



Office of the Information Commissioner
Queensland

IPOLA

IPOLA Reforms

Stakeholder engagement report

Stakeholder engagement status post phase 2 survey
response, September-October 2024

The OIC engaged with Privacy and RTI practitioners across Queensland, through a survey in September and October 2024. The outcomes of this survey and previous engagement in June/July 2024 continues to guide OIC in refining scheduled training and the development of resources to support agencies prepare for the commencement of the *Information Privacy and Other Legislation Amendment Act 2023*.

Background

In June and July 2024, the OIC engaged with practitioners to guide the roll out of products to support public sector agencies prepare for the reforms of the Information Privacy and Other Legislation Amendment Act (IPOLA) that is proposed to commence on 1 July 2025 (or 1 July 2026 for the Mandatory Notification of Data Breach (MNDB) scheme in local councils).

Via a survey and focus groups, stakeholders:

- prioritised the provision of Guidelines as their key requirement
- highlighted a need for information on the MNDB scheme, the new Queensland privacy principles (QPP's) and the new definition of personal information in particular, and
- requested training via face-to-face opportunities across the state, and virtually.

A report outlining the consolidated feedback is available via OIC's website.

In response to this feedback, the OIC has developed and published a broad range of Guidelines including those referencing the MNDB scheme, QPP's and new definition of personal information; rolled out Stage 1 – Awareness training via a statewide roadshow with virtual follow up sessions; and communicated regular updates via weekly and quarterly newsletters.

Survey capture and response

In September 2024, it was timely to again check in with stakeholders to ensure the Guidelines, training and communication were responding to requirements.

A second stakeholder survey captured:

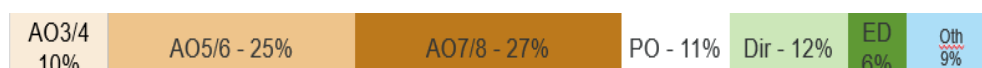
- stakeholder access to, and satisfaction with the OIC's IPOLA webpage, Guidelines, newsletters and training
- self-rated levels of IPOLA awareness before and after Stage 1 – Awareness training
- changes to stakeholder top priorities and preferences for information
- any adjustment in approaches by agencies to undertake activities to prepare for the reforms

From the second survey, the OIC received 172 responses across a broad range of public sector agencies and officer roles.

Survey response by agency



Officer representation:





67% of survey respondents told us their agencies were currently undertaking some form of IPOLA awareness activities, similar to the reported levels in the previous survey.

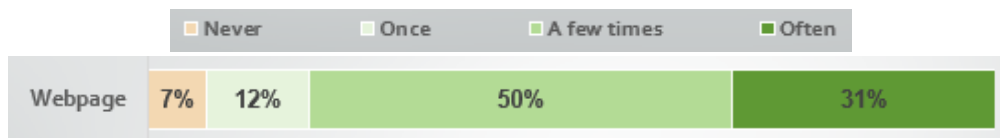
However, agency awareness activities are now far broader than previously reported with almost half the respondents stating that activities were being undertaken across their agency, as opposed to only within Privacy or Right to Information teams.

Stakeholder access to, and satisfaction with IPOLA collateral

IPOLA webpage

93% of survey respondents had visited the IPOLA website at least once.

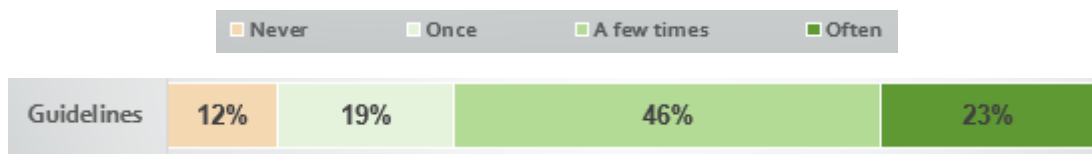
Access



IPOLA Guidelines

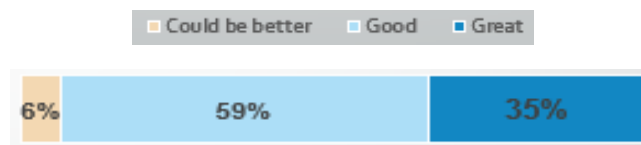
88% of survey respondents had accessed an IPOLA Guideline at least once with two-thirds accessing at least a few times.

Access



94% of survey participants were satisfied with the Guidelines, rating them as good or great

Satisfaction



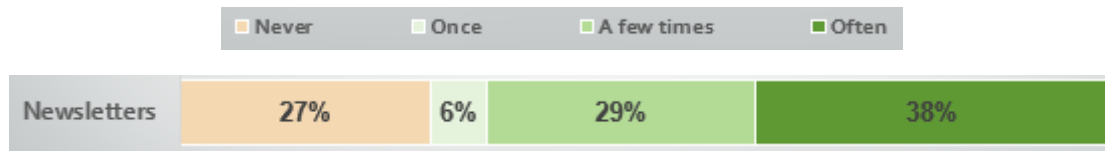
Comments on improving the Guidelines focused on:

- using simple English
- more visual content, including images, workflows, flowcharts or diagrams
- digestible formatting that helps the reader understand the flow of the content (key information boxes, practical examples of content)
- case studies or examples to explain key concepts.

IPOLA newsletters

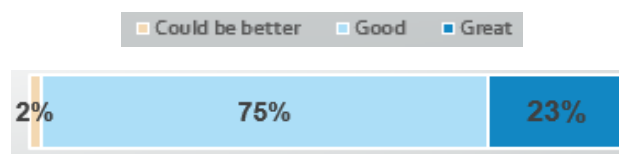
63% of respondents had accessed IPOLA newsletters at least once.

Access



Of those who had accessed newsletters, 98% were satisfied.

Satisfaction



Additional comments were limited and conflicting, including “..there is so much information...” and ‘.....they’re a bit brief. I need more information!’

IPOLA training

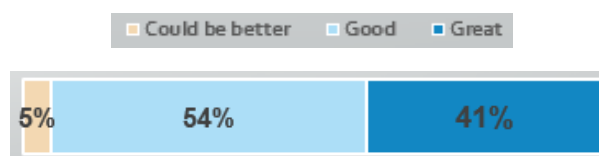
81% of survey respondents had attended Stage 1 – Awareness IPOLA training.

Access



95% of respondents were satisfied with the training.

Satisfaction



Significant positive feedback was received in relation to:

- the presenter’s style and approach to the delivery of Stage 1 training
- OIC’s commitment and delivery of face-to-face training regionally
- sharing of knowledge and experience in a face-to-face setting.

Attendees noted their readiness for further training opportunities focusing on in-depth information and practical advice to implement the reforms.

The following improvement opportunities were provided:

- the limited time spent on RTI amendments in Stage 1, with respondents requesting specific future RTI training
- offering practitioner specific training

- more practical examples of applying the legislation.

It is noted that OIC’s Stage 2 – Build Knowledge training includes a separate RTI training module and scenarios across the three training modules provided (RTI, the MNDB scheme and QPP’s).

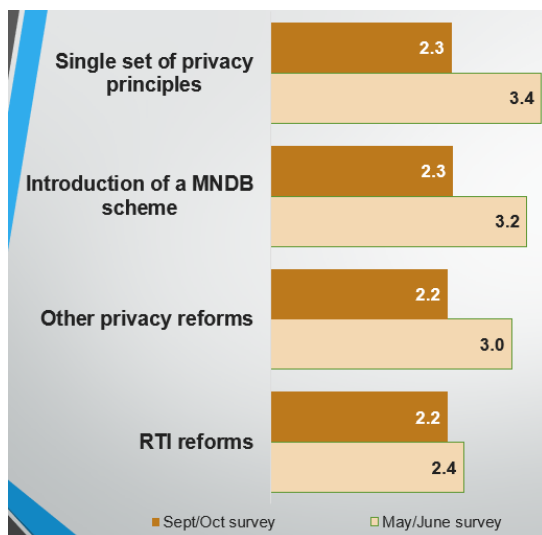
Respondents who did not attend Stage 1 training were asked to share their reasons why. These included:

- prior understanding of the reforms
- waiting for online training
- scheduling conflicts, including leave
- work priorities
- lack of availability (specifically in relation to a Brisbane session).

Awareness of the IPOLA reforms (self-rated)

On a 5-point scale, where 1 indicates limited awareness and 5 indicates expert level of awareness, respondents scored their awareness of the IPOLA reforms between 2.3 (for QPP’s and the MNDB scheme) and 2.2 (for other privacy reforms and the RTI amendments).

Interestingly, the levels rated in the latest survey are below the ratings in the June/July survey, particularly for the privacy reforms:



This may be explained by:

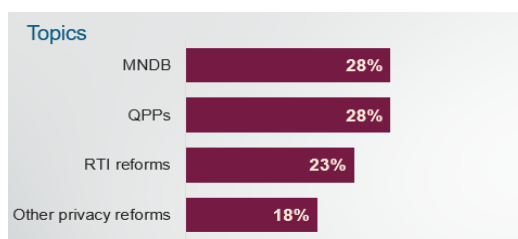
- differences in samples – the latest survey received more than three times the responses across a more diverse range of agencies, and/or
- some re-calibration of awareness of the key privacy reforms as participants begin to recognise the complexities and requirements of the QPP’s and/or MNDB scheme.

Stakeholder priorities

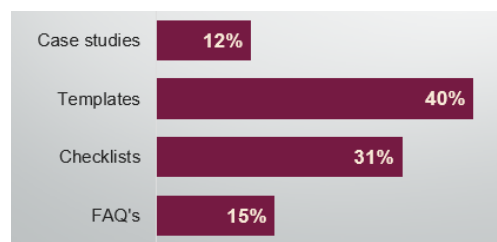
The topic and resource priorities identified by respondents align with prior feedback.

The MNDB scheme and QPPs remain the top priority and, with the publication of Guidelines, respondents are now seeking practical resources to support them prepare for the reforms, particularly templates and checklists. Templates for an MNDB policy and register were noted by several respondents as their top priorities.

Topic priorities



Resource priorities



A comparison of feedback across the two surveys is provided as Attachment A.

Next steps

Overall, the feedback demonstrates a strong engagement in the collateral delivered by the OIC, and positive levels of satisfaction across the products delivered (Guidelines, training, webpage, and communication). Stakeholders have demonstrated a readiness to commence practical learning and knowledge building training activities and are seeking practical resources such as checklists and templates to support their preparation for implementation of the reforms.

The IPOLA team will use this feedback to inform:

- Stage 2 – Build Knowledge training approach and content
- the development and prioritisation of other resources.

OIC will continue to communicate and conduct further engagement activities with stakeholders on the IPOLA products supporting agency preparation.

We strongly encourage all agencies to get involved by accessing our ever-increasing IPOLA resources, which are available on the OIC website, and participating in the training opportunities available (Stage 2 training is rolling out from late October 2024).



Attachment A – Comparison of feedback

This table provides a comparison of feedback across the two stakeholder surveys distributed in June (survey #1) and September (survey #2)

Privacy	
Survey #1	Survey #2
Specific training/resource requests	
<ul style="list-style-type: none"> case studies comparing new and old QPP's updated PIA form annotated legislation 	<ul style="list-style-type: none"> checklists templates case studies/scenarios annotated legislation mini quizzes
Advice on specific topics	
<ul style="list-style-type: none"> managing privacy complaints within the new timeframes, particularly with reference to the removal of s.166(3)(2) managing pseudonym applications 	<ul style="list-style-type: none"> QPP training collection notices Privacy Impact Assessments
MNDB scheme	
Survey #1	Survey #2
Specific training/resource requests	
<ul style="list-style-type: none"> scenario(s) of the end-to-end management of an MNDB incident definition of serious harm and guidance on agency consideration policy development (checklist and template suggested) 	<ul style="list-style-type: none"> practical training with scenarios and case studies template/s for policy template/checklist for notification template for MNDB register
Advice on specific topics	
	<ul style="list-style-type: none"> MNDB end to end (key elements) – <i>What does best practice look like?</i> MNDB – learnings from other jurisdictions – <i>What went well, not so well.</i>
RTI	
Survey #1	Survey #2
Specific training/resource requests	
<ul style="list-style-type: none"> training and resources to help officers understand the multiple changes to processing access and amendment applications (comparison of new and existing suggested) 	<ul style="list-style-type: none"> practical training to complete scenarios and case studies focussed on processing an application templates checklist more detailed/specific training sessions relating to RTI processing



Advice on specific topics	
<ul style="list-style-type: none"> requirements of an application received without an approved form managing mixed applications the impact of the single right of access reforms on statistical reporting when and how the remittal powers will be used 	<ul style="list-style-type: none"> N/A
General	
Survey #1	Survey #2
Other	
<ul style="list-style-type: none"> OIC coordinate information updates on other government agency websites (e.g. ForGov) 	<ul style="list-style-type: none"> PowerPoint slide deck to enable stakeholders to share information with executives and managers, ICT, governance, and risk teams. short training recordings/videos.