
IPOLA GUIDELINE

Transitional arrangements

GUIDELINE *Right to Information Act 2009* and *Information Privacy Act 2009*

Access applications made before 1 July 2025

This guide does not reflect the current law.

It highlights important changes to the *Right to Information Act 2009* in a general way.

This guide is not legal advice and additional factors may be relevant in specific circumstances. For detailed guidance, legal advice should be sought.

On 1 July 2025, significant amendments to the *Right to Information Act 2009* (RTI Act) and *Information Privacy Act 2009* (Qld) (IP Act) will commence. These impact both the processing of access and amendment applications and the Act under which they are made.

Existing access and amendment applications

The changes to the IP and RTI Acts do not apply to access or amendment applications¹ made before, and not finalised by, 1 July 2025.² These applications must be dealt with in accordance with the former RTI and/or IP Act as it existed when the application was received.

Refer to ***Disclosure logs*** for more information.

Refusal to deal – previous application for same documents

Sections 43 and 78P of the RTI Act allow an agency³ to refuse to deal with an access or amendment application to the extent it relates to documents previously applied for. Sections 206M and 206N of the RTI Act provide that the previous application, as mentioned in sections 43 and 78P, may include an access or amendment application made under the former IP Act.

¹ Whether compliant or noncompliant

² Section 206K of the RTI Act for RTI applications made before the amendments and section 217 of the IP Act for access and amendment applications made under the former IP Act.

³ In this guideline, references to an agency include a Minister unless otherwise specified.



Refer to ***Refusal to deal – previous application for same documents*** for more information.

Delegations and directions

Delegations, sub-delegations, and directions to deal with an amendment application made under section 50 and 51 of the former IP Act continue to have effect as if they had been made under sections 78H and 78I of the amended RTI Act.⁴

Continued protection

The protections in chapter 6, parts 1 and 2 of the former IP Act continue to apply to giving access or publishing documents in response to access applications under the former IP Act.⁵

Disclosure logs

Disclosure log requirements have changed significantly for departments and Ministers. The new disclosure log requirements apply equally to all agencies and Ministers⁶ and apply to all access applications which have not yet been added to the disclosure log, regardless of when they were made or finalised⁷. A reference to publication of documents in a disclosure log under s78A includes reference to disclosure of documents under the former disclosure log provisions.⁸

Refer to ***Disclosure logs*** for more information.

For additional IPOLA assistance, please contact the IPOLA team by email IPOLA.Project@oic.qld.gov.au

For information and assistance on current legislation, please refer to the OIC's guidelines, or contact the Enquiries Service on 07 3234 7373 or by email enquiries@oic.qld.gov.au

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⁴ Sections 206O and 206P of the RTI Act.

⁵ Section 218 and 225 of the IP Act.

⁶ Section 78A of the RTI Act

⁷ Section 206L of the RTI Act.

⁸ Section 206L of the RTI Act