



Office of the Information Commissioner
Queensland

IPOLA

IPOLA Reforms

Stakeholder feedback and response from engagement
in June and July 2024

The OIC engaged with Privacy and RTI practitioners across Queensland, through a survey and follow up focus groups in June and July 2024. These findings guide OIC in delivering training and resources to support agencies prepare for *Information Privacy and Other Legislation Amendment Act 2023*.



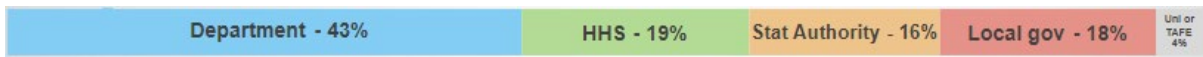
Survey

In June, OIC conducted a survey to capture:

- current, or baseline level of awareness and knowledge of key IPOLA amendments
- activities agencies are undertaking to prepare for the reforms
- information priorities and preferences – the topics at the top of stakeholder’s lists and how they want to receive the information.

OIC received 68 responses across a broad range of public sector agencies.

Survey response by agency

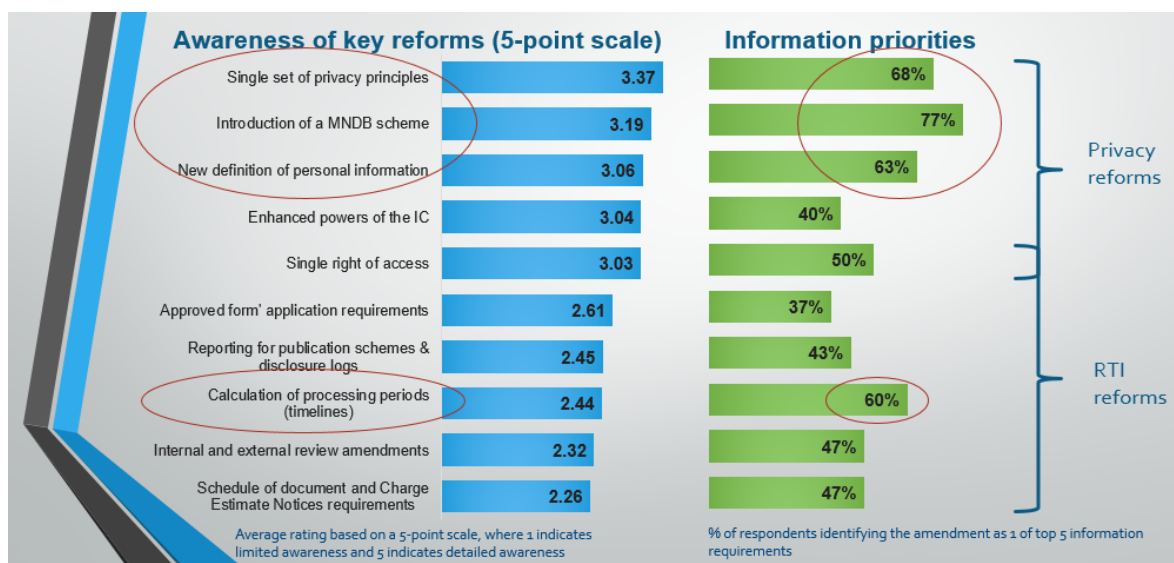


70% of respondents told us their agencies had commenced some awareness activities, including planning, review or redrafting of policies/procedures or forms, engaging with internal business units, and recruitment.

Agency awareness and priorities

On a 5-point scale, where 1 indicates limited awareness and 5 indicates detailed awareness, practitioners scored their current level of awareness of the IPOLA reforms at between 2.2 and 3.4.

Awareness of the changes to the privacy principles and the mandatory notification of data breach (MNDB) scheme is highest, as shown below. Similarly, practitioners prioritise these two areas as their priority for seeking information, followed by information on the new definition of personal information and the processing periods for RTI matters.



Practitioners are seeking Guidelines, followed by templates or forms and checklists, and seek training that is available face-to-face and remotely, with training material made available via OIC’s website.



Focus groups

In July, OIC held four, one-hour focus groups (two for RTI and two for Privacy) as face-to-face and virtual sessions. These provided an opportunity to share plans, and for practitioners to engage with the IPOLA project team and subject matter experts, ask questions, share preferences and concerns.

Overall, participants identified a strong preference for the provision of:

- guidelines relating to the areas of reform
- additional support material that is shorter and visual in nature. Examples highlighted included workflows, checklists, flowcharts and summary reference tools (including a document highlighting changes to the definition of personal information and a one-page QPP reference, now published)
- practical activities in training, such as scenarios and case studies.

The following points were highlighted:

Privacy	MNDB scheme specific	RTI
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"> • 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"> • training and resources to help officers understand the multiple changes to processing access and amendment applications (comparison of new and existing suggested)
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"> • contractor management under MNDB compliance requirements 	<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
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"> • support building senior executive awareness of the MNDB scheme requirements 	-



The IPOLA team presented the planned Training Program to seek feedback. Participants confirmed a preference for real time learning opportunities, including in regional locations, with the provision of training material and a pre-recorded presentation provided as further support.

Next steps

The IPOLA team will incorporate the inputs provided in the training material and resources developed ongoing, and in the prioritisation of specific guidelines and resources.

Thank you to everyone who completed the survey, and to the 163 focus group participants (many attending two sessions), representing 36 public sector entities.

OIC will continue to communicate and conduct further engagement activities throughout the transition year and encourage all stakeholders to get involved so priorities and feedback is captured.