



Office of the Information Commissioner
Queensland

Annual Report 2024-25



Front cover – In 2024-25, the OIC commenced a refresh of our logo and branding to support a new website and digital assets under construction and to be launched in 2025-26. The graphic on the front cover of this annual report is a sample element from our new logo and branding depicting the letters 'OIC' in binary code.

Acknowledgement of Traditional Owners and Elders

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 pay our respects to their Elders past and present.

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Annual report site

This document is available as a downloadable PDF from the website,

<https://www.oic.qld.gov.au/about/our-organisation/our-performance/annual-reports>

It is also available in paper form on request.

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25 September 2025

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

Dear Chair,

I am pleased to submit for presentation to the Parliament the Annual Report 2024-25 and financial statements for the Office of the Information Commissioner.

I certify that this Annual Report complies with the:

- prescribed requirements of the *Financial Accountability Act 2009* and the *Financial and Performance Management Standard 2019*
- detailed requirements set out in the annual report requirements for Queensland Government agencies.

A checklist outlining the annual reporting requirements is provided at page 76 of this Annual Report.

Yours sincerely



Joanne Kummrow
Information Commissioner

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Message from the Information Commissioner

On behalf of my fellow Commissioners and staff, I am pleased to present the 2024-25 Annual Report for the Office of the Information Commissioner (OIC).

The report highlights the OIC's performance and achievements in one of our busiest years to date. The data demonstrates continued demand for our information, guidance, policy advice, training, engagement, external review and privacy complaint mediation services. Additionally, we conducted 5 regulatory audits, with findings and recommendations tabled in Parliament.

A major focus in 2024-25 was preparing the Queensland public sector for changes to the RTI Act and IP Act under the *Information Privacy and Other Legislation Amendment Act 2023* (IPOLA), most of which commenced on 1 July 2025. To support this, we established a project team which drew upon the expertise of OIC subject matter experts and collaborated to develop new and updated guidance, tools and resources and presented training sessions for agencies across the State.

Queensland's commitment to open government, privacy protection, and public sector integrity is fundamental to a well-functioning democracy. The IPOLA reforms aim to enhance transparency and accountability, fostering greater public trust in government. Key reforms include the Queensland Privacy Principles, and a Mandatory Notification of Data Breach scheme.

Public concern about data breaches is growing, particularly in light of high-profile cyber incidents. The IPOLA reforms reflect this concern, placing greater responsibility on the public sector to lawfully collect, handle, store, and use personal information.

Personal information must be viewed by agencies as a valuable asset, and also a liability, particularly when it is retained longer than needed and not securely stored or managed. Nor should agencies collect more information than necessary to carry out their functions and activities.

Good record-keeping and information governance are essential for agencies to meet

their obligations under the IP and RTI Acts, as well as broader information management and cyber security. Equally important is fostering a culture of transparency and privacy, led from the top, that goes beyond mere compliance. The OIC remains committed to supporting agencies as they adapt to the IPOLA reforms and advocating for a culture that is committed to open government and protecting privacy.

This year has also been one of significant internal change for OIC. We reviewed our workplace capability needs, invested in employee training, restructured to optimise our resources, and commenced rolling out a new enterprise information technology platform to enhance efficiency and data insights. Additionally, we developed a new strategic plan to guide our future direction.

Our growth in employee numbers reflects the Government's investment in supporting the OIC's expanded functions and regulatory powers under the IPOLA reforms. While this has created opportunities for our people to take on new roles and upskill, it has also presented challenges. As a small statutory office, we must independently meet the same corporate and governance requirements as larger entities, often with limited resources. Continued investment in our resourcing and independence will be critical to sustaining our performance.

The OIC's success in 2024-25 is a testament to the dedication and expertise of our people. I extend my gratitude for their commitment to our vision and purpose. I also thank the Executive Leadership Team for their strategic and operational oversight, as well as their support in navigating organisational change and fostering continuous improvement.

We are proud of our achievements in 2024-25 and grateful for the opportunity to reflect on them through this annual report. As we embark on a new financial year, we remain committed to serving the Queensland community and working with the public sector.

Joanne Kummrow
Information Commissioner

Introduction and overview

About us

The Office of the Information Commissioner (OIC) is an independent statutory body established under the *Right to Information Act 2009* (RTI Act) and forms part of Queensland's framework of integrity agencies.

The OIC is headed by the Information Commissioner, who is an Officer of the Queensland Parliament and not subject to direction in the exercise of their functions and powers.

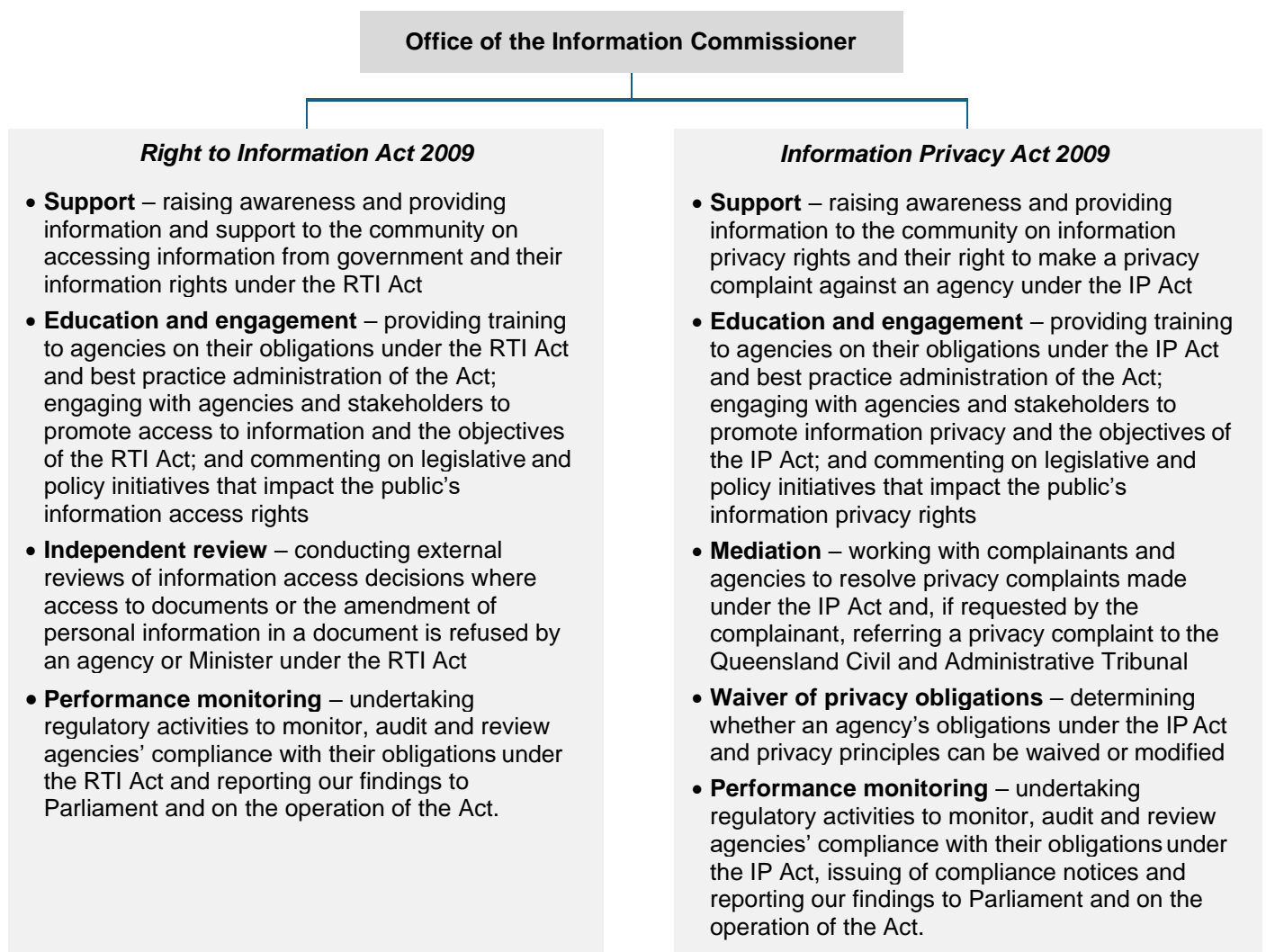
The Information Commissioner is supported by the Right to Information Commissioner and the Privacy Commissioner in delivering functions outlined in the RTI Act and the

Information Privacy Act 2009 (IP Act). All three Commissioners are appointed by the Governor-in-Council under our legislation.

The OIC promotes and protects the public's information access and privacy rights. These 'information rights' are human rights recognised internationally under the *Universal Declaration of Human Rights* and in Queensland under the *Human Rights Act 2019*.

To achieve our goals, we engage with the community, government agencies and with our key stakeholders and partners. We also collaborate with our national and international colleagues to share knowledge and collaborate on raising awareness and the advancement and protection of information rights.

Our functions



Strategic overview

Strategic Plan 2024-28

Our Vision Building trust through transparency

Our Purpose We independently uphold and promote information access and privacy rights

Our Values Respectful – Collaborative – Focused – Innovative

Objectives	Indicators	2023-24	2024-25	
		Actual	Target	Actual
Providing independent and timely privacy complaint mediation	Percentage of agency stakeholders satisfied with advice service we provide	100%	75%	100%
	Mean average days to finalise an accepted privacy complaint	144 days	140 days	158 days
Upholding community rights to access government information through independent and timely reviews of agency decisions under the IP and RTI Acts	Percentage of external review applications finalised to received	95%	100%	100%
	Applicant overall satisfaction with the service provided in assessment and conduct of external review of agency and Minister decisions about access to and amendment of government held information under the IP and RTI Acts	75%	70%	67%
	Percentage of agencies satisfied with the external review service	93%	75%	95%
	Percentage of open review applications over 12 months old at the end of reporting period	4.7%	0%	6.6%
	Percentage of finalised external review applications resolved informally without a decision	90%	75%	86%
	Mean average days to finalise an external review	147 days	150 days	176 days
Improving government services to the community by enhancing agency practices in right to information and information privacy	Agency overall satisfaction with the information resources provided by OIC	96%	80%	99%
	Agency overall satisfaction with the OIC Enquiries Service	97%	80%	100%
	Number of reports tabled in Parliament	4	5	5
	Number of advices to, and meetings with, agencies	98	N/A	90
Promoting greater awareness of right to information and information privacy to increase appropriate access to and protection of information	Number of consultations and submissions	87	N/A	37
	Number of responses to written and oral enquiries	5,895	4,500	5,847
	Cost of providing advice and guidance per Enquiries Service response	\$49	<\$65	\$65
	Percentage of training participants satisfied with sessions	99%	75%	98%
	Number of training participants	4,080	4,000	7,244
	Number of awareness activities conducted including online interactions	362	250	316
	Number of website visits	286,098	150,00	361,681

Year at a glance – 2024-25

External reviews

- **643 applications** received
 - **645 applications** finalised
 - **89 decisions** issued
 - **506 applications** resolved informally
 - **8 decisions** subject to appeal
- Page 16-17

Privacy complaints

- **168 complaints** received
 - **18 complaints** accepted for mediation
 - **88 complaints** finalised on grounds of declining to deal with
 - **16 complaints** referred to Queensland Civil and Administrative Tribunal
- Page 18-19

Supporting IPOLA changes

- **64 training sessions** held with **4,250 participants**
 - **88 Guidelines** and resources published
- Page 8-9

Education and information

- **7,244 participants**
 - **5,847 enquiries** received
- Page 10-11

Engagement

- **361,681 website visits**
 - **316 awareness activities** conducted
- Page 13-14

Audits and investigations

- **5 audit reports** tabled in Parliament
 - **18 recommendations** made
- Page 21-23

Major OIC events

- Hosted keynote speaker and panel discussion to celebrate **Privacy Awareness Week** (16-22 June)
 - Hosted **Solomon Lecture** and panel discussion to celebrate **International Access to Information Day**
- (28 September)
- Page 11-12

Submissions and consultations

- **8 submissions** made to parliamentary and government inquiries
 - **29 responses** to consultations conducted by Queensland, Commonwealth and other state or territory agencies
- Page 23

Preparing for the year ahead

Strategic planning

Led by the Information Commissioner, the OIC undertook a comprehensive review of the 2024-28 strategic plan in 2024-25.

In a highly consultative process, OIC employees were invited to provide input through a range of forums, including small group meetings, divisional discussions, a full day offsite workshop with all staff, and a technical working group. The results of our shared deliberations can be seen in a refined vision, purpose and strategic objectives for the organisation.

The Strategic Plan 2025-29¹ presents an important evolution of the OIC's future direction. It adopts a practical vision and purpose, with a strengthened focus on engagement with the community and broader, outcome-focused strategic objectives.

Workforce planning

Our regulatory, fiscal, and strategic environment continues to change, requiring increased agility in the performance of our functions and delivery of our services.

Looking to 2025-26, the OIC will have an expanded range of regulatory responsibilities. As part of our workforce planning, we considered how best to respond to our growing obligations, expectations and demands on our services and finite resources.

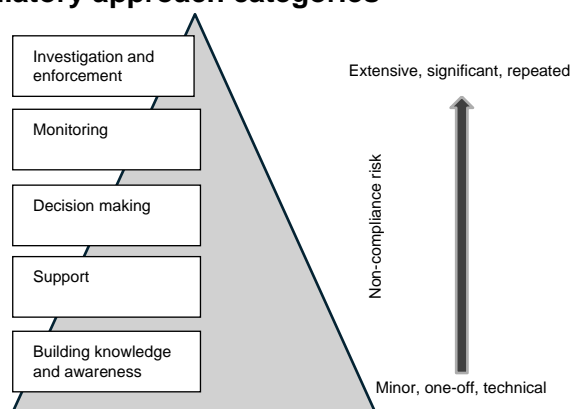
This activity was informed through employee feedback and resulted in a reconfiguration of our resources across the OIC to increase resilience, ensure greater role clarity and offer additional flexibility with existing resources. These changes were also accompanied by a commitment to upskill our people to meet the changing needs of their roles.

Regulatory policy

In preparation for our new regulatory functions from 1 July 2025, a Regulatory Policy was published describing how the OIC will use its statutory functions under the IP and RTI Act in support of compliance and continuous improvement in agency practices.

The OIC's Regulatory Policy² was published on our website on 30 June 2025. It describes the principles underpinning regulatory decisions, the factors considered when deciding which regulatory actions to take to promote compliance, and our response to non-compliance. In common with other risk-based regulatory systems, OIC prioritises the provision of education and advice services to promote compliance and will adopt a stronger regulatory stance where there is a higher risk of harm, and/or when the matter is serious or systemic.

Regulatory approach categories



¹ OIC's Strategic Plan 2025-29 is available at <https://www.oic.qld.gov.au/about/right-to-information/publication-scheme/our-priorities>

² OIC's Regulatory Policy is available at <https://www.oic.qld.gov.au/publications/policies/regulatory-policy>.

Service delivery and performance reporting

The OIC's performance against its service delivery standards and additional performance standards is highlighted below, with subsequent sections providing further detail by service area.

Service delivery standards	Target	Achievement			
		2021-22	2022-23	2023-24	2024-25
Informing, Educating and Engaging with the Public Sector and Community					
Agency overall satisfaction with the OIC Enquiries Service ¹	80%	98%	100%	97%	100%
Agency overall satisfaction with the information resources provided by OIC ¹	80%	98%	99%	96%	99%
Cost of providing advice and guidance per Enquiry Service response	<\$65	n/a	n/a	\$49	\$65
Right to Information External Reviews					
Percentage of external review applications finalised to received	100%	107%	94%	95%	100%
Percentage of finalised external reviews resolved informally without a decision	75%	89%	90%	90%	86%
Applicant overall satisfaction with the service provided in assessment and conduct of external review of agency and Minister decisions about access to and amendment of government-held information under the IP and RTI Acts ³	70%	44%	58%	75%	67% ²
Percentage of agencies satisfied with the review service ⁴	75%	98%	86%	93%	95%
Privacy Complaint Mediation and Data Breaches					
Percentage of agencies satisfied with the privacy complaint mediation service provided ⁵	75%	100%	94%	95%	90%

¹ The 2024-25 satisfaction level recorded is based on 76 completed surveys returned to OIC.

² For all external reviews finalised in 2024-25, OIC distributed a survey to all applicants with an external review. finalised. The satisfaction level recorded is based on 49 completed surveys returned to OIC.

³ The 2024-25 satisfaction level recorded is based on 37 completed surveys returned to OIC.

⁴ The 2024-25 satisfaction level recorded is based on 10 completed surveys returned to OIC.

Service delivery and performance reporting cont.

Additional performance standards	Target	Achievement			
		2021-22	2022-23	2023-24	2024-25
Informing, Educating and Engaging with the Public Sector and Community					
Number of responses to written and oral enquiries	4,500	5,330	5,190	5,895	5,847
Number of training participants	4,000	8,931	7,942	4,080	7,244
Percentage of training participants satisfied with sessions ⁵	75%	100%	99%	99%	98%
Number of website visits	150,000	317,672	295,270	286,098	361,681
Number of awareness activities conducted including online interactions ⁶	250	280	304	362	316
Right to Information External Reviews					
Mean average days to finalise an external review	150 days	139 days	152 days	147 days	176 days
Percentage of open reviews over 12 months old at end of reporting period	0%	0.8%	3.5%	4.7%	6.6% ⁷
Privacy Complaint Mediations					
Percentage of agency stakeholders satisfied with advice service we provide ⁸	75%	100%	91%	100%	100%
Mean average days to finalise an accepted privacy complaint ⁹	140 days	257 days	135 days	144 days	158 days
Number of advices to, and meetings with, agencies	N/A	359	184	98	90
Number of consultations and submissions	N/A	16	23	87	37 ¹⁰
Regulatory Audits and Investigations					
Number of audit reports tabled in Parliament	5	2	4	4	5

⁵ To maintain trend consistency, in 2024-25 the measure continues to only include participant satisfaction for BAU training activities, excluding IPOLA training. The satisfaction level recorded is based on 2,490 completed surveys returned to the OIC.

⁶ Activities include presentations, information sessions, campaigns, media releases, social media posts and publication of website news items.

⁷ 21 external reviews out of 320 were over 12 months old as at 30 June 2025.

⁸ The 2024-25 satisfaction level recorded is based on 2 completed surveys returned to the OIC.

⁹ This measure was discontinued as a Service Delivery Standard measure in 2022-23.

¹⁰ The reduction in the number of consultations and submissions in 2023-24 is due to a change in counting methodology.

Informing, Educating and Engaging with the Public Sector and Community – Service Delivery

Key achievements and challenges

We continued to provide a range of services and products to help agencies and members of the community understand their information access and privacy rights and responsibilities. Through advice, engagement and training, we build awareness and knowledge and developed capability regarding obligations under the IP Act and RTI Act.

We delivered these services in response to, and support of, existing legislation and to prepare the public sector for new legislative reforms that commenced on 1 July 2025.

We also marked key international events that promote privacy and information rights by delivering two events with associated awareness campaigns, namely Privacy Awareness Week and the International Access to Information Day.

More broadly, we participated in and supported regional and international initiatives including meetings of various peak bodies for information access and privacy³.

Preparing the public sector for the IPOLA reforms

We received funding through the State Budget 2023-24 to undertake training and education to assist agencies and entities prepare for and implement changes made to the IP and RTI Acts⁴ in the *Information Privacy and Other Legislation Amendment Act 2023* (IPOLA).

We established an IPOLA project team in 2023-24 with a program of work to provide advice, guidance and education, supported by a targeted communication and engagement model to support public sector agencies throughout Queensland.

The project utilised the skills and expertise of the project team alongside subject matter experts from across the OIC.

Key project achievements are provided in the table on page 9.

The project closed with the commencement of the amended IP and RTI Acts on 1 July 2025.

³ Including the Association of Information Access Commissioners (AIAC), the International Conference of Information. Commissioners (ICIC), the Global Privacy Association (GPA), Asia Pacific Privacy Authorities (APPA) and Privacy Authorities Australia (PAA).

⁴ See Information Privacy and Other Legislation Amendment Bill 2023 – Explanatory Notes.

Key IPOLA reforms project achievements

Across the public sector	
Informing	<ul style="list-style-type: none"> • 73 Guidelines to provide guidance to public sector agencies • 15 practical resources to support implementation of the reforms, most significantly: <ul style="list-style-type: none"> ◦ Model privacy and data breach policy templates to support agencies introduce the MNDB scheme (348 downloads) ◦ An interactive data breach assessment tool to guide agencies through a structured process ◦ A comprehensive 'Prepare for IPOLA' workbook (852 downloads) • Responding directly to enquiries about IPOLA (more than 1,000 email responses).
Educating	<ul style="list-style-type: none"> • A three-stage training program to build knowledge, develop capability and target specific learning requirements <ul style="list-style-type: none"> ◦ 64 training sessions held ◦ 50 of these were in-person with 26 held in regional Queensland, 11 held in Brisbane and 13 held in Southeast Queensland ◦ 4,250 participants from the public sector across Queensland • An online training module providing an overview of the reforms and compatible to upload to agencies own learning management systems.
Engaging	<ul style="list-style-type: none"> • Early cross-sector engagement through surveys and focus groups to inform project delivery and priorities with regular follow-up to ensure outputs met user needs • 5 newsletters distributed to more than 3,000 public sector officers supported by timely updates through socials • Key Commissioner news updates to agency CEOs and leaders • Specific web pages with IPOLA branding containing all information and resources.
OIC preparations	
MNDB scheme	<ul style="list-style-type: none"> • An online portal for agencies to make notifications about eligible data breaches from 1 July 2025 • OIC internal policies and procedures to appropriately manage data breach notifications under the mandatory scheme from 1 July 2025, alongside the ongoing voluntary scheme.
Other	<ul style="list-style-type: none"> • OIC internal policy requirements including: <ul style="list-style-type: none"> ◦ Queensland Privacy Principles (QPP) Privacy Policy ◦ Victims of Crime Assistance Policy,

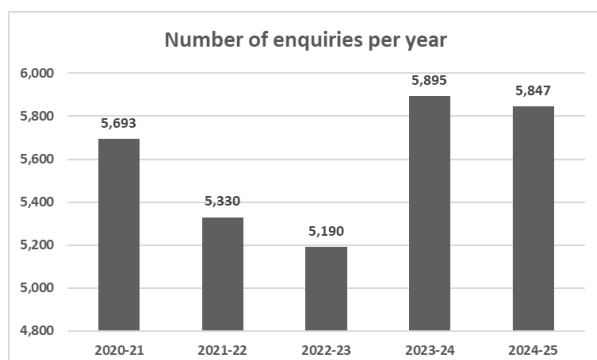
Providing information and assistance

Enquiries Service

The OIC's Enquiries Service provides general information and assistance to agencies and the community about the operation and application of the IP and RTI Acts.

In 2024-25, the OIC responded to enquiries from agencies preparing for the IPOLA reforms, including seeking advice on best practice handling of personal information and providing access to government-held information. The Enquiries Service also assisting member of the public in guiding them in how to exercise their right to request access to and amend documents and make privacy complaints.

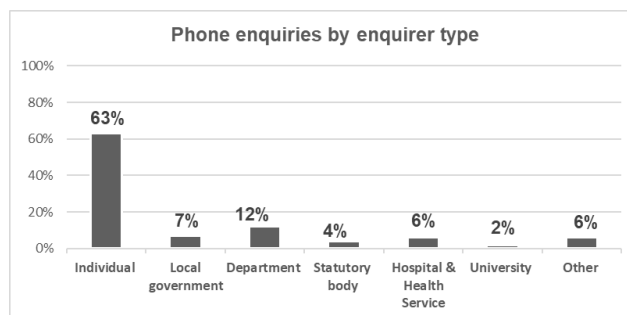
In 2024-25, the OIC responded to 5,847 enquiries⁵. This is the second highest number of enquiries to date and reflects sustained demand for our information and assistance services.



The cost per enquiry was higher in 2024-25 than the previous financial year, at \$65 per enquiry, based on a re-distribution of team resources to provide subject matter expert support to the IPOLA reforms project.

Consistent with previous years, most enquiries related to access to or amendment of information under the IP and RTI Acts (63%) followed by questions about the privacy principles and complaints (16%), miscellaneous queries (12%) and matters for other jurisdictions (9%) (for example, the Office of the Australian Information Commissioner).

The highest number of Enquiries Service users in 2024-25 were members of the public who accounted for 63% of all enquiries received followed by departments (12%), local governments (7%), Hospital and Health Services (6%), other/not specified (6%), statutory bodies (4%) and universities (2%).



Most enquiries were received by phone, followed by email then OIC's webform and letter. This pattern is consistent for enquiries from members of the public and other contacts.

Guidance and information resources

In 2024-25, we published one new Information Sheet and 3 new Guidelines, and reviewed and updated 10 Information Sheets, 3 Annotated Legislation entries and 51 Guidelines to reflect machinery-of-government or legislative changes, significant Information Commissioner or QCAT decisions, or in response to emerging trends, issues or requests from stakeholders. These resources were delivered in addition to those supporting the IPOLA reforms.

The OIC's comprehensive suite of Guidelines, Annotated Legislation and Information Sheets are published on our website and assist agency officers in applying the IP and RTI Act.

Guidelines provide commentary on significant OIC external review decisions and offer best practice examples to support agencies when processing information access and amendment requests, handling personal information and responding to privacy complaints and data breaches.

Annotated Legislation contain commentary, legislative interpretation and detailed references to OIC and Queensland Civil and

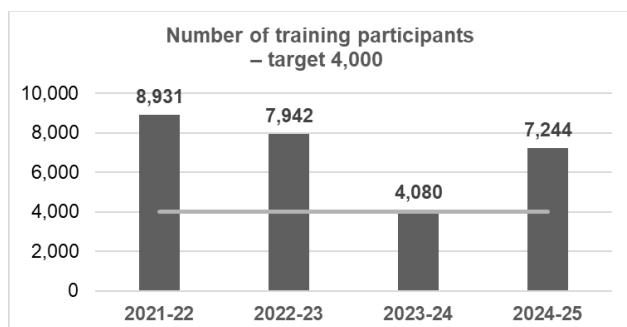
⁵ This figure excludes enquiries and requests for assistance handled by the IPOLA project team.

Administrative Tribunal decisions to provide additional practical guidance for agencies.

Information Sheets are prepared for the community and provide general, practical information about how members of the public can exercise their information access and privacy rights.

Education and training

In 2024-25, a total of 7,244 participants attended an OIC training session, which is up from 4,080 participants in 2023-24.



We attribute this increased participation to the OIC's IPOLA training program which hosted 4,250 participants, while our existing information access and privacy related training offerings attracted 2,994 participants.

In-person delivery

The delivery of a proactive IPOLA training program impacted both the number of agency requests to provide training about current legislation and OIC's capacity to respond to such requests.

In 2024-25, we delivered 8 in-person training sessions of which 3 were face-to-face, 3 were hybrid and 2 were via webinar. These sessions were attended by 573 participants, and included:

- face-to-face workshops and training on privacy and RTI principles for Mackay Hospital and Health Service
- targeted training on Privacy Impact Assessments for Logan City Council
- tailored online training courses for the Queensland Children's Hospital.

Online delivery

During 2024-25, 2,421 participants completed an online OIC privacy or RTI training course.

As part of the OIC's IPOLA reforms project, we coordinated a review and amendment of our online training resources to ensure they reflected the IPOLA reforms and were available from the commencement of the reforms on 1 July 2025.

We also continued to provide a suite of online training courses to maximise state-wide access and learning opportunities for stakeholders. These free online modules have been available for over 10 years, and we have seen a decline in the number of training participants in recent years as the content of these modules has not been updated and agencies have developed their own training resources. A significant review and uplift of the OIC's online training modules is underway and will be completed in 2025-26.

In addition, OIC offered a range of recorded presentations on topics specific to RTI and privacy rights and responsibilities.

Key events and stakeholder engagement

International Access to Information Day and Solomon Lecture

International Access to Information Day (IAID) is a UNESCO led initiative, held annually on 28 September, to raise awareness of the fundamental human right to access government-held information and to promote public participation in government.

OIC marks this initiative through a signature event, the Solomon Lecture, led by a keynote speaker followed by a panel discussion in honour of Dr David Solomon AM, Chair of the 2007-08 Independent Freedom of Information Review Panel which led to Queensland's right to information and information privacy reforms.

With reference to the 2024 UNESCO theme, '*Mainstreaming Access to Information and Participation in the Public Sector*', this year's

Solomon Lecture, delivered by Professor AJ Brown AM was titled, '*Push, Pull and Public Trust: Taking stock of citizens' rights to know in a 'Free Assange' Australia*'. Professor Brown is a professor of public policy and law in the School of Government and International Relations at Griffith University and specialises in public integrity, accountability, governance reform and public trust.

Professor Brown's keynote discussed the extent to which public trust and participation in government continues to hinge on ready access to official information. He focused on the lessons of effective information rights enforcement for other areas of the Queensland and national integrity systems, especially the duties and protections applying to the public officials who serve as primary custodians of public interest information.

The panel discussion, moderated by journalist and media personality, Ms Kendall Gilding, featured:

- Elizabeth Tydd, Australian Information Commissioner
- Angela Pyke, Deputy Ombudsman, Queensland Ombudsman
- Matthew Cooke, Chairperson, Queensland Aboriginal and Islander Health Council
- Professor AJ Brown AM, School of Government and International Relations, Griffith University.

Alongside hosting the event, OIC provided agencies and the community with a range of resources, including a poster, digital assets, social media tiles and tip sheets. These were available on our website to help raise awareness about information access rights and responsibilities.

A recording of the event is available on our website and YouTube channel.

Privacy Awareness Week

Privacy Awareness Week (PAW) shines a light on the importance of protecting and respecting personal information, both from the perspective of agencies and the community. We continued our strong support of PAW, held from 17 to

22 June 2025, as an active member of the Asia Pacific Privacy Authorities.

This year's PAW theme, '*Privacy: it's everyone's business*', was aimed at both citizens and public sector officers acting in their professional capacity across the government sector.

To launch PAW, we hosted a signature event with Georgina Poole delivering the keynote presentation titled, '*Learning from Data Incidents: What Safety Can Teach Us About Privacy*'. Georgina is a well-known author, researcher, podcast host and advocate of Human and Organisational Performance (HOP).

Ms Poole's keynote highlighted how human error is widely acknowledged as a leading contributor to data breaches and yet organisations often focus on individual accountability rather than understanding and improving the systems people work within.

Ms Poole explored how government agencies could better understand and respond to privacy breaches by evaluating system design, context, and everyday pressures in shaping human behaviour rather than focusing on individual blame. Ms Poole offered practical strategies to shift from a compliance mindset to a learning culture that treats privacy as a shared responsibility.

The keynote was followed by a panel discussion moderated by journalist, Ms Kim Skubris, featuring:

- Leanne Harvey, Vice-President (Administration) and University Registrar, Queensland University of Technology
- Dr Jodie Siganto, Director, Privacy 108
- Kathy Sundstrom, National Manager Outreach and Engagement, IDCare
- Susan Shanley, Acting Privacy Commissioner, Queensland.

A range of resources, including a poster, digital assets, social media tiles and tip sheets were available on our website to help raise awareness about privacy rights and responsibilities.

A recording of the event is available on our website and YouTube channel.

Stakeholder engagement

Stakeholder engagement underpins our ability to achieve strategic and operational objectives. It enhances resilience, encourages innovation through collaboration, and builds accountability and legitimacy for our policies and programs.

Our engagement activities include presentations, information sessions and meetings with departmental and statutory body Chief Executive Officers and senior leaders and officers across Queensland to raise awareness and understanding about information access and privacy rights and responsibilities.

In 2024-25, we delivered 22 presentations, including to:

- the Indigenous Councils Chief Executive forum in Cairns and Governance Forums in Mackay and Brisbane
- local councils and councillors, including Mornington Shire Council and Banana Shire Council
- the Australian Institute of Administrative Law
- senior agency executives and public sector boards, cross-sector steering committees, and a range of forums and communities of practice.

In addition, we met with 14 key regional and rural agency stakeholders to share experiences, challenges faced and emerging trends including visits to:

- Mackay Regional Council
- Mackay Regional Hospital and Health Service
- Cairns Regional Council
- Central Queensland Hospital and Health Service
- Longreach Regional Council
- Barcaldine Regional Council
- Winton Regional Council
- Central West Hospital and Health Service.

Additional engagements

We use a range of channels to communicate with the community and our stakeholders, including the OIC website, regular email updates, social media and media releases.

In 2024-25, the OIC recorded the following engagements:

- 361,681 website visits
- 52 news items posted on our website
- over 300 LinkedIn posts and re-posts achieving more than 75,000 impressions
- 6 media releases.

The OIC's website, which recorded 361,681 visits in 2024-25, up from 286,098 in 2023-24. This trend was experienced throughout the year indicating significant engagement with our IPOLA updates and resources in the lead up to commencement of most of the reforms from 1 July 2025.

Public sector partnerships

We continue to support public sector partnerships and networks by:

- leading 3 IP and RTI practitioners' network forums, which facilitate information sharing and good privacy and RTI practice guidance
- maintaining a Privacy Champions network to embed 'Privacy by Design' into technologies, systems and business practices. In 2024-25, the OIC held 5 network meetings with presentations from a range of agencies on a range of topics, including agency preparations for the IPOLA reforms
- engaging in a range of regular public sector committees and forums, including our participation at:
 - Queensland Government Cyber Security Committee meetings
 - Communities of Practice meetings across the public sector.

Australian and international networks

Our Commissioners participate in a range of networks and forums to support connectedness and collaboration between Queensland and other Australian and international jurisdictions where we share information and good practice.

Privacy networks and forums

OIC participates in 3 key privacy forums:

- Privacy Authorities Australia (PAA) – a group of Australian privacy authorities who meet regularly to promote and collaborate on best practice and consistency of privacy policies and laws
- Asia Pacific Privacy Authorities (APPA) – the main forum for privacy and data protection regulators in our region, which provides an opportunity for members to form partnerships and exchange ideas about privacy regulation and new technologies
- Global Privacy Assembly (GPA) – provides international leadership in data protection and privacy by connecting the efforts of 130 authorities worldwide
- OIC is also a member of the International Association of Privacy Professionals (IAPP).

In 2024-25, OIC participated in the following privacy networks and forums:

- online in the 46th GPA conference held in Jersey, Channel Islands from 28 October to 1 November 2024
- in person at a PAA meeting held in Melbourne on 3 June 2025, to discuss issues and trends about protecting individuals' personal information and data. The meeting included a presentation by the Commonwealth Privacy Commissioner on the development of the Children's Online Privacy Code and discussion about facial recognition and surveillance technology

- online in the 62nd and 63rd APPA Forums on 26 and 27 November 2024 (hosted by Japan) and 11 and 12 June 2025 (hosted by New Zealand) respectively. The Acting Privacy Commissioner gave a presentation at the 63rd APPA forum on the harmonisation of privacy laws across jurisdictions.

Information access networks

OIC is a member of and participates in two key information access networks:

- Association of Information Access Commissioners meet bi-annually to discuss issues and trends relevant to Australian and New Zealand jurisdictions, including contemporary challenges to information access and heightened risks. In 2024-25, OIC attended a meeting in Adelaide in November 2024 and hosted a meeting in Brisbane in February 2025. Information Commissioners release communiques after these meetings highlighting issues discussed, including key observations in relation to public access to information, government transparency – trends and challenges⁶.
- International Conference of Information Commissioners (ICIC), which comprises Information Commissioners and Ombudsmen from around the world, was established to foster broader public awareness of freedom of information and benefit from the exchange of knowledge and experience among its international members. The Information Commissioner attended the ICIC Conference held in Berlin from 23 to 25 June 2025 (self-funded). The conference theme was "*Access to Environmental Information in a Digital Era*".

⁶ AIAC communiques are available at <https://www.oic.qld.gov.au/information-for/media/association-of-information-access-commissioners>.

Supporting public awareness initiatives

In 2024-25, the OIC shared information about a range of government public awareness initiatives with our employees and to stakeholders through our digital channels, including:

- International Women's Day
- Domestic and Family Violence Prevention Month
- National Reconciliation Week
- NAIDOC Week
- Multicultural Qld Month
- R U OK Day
- Queensland Mental Health Week.

We also supported the Queensland Government's whole-of-government campaign, 'Get ready for storm season' to raise awareness about how agencies can deal with personal information in an emergency or disaster event. Support involved preparing and sharing resources and key messaging with our stakeholders.

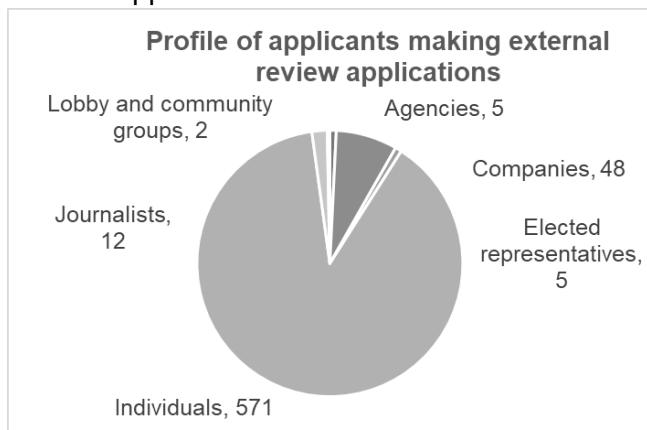
Right to Information External Reviews – Service Delivery

Key achievements and challenges

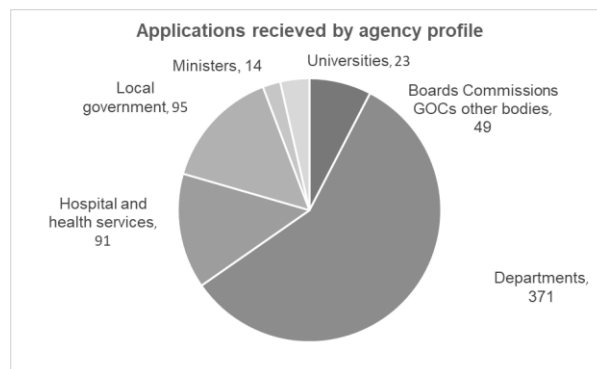
A core function of OIC as an integrity agency is conducting independent reviews of decisions made by agencies and Ministers under the RTI Act for access to government-held information.

In 2024-25, OIC received 643 applications for external review and finalised 645 applications, representing a finalisation rate of 100%. Due to resource constraints, the mean average days to finalise external reviews increased and number of files on hand, remained high at 320. The number of files over 12 months old have also steadily increased since last year (6.6%).

The 643 external review applications were made by 464 separate applicants (some of whom sought more than one review). Most applications are made by members of the community seeking access to their personal information. The various types of external review applicants are set out in the table below.



The breakdown of agencies the subject of an external review in 2024-25 reveals that departments accounted for the largest number of external review applications received, followed by local governments and hospital and health services.



Of the 645 matters finalised in 2024-25, 89 resulted in formal decisions being issued, while 506 were settled by way of informal resolution or administratively closed.

Appeals and judicial reviews

Appeals

An external review applicant or agency has a right to appeal to the Queensland Civil and Administrative Tribunal (QCAT) against a decision of the Information Commissioner on a question of law.

Eight appeals were made to QCAT in 2024-25 and 7 were finalised. With the exception of one matter, which was remitted to the OIC for reconsideration, QCAT affirmed OIC's external review decisions.

QCAT has continued to find that the external review participants, and not the Information Commissioner, are the proper parties to appeals of external review decisions⁷. The IPOLA amendments to the RTI Act, which commenced on 1 July 2025, clarified that for an appeal against a decision of the Information Commissioner, the participants in the external review are the parties to the appeal, not the Information Commissioner.

⁷ *Stella v Information Commissioner & Anor* [2024] QCATA 24, adopting the approach in *Stiles v Information Commissioner* [2021] QCATA 152 and *Underwood v Metro North Hospital and Health Service & Anor* [2022] QCATA 124.

Judicial reviews

The Queensland Supreme Court, under the *Judicial Review Act 1991* may judicially review a written external review decision of the Information Commissioner made under the IP or RTI Act.

No applications for judicial review were made to the Queensland Supreme Court in 2024-25.

Financial hardship applications

In 2024-25, 6 financial hardship applications were received and finalised by the OIC.

Of these, 5 applicant organisations were granted financial hardship status, and one was refused.

Emerging themes and issues

The OIC continues to observe a high number of external reviews for matters that do not require the applicant to make a formal RTI application. Coupled with findings from OIC's performance monitoring and audit activities, the high demand on formal RTI requests suggests that improvements to administrative access schemes and other proactive release mechanisms is required.

The increasing use of new technologies by agencies, such as closed-circuit camera systems, body-worn cameras, messaging apps and artificial intelligence tools are also evident in the increasing demand for formal RTI applications. The OIC recommends that agencies take a 'Transparency by Design' approach when introducing new technologies to ensure that they continue to meet their obligations under the RTI Act.

The nature of the OIC's engagements on external review suggests a number of emerging trends, including increasing levels of:

- distrust by members of the community in public sector entities resulting in demands by applicants for increasing amounts of information, including metadata and digital records like body-worn camera and CCTV footage

- mistrust by members of the community in agency responses to information requests, which indicate that information does not exist, cannot be located or cannot be released in the public interest
- frustration by members of the community resulting in complaints and allegations of corruption and demands for OIC to investigate matters that are beyond our jurisdiction.

These trends contribute to the consistently high levels of demand for information through the formal access route and contribute to the difficulty in finalising some external reviews in a timely manner.

Privacy Complaints and Data Breaches

– Service Delivery

Key achievements and challenges

The most significant IPOLA reforms that came into effect on 1 July 2025 are in the IP Act, including the establishment of a single set of Queensland Privacy Principles (QPP) that align with the Australian Privacy Principles and introduce additional privacy protection obligations, and the establishment of a mandatory notification scheme that requires agencies to notify the Information Commissioner about an eligible data breach.

Establishing the necessary systems, processes and team resources within the privacy team to be ready for commencement of these reforms has required significant focus in 2024-25.

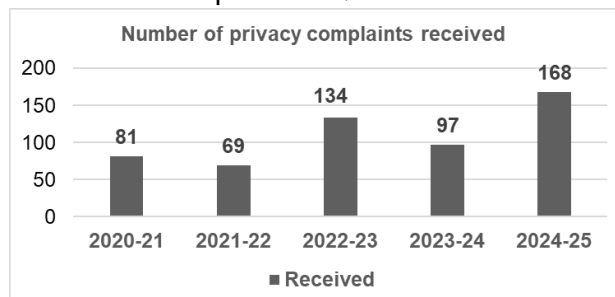
Balancing these preparations alongside high complaint numbers, recruitment of new team members and review of voluntary data breach notifications has been challenging. Despite this, the team's performance against its key performance metrics remained strong, with the exception of the mean average days to finalise an accepted privacy complaint, which increased to 158 days from 144 days in the previous year, and remains above OIC's target of 140 days.

Privacy complaints

In 2024-25, the OIC received 168 privacy complaints and carried over 18 complaints from the previous financial year. The number of complaints received this financial year is the highest since the IP Act commenced in 2009.

An individual who believes an agency has not complied with the privacy principles when dealing with their personal information should first raise their complaint with the relevant agency. If, after 45 business days, they do not receive a response or are not satisfied with the agency's response, they may bring their complaint to OIC. We conduct preliminary enquiries to determine if we can deal with the complaint under the IP Act. If so, our role is to

mediate the complaint. If the complaint cannot be resolved through mediation, the individual may request the Information Commissioner refer their complaint to QCAT.



The Information Commissioner may decline to deal with a privacy complaint, including when:

- the complaint does not relate to the complainant's own personal information
- the complainant has not first made a complaint to the relevant agency or entity and allowed for an appropriate time to receive a response
- it is more than 12 months since the complainant first became aware of the act or practice the subject of the complaint
- the complaint is 'frivolous, vexatious, misconceived or lacking in substance'. This includes complaints that fall outside the OIC's jurisdiction (e.g. the complaint relates to a Commonwealth government agency or the complaint does not relate to a breach of the relevant privacy principles).

The Information Commissioner may decline to further deal with a privacy complaint, including when:

- the complainant does not comply with a reasonable request from the OIC
- the Information Commissioner is satisfied on reasonable grounds the complainant has not cooperated with the OIC in dealing with the complaint
- the complainant is unable to be contacted by the OIC.

In 2024-25:

- 18 complaints were accepted for mediation, with 2 being resolved through agreement between the parties
- 88 complaints were declined on grounds the complaint was reasonably believed to be 'frivolous, vexatious, misconceived or lacking in substance' or the complainant had not first raised their privacy complaint directly with the relevant agency as required under the IP Act
- 13 complaints were withdrawn by the complainant
- 18 complaints were accepted for mediation, with 2 being resolved through agreement between the parties
- 67 complaints remained open as at 30 June 2025.

The 67 complaints that remained opened can be attributed to the reduced capacity of the team due to high complaint numbers and the significant involvement of team members in the IPOLA reforms project and the OIC's preparation for the IPOLA reforms to the IP Act.

Referrals and reviews

Referrals to QCAT

If it appears that resolution of a privacy complaint cannot be achieved, or mediation is attempted but agreement between the participants is not achieved, the Information Commissioner must give written notice to the complainant and the respondent agency that the complainant may request their complaint be referred to QCAT for determination.

Where a privacy complaint is not resolved, the complainant can request the Information Commissioner refer their complaint to QCAT.

In 2024-25, OIC referred 16 complaints to QCAT.

The Information Commissioner is not a party in privacy complaint proceeding before QCAT.

Judicial reviews

The Queensland Supreme Court may judicially review decisions of the Information Commissioner under the *Judicial Review*

Act 1991. In relation to privacy, those applications usually relate to a decision of the Information Commissioner declining to deal with a privacy complaint.

In 2024-25, there was one judicial review application made, and the decision remained reserved as at 30 June 2025.

Waiver applications

An agency or bound contracted service provider can apply to the Information Commissioner under the IP Act for an approval waiving or modifying their obligations under one or more of the privacy principles in the IP Act.

In 2024-25, one waiver application was received and remained under consideration as at 30 June 2025.

Voluntary data breach notification scheme

In 2024-25, the Information Commissioner received 53 voluntary notifications of privacy data breaches from agencies, compared to 41 in the previous year.

Most reported voluntary data breaches involve human error due to emails with personal information sent to the wrong recipient, or a document containing personal information attached to an email in error. A limited number of breaches involve unauthorised access to or disclosure of information, and inadvertent loss or disclosure of personal information in paper records.

Although it is not mandatory for an agency to notify the Information Commissioner and/or affected parties of all privacy data breaches, it is recommended they do so. Notification of data breaches reflects a commitment by an agency to transparency and allows the OIC to provide agencies with assistance when responding to a data breach, including advice on notifying any affected individuals, and how to mitigate future similar breaches.

The data the OIC obtains through voluntary data breach notifications informs our regulatory activities to support agencies across the public sector, including in relation to our provision of

proactive guidance and training for agency employees and engagement with agency leaders.

The Mandatory Notification of Data Breach scheme commences on 1 July 2025 and will apply to Queensland public sector agencies with the exception of local governments, which will not be subject to the scheme until 1 July 2026. The OIC will continue to operate our voluntary notification scheme for data breaches alongside the Mandatory Notification of Data Breach scheme.

Emerging themes and issues

Most data breaches reported to the Information Commissioner related to human error when sending emails. The level of harm depends on the type of information disclosed or accessed. In some instances, such as unintentionally carbon copying recipients to an email instead of blind copying, the harm may be very low. However, the use of email as the main form of communication means that sensitive information is sent increasingly by email, which presents a risk of serious harm when errors occur. Recognising human error as the most likely cause of data breaches presents an opportunity for agencies to put in place appropriate protocols and strategies to reduce the risk of such incidents.

It is unclear what has driven the significant increase in the number of privacy complaints received this year. It may be due to increased awareness of privacy rights in the community. However, the overwhelming trend of declining to deal with most complaints indicates that the community's understanding of the privacy complaint process under the IP Act is low. For example, complainants may seek to make complaints about general privacy concerns that do not relate to a breach of a privacy principle under the IP Act, or may complain to the Information Commissioner before first complaining to the relevant agency. This may be caused by unclear agency complaint processes. In these situations, OIC engages with the complainant to explain the requirements for making a privacy complaint to raise awareness and understanding.

From 1 July 2025, agencies must publish a Queensland Privacy Principles policy detailing how an individual can make a complaint about an alleged breach by the agency of the privacy principles and how the agency will deal with the complaint. It is anticipated that this new requirement will increase the community's knowledge and understanding of agencies' privacy complaint obligations and processes.

Regulatory Audits and Investigations

– Service Delivery

Key achievements and challenges

In 2024-25, the Regulatory Audits and Investigations completed, and the Information Commissioner tabled the following 5 reports in the Parliament:

- 2 compliance audits
- 1 privacy audit
- 2 follow-up audits, which assessed how well agencies have implemented recommendations made in previous audit reports.

Each of the audited agencies accepted the recommendations made in the tabled reports.

As at 30 June 2025, the Regulatory Audits and Investigations team has commenced work, with 2 preliminary enquiries on agencies where there are privacy concerns. At the end of 2024-25, these preliminary enquiries were ongoing.

Regulatory audits and reviews, and reports to parliament

Compliance audits

The 2024-25, compliance audits added a new feature – models of good practice based on audit insights. These models of good practice inform all agencies as to the Information Commissioner's expectations for agencies' administration of the IP and RTI Acts. They can also be used in future audits or reviews as a baseline assessment.

A key model in 2024-25 is about good practice in handling requests for information.

Responding to access requests for government-held information⁸

This audit conducted under the RTI Act examined whether agencies' responses to

requests for information were undertaken in a timely and customer-focused way. The audit examined the practices of 3 agencies: the Queensland Police Service, Brisbane City Council and Cairns and Hinterland Hospital and Health Service.

Delay in responding to RTI applications in these 3 agencies triggered the audit, which had 2 main phases. In the first phase, the audit identified underlying factors causing delay. The second phase identified steps agencies had taken to address problems or improve service delivery. Two of the agencies, the Queensland Police Service and the Brisbane City Council, had adopted effective strategies to address delays. Cairns and Hinterland Hospital and Health Service had recognised the issues and was working on possible solutions.

The audit found common themes across the 3 agencies. These insights led to the development of a model describing how all Queensland agencies can achieve timely and effective application handling. The audit made 10 recommendations relevant to all agencies.

The audit found 3 critical contextual factors:

- senior executive leadership commitment to right to information and information privacy
- a culture of openness and transparency
- sufficient and appropriate resources allocated to information handling.

In carrying out their information access obligations, agencies need to ensure customer-focused service delivery, effective systems such as policies, procedures and fit-for-purpose technology, and sufficient employee resources with relevant experience and training.

⁸ Audit Report Responding to access requests for government-held information, Report No. 4 for 2024-25, tabled 10 June 2025 – https://www.oic.qld.gov.au/_data/assets/pdf_file/0019/70309/Audit-Report-on-Responding-to-access-requests-for-government-held-information.pdf

Administrative access to medical records under the IP and RTI Acts⁹

This audit examined administrative access in 2 hospital and health services: Metro South Hospital and Health Service and West Moreton Hospital and Health Service.

Both hospital and health services generally provided a good service to people seeking access to medical records. The audit made 4 recommendations to each of the agencies for process improvements.

The audit identified that all Queensland agencies should ensure 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
- an efficient alternative to formal RTI applications – quick, easy, cost-effective, thorough and a reliable pathway to information access
- part of everyday business operations – approved by the agency's 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.

Privacy audit

Minimising personal information held by agencies and strategies to mitigate the risk of privacy breaches¹⁰

This privacy audit examined personal information handling practices in Urban Utilities. The agency provides water and wastewater services across South East Queensland and collects personal information to deliver these services, for example, to process payments or ensure uninterrupted water supply for critical customers.

The audit found that Urban Utilities takes its privacy and records management responsibilities seriously and is committed to complying with its privacy obligations under the IP Act and privacy principles. For example, the audit found the agency only collects the personal information it needs. The audit also found the agency generally disposed of personal information it no longer needs well, but there was room to improve the framework.

The audit made 4 recommendations to strengthen Urban Utilities' privacy protections, and 1 recommendation to all Queensland agencies about identifying and then mitigating privacy risks.

Follow-up audits

Mitigating the risks of privacy breach through staff education¹¹

This follow-up audit examined how well 3 agencies implemented 4 recommendations made to all agencies about privacy training.

The 3 agencies were the Department of Transport and Main Roads, WorkCover Queensland and Queensland Rural and Industry Development Authority (QRIDA).

The follow-up audit found these agencies had either implemented or partly implemented all recommendations made by the Information

⁹ 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, tabled 18 February 2025 – https://www.oic.qld.gov.au/_data/assets/pdf_file/0007/69172/DoE-Admin-access-in-schools-follow-up-report.pdf

¹⁰ Minimising Personal Information Held Strategies to mitigate the risk of privacy breaches Report No. 1 for 2024-25, tabled 10 December 2024 - https://www.oic.qld.gov.au/_data/assets/pdf_file/0006/66858/Minimising-personal-information-held.pdf

¹¹ Follow-up of Report No. 1 for 2022-23 Mitigating the risks of privacy breach through staff education Report No. 5 for 2024-25, tabled 11 June 2025 - https://www.oic.qld.gov.au/_data/assets/pdf_file/0013/70312/Mitigating-the-risks-of-privacy-breach-through-staff-education_Follow-up.pdf

Commissioner in a previous audit report. The audit was part of a series on how agencies educate and train employees about their privacy obligations under the IP Act and privacy principles. This audit examined how well 3 agencies implemented 4 recommendations made to all agencies about privacy training. The 3 agencies were the Department of Transport and Main Roads, WorkCover Queensland and the Queensland Rural and Industry Development Authority (QRIDA).

The audit found that the 3 agencies had made progress in implementing all the recommendations, with 5 fully implemented, 4 partially implemented and some progress made on 1 recommendation. While each agency had made improvements, the audit found work remains, particularly in ensuring people attend training.

Administrative access to documents held in public schools¹²

This follow-up audit found none of the recommendations implemented, fully or partially.

The Department of Education had started work, making progress on four recommendations and limited progress on one recommendation. One recommendation could not be assessed. The audit found that the department's actions were insufficient to improve administrative access to school documents.

Responses to parliamentary inquiries and consultations

Submissions

In 2024-25, the Information Commissioner made 8 formal written submissions to parliamentary inquiries undertaken by the Queensland and Australian Governments:

- Submission to the Education, Arts and Communities Committee's inquiry into the Domestic and Family Violence Protection and Other Legislation Amendment Bill 2025

- Submission to the Reviewer for the Statutory Review of the Data Availability and Transparency Act 2022
- Submission to the Education, Arts and Communities Committee's inquiry into the Education (General Provisions) Amendment Bill 2025
- Submission to the State Development, Infrastructure and Works Committee's inquiry into the Queensland Academy of Sport Bill 2025
- Submission to the Attorney-General's Department Consultation Paper regarding the use of automated decision-making by government
- Submission to the Department of Justice and Attorney-General's Consultation Paper - Review of the Right to Information Regulation 2009 and Information Privacy Regulation 2009
- Submission to the Senate Legal and Constitutional Affairs Legislation Committee's inquiry into the Privacy and Other Legislation Amendment Bill 2024
- Submission to the Interim Australian Centre for Disease Control's Open submission invitation: Understanding the community's views and perspectives on data use.

Consultations

In 2024-25, the Information Commissioner provided feedback in response to 29 consultation requests from Queensland government agencies, and Commonwealth or other state or territory agencies.

Our feedback generally concerns the application of the IP and RTI Acts, best practice in relation to information access and privacy, or input into proposed legislative reform or policy developments.

¹² 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 for 2024-25, tabled 29 April 2025 - https://www.oic.qld.gov.au/_data/assets/pdf_file/0007/69172/DoE-Admin-access-in-schools-follow-up-report.pdf.

Supporting Service Delivery

Our leadership

The OIC's Executive Leadership Team comprises the:

- Information Commissioner
- Privacy Commissioner
- Right to Information Commissioner
- Executive Director, Corporate and Strategic Services.

Information Commissioner

The Information Commissioner is the chief executive of the OIC, a statutory appointee and an officer of the Parliament with statutory functions and powers under the IP and RTI Acts.

Joanne Kummrow was appointed as Information Commissioner on 3 April 2024 for a 3-year term.

Joanne is an experienced public sector leader and statutory decision maker with a professional career working in the public, legal and integrity sectors. From 2018 to 2024, Joanne served as Public Access Deputy Commissioner at the Office of the Victorian Information Commissioner. Her background in the legal sector includes as a government lawyer and working in the private and not-for-profit sectors. Joanne holds a Bachelor of Laws (Hons.) and Bachelor of Arts and is an accredited specialist in Administrative Law. She was admitted to practice law in 2002.

Privacy Commissioner

As a deputy to the Information Commissioner, the Privacy Commissioner performs statutory functions under the IP Act. The Privacy Commissioner leads the OIC's privacy complaint and conciliation services, engages with government agencies to promote the fair collection and responsible use by government of personal information and raises awareness of the community's privacy rights.

Paxton Booth was appointed as the Privacy Commissioner for a 2-year term in December 2021 and reappointed for a further 5-year term in December 2023. In July 2024, Paxton

resigned from his role having been appointed as Deputy Integrity Commissioner in the Office of the Integrity Commissioner. Paxton holds a Bachelor of Laws and Bachelor of Commerce and was admitted to practice law in 1997.

Jim Forbes commenced as Acting Privacy Commissioner from 15 July 2024 to 27 January 2025 bringing more than 20 years experience working in private legal practice, privacy and information law and policy and across both the OIC's privacy and external review functions. Jim holds a Bachelor of Laws (Hons) and a Bachelor of Arts (Hons) and was admitted to practice law in 2001.

Susan Shanley commenced as Acting Privacy Commissioner from 18 November to 29 November 2024 and 28 January to 30 June 2025. Susan has worked in various OIC roles for over 6 years and has significant public sector experience working in strategic policy and legislative reform in government agencies and has practised commercial law in private practice. Susan holds a Bachelor of Laws (Hons) and was admitted to practice law in Queensland.

On 1 October 2025, the OIC will welcome a new Privacy Commissioner, **Alexander White** who has been appointed for a 5-year term.

Right to Information Commissioner

As a deputy to the Information Commissioner, the Right to Information Commissioner performs statutory functions under the IP and RTI Acts. The Right to Information Commissioner leads the Right to Information Group which conducts independent external reviews of access and amendment decisions made by agencies and Ministers. The Right to Information Commissioner also champions information access rights across government agencies and the community.

Stephanie Winson was appointed on 16 January 2023 for a 3-year term. Stephanie is an experienced executive public sector leader and lawyer. Stephanie served as the Assistant Ombudsman with the Office of the

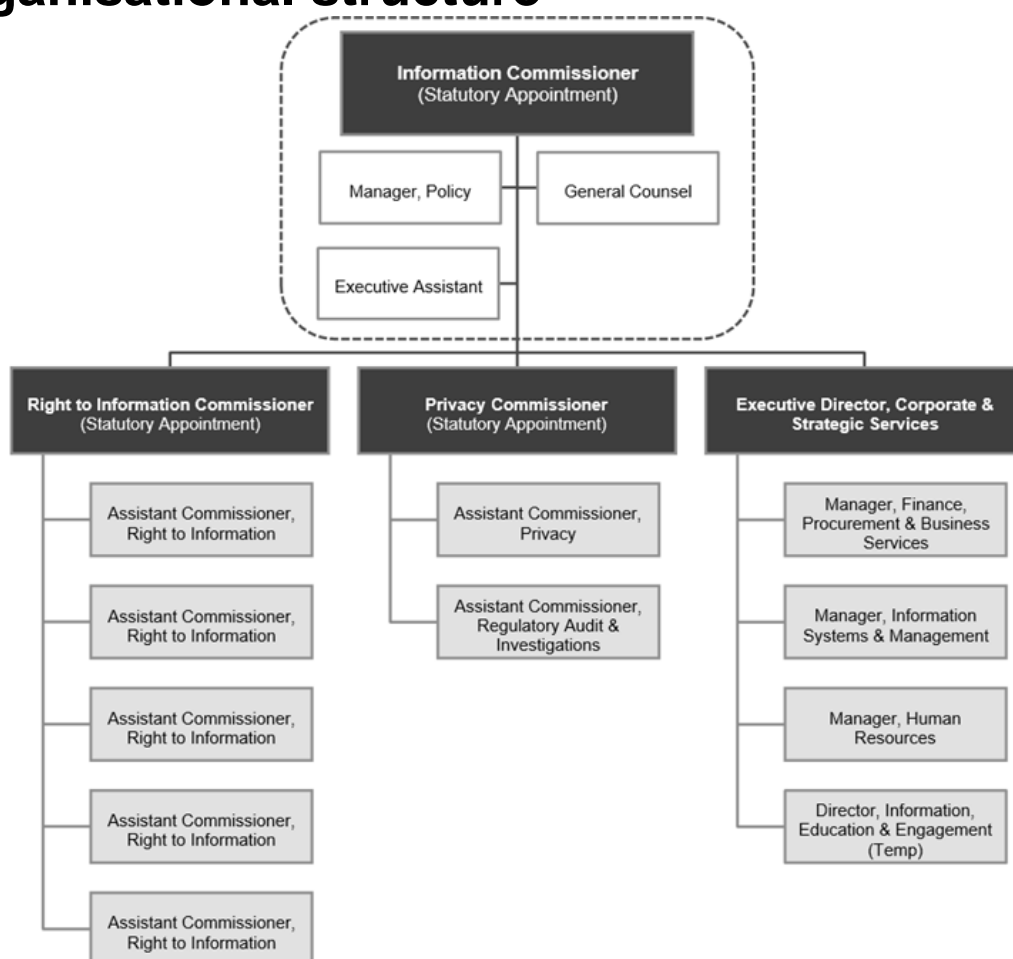
New Zealand Ombudsman and held various legal and senior leadership roles in the New Zealand public sector and the constitutional role of Secretary of the National Assembly of Namibia. Stephanie holds a Master of laws (LLM) with distinction, Bachelor of Laws (LLB) and a Bachelor of Arts (BA) and was admitted to practice law in Namibia (1993), New Zealand (2002) and Queensland (2025).

Executive Director, Corporate and Strategic Services

The Executive Director, Corporate and Strategic Services leads teams responsible for proactive regulatory activity delivered through education and engagement and information and assistance, and for core corporate support functions including finance, human resources, IT, and communications. The Executive Director supports the Information Commissioner in driving organisational strategy, planning and performance activities.

Zoe Mochrie has built a portfolio of experience across corporate, policy, strategy and regulatory activities in diverse domains spanning international affairs, health, natural resources, building and construction and information access. Zoe held a range of leadership positions with the Scottish Government, including as Head of Legislation, Governance and FOI, and Head of International Strategy. Zoe holds a Master of Arts (Hons), Master of Public Administration, and is a Graduate of the Australian Institute of Company Directors.

Our organisational structure



Our Workforce

Human resources

As at 30 June 2025, the OIC had an approved establishment of 51.1 full-time equivalent (FTE) and an active paid establishment of 51.81 FTE. This figure is inclusive of our 3 Commissioners, who are statutory appointees. This slight exceedance was the result of temporary employees remaining on staff to conclude the IPOLA reforms project.

Eighty-one percent of our active and paid employees are permanent employees; 3% are seconded from other Queensland Government agencies; and 16% are temporary employees.

Four permanent employees separated or resigned during 2024-25, resulting in a permanent separation rate of 8.3%.

No early retirement, retrenchment or redundancy packages were processed during 2024-25.

Flexible working arrangements

All flexible working options available to OIC employees are outlined in the OIC's *Flexible Working Policy and Remote Working Procedure*. All employees can access flexible work options, including flexible start and finishing times, part-time and hybrid/remote work arrangements and use of accrued time.

All employees who choose to work within a hybrid working model have an approved annual remote work agreement, which outlines requirements relating to information security and workplace health and safety.

The OIC recognises that flexible work arrangements aid in attracting a highly skilled workforce and as such, all vacancies during 2024-25 were advertised as a flexible position type, with job advertisements promoting flexible work arrangements. Currently, 20 employees work part-time.

Workforce planning and recruitment

The OIC is committed to attracting and retaining a workforce that is inclusive, diverse, engaged, agile, high performing and embraces continuous improvement.

During 2024-25, the OIC welcomed 11 new employees. This figure is attributed to new fixed term positions created as part of the IPOLA project team and vacancies arising from employee movements and separations.

During 2024-25, the OIC undertook a workforce planning and design project, which commenced in the previous financial year. The purpose of the project was to review and assess OIC's current and future workforce requirements and ensure an organisational structure and design that is fit for purpose.

A revised OIC organisational structure was approved and implemented on 6 January 2025. As a result, several new temporary and permanent roles were advertised and recruited to across the organisation.

On an operational level, as with previous years, the OIC has a relatively small resource base with increased demand for our services, and as such we have continued, where possible, to review how we can ensure our workforce capabilities will enable the achievement of strategic objectives in line with community expectations and stakeholder demand.

Health, safety and wellbeing

OIC is committed to providing a safe, responsive, and inclusive workplace environment for all employees. We recognise the important role a workplace has in relation to employee health and wellbeing, and as such we aim to support our employees through appropriate workplace policies, procedures, work practices and initiatives.

During 2024-25, the OIC's Wellbeing Committee met regularly throughout the year to support employee health, safety, and

wellbeing, oversee the embedded wellbeing program trial, and plan health, safety and wellbeing initiatives.

The OIC's Health, Safety and Wellbeing Policy outlines our continuous improvement and employee-focused approach to health, safety and wellbeing issues. The policy underpins all relevant initiatives and training opportunities made available to employees during 2024-25.

During 2024-25, the OIC initiatives in addition to existing initiatives, including:

- implementing OIC's Health Safety and Wellbeing Committee Terms of Reference, which was developed in accordance with the *Work, Health and Safety Act 2022*, Division 4, section 75-79
- delivering a pilot program under the OIC's wellbeing initiatives to provide embedded and proactive psychological support for our employees
- recognising/promoting key days of significance including RUOK? Day, Women's Health Week and a Menopause awareness session
- continuing mandatory health, safety and wellbeing online training for new employees
- continuing optional online health, safety and wellbeing training for all employees.

Consultation and engagement

During 2024-25, the OIC's Consultative Committee met regularly, in accordance with the *Office of the Information Commissioner – Certified Agreement 2022*.

OIC remains committed to appropriate consultation and constructive engagement with employees on workplace related matters, including through the Consultative Committee.

Enterprise bargaining

The *Office of the Information Commissioner – Certified Agreement 2022* expires on 31 October 2025.

In June 2025, preparations for consultation began and the OIC and the Union will work collaboratively towards a replacement agreement by the expiration date of the current agreement.

Training and development

The OIC is committed to supporting and investing in our people through new employee inductions, annual performance management and development reviews and a variety of training and development opportunities.

During 2024-25, the OIC conducted a range of employee-focused activities including:

- implementing a digitised Performance Management System and successfully completing the 12 month Performance and Development Plan (PDP) review
- working with employees to identify and implement action items arising from the 2024 Working for Queensland Survey results
- supporting the process for employee performance and development reviews
- supporting professional development and career growth opportunities through both formal and informal training opportunities, higher duties, and secondment engagements
- consulting and engaging with employees on a wide range of issues including policy reviews, strategic and operational planning and health, safety and wellbeing initiatives
- converting 2 temporary employees to permanent roles (Directive 02/23)
- establishing a Senior Leadership Team that brings together senior OIC employees to invest in their potential as future OIC and public sector leaders through their consideration of issues and the initiation of activities to support the achievement of the OIC's strategic and operational performance goals, and working together to oversight people matters and strengthen collaboration across the OIC
- continuing to provide access to free, confidential counselling and support services to employees and their immediate family members through the Employee Assistance Program.

In 2024-25, the OIC spent \$0.063 million on employee professional development including training, conferences and seminars, training and workshops, representing an increase of \$0.034 million compared to 2023-24.

These opportunities largely focused on targeted training related to the identified needs of employees, including health and safety, technical skills relevant their roles and developing management and leadership skills.

In addition to external professional development opportunities, the OIC continued to implement and monitor our mandatory and compliance training offerings, which include:

- health and safety, including workplace bullying and occupational violence
- domestic and family violence response
- human rights
- code of conduct
- cultural capability
- records management.

Onboarding

New employees participate in an induction process to ensure a smooth transition into their new position. During the induction process, employees are provided with information relating to employment conditions, code of conduct requirements and OIC functions and responsibilities.

The induction process, inclusive of mandatory training, ensures employees know and understand their obligations and responsibilities as OIC and public sector employees.

During 2024-25, the OIC also enhanced its online onboarding portal to simplify the onboarding experience for new employees, specifically relating to the period between receipt of the job offer and commencement of employment.

Working for Queensland Survey

In 2024-25, OIC employees participated in the 2024 Working for Queensland Survey. The survey is conducted annually and seeks the views and experiences of the OIC's permanent and temporary employees. The survey results showed 96% of our employees commenced the survey, an increase compared to the 2023 result of 88%.

Overall, the survey results were encouraging, with 82% of respondents reporting positive engagement, or connectedness, to OIC, which is 22 percentage points higher than the broader

public sector average of 60%. The survey results showed high employee engagement across many indicators, consistent with previous years.

In 2024-25, the OIC achieved the following 5 highest scores:

- Social Support: My Manager and Workgroup Performance (97% favourability)
- Keeping You Well: My Confidence Discussing Wellbeing with My Manager (85% favourability)
- Your Job: Task Identity (85% favourability)
- Building Your Future: Performance Discussions (70% favourability)
- Building Your Future: Professional Development (57% favourability).

Following a review of the OIC's 2023 survey results, we identified 2 key focus areas for 2024-25:

- workplace safety and mental health responses to some questions about work demands on our people
- employee performance management feedback.

Survey responses were shared with employees through an information session and distribution of full survey results. Employees were invited to share their thoughts and ideas regarding the identified key focus areas for 2024-25.

The OIC is committed to a supportive and positive workplace and ensuring continuous improvement in everything we do. The Working for Queensland Survey is an important way in which we receive valuable employee feedback and guides our setting of priorities to maintain a healthy, safe, engaged and professional workforce.

Machinery-of-government changes

During 2024-25, the OIC was not directly affected by machinery-of-government changes.

Our governance

Risk management framework

OIC's risk management framework is aligned to the international standard *ISO 31000:2018 Risk Management – Guidelines*, and the Queensland Treasury's *Guide to Risk Management 2020*, with the aim of integrating risk management into all functions and plans.

The OIC continues to mature its approach to risk management and in 2024-25, we refreshed our risk management framework and risk appetite statement to reflect increasing regulatory responsibilities and a rapidly evolving regulatory and stakeholder landscape.

In 2024-25, we focused particularly on risk management in strategic projects to effectively mitigate financial and technology risks associated with significant system improvements.

Governance committees

Executive Leadership Team

The OIC's Executive Leadership Team (ELT) is constituted by the Information Commissioner, Right to Information Commissioner, Privacy Commissioner, and Executive Director Corporate and Strategic Services (formerly the Chief Operating Officer).

The ELT meets monthly to oversee the OIC's operations, and by exception, to consider challenges to the achievement of strategic objectives and to monitor people matters, operational and project performance, budget and risk.

During 2024-25, the ELT welcomed a rotating seat for a member of the Senior Leadership Team to join ELT meetings to report on SLT activities and issues identified, and observe ELT meetings and report back to the SLT.

Governance Committee

The OIC's Governance Committee was re-established as a separate committee in 2024-25 to provide opportunity for detailed examination of strategic projects, budget strategy, ICT initiatives, risk management, and

audit activities. The Governance Committee has the same membership as ELT and meets quarterly.

Senior Leadership Team

In 2024-25, aligned with OIC's revised organisational structure, a Senior Leadership Team (SLT) was established. The SLT is constituted by senior OIC employees including Assistant Commissioners and Managers across the OIC. The SLT meets monthly and provides advice and recommendations to the ELT on matters of organisational priority, operational performance, continuous improvement and risk.

Agency Consultative Committee

In accordance with the OIC's Certified Agreement, the OIC continued to engage with the Together Union through our Consultative Committee. The Committee consists of union, employee and management representation and met approximately quarterly through 2024-25.

WHS Committee

The Workplace Health and Safety Committee provides an opportunity for employee participation in the OIC's safety and wellbeing program and assists the Information Commissioner to meet their legislative responsibilities under the *Work Health and Safety Act 2011*. The Committee acts as a review body over the safety and wellbeing processes by:

- monitoring conditions to ensure that employee safety and wellbeing are safeguarded
- promoting a cooperative approach with regards to relevant safety and wellbeing issues
- Identifying issues of concern and championing these (e.g. RU OK day, men's/women's health week).

The Committee is employee-led, met quarterly, and includes both employee and management representatives.

External accountability

The Information Commissioner is an Officer of the Parliament and reports through the Justice,

Integrity and Community Safety Committee which has a monitor and review function in relation to the performance of the OIC.

The Information Commissioner, supported by the Right to Information Commissioner and Privacy Commissioner, meets annually with the Committee to discuss performance after the tabling of the OIC's annual report. The annual report is one of the key means of demonstrating accountability, providing a comprehensive disclosure of the OIC's financial and operational performance. The Commissioners provided evidence to the parliamentary committee at a public hearing held on 19 February 2025.

In addition to the OIC's annual report and annual appearance before the parliamentary committee, the OIC prepares an annual Service Delivery Statement for inclusion in the State Budget papers and contributes to briefings for the Estimates process. The Information Commissioner attends the Estimates hearing to answer any questions about the OIC's budget and operational performance.

The RTI Act requires that a strategic review of the OIC be carried out at least every 5 years, by an appropriately qualified person, following terms of reference decided by the Governor-in-Council. The reviewer is required to provide a report of the review to the parliamentary committee, the Minister, and the Commissioner. The last strategic review was tabled on 31 January 2023 and the next review is due to be conducted in 2027.

The Queensland Audit Office (QAO) annually audits the OIC's financial statements in accordance with the *Financial Accountability Act 2009*. The unqualified audit report received from the QAO is included at pages 57-58.

Internal audits

The OIC engages the Corporate Administration Agency (CAA) to conduct internal audit on a fee for service basis. In 2024-25, CAA conducted an internal audit of the OICs corporate governance arrangements. The report was received in April 2025, with all recommendations accepted for action.

Ethical conduct

The Code of Conduct for the Queensland Public Sector applies to OIC employees.

Under the *Public Sector Ethics Act 1994*, new starters learn about the Code of Conduct through their induction program and are asked to confirm their understanding and ability to apply the code. This training is also carried out annually for all OIC employees to ensure our people are well equipped to meet the expectations of the Code.

New employees must also complete a suite of mandatory online training at induction and undertake periodic refreshers. The training covers topics including: code of conduct, workplace health and safety, workplace bullying and domestic violence.

The OIC's Strategic Plan, employee performance agreements, policies, procedures, practices, and training uphold the Code of Conduct, ethical decision making, and *Public Sector Ethics Act 1994*, in particular, the ethical obligations of public officials and our OIC values.

In 2024-25, the OIC strengthened its approach to the management of potential conflicts of interest by updating procedures for declarations in relation to recruitment and procurement, and by implementing a new requirement to proactively declare potential conflicts on an annual basis. In this way, the consideration of the potential for a conflict to arise is considered routinely, providing opportunity to effectively manage associated risks.

Service complaints

The OIC endeavours to resolve service complaints it receives from those who use our services informally. When this is not possible or appropriate, the Executive Director Corporate and Strategic Services receives written service complaints and ensures they are handled independently in accordance with the OIC's Complaints Management Procedure.

The OIC cannot deal with complaints about the merits or legality of a privacy complaint or external review decision. In these circumstances, the participant may be able to appeal or seek judicial review. However, appeals and judicial reviews of this nature can be made on a point of law only.

During 2024-25, the OIC received 6 service complaints from members of the public. Five complaints were closed as unsubstantiated. One complaint was partially substantiated, with service standards found to have dropped below our expectations. An apology was offered and accepted by the complainant.

Of the unsubstantiated complaints received, one matter referred to the *Human Rights Act 2019*. The response outlined the consideration given to human rights in this case, noting the interaction of section 13 of the Act,

A human right may be subject under law only to reasonable limits that can be demonstrably justified in a free and democratic society based on human dignity, equality and freedom,

with section 26 of the RTI Act,

An access application may not be made or transferred to the information commissioner, the RTI commissioner or the privacy commissioner

as evidence of Parliament's intention to impose a reasonable limitation on access to information held by the OIC where it relates to its functions under the IP and RTI Acts.

OIC Commissioners, and employees under delegation from the Information Commissioner, are statutory decision makers, and our people are mindful of the impact decisions can have on the public. A key compliance activity for the OIC is ensuring our people understand their obligation to act and make decisions that are compatible with the Human Rights Act 2019.

In 2024-25, the OIC did not receive any public interest disclosures under the Public Interest Disclosures Act 2010.

Information management and systems

In 2024-25, the OIC focused on improving our information management and systems to make services more efficient, encourage teamwork and collaboration with the OIC, and better engage with our stakeholders.

Key projects included introducing a new customer relationship management (CRM) system, launching a new intranet, and creating an agency portal.

New Customer Relationship Management (CRM) system

In 2024-25, the OIC commenced a significant project replace our old case management system with a new cloud-based CRM.

This upgrade will continue into 2025-26 and will improve access to OIC case records, workflow tools, and reporting features. The CRM will also serve as the main system for managing case documents, reducing reliance on emails and informal methods, and ensuring more consistent and efficient processes across the organisation.

New agency portal

The OIC's new CRM has also enabled the development of an Agency Portal, a self-service tool for agencies and entities regulated by the Information Commissioner to:

- submit mandatory and voluntary data breach notifications
- track the progress of these notifications
- monitor privacy complaints involving their agency or entity.

The Agency Portal launched on 1 July 2025 and supports the making of notifications under the Mandatory Notification of Data Breach (MNDB) scheme. It provides a streamlined way for agencies to meet their privacy reporting obligations and enhances the OIC's digital services in line with public sector expectations.

New OIC intranet

In 2024-25, the OIC introduced a new intranet site to improve internal communication and access to resources. Built on Microsoft SharePoint, the intranet features an easy-to-use interface, dedicated sections for different teams, and tools to encourage knowledge sharing.

Artificial intelligence tool trial

In 2024-25, the OIC commenced a trial of QChat, a generative artificial intelligence (AI) tool developed by the Queensland Government.

Our trial aims to explore how the AI tool can be used by OIC employees to assist them with administrative tasks, including drafting internal documents, reviewing and editing content and conducting research. The trial is being conducted in a secure environment with safeguards to protect information and ensure QChat's ethical use.

To date, OIC employee feedback has highlighted potential productivity benefits while emphasising the need for human oversight to ensure accuracy and fit for purpose content. Insights from the trial will guide future decisions about the OIC's use of AI tools and contribute to the Queensland public sector's understanding of responsible AI use.

Website rebuild

In 2024-25, the OIC commenced a project to rebuild our website, which is 14 years old. The new website will improve access to the OIC services and information for members of the community and agencies, through offering a modern, user-focused and accessible platform. It will also enhance OIC's online service delivery, making it easier for the public and agencies to engage with our regulatory and advisory functions.

Cybersecurity

In 2024-25, the OIC focused on modernising our information technology infrastructure and improving cybersecurity. Key actions included:

- progressing the implementation of the 'Essential Eight' cybersecurity strategies to the appropriate maturity level
- mandatory Cyber Security, Records Management and SharePoint training for all employees
- testing OIC's Incident Response Plan
- conducting phishing simulations and targeted cyber education programs to raise employee awareness.

These efforts are designed to strengthen the OIC's security capabilities and vigilance among all employees of cyber threats.

Records management

In 2024-25, the OIC continued to improve our recordkeeping practices by updating our systems and tools to meet our responsibilities.

In 2024-25, key achievements included:

- consolidating electronic document storage locations
- introducing security classifications
- enhancing integration between SharePoint and Microsoft Teams for seamless record capture.

The OIC also completed 2 major projects: cataloguing offsite hard copy records and updating our Information Asset Register.

OIC employees received training on records management basics, the lifecycle of a record, and the Business Classification Scheme.

In 2025-26, a new Records Awareness training module will be added to the OIC's induction process, along with an ongoing training plan to improve information management practices. Training materials and resources are available on the intranet.

In response to the new *Public Records Act 2023*, the OIC is reviewing our recordkeeping systems to ensure they remain effective and fit for purpose.

Open data

The OIC continued to release data sets through the Queensland Government's open data portal at data.qld.gov.au.

In 2024-25, OIC data sets published on the portal, included:

- gifts and benefits register
- consultancies and contractors
- overseas travel
- survey results
- performance dashboard
- audit results
- about applications for and outcomes of external review.

Financial performance and management

Managing our budget

The OIC ended the 2024-25 financial year in a secure financial position with adequate reserves to fulfil our responsibilities.

Expenditure

The OIC spent most of our approved funding (\$9.266 million or 75.22% of our total expenses) on employee-related expenses such as salaries, superannuation entitlements, long service leave and payroll tax. Our day-to-day running expenses cost \$3.053 million.

Significant operating items relate to contractor and consultants (\$1.851 million), office accommodation (\$0.352 million), computer related costs such as software licensing (\$0.340 million) and corporate service charges (\$0.185 million).

The OIC's budget for 2024-25 was adjusted by an approved \$0.402 million to fund the reclassification of senior officers, 4% wage increase for Senior Executive Services and Senior Officer positions and \$0.017 million for State wage case increases. The OIC's budget was further adjusted by approval to receive an additional grant of \$2.993 million for the IPOLA reforms project.

The OIC's overall expenditure of \$12.319 million is a 24.72% increase on the previous reporting period (\$9.877 million). This increase is due to:

- an increase in employee expenses in 2024-25, with approval for additional resources to carry out the IPOLA reforms project for an additional 1.8 full-time equivalent temporary positions, wage increases through the enterprise bargaining agreement, and wage increases for Senior Officers and Senior Executive Service officers
- an investment in contractors and consultants incurred for the IPOLA reforms project and strategic priorities.

Assets

As at 30 June 2025, the OIC's assets totalled \$4.779 million and comprised:

- \$4.406 million cash at bank
- \$0.365 million receivables and other current assets
- \$0.008 million non-current assets.

Liabilities

As at 30 June 2025, the OIC's liabilities totalled \$0.520 million and included:

- \$0.227 million in payables
- \$0.293 million in accrued employee benefits.

The OIC's financial statements provide an overview of our financial activities during 2024-25. The Queensland Audit Office audited these statements, our supporting documentation and our systems and processes. We received an unqualified audit opinion.

Consultants and contractors

In 2024-25, the OIC spent \$1.850 million on contractors and consultants primarily to enhance technology and data management systems. This strategic and enterprise focus was to support the purchase and setup of a new customer relationship management (CRM) system, the first stage of which went live on 1 August 2024 for the OIC's Information and Assistance team initially).

The following table provides a breakdown of the OIC's total expenditure on consultants during 2024-25.

Name of consultancy provider	Reporting period	Purpose of engagement	Benefits of engagement	Engagement expenditure (\$)
GSA Management Consulting Pty Ltd	FY 2024-25	Strategic Plan review	Providing independent assessment of strategic planning	26,950
Total expenditure on consultancies				26,950

Financial outlook

Five-year comparison of revenue versus expenses (\$'000)

	2020-21	2021-22	2022-23	2023-24	2024-25
Appropriation	7,289	7,347	7,691	11,397	12,205
Other revenue	25	25	122	189	279
Employee expenses	5,385	6,053	6,377	7,466	9,266
Supplies and services	1,446	1,183	1,540	2,375	2,983
Depreciation and amortisation	4	4	2	7	8
Other expenses	22	22	24	29	62
Surplus (Deficit)	457	110	(130)	1,709	165

Audited financial statements

A more detailed view of our financial performance and position for 2024-25 is in our financial statements, from page 36 of this report.

Accountable and transparent

In line with the Queensland Government's commitment to improve financial management in the public sector, the OIC continued to review our internal accounting practices as well as the quality of information we provided to Queensland Treasury.

The OIC worked with our corporate service provider, the Corporate Administration Agency (CAA) to streamline our reporting processes and to improve the accuracy of our reporting.

We provided all requested information to the Queensland Audit Office and discussed ways to improve our financial management practices in the future.

International travel

No international travel was funded by the OIC in 2024-25.

Office of the Information Commissioner Financial Statements

for the year ended 30 June 2025

**Office of the Information Commissioner
Financial Statements
for the year ended 30 June 2025**

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Office of the Information Commissioner
Statement of Comprehensive Income
for the year ended 30 June 2025

		2025	2025	2025	2024
		Actual	Original Budget	Budget Variance *	Actual
	Notes	\$000	\$000	\$000	\$000
Income from Continuing Operations					
Grants and Contributions	3.	12,205	12,188	17	11,397
Interest		279	30	249	189
Total Income from Continuing Operations		12,484	12,218	266	11,586
Expenses from Continuing Operations					
Employee expenses	4.	9,266	9,544	(278)	7,466
Supplies and services	7.	2,963	2,639	344	2,375
Depreciation		8	8	-	7
Other expenses	8.	62	27	35	29
Total Expenses from Continuing Operations		12,319	12,218	101	9,877
Operating Result from Continuing Operations		165	-	165	1,709
Total Other Comprehensive Income		-			-
Total Comprehensive Income		165	-	165	1,709

The accompanying notes form part of these financial statements.

** An explanation of major variances is included at Note 20.*

Office of the Information Commissioner
Statement of Financial Position
as at 30 June 2025

		2025	2025	2025	2024
		Actual	Original Budget	Budget Variance *	Actual
	Notes	\$000	\$000	\$000	\$000
Current Assets					
Cash and cash equivalents	9.	4,406	1,991	2,415	4,260
Receivables		230	240	(10)	171
Prepayments		135	88	47	110
Total Current Assets		4,771	2,319	2,452	4,541
Non-Current Assets					
Plant and equipment		8	8	-	15
Total Non-Current Assets		8	8	-	15
Total Assets		4,779	2,327	2,452	4,556
Current Liabilities					
Payables	10.	227	260	(33)	230
Accrued employee benefits	11.	293	172	121	232
Total Current Liabilities		520	432	88	462
Total Liabilities		520	432	88	462
Net Assets		4,259	1,895	2,364	4,094
Equity					
Accumulated surplus		4,259	1,895	2,364	4,094
Total Equity		4,259	1,895	2,364	4,094

The accompanying notes form part of these financial statements.

* An explanation of major variances is included at Note 20.

Office of the Information Commissioner
Statement of Changes in Equity
for the year ended 30 June 2025

	Accumulated Surplus \$000
Balance as at 1 July 2023	2,385
Operating result from continuing operations	1,709
Balance as at 30 June 2024	4,094
Balance as at 1 July 2024	4,094
Operating result from continuing operations	165
Balance as at 30 June 2025	4,259

The accompanying notes form part of these financial statements.

Office of the Information Commissioner
Statement of Cash Flows
for the year ended 30 June 2025

		2025	2025	2025	2024
		Actual	Original Budget	Budget Variance *	Actual
	Notes	\$000	\$000	\$000	\$000
CASH FLOWS FROM OPERATING ACTIVITIES					
<i>Inflows:</i>					
Grants and Contributions		12,205	12,188	17	11,397
GST collected from customers		3	-	3	3
GST input tax credits from ATO		285	-	285	271
Other Revenue		279	30	249	181
<i>Outflows:</i>					
Employee expenses		(9,235)	(9,544)	309	(7,455)
Supplies and services		(3,011)	(2,639)	(372)	(2,423)
GST paid to suppliers		(315)	-	(315)	(260)
GST remitted to ATO		(3)	-	(3)	(3)
Other		(82)	(27)	(35)	(30)
Net cash provided by / (used in) operating activities		146	8	138	1,681
CASH FLOWS FROM INVESTING ACTIVITIES					
<i>Outflows:</i>					
Payments for plant and equipment		-	-	-	(23)
Net cash used in investing activities		-	-	-	(23)
Net increase/(decrease) in cash and cash equivalents		146	8	138	1,658
Cash and cash equivalents - opening balance		4,260	1,963	2,277	2,602
Cash and cash equivalents - closing balance	9.	4,406	1,991	2,415	4,260

The accompanying notes form part of these financial statements.

** An explanation of major variances is included at Note 20.*

Office of the Information Commissioner**Notes to the Statement of Cash Flows****for the year ended 30 June 2025**

Reconciliation of operating result to net cash provided by operating activities

	2025	2024
	\$000	\$000
Operating Surplus/(deficit)	165	1,709
Non-cash items:		
Depreciation expense	8	7
Changes in assets and liabilities:		
(Increase)/decrease in trade receivables	1	(8)
(Increase)/decrease in GST receivable	(30)	11
(Increase)/decrease in other current assets	(56)	45
Increase/(decrease) in payables	(3)	(27)
Increase/(decrease) in accrued employee benefits	61	(56)
Net cash provided by/(used in) operating activities	146	1,681

Office of the Information Commissioner**Notes to the Financial Statements
for the year ended 30 June 2025**

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	1.2 Compliance with Prescribed Requirements
	1.3 Presentation
	1.4 Authorisation of Financial Statements for Issue
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Office of the Information Commissioner
Notes to the Financial Statements
for the year ended 30 June 2025

1. Basis of Financial Statement Preparation

1.1 General Information

The Office of the Information Commissioner (the Office) was established under the repealed Freedom of Information Act 1992 and continues under the Right to Information Act 2009. On 1 July 2025, the Information Privacy Regulation 2025, Right to Information Regulation 2025 and the Information Privacy and Other Legislation Amendment Act 2023 (Qld) (IPOLA) commenced, introducing new privacy and information management obligations for Queensland public sector agencies.

The budget for the Office must be approved by the Attorney-General and Minister for Justice and Minister for the Integrity, as Minister responsible for the Right to Information Act 2009.

The head office and principal place of business of the Office is Level 11, 53 Albert Street, BRISBANE QLD 4000.

1.2 Compliance with Prescribed Requirements

The Office has prepared these financial statements in compliance with section 39 of the *Financial and Performance Management Standard 2019*. The financial statements comply with Queensland Treasury's Minimum Reporting Requirements for reporting periods beginning on or after 1 July 2024.

The Office is a not-for-profit entity and these general purpose financial statements are prepared on an accrual basis (except for the Statement of Cash Flows which is prepared on a cash basis) in accordance with Australian Accounting Standards and Interpretations applicable to not-for-profit entities.

New accounting standards early adopted and/or applied for the first time in these financial statements are outlined in Note 16.

1.3 Presentation

Currency and Rounding

Amounts included in the financial statements are in Australian dollars and rounded to the nearest \$1,000 or, where that amount is \$500 or less, to zero, unless disclosure of the full amount is specifically required. Due to rounding, totals may not add exactly.

Comparatives

Comparative information reflects the audited 2023-24 financial statements.

Current/Non-Current Classification

Assets and liabilities are classified as either 'current' or 'non-current' in the Statement of Financial Position and associated notes.

Assets are classified as 'current' where their carrying amount is expected to be realised within 12 months after the reporting date. Liabilities are classified as 'current' when they are due to be settled within 12 months after the reporting date, or the Office does not have the right at the end of the reporting period to defer settlement to beyond 12 months after the reporting date.

All other assets and liabilities are classified as non-current.

1.4 Authorisation of Financial Statements for Issue

The financial statements are authorised for issue by the Information Commissioner and the Executive Director, Corporate and Strategic Services (former title - Chief Operating Officer) at the date of signing the Management Certificate.

1.5 Basis of Measurement

Historical cost is used as the measurement basis in this financial report unless specified otherwise.

Office of the Information Commissioner
Notes to the Financial Statements
for the year ended 30 June 2025

1. Basis of Financial Statement Preparation (continued)

1.5 Basis of Measurement (continued)

Historical Cost

Under historical cost, assets are recorded at the amount of cash or cash equivalents paid or the fair value of the consideration given to acquire assets at the time of their acquisition. Liabilities are recorded at the amount of proceeds received in exchange for the obligation or at the amounts of cash or cash equivalents expected to be paid to satisfy the liability in the normal course of business.

1.6 The Reporting Entity

The financial statements include all income, expenses, assets, liabilities and equity of the Office. The Office has no controlled entities.

2. Office Objectives

The Office's objectives are to:

- Provide independent, timely and fair reviews of decisions made under the *Right to Information Act 2009* (RTI Act) and *Information Privacy Act 2009* (IP Act)
- Assist agencies to adopt privacy by design and achieve compliance with the privacy principles
- Provide an independent, timely and fair privacy complaint mediation service
- Promote greater awareness of right to information and information privacy in the community and within government
- Improve agencies' practices in right to information and information privacy

The Office is a statutory body for the *Financial Accountability Act 2009*. The role of the Office is to perform the statutory functions set out in the RTI Act and IP Act which include:

- External review of agency decisions on information access applications
- Reviewing and reporting on agencies' performance under the RTI Act and IP Act, including personal information handling practices
- Mediating privacy complaints and making decisions on applications of waiver of the privacy principles
- Providing support and assistance to the community and agencies about the operation of the RTI Act and the IP Act, including an Enquiries Service
- Promoting awareness of Right to Information and Privacy issues
- Commenting on legislation and administrative changes to improve practice

Office of the Information Commissioner
Notes to the Financial Statements
for the year ended 30 June 2025

	2025 \$000	2024 \$000
3. Grants and Contributions		
Grants from Queensland Government through Department of Justice	12,205	11,397
Total	12,205	11,397

Accounting Policy - Grants and Contributions

Government grants are non-reciprocal in nature and are recognised as revenue in the year in which the OIC obtains control over them or the right to receive them. Grants are accounted for under AASB 1058 Income of Not-for-Profit Entities.

4. Employee Expenses

Employee benefits		
Salaries & wages	6,833	5,518
Annual leave levy	735	593
Employer superannuation contributions	951	810
Long service leave levy	186	142
Other employee benefits	16	14
Employee related expenses		
Payroll tax	402	313
Workers' compensation premium	32	21
Other employee related expenses	111	55
Total	9,266	7,466
	No.	No.
Full-Time Equivalent Employees	51.81	48.39

Accounting Policy - Wages and Salaries

Wages and salaries due but unpaid at reporting date are recognised in the Statement of Financial Position at the current salary rates. As the Office expects such liabilities to be wholly settled within 12 months of reporting date, the liabilities are recognised at undiscounted amounts.

Accounting Policy - Sick Leave

Prior history indicates that on average, sick leave taken each reporting period is less than the entitlement accrued. This is expected to continue in future periods. Accordingly, it is unlikely that existing accumulated entitlements will be used by employees and no liability for unused sick leave entitlements is recognised. As sick leave is non-vesting, an expense is recognised for this leave as it is taken.

Office of the Information Commissioner
Notes to the Financial Statements
for the year ended 30 June 2025

4. Employee Expenses (continued)

Accounting Policy - Annual Leave

The Office is a member of the Queensland Government's Annual Leave Central Scheme (ALCS). Under this scheme, a levy is made on the Office to cover the cost of employees' annual leave (including leave loading and on-costs). The levies are expensed in the period in which they are payable. Amounts paid to employees for annual leave are claimed from the scheme quarterly in arrears.

Accounting Policy - Long Service Leave

Under the Queensland Government's Long Service Leave Scheme, a levy is made on the Office to cover the cost of employees' long service leave. The levies are expensed in the period in which they are payable. Amounts paid to employees for long service leave are claimed from the scheme quarterly in arrears.

Accounting Policy - Superannuation

Post-employment benefits for superannuation are provided through defined contribution (accumulation) plans or the Queensland Government's defined benefit plan (the former QSuper defined benefit categories now administered by the Government Division of the Australian Retirement Trust) as determined by the employee's conditions of employment.

Defined Contribution Plans - Contributions are made to eligible complying superannuation funds based on the rates specified in the relevant EBA or other conditions of employment. Contributions are expensed when they are paid or become payable following completion of the employee's service each pay period.

Defined Benefit Plan - The liability for defined benefits is held on a whole-of-government basis and reported in those financial statements pursuant to AASB 1049 *Whole of Government and General Government Sector Financial Reporting*. The amount of contributions for defined benefit plan obligations is based upon the rates determined on the advice of the State Actuary. Contributions are paid by the Office at the specified rate following completion of the employee's service each pay period. The Office's obligations are limited to those contributions paid.

Accounting Policy - Workers' Compensation Premiums

The Office pays premiums to WorkCover Queensland in respect of its obligations for employee compensation. Workers' compensation insurance is a consequence of employing employees, but is not counted in an employee's total remuneration package. It is not employee benefits and is recognised separately as employee related expenses.

5. Key Management Personnel (KMP)

The following details for KMP reflect those positions that had authority and responsibility for planning, directing and controlling the activities of the Office during 2024-25 and 2023-24. Further information about these positions can be found in the body of the Annual Report under the section relating to Executive Management.

Position	Position Responsibility
Information Commissioner	The Information Commissioner role is to deliver an independent, timely and fair review of decisions made under the <i>Right to Information Act 2009</i> and <i>Information Privacy Act 2009</i> ; an independent timely and fair privacy complaint mediation service; improve agencies' practices to right to information and information privacy; promote greater awareness of right to information and information privacy in the community and within Government; and assist agencies to achieve compliance with the privacy principles.
Right to Information (RTI) Commissioner	The RTI Commissioner's role is that of a deputy to the Information Commissioner, with particular responsibility for matters relating to the Information Commissioner's functions under the <i>Right to Information Act 2009</i> .

Office of the Information Commissioner

Notes to the Financial Statements for the year ended 30 June 2025

5. Key Management Personnel (KMP) (continued)

Position	Position Responsibility
Privacy Commissioner	The Privacy Commissioner's role is that of a deputy to the Information Commissioner, with particular responsibility for matters relating to the Information Commissioner's functions under the <i>Information Privacy Act 2009</i> .
Executive Director, Corporate and Strategic Services (former title Chief Operating Officer)	The Executive Director, Corporate and Strategic Services implements and monitors systems and processes to support organisational objectives and raise awareness of information access and privacy rights, including supporting the Information Commissioner in the design and implementation of strategic and governance priorities for the Office, Financial, Human Resources, Information and Assistance & Training and Stakeholder Relations delegations as determined by the Information Commissioner.
Director, Audit and Evaluation (position ceased to be part of KMP 05/01/2025)	The Director, Audit and Evaluation is a member of the Executive Leadership Team and has particular responsibility for monitoring, auditing and reporting on agencies' compliance with the <i>Right to Information Act</i> and <i>Information Privacy Act</i> .

KMP Remuneration Policies

The remuneration and terms of employment for statutory office holders in key executive management positions are set by Governor in Council and are equivalent to those set by the Queensland Public Sector Commission.

Remuneration policy for the Office's key management personnel in non-statutory office holder positions is set by the Queensland Public Sector Commission following repeal of legislation on 1 March 2023, as provided for under the Public Sector Act 2022.

Remuneration expenses for KMP comprise the following components:

Short-term employee expenses, including:

- salaries, allowances and leave entitlements earned and expensed for the entire year, or for that part of the year during which the employee occupied a KMP position; and
- non-monetary benefits - consisting of provision of car parking together with fringe benefits tax applicable to the benefit.

Long-term employee expenses include amounts expensed in respect of long service leave entitlements earned.

Post-employment expenses include amounts expensed in respect of employer superannuation obligations.

Termination benefits include payments in lieu of notice on termination and other lump sum separation entitlements (excluding annual and long service leave entitlements) payable on termination of employment or acceptance of an offer of termination of employment.

Performance Payments

OIC does not pay any performance payments or bonuses.

Office of the Information Commissioner
Notes to the Financial Statements
for the year ended 30 June 2025

5. Key Management Personnel (KMP) (continued)

Remuneration Expenses

The following disclosures focus on the expenses incurred by the Office attributable to KMP during the respective reporting periods. The amounts disclosed are determined on the same basis as expenses recognised in the Statement of Comprehensive Income.

2024-2025

Position	Short Term Employee Expenses		Long Term Employee Expenses	Post-employment Benefits	Termination Benefits	Total Expenses
	Monetary Expenses \$'000	Non-Monetary Benefits \$'000	\$'000	\$'000	\$'000	\$'000
Information Commissioner (1 Jul 2024 - 30 Jun 2025)	378	8	10	46	-	442
Executive Director, Corporate and Strategic Services (former title Chief Operating Officer) (1 Jul 2024 - 30 Jun 2025)	201	8	5	26	-	240
RTI Commissioner (1 Jul 2024 - 30 Jun 2025)	226	8	6	28	-	268
Privacy Commissioner (1 Jul 2024 - 26 Jul 2024) *	10	2	-	2	-	14
Privacy Commissioner (Acting 1) (15 Jul 2024 - 27 Jan 2025)	111	5	3	15	-	134
Privacy Commissioner (Acting 2) (26 Jan 2025 - 30 Jun 2025)	104	1	3	12	-	120
Director Audit and Evaluation** (1 Jul 2024 - 5 Jan 2025)	87	-	2	10	-	99
Total Remuneration	1,117	32	29	139	-	1,317

* Officer on leave 15 Jul 2024 to 26 Jul 2024

** Position ceased to be part of KMP 5 Jan 2025

2023-2024

Position	Short Term Employee Expenses		Long Term Employee Expenses	Post-employment Benefits	Termination Benefits	Total Expenses
	Monetary Expenses \$'000	Non-Monetary Benefits \$'000	\$'000	\$'000	\$'000	\$'000
Information Commissioner 1 (01 Jul 2023 - 13 Sep 2023)	46	4	1	12	10	73
Information Commissioner (Acting 1) (14 Sep 2023 - 28 Mar 2024)	155	3	4	20	-	182
Information Commissioner 2 (From 03 Apr 2024)	95	-	2	11	-	108
Chief Operating Officer (Acting 1) (28 Aug 2023 - 10 Nov 2023)	44	-	1	6	-	51
Chief Operating Officer (From 13 Nov 2023)	125	3	4	16	-	148
RTI Commissioner (Acting 1) * (14 Sep 2023 - 28 Mar 2024)	92	-	2	14	-	108
RTI Commissioner (Acting 2) * (28 Sep 2023 - 20 Feb 2024)	74	-	2	10	-	86
RTI Commissioner ** (01 Jul 2023 - 13 Sep 2023) & (From 08 Apr 2024)	98	4	2	13	-	117
Privacy Commissioner	214	9	5	30	-	258
Director, Audit and Evaluation *** (From 13 Nov 2023)	85	-	2	12	-	99
Total Remuneration	1,029	23	25	144	10	1,231

* job sharing

** acting Information Commissioner from 14 Sep 2023 to 28 Mar 2024

*** now KMP from 13 Nov 2023

Office of the Information Commissioner**Notes to the Financial Statements****for the year ended 30 June 2025**

6. Related Party Transactions**Transactions with other Queensland Government-controlled entities**

The Office received Grant Funding from the Department of Justice (\$12,205K).

The Office has an agreement with Department of Housing and Public Works (State of Queensland) for the provision of office accommodation (\$352K) & has received corporate services from the Corporate Administration Agency (\$189K) (Refer Note 7).

The Office received IT support services from CITEC (\$8K) (Refer Note 7).

The Office received access to legal research through the Department of Justice (\$3K). (Refer Note 7).

All transactions with other Queensland Government-controlled entities were at arms length.

	2025 \$000	2024 \$000
7. Supplies and Services		
Contractor and consultants	1,851	798
Office accommodation	352	342
Computer related charges	340	429
Corporate service charges	185	584
Operating, administration and other costs	175	107
Minor equipment and office maintenance	45	94
Communications and utilities	35	41
Total	2,983	2,375

Accounting policy – Distinction between grants and procurement

For a transaction to be classified as supplies and services, the value of goods or services received by the Office must be of approximately equal value to the value of the consideration exchanged for those goods or services. Where this is not the substance of the arrangement, the transaction is classified as a grant.

Contractor and Consultants

The Office engaged contractors and consultants to enhance the technology and data management systems. The focus was to support the purchase and setup of a new customer relationship management (CRM) system (which went live on 1 August 2024 for the Information and Assistance team initially). Dalacom continues to deliver ongoing IT support and assists with integrating our systems into Salesforce CRM.

Corporate service charges

Corporate service charges represent the services provided to the Office by the Corporate Administration Agency as its shared service provider.

Office accommodation

Payments for non-specialised commercial office accommodation under the Queensland Government Accommodation Office (QGAO) framework arise from non-lease arrangements with the Department of Housing and Public Works, who has substantive substitution rights over the assets used within this scheme. Payments are expensed as incurred and categorised within office accommodation line item.

Office of the Information Commissioner
Notes to the Financial Statements
for the year ended 30 June 2025

	2025 \$000	2024 \$000
8. Other Expenses		
Queensland Audit Office - external audit fees for the audit of the financial statements ⁽¹⁾	28	25
Insurance - QGIF	5	4
Special Payments ⁽²⁾		
Ex-gratia payment	29	-
Total	62	29

⁽¹⁾ Total audit fees quoted by the Queensland Audit Office relating to the 2024-25 financial statements are \$27,500 (2024: \$25,000).
There are no non-audit services included in this amount.

⁽²⁾ Special payments represent 1 ex-gratia payment over \$5,000 to an employee on termination.

Accounting Policy - Special Payments

Special payments represent ex-gratia expenditure and other expenditure that the Office is not contractually or legally obligated to make to other parties. The Office maintains a register of all special payments greater than \$5,000 in accordance with the Financial and Performance Management Standard 2019.

9. Cash and Cash Equivalents

Cash at bank	4,406	4,260
	4,406	4,260

Accounting Policy - Cash

For the purpose of the Statement of Financial Position and the Statement of Cash Flows, cash assets include all cash and cheques received but not banked at 30 June as well as deposits at call with financial institutions.

10. Payables

Trade creditors	7	36
Corporate card	17	14
Payroll tax	35	47
Accrued supplies and services	166	133
Total	227	230

Accounting Policy - Payables

Accrued supplies and services are recognised upon receipt of the goods or services ordered and are measured at the nominal amount i.e. agreed purchase/contract price, gross of applicable trade and other discounts. Amounts owing are unsecured.

11. Accrued Employee Benefits

<i>Current</i>		
Salary and wages outstanding	26	-
Long service leave levy payable	49	45
Annual leave levy payable	214	183
Other	4	4
Total	293	232

Accounting Policy - Accrued Employee Benefits

No provision for annual leave or long service leave is recognised in the Office's financial statements as the liability is held on a whole-of-government basis and reported in those financial statements pursuant to AASB 1049 *Whole of Government and General Government Sector Financial Reporting*.

Office of the Information Commissioner
Notes to the Financial Statements
for the year ended 30 June 2025

12. Commitments

There are no legal or any other commitments that are known to the Office at 30 June 2025.

13. Contingencies

There are no legal or any other contingencies that are known to the Office at 30 June 2025.

14. Financial Risk Disclosures

Financial Instrument Categories

Financial assets and financial liabilities are recognised in the Statement of Financial Position when the Office becomes party to the contractual provisions of the financial instrument. The carrying amounts of receivables and payables represent the value of the original transactions. The Office has the following categories of financial assets and financial liabilities:

Category	Note	2025 \$'000	2024 \$'000
Financial assets			
Cash and cash equivalents	9.	4,406	4,260
Financial assets at amortised cost - comprising:			
Receivables		230	170
Total financial assets		4,636	4,430
Financial liabilities			
Financial liabilities at amortised cost - comprising:			
Payables	10.	227	230
Total financial liabilities at amortised cost		227	230

No financial assets and financial liabilities have been offset and presented net in the Statement of Financial Position.

Office of the Information Commissioner
Notes to the Financial Statements
for the year ended 30 June 2025

14. Financial Risk Disclosures (continued)

Financial Risk Management

(a) Risk Exposure

The Office's activities expose it to a variety of financial risks as set out in the following table:

Risk Exposure	Definition	Exposure
Credit Risk	Credit risk exposure refers to the situation where the Office may incur financial loss as a result of another party to a financial instrument failing to disclose their obligation.	The Office is exposed to credit risk in respect of its receivables.
Liquidity Risk	Liquidity risk refers to the situation where the Office may encounter difficulty in meeting obligations associated with financial liabilities that are settled by delivering cash or another financial asset.	The Office is exposed to liquidity risk in respect of its payables.
Market Risk	The risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises three types of risk: currency risk, interest rate risk and other price risk. <i>Interest rate risk</i> is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates.	The Office does not trade in foreign currency and is not materially exposed to commodity price changes or other markets. The Office is exposed to interest rate risk through its cash deposited in interest bearing accounts.

(b) Risk Measurement and Management Strategies

The Office measures risk exposure using a variety of methods as follows:

Risk Exposure	Measurement	Risk Management Strategies
Credit Risk	Ageing analysis, earnings at risk	The Office manages credit risk through the use of a credit management strategy. Exposure to credit risk is monitored on an on-going basis.
Liquidity Risk	Sensitivity Analysis	The Office manages exposure to liquidity risk by ensuring sufficient funds are available to meet employee and supplier obligations at all times. This is achieved by ensuring minimum levels of cash are held within the bank account to match the expected duration of the various employee and supplier liabilities.
Market Risk	Interest rate sensitivity analysis	The Office does not undertake any hedging in relation to interest rate risk.

The Office's activities may expose it to a variety of financial risks. However, any risk is considered to have a minimal effect on the Office.

Office of the Information Commissioner
Notes to the Financial Statements
for the year ended 30 June 2025

15. Future Impact of Accounting Standards Not Yet Effective

All other Australian accounting standards and interpretations with future effective dates are either not applicable to the Office's activities or have no material impact on the Office.

16. First Year Application of New Accounting Standards or Change in Accounting Policy

Accounting standards applied for the first time

No new accounting standards or interpretations that apply to the Office for the first time in 2024-25 had any material impact on the financial statements.

Accounting Standards Early Adopted

No Australian Accounting Standards have been early adopted for 2024-25.

17. Events after the Balance Date

There were no significant events occurring after the balance date.

18. Taxation

The Office is a State body as defined under the *Income Tax Assessment Act 1936* and is exempt from Commonwealth taxation with the exception of Fringe Benefits Tax (FBT) and Goods and Services Tax (GST). FBT and GST are the only taxes accounted for by the Office. GST credits receivable from, and GST payable to the Australian Taxation Office (ATO), are recognised in the Statement of Financial Position.

19. Climate Risk Disclosure

The State of Queensland provides information and resources on climate related strategies and actions accessible at <https://www.energyandclimate.qld.gov.au/climate> and <https://www.treasury.qld.gov.au/energy-and-climate/>

The Queensland Sustainability Report (QSR) outlines how the Queensland Government measures, monitors and manages sustainability risks and opportunities, including governance structures supporting policy oversight and implementation. To demonstrate progress, the QSR also provides time series data on key sustainability policy responses. The QSR is available via Queensland Treasury's website at <https://www.treasury.qld.gov.au/programs-and-policies/queensland-sustainability-report>

No adjustments to the carrying value of assets held by the Office were recognised during the financial year as a result of climate-related risks impacting current accounting estimates and judgements. No other transactions have been recognised during the financial year specifically due to climate-related risks impacting the Office.

Office of the Information Commissioner
Notes to the Financial Statements
for the year ended 30 June 2025

20. Budgetary Reporting Disclosures

This section contains explanations of major variances between the Office's actual 2024-2025 financial results and the original budget presented to Parliament.

20.1 Explanation of Major Variances - Statement of Comprehensive Income

Interest revenue:	Actual interest is \$249k higher than the budgeted \$30k. This is due to higher cash received and higher interest rate than budgeted.
Employee Expenses:	Actual employee costs are \$278k lower than budgeted \$9,544k. This is largely due to vacancies throughout the year and delays in recruitment activities.
Supplies and services:	Actual supplies and services costs are \$344k higher than budgeted \$2,639k primarily due to an increase in contractor costs incurred for the Information Privacy and Other Legislation Amendment Act (IPOLA Act) reform project and strategic priorities.
Other Expenses:	Actual other expenses are \$35k higher than budgeted \$27k primarily due to an ex-gratia payment to an employee on termination.

20.2 Explanation of Major Variances - Statement of Financial Position

Cash:	Actual cash is \$2,415k higher than the budgeted \$1,991k. This is primarily due to higher interest revenue and the timing of expenditure across reporting periods.
Prepayments:	Actual prepayments are \$47k higher than budgeted \$88k primarily due to early charges relating to the CRM system.
Payables	Actual payables are \$33k lower than the budgeted \$260k primarily due to more invoices paid by 30 June 2025 than anticipated.
Accrued Employee benefits:	Actual accrued employee benefits are \$121k higher than the budgeted \$172k. This is mainly driven by long service leave not taken and annual leave levy payable to OIC staff.
Accumulated Surplus:	Actual accumulated surplus is \$2,364k higher than the budgeted \$1,895k. This is primarily due to higher interest revenue and the timing of expenditure across reporting periods.

20.3 Explanation of Major Variances - Statement of Cash Flows

Other revenue:	Actual interest is \$249k higher than the budgeted \$30k. This is due to higher cash received and higher interest rate than budgeted.
Employee Expenses:	Actual employee costs are \$309k lower than budgeted \$9,544k. This is largely due to vacancies throughout the year and delays in recruitment activities.
Supplies and services:	Actual supplies and services costs are \$372k higher than budgeted \$2,639k primarily due to an increase in contractor costs incurred for the IPOLA Act reform project and strategic priorities.
Other Expenses:	Actual other expenses are \$35k higher than budgeted \$27k primarily due to an ex-gratia payment to an employee on termination.

**Office of the Information Commissioner
Management Certificate for the year ended 30 June 2025**

These general purpose financial statements have been prepared pursuant to section 62(1) of the *Financial Accountability Act 2009* (the Act), section 39 of the *Financial and Performance Management Standard 2019* and other prescribed requirements. In accordance with section 62(1)(b) of the Act we certify that in our opinion:

- (a) the prescribed requirements for establishing and keeping the accounts have been complied with in all material respects;
- (b) the financial statements have been drawn up to present a true and fair view, in accordance with prescribed accounting standards, of the transactions of the Office of the Information Commissioner for the financial year ended 30 June 2025 and of the financial position of the entity at the end of that year; and

We acknowledge responsibility under section 7 and section 11 of the *Financial Performance Management Standard 2019* for the establishment and maintenance, in all material respects, of an appropriate and effective system of internal controls and risk management processes with respect to financial reporting throughout the reporting period.



Joanne Kuhnrow
Information Commissioner

Date: 25/8/2025



Zoe Mochrie
Executive Director - Corporate and Strategic Services

Date: 25/8/2025

INDEPENDENT AUDITOR'S REPORT

To the Commissioner of the Office of the Information Commissioner

Report on the audit of the financial report

Opinion

I have audited the accompanying financial report of the Office of the Information Commissioner.

The financial report comprises the statement of financial position as at 30 June 2025, the statement of comprehensive income, statement of changes in equity and statement of cash flows for the year then ended, notes to the financial statements including material accounting policy information, and the management certificate.

In my opinion, the financial report:

- a) gives a true and fair view of the entity's financial position as at 30 June 2025, and its financial performance and cash flows for the year then ended; and
- b) complies with the *Financial Accountability Act 2009*, the Financial and Performance Management Standard 2019 and Australian Accounting Standards.

Basis for opinion

I conducted my audit in accordance with the *Auditor-General Auditing Standards*, which incorporate the Australian Auditing Standards. My responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Report* section of my report.

I am independent of the entity in accordance with the ethical requirements of the Accounting Professional and Ethical Standards Board's APES 110 *Code of Ethics for Professional Accountants (including independence standards)* (the Code) that are relevant to my audit of the financial report in Australia. I have also fulfilled my other ethical responsibilities in accordance with the Code and the *Auditor-General Auditing Standards*.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Responsibilities of the entity for the financial report

The Information Commissioner is responsible for the preparation of the financial report that gives a true and fair view in accordance with the *Financial Accountability Act 2009*, the Financial and Performance Management Standard 2019 and Australian Accounting Standards, and for such internal control as the Information Commissioner determines is necessary to enable the preparation of the financial report that is free from material misstatement, whether due to fraud or error.

The Information Commissioner is also responsible for assessing the entity's ability to continue as a going concern, disclosing, as applicable, matters relating to going concern and using the going concern basis of accounting unless it is intended to abolish the entity or to otherwise cease operations.

Auditor's responsibilities for the audit of the financial report

My objectives are to obtain reasonable assurance about whether the financial report as a whole is free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes my opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with the Australian Auditing Standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of this financial report.

A further description of my responsibilities for the audit of the financial report is located at the Auditing and Assurance Standards Board website at:
https://www.auasb.gov.au/auditors_responsibilities/ar4.pdf

This description forms part of my auditor's report.

Statement

In accordance with s.40 of the *Auditor-General Act 2009*, for the year ended 30 June 2025:

- a) I received all the information and explanations I required.
- b) I consider that, the prescribed requirements in relation to the establishment and keeping of accounts were complied with in all material respects.

Prescribed requirements scope

The prescribed requirements for the establishment and keeping of accounts are contained in the *Financial Accountability Act 2009*, any other Act and the Financial and Performance Management Standard 2019. The applicable requirements include those for keeping financial records that correctly record and explain the entity's transactions and account balances to enable the preparation of a true and fair financial report.



Rachel Vagg
Auditor-General

26 August 2025

Queensland Audit Office
Brisbane

Appendices and supporting information

Appendices

1. Category and number of external review applications received
2. Profile of applicants making external review applications
3. External review applications received by agency profile
4. Outcome of external review applications
5. Outcome of external review decisions
6. Right to Information regulation reporting requirements not captured elsewhere in the annual report
7. 2024-25 applications for external review of decisions made by an agency and Minister
8. Privacy regulation reporting requirements not captured elsewhere in annual report
9. 2024-25 privacy complaints received by agency profile
10. 2024-25 privacy complaints received about an agency or Minister
11. Compliance checklist.

1. Category and number of external review applications received

	2020-21	2021-22	2022-23	2023-24	2024-25		
					RTI	IP	Total
Refusal of access	309	283	267	361	137	197	332
Deemed refusal of access	146	136	150	79	41	44	86
Agency refusal to deal	82	58	62	100	29	58	87
Sufficiency of search	76	76	96	95	32	26	59
Refusal of amendment	23	7	5	6		9	9
No jurisdiction	24	19	31	25	19	12	31
Third party objection to release	17	24	14	23	26	5	31
Deemed refusal of amendment	5	1	1	2		1	1
Fees or charges	3	2	2	5	5	2	7
Total applications	685	606	628	696	289	354	643

2. Profile of applicants making external review applications

	2020-21	2021-22	2022-23	2023-24	2024-25
Agencies	7	2	1	6	5
Companies	42	53	40	43	48
Elected representatives	9	13	3	11	5
Individuals	588	500	558	597	571
Media	20	22	17	31	12
Lobby and community groups	19	16	9	8	2
Total	685	606	628	696	643

3. External review applications received by agency profile

	2020-21	2021-22	2022-23	2023-24	2024-25
Boards/commissions/GOCs/other bodies	60	67	57	78	49
Departments	389	361	406	404	371
Hospital and health services	73	62	62	90	91
Local governments	130	92	76	97	95
Ministers	9	15	9	22	14
Universities	24	9	18	5	23
Total	685	606	628	696	643

4. Outcomes of external review applications

Outcome of review	2020-21	2021-22	2022-23	2023-24	2024-25
Affirming agency decision	35	35	36	36	42
Varying agency decision	29	30	16	23	36
Setting aside agency decision	9	8	5	9	11
External review decisions made under section 110 of RTI Act or section 123 of IP Act	73	73	57	68***	89
External reviews settled informally	613	491	476*	557**	506
Decision application is out of jurisdiction - section 52, section 101 IP Act; section 32, section 88 of the RTI Act	15	11	4	6	6
Decision not to deal with application - section 107 of IP Act, section 94 of the RTI Act	14	37	9	10	30
Decision to allow agency further time to deal with application - section 106 of IP Act, section 93 of RTI Act	38	38	40	22	14
Determination of external review not required	67	86	53	38	50
Total	753	650	586*	663**	645

* On 30 June 2023, there were 479 external reviews settled informally, with a total of 589. Since 30 June 2023, 3 files were reopened, reducing the category to 476 files, and the total to 586

** On 30 June 2024, there were 558 external reviews settled informally, with a total of 664. Since then, 1 file was reopened reducing the category to 557, and the total to 663.

*** On 30 June 2024, external decisions made under section 110 of RTI Act or section 123 of IP Act (affirming, varying and setting aside agency decisions totalled 68 not 98 as previously reported)

5. Outcomes of external review decisions

Review number	Agency	Date of decision	Outcome	Outcome type	Section decision
317431	Department of Transport and Main Roads	2/07/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
317429	Office of the Director of Public Prosecutions	2/07/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
317651	Queensland Corrective Services	25/07/2024	decision s.123 - affirming agency response - IPA	refusal to deal	IP Act - s.59
317434	Queensland Police Service	29/07/2024	decision s.123 - varying agency response - IPA	refusal to deal	IP Act - s.62, IP Act - s.67(1)
318020	Department of Justice and Attorney-General	7/08/2024	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
318075	Queensland Police Service	8/08/2024	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(a), RTI Act - s.47(3)(b)
317658	Queensland Corrective Services	12/08/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(b)
317276	Queensland Police Service	12/08/2024	decision s.110 - set aside agency response - RTI	refusal to deal	RTI Act - s.41
317189	Queensland Building and Construction Commission	13/08/2024	decision s.110 - affirming agency response - RTI	access refused	RTI Act - s.47(3)(a), RTI Act - s.47(3)(b), RTI Act - s.47(3)(e)
318040	Department of Justice and Attorney-General	16/08/2024	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), IP Act - s.88, RTI Act - s.47(3)(b), RTI Act - s.47(3)(e)
317683	Queensland Police Service	20/08/2024	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(a)
317632	Metro South Hospital and Health Service	22/08/2024	decision s.110 - affirming agency response - RTI	access refused	RTI Act - s.47(3)(b)
317873	Legal Practitioners Admissions Board	26/08/2024	decision s.110 - affirming agency response - RTI	access refused	RTI Act - s.47(3)(b)

Review number	Agency	Date of decision	Outcome	Outcome type	Section decision
317861	Sunshine Coast Regional Council	10/09/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(a)
317928	Council of the City of Gold Coast	19/09/2024	decision s.110 - set aside agency response - RTI	access granted - full	RTI Act - s.47(3)(b)
317705	Department of Transport and Main Roads	19/09/2024	decision s.110 - affirming agency response - RTI	access granted - full	RTI Act - s.37, RTI Act - s.47(3)(b)
317882	Queensland Corrective Services	24/09/2024	decision s.123 - affirming agency response - IPA	refusal to deal	IP Act - s.62
317894	Logan City Council	26/09/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1)
317940	Griffith University	2/10/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
318032	Queensland Police Service	4/10/2024	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
318037	Department of State Development and Infrastructure	10/10/2024	decision s.110 - affirming agency response - RTI	access refused	RTI Act - s.47(3)(b)
318077	Lockyer Valley Regional Council	15/10/2024	decision s.123 - affirming agency response - IPA	access refused - part	IP Act - s.67(1), RTI Act - s.47(3)(b)
318066	Queensland Police Service	18/10/2024	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(a), RTI Act - s.47(3)(b), RTI Act - s.47(3)(e)
317570	Department of Environment, Science and Innovation	22/10/2024	decision s.110 - set aside agency response - RTI	access granted - full	
318266	Brisbane City Council	23/10/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(b)
317842	Department of Transport and Main Roads	23/10/2024	decision s.110 - affirming agency response - RTI	access granted - full	RTI Act - s.47(3)(b)

Review number	Agency	Date of decision	Outcome	Outcome type	Section decision
316490	Hon Mick de Brenni MP, Minister for Energy, Renewables and Hydrogen and Minister for Public Works an	24/10/2024	decision s.110 - varying agency response - RTI	access refused	RTI Act - s.47(3)(b), RTI Act - s.47(3)(e), RTI Act - s.73
317300	Gold Coast Hospital and Health Service	30/10/2024	decision s.123 - varying agency response - IPA	access refused - part	IP Act - s.67(1), IP Act - s.88, RTI Act - s.47(3)(b), RTI Act - s.47(3)(e)
317685	Townsville Hospital and Health Service	7/11/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
317700	Townsville Hospital and Health Service	7/11/2024	decision s.123 - set aside agency response - IPA	access refused	IP Act - s.66, IP Act - s.67(1), RTI Act - s.47(3)(e)
317172	Department of the Environment, Tourism, Science and Innovation	12/11/2024	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(a)
317214	Cairns Regional Council	14/11/2024	decision s.110 - set aside agency response - RTI	access granted - full	RTI Act - s.47(3)(b)
317646	Department of State Development, Infrastructure and Planning	18/11/2024	decision s.123 - varying agency response - IPA	access refused	RTI Act - s.47(3)(e)
317983	Metro North Hospital and Health Service	19/11/2024	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(a), RTI Act - s.47(3)(b)
317972	Queensland Police Service	19/11/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1)
317485	Legal Services Commission	20/11/2024	decision s.123 - set aside agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
318035	Department of Justice	22/11/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)

Review number	Agency	Date of decision	Outcome	Outcome type	Section decision
316475	Department of Energy and Public Works	25/11/2024	decision s.110 - varying agency response - RTI	access refused	RTI Act - s.47(3)(a), RTI Act - s.47(3)(b), RTI Act - s.47(3)(e), RTI Act - s.55(2)
317724	Department of State Development, Infrastructure and Planning	27/11/2024	decision s.110 - set aside agency response - RTI	access granted - full	RTI Act - s.47(3)(a), RTI Act - s.47(3)(b)
317897	Energex	28/11/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(a), RTI Act - s.47(3)(e)
317898	Energy Queensland Ltd	28/11/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(a), RTI Act - s.47(3)(e)
317573	Department of Housing and Public Works	3/12/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
317941	Brisbane City Council	12/12/2024	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(a), RTI Act - s.47(3)(b)
318004	Department of the Premier and Cabinet	18/12/2024	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
317179	Crime and Corruption Commission	19/12/2024	decision s.110 - varying agency response - RTI	access refused	RTI Act - s.47(3)(a), RTI Act - s.47(3)(b), RTI Act - s.55(2), RTI Act - s.73, RTI Act - s.94(1)(a)
317980	Department of Justice	16/01/2025	decision s.123 - affirming agency response - IPA	refusal to deal	IP Act - s.60
317741	Griffith University	10/02/2025	decision s.123 - varying agency response - IPA	access refused	RTI Act - s.47(3)(e)
317523	Department of State Development, Infrastructure and Planning	11/02/2025	decision s.123 - varying agency response - IPA	access refused	RTI Act - s.47(3)(e)
317657	Office of the Health Ombudsman	11/02/2025	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)

Review number	Agency	Date of decision	Outcome	Outcome type	Section decision
317910	Queensland Rail	18/02/2025	decision s.110 - affirming agency response - RTI	access refused	RTI Act - s.47(3)(a), RTI Act - s.47(3)(b)
317888	Department of Justice	27/02/2025	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), IP Act - s.88
318232	Griffith University	27/02/2025	decision s.123 - varying agency response - IPA	access refused	IP Act - s.88, RTI Act - s.47(3)(b), RTI Act - s.47(3)(e)
317953	Queensland Corrective Services	28/02/2025	decision s.123 - affirming agency response - IPA	neither confirm nor deny	IP Act - s.69(2)
317697	Department of Education	6/03/2025	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
318064	Department of State Development, Infrastructure and Planning	12/03/2025	decision s.110 - affirming agency response - RTI	access application not compliant	RTI Act - s.24, RTI Act - s.33
317819	Griffith University	13/03/2025	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
317655	Darling Downs Hospital and Health Service	20/03/2025	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), IP Act - s.88, RTI Act - s.47(3)(a), RTI Act - s.47(3)(b)
317678	Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development	21/03/2025	decision s.123 - varying agency response - IPA	access refused	IP Act - s.88, RTI Act - s.47(3)(d)
317730	Queensland Building and Construction Commission	24/03/2025	decision s.110 - varying agency response - RTI	access refused	RTI Act - s.47(3)(e)
318252	Queensland Police Service	25/03/2025	decision s.123 - varying agency response - IPA	refusal to deal	IP Act - s.62
317908	Queensland Ombudsman	26/03/2025	decision s.110 - affirming agency response - RTI	access refused	RTI Act - s.47(3)(b)
317959	Fraser Coast Regional Council	1/04/2025	decision s.110 - affirming agency response - RTI	access refused - part	RTI Act - s.47(3)(b)

Review number	Agency	Date of decision	Outcome	Outcome type	Section decision
317669	The Public Trustee of Queensland	2/04/2025	decision s.110 - varying agency response - RTI	access refused	RTI Act - s.47(3)(e)
317746	Queensland Police Service	8/04/2025	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
317604	Sunshine Coast Regional Council	16/04/2025	decision s.110 - affirming agency response - RTI	application outside scope of the Act	RTI Act - s.32
318127	Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development	17/04/2025	decision s.110 - affirming agency response - RTI	access granted - full	RTI Act - s.47(3)(a), RTI Act - s.47(3)(b)
317885	Queensland Building and Construction Commission	30/04/2025	decision s.110 - affirming agency response - RTI	application outside scope of the Act	RTI Act - s.32
318386	Department of Justice	6/05/2025	decision s.123 - affirming agency response - IPA	access refused	RTI Act - s.47(3)(e)
318121	Department of the Premier and Cabinet	7/05/2025	decision s.123 - affirming agency response - IPA	access refused	RTI Act - s.47(3)(e)
318295	Department of State Development Infrastructure Local Government and Planning	22/05/2025	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.54
317694	Queensland Police Service	22/05/2025	decision s.110 - varying agency response - RTI	access refused	RTI Act - s.47(3)(a), RTI Act - s.47(3)(b), RTI Act - s.47(3)(e)
318131	Toowoomba Regional Council	28/05/2025	decision s.110 - affirming agency response - RTI	access refused	RTI Act - s.47(3)(b)
318388	Department of Transport and Main Roads	29/05/2025	decision s.123 - set aside agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(a)
318033	Griffith University	3/06/2025	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)

Review number	Agency	Date of decision	Outcome	Outcome type	Section decision
318378	Queensland Health	10/06/2025	decision s.123 - affirming agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
318031	Department of Youth Justice and Victim Support	11/06/2025	decision s.123 - varying agency response - IPA	access refused - part	IP Act - s.67(1), RTI Act - s.47(3)(e)
318015	Queensland Police Service	11/06/2025	decision s.123 - set aside agency response - IPA	access refused	IP Act - s.59, RTI Act - s.47(3)(f)
318196	Queensland Police Service	11/06/2025	decision s.110 - affirming agency response - RTI	access refused	RTI Act - s.47(3)(a)
317974	Queensland Building and Construction Commission	16/06/2025	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), IP Act - s.88, RTI Act - s.47(3)(a), RTI Act - s.47(3)(b), RTI Act - s.47(3)(e), RTI Act - s.47(3)(f)
317883	Department of State Development, Infrastructure and Planning	18/06/2025	decision s.123 - set aside agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(e)
318479	Queensland Police Service	18/06/2025	decision s.110 - affirming agency response - RTI	access refused	RTI Act - s.47(3)(a), RTI Act - s.47(3)(b)
318201	Department of Justice	19/06/2025	decision s.110 - varying agency response - RTI	access refused	RTI Act - s.12, RTI Act - s.47(3)(e)
317960	Department of the Environment, Tourism, Science and Innovation	19/06/2025	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(b), RTI Act - s.47(3)(e)
317991	Department of the Environment, Tourism, Science and Innovation	19/06/2025	decision s.123 - varying agency response - IPA	access refused	IP Act - s.67(1), RTI Act - s.47(3)(b), RTI Act - s.47(3)(e)
318261	Metro North Hospital and Health Service	19/06/2025	decision s.123 - affirming agency response - IPA	access refused	RTI Act - s.47(3)(b)

Review number	Agency	Date of decision	Outcome	Outcome type	Section decision
318469	Department of Transport and Main Roads	23/06/2025	decision s.110 - affirming agency response - RTI	access granted - full	RTI Act - s.47(3)(b)
317896	Department of State Development, Infrastructure and Planning	24/06/2025	decision s.110 - varying agency response - RTI	access refused	RTI Act - s.73
318570	Department of Housing and Public Works	25/06/2025	decision s.123 - affirming agency response - IPA	application not compliant	IP Act - s.53
317121	Board of Professional Engineers of Queensland	30/06/2025	decision s.110 - set aside agency response - RTI	access refused	RTI Act - s.47(3)(a), RTI Act - s.47(3)(b), RTI Act - s.47(3)(e), RTI Act - s.73

6. RTI regulation reporting requirements not captured elsewhere in annual report

RTI requirements	
Right to Information Regulation part 4 section 7	Outcome
(d) the number of times and the way in which the commissioner has used the entitlement to full and free access to documents under section 100 of the RTI Act*	3
(f) the number of applications for extension of the 10-year period received by the commissioner under schedule 4, part 4, item 1 of the RTI Act and the commissioner's decision for each application	0

* Section 100 of the RTI Act is read in conjunction with section 103 of that Act.

7. 2024-25 applications for external review of decisions made by agencies and Ministers

Boards, commissions, Government Owned Corporations and other bodies	
Board of Professional Engineers of Queensland	2
Crime and Corruption Commission	4
Energy Queensland Ltd	1
Ergon Energy	1
Far North Queensland Ports Corporation Ltd	1
Legal Aid Queensland	3
Legal Services Commission	1
Mental Health Review Tribunal	1
Office of the Director of Public Prosecutions	1
Office of the Health Ombudsman	9
Office of the Public Guardian	1
Queensland Building and Construction Commission	3
Queensland Civil and Administrative Tribunal	2
Queensland Courts	1
Queensland Human Rights Commission	1
Queensland Industrial Relations Commission	1
Queensland Ombudsman	3
Queensland Racing Integrity Commission	1
Queensland Rural and Industry Development Authority	2
Residential Tenancies Authority	2
Resources Safety and Health Queensland	1
Stadiums Queensland	1
Sunwater Limited	2
The Public Trustee of Queensland	1
WorkCover Queensland	3
Sub-total	49
Departments	
Department of Agriculture and Fisheries	2
Department of Child Safety, Seniors and Disability Services	6
Department of Customer Services, Open Data and Small and Family Business	2
Department of Education	11
Department of Environment, Science and Innovation	1
Department of Families, Seniors, Disability Services and Child Safety	27
Department of Housing and Public Works	8
Department of Housing, Local Government, Planning and Public Works	2
Department of Justice	21
Department of Justice and Attorney-General	3
Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development	7
Department of Primary Industries	1
Department of Regional Development, Manufacturing and Water	2
Department of Resources	2
Department of State Development and Infrastructure	4
Department of State Development, Infrastructure and Planning	15
Department of the Environment, Tourism, Science and Innovation	13

Departments cont.	
Department of the Premier and Cabinet	3
Department of Trade, Employment and Training	1
Department of Transport and Main Roads	17
Department of Youth Justice	1
Economic Development Queensland	1
Office of the Premier	1
Queensland Ambulance Service	1
Queensland Corrective Services	25
Queensland Fire Department	11
Queensland Health	11
Queensland Police Service	166
Queensland Treasury	6
Sub-total	371
Hospital and Health Services	
Cairns and Hinterland Hospital and Health Service	12
Children's Health Queensland Hospital and Health Service	8
Darling Downs Hospital and Health Service	1
Gold Coast Hospital and Health Service	8
Mackay Hospital and Health Services	1
Metro North Hospital and Health Service	31
Metro South Hospital and Health Service	14
Sunshine Coast Hospital and Health Service	8
West Moreton Hospital and Health Service	5
Wide Bay Hospital and Health Service	3
Sub-total	91
Local governments	
Brisbane City Council	27
Bundaberg Regional Council	2
Cairns Regional Council	3
City of Moreton Bay	10
Council of the City of Gold Coast	12
Douglas Shire Council	2
Fraser Coast Regional Council	1
Gladstone Regional Council	1
Ipswich City Council	1
Logan City Council	9
Mackay Regional Council	3
Mareeba Shire Council	2
Noosa Shire Council	1
Redland City Council	4
Rockhampton Regional Council	2
Scenic Rim Regional Council	2
Sunshine Coast Regional Council	6
Toowoomba Regional Council	3
Townsville City Council	1
Whitsunday Regional Council	3
Sub-total	95

Ministers	
Deb Frecklington, Attorney-General and Minister for Justice and Minister for Integrity	1
Hon Cameron Dick, Deputy Premier, Treasurer and Minister for Trade and Investment	1
Hon Daniel Purdie MP, Minister for Police and Emergency Services	2
Hon Leanne Linard, Minister for the Environment and the Great Barrier Reef and Minister for Science	3
Hon Shannon Fentiman MP, Minister for Health, Mental Health and Ambulances. Minister for Women	1
Hon Steven Miles MP, Premier	6
Sub-total	14
Universities	
Griffith University	12
James Cook University	4
Queensland University of Technology	1
The University of Southern Queensland	1
The University of Queensland	5
Sub-total	23
TOTAL	643

* In 2024-2025, a machinery-of-government change on 1 November 2024 resulted in several changes to departments. The name used in this table is the name of the entity at the time the review commenced.

8. Information privacy regulation reporting requirements not captured elsewhere in annual report

Information Privacy requirements	
Information Privacy Regulation part 4 section 5(1)	
(c) the number of times and the way in which the commissioner has used the entitlement to full and free access to documents under section 113 of the IP Act*	
(e) approval of waivers or modifications of the privacy principles under chapter 4, part 5 of the IP Act	0
(f) compliance notices given under chapter 4, part 6 of the IP Act	0
Information Privacy Regulation part 4 section 5(2)	
(a) the number of complaints the commissioner has declined to deal with or has declined to continue dealing with	88
(b) the grounds for declining to deal with the complaints under paragraph (a)	
i. No jurisdiction – section 164 not triggered	8
ii. Section 168(1)(a) – not an individual's personal information	3
iii. Section 168(1)(b) - requirements under section 166(3) not met	27
iv. Section 168(1)(c) - frivolous, vexatious, misconceived or lacking in substance	41
v. Section 168(1)(e) - provision of more time to entity	4
vi. Section 168(1)(f) - more than 12 months since complaint aware of breach	24
vii. Section 168(2)(a) - the complainant does not comply with a reasonable request	1
viii. Section 168(2)(b) complainant has not cooperated in the commissioner's dealing with the complaint	1
ix. No jurisdiction - Exempt entity under sch 2 pt 1	1
(c) the categories of relevant entities to which the 110 finalised complaints relate	
i. Boards/commissions/other bodies	20
ii. Departments	55
iii. Hospital and health services	9
iv. Local governments	14
v. Universities	5
v. Outside jurisdiction	16
(d) the provisions of the privacy principles to which the complaints relate	
i. IPP1 (lawful and fair collection)	34
ii. IPP2 (collection requested from individual)	16
iii. IPP3 (collected information is relevant and current)	17
iv. IPP4 (storage and security)	26
v. IPP5 (information concerning personal information)	1
vi. IPP6 (access)	8
vii. IPP7 (amendment)	7
viii. IPP8 (accuracy of personal information)	15
ix. IPP9 (use of personal information for relevant purpose)	18
x. IPP10 (alternative use)	28
xi. IPP11 (disclosure to third party)	82
xii. NPP2 (use and disclosure)	9
xiii. NPP3 (information is current)	1
xiv. NPP4 (data security)	2
xv. Chapter 2 part 4 (bound contracted service provider)	1
xvi. Section 33 (transfer of personal information outside Australia)	1
(e) the number of complaints referred by the commissioner to other entities under section 169 of the Act	0

* Section 113 of the IP Act is read in conjunction with section 116 of that Act.

A privacy complaint can involve more than one privacy principle.

Note – Information in this appendix in previous years now appears within the relevant section of this annual report, for example, privacy advice and complaint mediation.

9. 2024-25 privacy complaints received by agency profile

Agency	
Boards/commissions/other bodies	25
Departments	82
Hospital and health services	16
Bound contracted service providers	1
Local government	19
Universities	8
Ministers	1
Outside Jurisdiction	16
Total	168

10. 2024-25 privacy complaints received about an agency or Minister

Boards, commissions and other bodies	
Crime and Corruption Commission Queensland	1
Director Child Protection Litigation	2
Legal Aid Queensland	2
Legal Services Commission	2
Mental Health Review Tribunal	1
Office of the Health Ombudsman	1
Office of the Information Commissioner	1
Public Trust Office	1
Queensland Building and Construction Commission	7
Queensland Human Rights Commission	1
Queensland Industrial Relations Commission	1
The Public Trustee of Queensland	2
WorkCover Queensland	5
Sub-total	27
Bound contracted service providers	
Norton Rose Fulbright Australia	1
Sub-total	1
Departments	
Department of Customer Services, Open Data and Small and Family Business	1
Department of Education	15
Department of Families, Seniors, Disability Services and Child Safety	11
Department of Housing and Public Works	1
Department of Housing, Local Government, Planning and Public Works	2
Department of Justice	7
Department of Justice and Attorney-General	2
Department of Primary Industries	1
Department of State Development and Infrastructure	1
Department of State Development, Infrastructure and Planning	1
Department of the Environment, Tourism, Science and Innovation	1
Department of Transport and Main Roads	7
Queensland Corrective Services	1

Departments cont.	
Queensland Health	2
Queensland Police Service	29
Sub-total	82
Hospital and health services	
Central Queensland Hospital and Health Service	2
Gold Coast Hospital and Health Service	2
Metro North Hospital and Health Service	2
Metro South Hospital and Health Service	5
Torres and Cape Hospital and Health Service	1
Townsville Hospital and Health Service	1
West Moreton Hospital and Health Service	2
Wide Bay Hospital and Health Service	1
Sub-total	16
Local governments	
Banana Shire Council	1
Brisbane City Council	2
Fraser Coast Regional Council	1
Gympie Regional Council	3
Logan City Council	2
Mackay Regional Council	1
North Burnett Regional Council	1
Redland City Council	2
Rockhampton Regional Council	1
Scenic Rim Regional Council	1
Somerset Regional Council	2
Sunshine Coast Regional Council	1
Townsville City Council	1
Sub-total	19
Ministers	
Hon Yvette D'Ath, Attorney-General and Minister for Justice and Minister for the Prevention of Domestic Violence	1
Sub-total	1
Outside jurisdiction*	
Private entity out of jurisdiction	15
Magistrates Court	1
Sub-total	16
Universities	
Griffith University	2
Queensland University of Technology	2
University of Southern Queensland	1
University of the Sunshine Coast	1
Sub-total	6
TOTAL	168

* Entities listed as outside jurisdiction include those not within the scope of the IP Act because they are not an 'agency' for the purposes of that Act, or a bound contracted service provider. Other entities listed in categories of complaints received from agencies may also be determined to be entities to which the privacy principles do not apply in relation to a particular function, for example, a court's judicial functions (see IP Act, section 19 and Schedule 2, Part 2).

11. Compliance checklist

Summary of requirement		Basis for requirement	Annual report reference
Letter of compliance	<ul style="list-style-type: none"> A letter of compliance from the accountable officer or statutory body to the relevant Minister/s 	ARRs – section 7	i
Accessibility	<ul style="list-style-type: none"> Table of contents Glossary 	ARRs – section 9.1	i 77
	<ul style="list-style-type: none"> Public availability 	ARRs – section 9.2	Inside front cover
	<ul style="list-style-type: none"> Interpreter service statement 	<i>Queensland Government Language Services Policy</i> ARRs – section 9.3	Inside front cover
	<ul style="list-style-type: none"> Copyright notice 	<i>Copyright Act 1968</i> ARRs – section 9.4	Inside front cover
	<ul style="list-style-type: none"> Information Licensing 	<i>QGEA – Information Licensing</i> ARRs – section 9.5	Inside front cover
General information	<ul style="list-style-type: none"> Introductory Information 	ARRs – section 10	2
Non-financial performance	<ul style="list-style-type: none"> Government's objectives for the community and whole-of-government plans/specific initiatives 	ARRs – section 11.1	N/A
	<ul style="list-style-type: none"> Agency objectives and performance indicators 	ARRs – section 11.2	3, 6-7
	<ul style="list-style-type: none"> Agency service areas and service standards 	ARRs – section 11.3	8-23
Financial performance	<ul style="list-style-type: none"> Summary of financial performance 	ARRs – section 12.1	34-35
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	<ul style="list-style-type: none"> Executive management 	ARRs – section 13.2	24-25
	<ul style="list-style-type: none"> Government bodies (statutory bodies and other entities) 	ARRs – section 13.3	N/A
	<ul style="list-style-type: none"> Public Sector Ethics 	<i>Public Sector Ethics Act 1994</i> ARRs – section 13.4	28
	<ul style="list-style-type: none"> Human Rights 	<i>Human Rights Act 2019</i> ARRs – section 13.5	2, 31
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	<ul style="list-style-type: none"> Early retirement, redundancy and retrenchment 	<i>Directive No.04/18 Early Retirement, Redundancy and Retrenchment</i> ARRs – section 15.2	26
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	<ul style="list-style-type: none"> Consultancies 	ARRs – section 31.1	34-35, https://data.qld.gov.au
	<ul style="list-style-type: none"> Overseas travel 	ARRs – section 31.2	35, https://data.qld.gov.au
	<ul style="list-style-type: none"> Queensland Language Services Policy 	ARRs – section 31.3	N/A
	<ul style="list-style-type: none"> Charter of Victims' Rights 	<i>VCSVRB Act 2024</i> ARRs – section 31.4	N/A
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FAA
FPMS
ARRs

Financial Accountability Act 2009
Financial and Performance Management Standard 2019
Annual report requirements for Queensland Government agencies

Glossary

Application

A formal request to access or amend government-held information made to an agency or Minister under the IP or RTI Act.

Best practice

A method or technique for accomplishing a business outcome that has consistently shown results superior to those achieved by other means, used as an industry benchmark.

Decision

A formal, written decision from the Information Commissioner on an external review application to affirm, vary, or set aside a decision made by an agency or Minister.

Early resolution

A flexible conciliation-based process in which OIC seeks to resolve an external review application by negotiating a mutually acceptable outcome with the parties, without the need for a formal written decision.

External Review

OIC's independent merits review of Queensland government agencies and Ministers' decisions about access to information under the right to information legislation and access to, or amendment of, documents under the information privacy legislation.

Open data

Open data is data that organisations, businesses and individuals made available for anyone to access, use and share.

Privacy complaint

A complaint alleging that an agency has failed to comply with the privacy principles or a waiver or modification approval under the IP Act.

Privacy principles

A set of rules that prescribe how Queensland government agencies and Ministers must manage the personal information they collect, hold, use and disclose.

QCAT

The Queensland Civil and Administrative Tribunal is an independent tribunal which actively resolves disputes.

Right to information (RTI)

The legislative and administrative framework that allows individuals to access information held by Queensland government agencies.

Service

A group of related activities contributing to a common organisational objective.

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