the management of administrative access arrangements for access to school documents.

The department supported the recommendations and agreed to implement them by May 2024.

The following information includes the department's actions to date.

Recommendation 1: *Implement clear and up-to-date administrative access to information policies and procedures that are easy to find and use.*

– The department has drafted a new *Administrative access to information procedure* (Procedure) and an updated *Documents held in schools – access and requests guideline* (Guideline).

– In 2024, a broad range of internal stakeholders were consulted, including staff in regional offices, the Integrity and Employee Relations unit and Legal Services branch. The requirement for a decision-making process map and an end-to-end process map was identified, developed and included in the external consultation process.

– External consultation is currently underway, having commenced on 26 March 2025 and concluding on 24 April 2025. External stakeholders include the Queensland Secondary Principals' Association, Queensland Teachers' Union, Parents and Citizens' Association Queensland and School Business Managers' Association Queensland.

– The Procedure will be published by 2 June 2025, but not effective until 14 July 2025, to allow schools time to prepare.

Recommendation 2: Clarify what information the department's regions and schools make routinely available and who is authorised to release it.

— The department has designated Information Access Officers in all eight regional offices. The Information Access Officers are authorised to release information in line with the Procedure and supporting Guideline. Within schools, the responsibility for administrative release remains with the principal.

— The department's website provides information regarding the type of information held in schools and regional offices, what is routinely available via administrative access and how to go about lodging a request.

— Information that the regions and schools routinely make available includes, but is not limited to, student records, staff records, volunteers' records and parent records.

Recommendation 3: Provide targeted and accessible training to department staff on administrative access.

— The department currently provides targeted online mandatory training in administrative access to staff at management level within corporate office, regions and schools.

— The department is currently developing a plan to prepare and deliver training through the QLearn platform which will reflect the new Procedure and Guideline, test the user's understanding of the subject matter and allow the department to verify employee completion.

— The training development will commence on approval and publication of the new Procedure. The training course is scheduled for completion and release in December 2025.

— All Information Access Officers will be required to successfully complete this training course.

Recommendation 4: Promote the availability of access to student and non-student information held by the department.

— The department is currently delivering an extensive records and information management training program to all school, regional office and corporate office staff.

— To date, the department has delivered training to over 400 schools and regional offices.

— One of the key focus areas of this training is the importance of maintaining accurate records over time to ensure availability and access to information.

— The training includes content that explains the concept of proactive release of information, the difference between administrative and statutory release, and the importance of promoting the availability of access to student and non-student information within individual school communities.

Recommendation 5: Re-establish the Information Access Officer Network (IAON) to support consistent access to information arrangements across the department's regions.

— The department has reinvigorated the IAON with meetings scheduled once every school term at a minimum. The IAON sessions aim to provide training, share knowledge and provide a forum for participants to ask questions and seek advice.

— The new Procedure, Guideline and two supporting process maps will provide clear guidance and imbed a consistent approach to information access across the department's regions.

Recommendation 6: *Consult with stakeholders and implement the policies and procedures developed under Recommendation 1.*

– The department is currently developing an implementation plan that, pending the approval and publication of the updated Procedure and Guideline, will communicate the changes to stakeholders and provide appropriate training and support to ensure stakeholders are able to execute their responsibilities confidently and diligently.

The department welcomes feedback on its progress to date and its proposed future implementation plans. The department is committed to continually improving its information management practices, including the proactive release of information.

Should you wish to discuss this matter further, I invite you to contact Mr Thomas King, Executive Director, Information and Technologies, on (07) 3034 4918 or by email at thomas.king@qed.qld.gov.au.

I trust this information is of assistance.

Yours sincerely

SHARON SCHIMMING
Director-General
Ref: 25/317196