



information
and privacy
commission
new south wales

Final investigation report

Complainant:

Anonymous

Agency:

WorkCover Authority of NSW

Date of report:

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Executive summary

Under section 9(1) of the *Government Information (Public Access) Act 2009* (**GIPA Act**), a person who makes an access application for government information has a legally enforceable right to be provided with the information unless there is an overriding public interest against its disclosure.

In October 2011, the IPC commenced an investigation into whether WorkCover was meeting its obligations under the GIPA Act when dealing with access applications. The investigation was conducted under the *Government Information (Information Commissioner) Act 2009* (**GIIC Act**).

The IPC commenced the investigation in response to complaints received from the complainant.

The scope of this investigation is:

- WorkCover's process in dealing with access applications;
- whether WorkCover has an immediate right of access to information as set out in section 121 of the GIPA Act where that information is contained in records held by private sector entities that provide services to the public on behalf of WorkCover;
- resources available to assist WorkCover in exercising its functions under the GIPA Act; and
- whether WorkCover complies with section 53 of the GIPA Act when conducting searches for information requested in an access application.

This report sets out the findings of our investigation, our recommendations and observations.

In November 2013, the IPC provided WorkCover and the complainant with a provisional report which outlined its provisional findings and recommendations with respect to this investigation. WorkCover provided a response to the IPC's recommendations and observations, which advised that WorkCover will review its processes in light of the recommendations and observations in this report.

The IPC notes the efforts and co-operation of WorkCover during this investigation and the steps it has taken to actively consider its obligations under the GIPA Act.

Summary of findings, recommendations and observations

Findings

1. WorkCover has demonstrated its commitment to implementing both the letter and the spirit of the GIPA Act. However, WorkCover could improve its practices with respect to registration and assessment of access applications to address minor misunderstandings of the legislative provisions in the GIPA Act.
2. WorkCover has an appropriate right of access to information under its Scheme Agent Deeds, as required by section 121 of the GIPA Act.
3. WorkCover has developed helpful resources to assist it in exercising its functions under the GIPA Act in respect of access applications. WorkCover would benefit from expanding these resources to address other obligations under the Act, including a proactive release program.
4. WorkCover complies with section 53 of the GIPA Act when conducting searches for information requested in an access application. WorkCover has adopted a best practice approach to searches and ought to be commended for its efforts in this regard.

Recommendations

1. WorkCover review its processes and procedures for dealing with access applications in accordance with the guidance in this report with respect to the following:
 - a. the date an access application is received by WorkCover is the date it is received by the agency, not the date it is received by the Right to Information Unit. This impacts on the timeframes for dealing with the access application, as set out in the GIPA Act.
 - b. receipt of certified proof of identification is not a requirement for an access application to be valid. Although it is good practice to require proof of identification before releasing personal information (and to ensure that applicants' representatives have authority from the applicant) a failure to provide identification (or proof of authority) does not render an access application invalid.
 - c. it is not open to WorkCover to treat a formal access application as informal regardless of whether or not WorkCover decides to reduce or waive fees and charges associated with the application and regardless of whether or not WorkCover holds or provides access to the requested information. This is because informal applications do not carry with them an enforceable right to access information subject to the public interest test, nor do they carry review rights.
2. As WorkCover reviews its contracts with private sector entities or enters new agreements in the future, it ensures the agreements comply with section 121 of the GIPA Act.
3. WorkCover internally review its compliance with other requirements of the GIPA Act, including requirements with respect to the disclosure of open access information, and WorkCover's proactive release program.

Observations

1. WorkCover staff consistently referred to the availability of and assistance from their manager and senior staff within the Right to Information Unit as well as the Unit's commitment to meeting the objects of the GIPA Act. Staff also noted the benefit of external and internal training and procedural resources developed by WorkCover. WorkCover is to be commended for its leadership in assisting its staff in the Right to Information Unit and for the Unit's work in developing resources to assist its staff.
2. WorkCover's files do not contain all file notes of conversations with applicants or objectors. This is because some of these files notes are kept in individual staff members' notebooks. In our view it would be of benefit to the Unit and, as required, to the IPC as a review body if all records of conversations were kept on the working file.
3. WorkCover procedures, files and templates occasionally use the word "exempt" for documents that may be withheld in response to an access application. In our view this is unhelpful as it reflects the exemption model under the FOI Act rather than the balancing model under the GIPA Act.
4. WorkCover's estimates spreadsheet used for calculating processing charges does not appear to automatically account for 20 hours free processing time if the application is for personal information. It is our understanding that WorkCover does not charge for the first 20 hours if the application is for personal information, as provided for in section 67 of the GIPA Act, and that this is not provided for in the spreadsheet because such applications rarely take 20 hours to complete. However in our view it would be helpful to have this accounted for in the spreadsheet and procedures manual.
5. Some files that we reviewed refer to previous OIC/IPC contact details that are no longer current. We suggest that WorkCover review its template correspondence to ensure the IPC's current contact details are included as appropriate.

Investigation: purpose and process

Outline of investigation powers of the Information Commissioner

Under section 17 of the GIPA Act, the Information Commissioner's role includes:

- promoting the object of the GIPA Act;
- providing information, advice, assistance and training to agencies about the GIPA Act;
- assisting agencies in connection with the exercise of their functions under the GIPA Act; and
- monitoring, auditing and reporting on the exercise by agencies of their functions under, and compliance with, the GIPA Act.

Section 21 of the GIIC Act empowers the Information Commissioner to conduct investigations into how a particular agency exercises its functions under the GIPA Act.

Section 23(1) of the GIPA Act provides that such an investigation should be made in the absence of the public.

Section 15 of the GIIC Act entitles the Information Commissioner to:

- act in an informal manner (as far as possible);
- determine the procedures to be followed in conducting an investigation; and
- inform herself on any matter in any way that the Commissioner considers to be just.

The procedures for conducting investigations are set out in section 23 of the GIIC Act and include giving the subject of the investigation and the complainant an opportunity to provide submissions.

Division 4 of the GIIC Act sets out the Information Commissioner's powers in an investigation, including the authority to:

- require information (section 25); and
- enter and inspect any premises occupied or used by an agency, and inspect any record or thing on the premises (section 26).

In line with the Information Commissioner's functions, the aim of investigating an agency is to identify what systems, policies and practices the agency has in place in order to exercise its functions under the GIPA Act, and assist the agency to meet its obligations under that Act.

Reason for, and scope of, the investigation

In the period between 1 July 2010 and 17 October 2011, the Information Commissioner received a number of requests for assistance from the complainant in relation to WorkCover's decisions in response to access applications and the exercise of WorkCover's functions under the GIPA Act.

On 19 September 2011, staff of the Information Commissioner met with the complainant to discuss concerns raised in the course of these matters. At the conclusion of that meeting, the IPC agreed to investigate some of the issues raised by the complainant. The issues we agreed to investigate are:

- WorkCover's process in dealing with access applications;
- whether WorkCover has an immediate right of access to information as set out in section 121 of the GIPA Act where that information is contained in records held by private sector entities that provide services to the public on behalf of WorkCover;

- resources available to assist WorkCover in exercising its functions under the GIPA Act; and
- whether WorkCover complies with section 53 of the GIPA Act when conducting searches for information requested in an access application.

On 17 October 2011, the Information Commissioner notified WorkCover and the complainant of her decision to investigate and report on the exercise of WorkCover's functions under the GIPA Act, as required by section 22 of the GIIC Act.

During the course of the investigation, the Information Commissioner received additional requests for assistance from the complainant regarding WorkCover decisions made under the GIPA Act.

On 11 October 2013 the Information Commissioner provided the complainant and WorkCover with a consolidated review report that contained guidance about issues raised in the reviews followed by attachments that set out the IPC's view about each decision made by WorkCover. Following the conclusion of the review files we conducted a second site visit at WorkCover and prepared this investigation report.

We considered the issues raised in the reviews and the decisions made by WorkCover when we conducted this investigation. However this investigation is distinct from the review report, where we have considered each decision and provided our view. This investigation report is independent of the review report and considers WorkCover's overall approach to and compliance with the GIPA Act as at the time of this report.

How did we investigate?

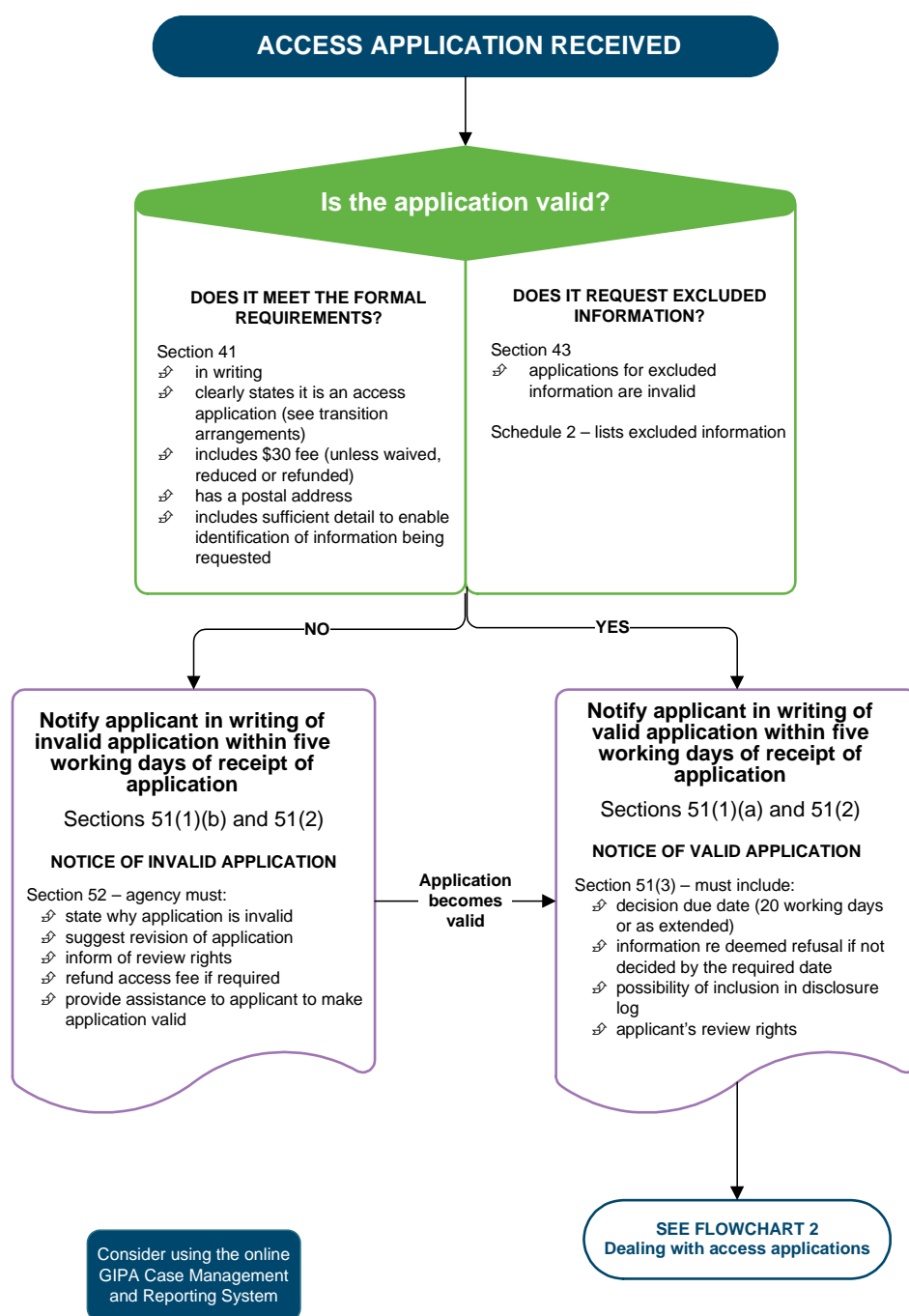
In conducting the investigation the IPC:

- met with the complainant to discuss the complainant's concerns regarding WorkCover's compliance with the GIPA Act;
- received and considered information from the complainant;
- attended WorkCover's Right to Information Unit's premises where we met with and interviewed relevant WorkCover officers at the beginning of the investigation and again prior to finalising the IPC's provisional report into the investigation. During these site visits we also received a tour of the Unit's premises and reviewed a random selection of WorkCover's GIPA files;
- attended WorkCover's Legal Group's premises where we reviewed the 2010 Scheme Agent Deed and operational document set;
- considered complaints and requests for review received by the Information Commissioner regarding WorkCover, including the complaints and requests for review submitted by the complainant;
- reviewed process and procedure documents of WorkCover, including:
 - checklists;
 - procedures manual; and
 - GIPA File review form;
- requested and received information and ancillary documents from WorkCover, including
 - contracts and deeds; and
 - internal working documents.

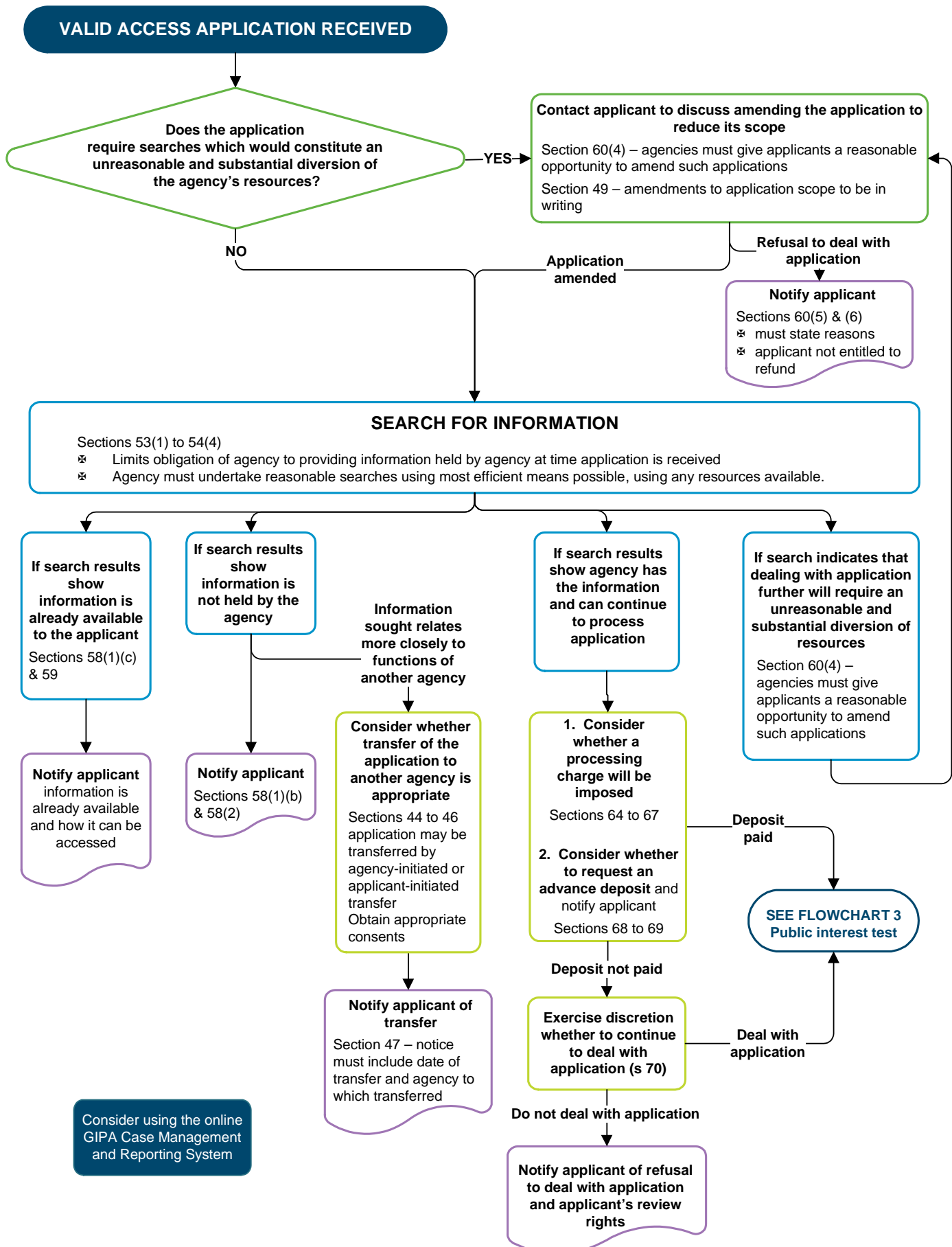
WorkCover's process for dealing with access applications

The GIPA Act sets out the process for dealing with access applications. The IPC has condensed this process into a series of three flow charts, which are inserted below:

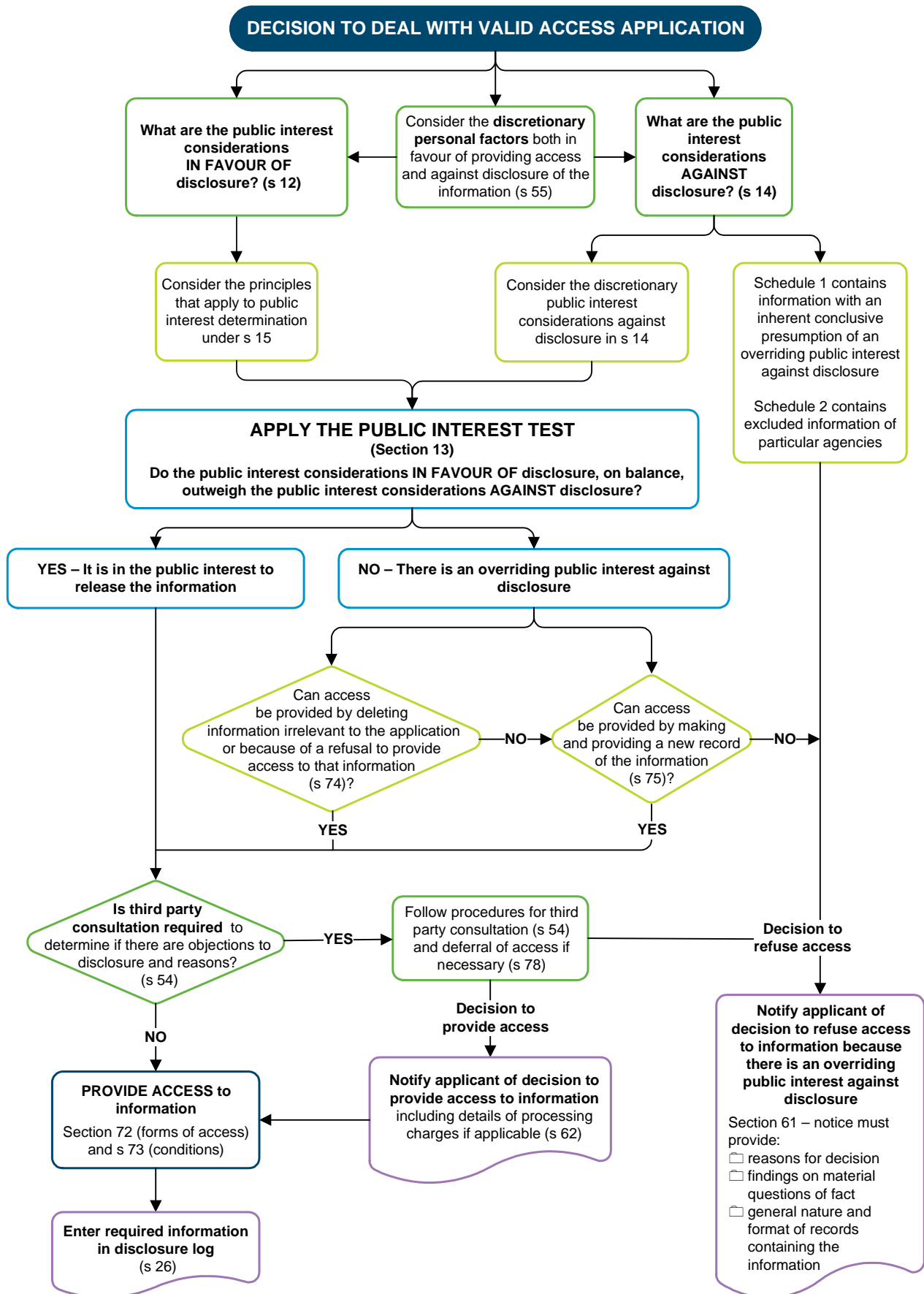
FLOWCHART 1: RECEIVING FORMAL ACCESS APPLICATIONS



FLOWCHART 2: DEALING WITH ACCESS APPLICATIONS



FLOWCHART 3 PUBLIC INTEREST TEST



In the course of this investigation the IPC discussed WorkCover's process for dealing with access applications in the onsite visits at WorkCover, and considered the process of access applications that led to the 37 decisions that we reviewed.

Overall, WorkCover has a clear understanding of the requirements for dealing with access applications. This is demonstrated by the process set out in WorkCover's *Access Application File Running Sheet*, its draft procedures manual, the knowledge of staff members that we interviewed and the information we obtained from our file review.

Although WorkCover, overall, complies with the requirements for processing access applications, there are three areas where, in our view, WorkCover could improve. We consider these to be administrative corrections that WorkCover can make to improve its compliance with the GIPA Act. They relate to the date an access application is received, certified proof of identification and completing formal access applications in the formal process.

Date an access application is received

WorkCover calculates the timeframes in the GIPA Act by the date the application is received at the Right to Information Unit. However, this is not necessarily the same date that the application is received by WorkCover as an agency. The date the application arrives at the Right to Information Unit may be later than the date the application arrives at WorkCover. This is because the application may first be processed as incoming mail and cheques may be processed by Financial Services upon receipt from Office Support Services.

The date an access application is received by WorkCover is the date it is received by the agency, not the date it is received by the Right to Information Unit. Accordingly the statutory timeframes in part 4 of the GIPA Act run from the date of receipt by the agency.

We recommend that WorkCover review its processes and procedures relating to timeframes under the GIPA Act so that they run from the date the application is received by the agency.

Certified proof of identification

WorkCover's procedure manual and our file review indicate that WorkCover may decide that an access application is invalid if it does not include a certified copy of a proof of identification document.

Although it is good practice to require proof of identification before releasing personal information (and to ensure that applicants' representatives have authority from the applicant before dealing with the representative) a failure to provide identification (or proof of authority) does not render an access application invalid.

We recommend that WorkCover review its processes and procedures relating to decisions about valid and invalid applications so that the criteria for a valid application reflects the provisions of section 41 of the GIPA Act.

Formal / informal applications

Our discussion with staff and file review indicate that WorkCover may decide to treat a formal access application as an informal application from time to time. From our review it is our view that WorkCover does this with the intention of assisting the applicant, as it does not charge an application or processing

fee and provides helpful information to the applicant when it does so. However, under the GIPA Act it is not open to WorkCover to exercise discretion to treat a formal access application as informal.

If an agency receives a formal access application it is required to deal with it under Part 4 of the GIPA Act. This requires an agency to make a reviewable decision about each and every access application that it receives (or, if it does not respond in time, it will be deemed to have decided to refuse to deal with the application). If the applicant is aggrieved by the reviewable decision, they may exercise their right to seek a review.

In contrast, review rights are not available on informal applications.

For this reason it is not available to agencies to treat formal access applications informally, even if it would be more convenient to the agency to do so. We note that this does not affect WorkCover's discretion under section 127 of the GIPA Act to waive or reduce fees and charges associated with the application, nor does it affect WorkCover's authority under section 76 to provide additional information in response to an access application, including context that may be relevant to the applicant.

We recommend that WorkCover review its processes and procedures relating to access application so that every access application receives a formal reviewable decision, unless the applicant withdraws the formal application and chooses to instead request the information informally under section 8 of the GIPA Act.

Processing charges

At the commencement of our investigation WorkCover had elected not to impose an application fee or processing charge for any access application that it received.

Prior to the conclusion of the investigation, WorkCover had decided to charge an application fee and processing charges, subject to certain occasions where it exercises its discretion to waive or reduce the fee. WorkCover also imposes advance deposits for dealing with access applications.

In our view WorkCover has taken a diligent approach to estimating processing charges and seeking advance deposits. It has calculated average amounts of time required for processing certain quantities of information, conducting third party consultations, deciding and drafting decisions and other chargeable actions under the GIPA Act. Our review indicates that WorkCover carefully calculates its estimate of charges before it seeks an advance deposit. Our file review demonstrated that, in circumstances where WorkCover overestimated the processing charge for an application, it was conscientious and prompt about refunding the difference to the applicant. Such a situation arises if:

- an application is not completed on time
- an estimation is over calculated
- an applicant elects to pay the entire amount of estimated costs instead of the 50% advance deposit and the timeframe does not make the estimate
- a schedule 2 exclusion applies
- a concession card holder pays the \$30 application fee and WorkCover (in line with its internal policy exercising its discretion to reduce the fee) only requires 50% of the application fee i.e. \$15
- application is sent to WorkCover in error
- WorkCover has decided to waive the application fee (including where the applicant is the next of kin of a deceased person).

We also note that WorkCover's approach to when and how it will exercise its discretion to reduce or waive fees and charges demonstrates that it has thoughtfully considered this discretion in a manner that meets section 3(2)(b) of the GIPA Act, which requires agencies to exercise discretions, as far as

possible, so as to facilitate and encourage, promptly and at the lowest reasonable cost, access to government information. To facilitate this, it has included a step in its process where staff contact the applicant to discuss the scope of the access application early in the process in order to reduce possible cost to the applicant.

WorkCover's approach to processing charges demonstrates good practice, however we recommend that WorkCover review its resources to provide a 'check and balance' for compliance with section 67 of the GIPA Act. This section provides that an agency cannot impose processing charges for the first 20 hours of processing time for an application for the applicant's personal information. WorkCover's estimates spreadsheet used for calculating processing charges does not appear to account for 20 hours free processing time if the application is for personal information. It is our understanding that WorkCover does not charge for the first 20 hours if the application is for personal information, as provided for in section 67 of the GIPA Act and that this is not provided for in the spreadsheet because such applications rarely take 20 hours to complete. However in our view it would be helpful to have this accounted for in the spreadsheet and procedures manual.

Records of conversations

In our file review we observed that WorkCover's files do not contain all file notes of conversations with applicants or objectors. This is because some of these files notes are kept in individual staff members' notebooks. Some but not all are kept in the relevant TRIM file. In our view it would be of benefit to the Unit and, as required, to the IPC as a review body if all records of conversations were kept on the working file.

Searches for information

Section 53 of the GIPA Act sets out the requirement to conduct searches:

53 Searches for information held by agency

(1) The obligation of an agency to provide access to government information in response to an access application is limited to information held by the agency when the application is received.

(2) An agency must undertake such reasonable searches as may be necessary to find any of the government information applied for that was held by the agency when the application was received. The agency's searches must be conducted using the most efficient means reasonably available to the agency.

(3) The obligation of an agency to undertake reasonable searches extends to searches using any resources reasonably available to the agency including resources that facilitate the retrieval of information stored electronically.

(4) An agency is not required to search for information in records held by the agency in an electronic backup system unless a record containing the information has been lost to the agency as a result of having been destroyed, transferred, or otherwise dealt with, in contravention of the State Records Act 1998 or contrary to the agency's established record management procedures.

(5) An agency is not required to undertake any search for information that would require an unreasonable and substantial diversion of the agency's resources.

The expression 'government information' is defined in section 4 of the GIPA Act as 'information contained in a record held by an agency.'

Before deciding that it does not hold information, an agency must comply with the requirements of section 53(2) of the Act. The requirements are:

- undertake such reasonable searches as necessary to locate the information requested; and
- use the most efficient means reasonably available to the agency.

The GIPA Act does not require an agency to include details of its searches in a notice of decision. However, our view is that it is good practice for written decisions to clearly explain what the search processes were, what was found, an explanation if no records were found, what was released and what was held back. Details of searches should include where and how the agency searched, a list of any records found – and if appropriate a reference to the business centre holding the records, the key words used to search digital records (including alternative spellings used) and a description of the paper records that were searched.

WorkCover's searches

We reviewed WorkCover's searches and its understanding of the search requirements in our on-site visits to WorkCover.

In our view, WorkCover's current approach to searches for information complies with the requirements in the GIPA Act and demonstrates good practice.

WorkCover's *Access Application File Running Sheet* includes a checklist for conducting electronic searches, requesting the file from WorkCover's records repository.

WorkCover staff informed us that when an access application is received, staff search across WorkCover records in records management systems and databases known as TRIM, WSMS, OMS, and CASES. WorkCover also conducts searches by contacting the relevant staff within the business divisions who search paper files for relevant documents. If required, staff in the Right to Information Unit can access records held by other WorkCover staff and can search information in emails either by asking the account holder to conduct the search, by sitting with the staff member while the search is conducted, or (subject to clearance and once authorised with assistance by IT staff) search emails and mobile phone content of current and past staff.

WorkCover undertakes searches using various subjects, including (for example) the injured worker's name, date of incident, employer's name, location of incident and various spellings of names and so on in case of typo's or incorrect spellings in the database.

WorkCover's completed files are archived to the West Gosford Repository approximately twice a year. WorkCover retrieves these files from the Repository when process applications.

In our second site visit to WorkCover, staff informed us that WorkCover has adopted the guidance in our review report with respect to information held by third parties. In particular, where the information requested is held by a Scheme Agent, WorkCover now requests access to the information directly from the Scheme Agent. This applies to all third parties where WorkCover has a right of access to the information. We note that WorkCover is not required to seek the information from a third party if it does not have a right of access the information (including a third party who is not in a relevant contractual relationship with WorkCover).

It is our view that WorkCover's searches comply with the requirements in the GIPA Act and demonstrate WorkCover's commitment to the objects set out in the GIPA Act.

Information held by third parties

The IPC considered whether WorkCover has an immediate right of access to information as set out in section 121 of the GIPA Act where that information is contained in records held by private sector entities that provide services to the public on behalf of WorkCover.

Section 121 of the GIPA Act provides:

121 Provision of information by private sector contractors

(1) An agency that enters into a contract (a government contract) with a private sector entity (the contractor) under which the contractor is to provide services to the public on behalf of the agency must ensure that the contract provides for the agency to have an immediate right of access to the following information contained in records held by the contractor:

- (a) information that relates directly to the performance of the services by the contractor,*
- (b) information collected by the contractor from members of the public to whom it provides, or offers to provide, the services,*
- (c) information received by the contractor from the agency to enable it to provide the services.*

Note. A reference in this Act to government information held by an agency includes information held by a private sector entity to which the agency has an immediate right of access. See clause 12 of Schedule 4. This means that an access application can be made to the agency for that information.

(2) A government contract is not required to provide for the agency to have an immediate right of access to any of the following information:

- (a) information that discloses or would tend to disclose the contractor's financing arrangements, financial modelling, cost structure or profit margins,*
- (b) information that the contractor is prohibited from disclosing to the agency by provision made by or under any Act (of this or another State or of the Commonwealth),*
- (c) information that, if disclosed to the agency, could reasonably be expected to place the contractor at a substantial commercial disadvantage in relation to the agency, whether at present or in the future.*

Note. The contractor may be entitled to be consulted by the agency under section 54 (Consultation on public interest considerations) in relation to an access application made to the agency for information held by the contractor.

2010 Scheme Agent Deed

WorkCover contracts with private sector entities who provide services to the public on WorkCover's behalf. In particular, WorkCover provides workers compensation insurance through contracted Scheme Agents to employers operating in New South Wales. In the course of our investigation we reviewed a complete copy of one of the 2010 Scheme Agent Deeds.

The Workers Compensation Nominal Insurer is a statutory legal entity constituted by section 154A of the *Workers Compensation Act 1987*. The Nominal Insurer does not represent the State or any authority of the State and is responsible for managing the operation of the Workers Compensation Insurance Fund.

WorkCover acts as the Nominal Insurer but remains a distinct legal entity, being a statutory corporation representing the Crown.

The *Workers Compensation Act 1987* (**Workers Compensation Act**) and the *Workplace Injury Management and Workers Compensation Act 1998* (**WIMWC Act**) are to be read together. Under section 154C of the Workers Compensation Act, in acting for the Nominal Insurer, WorkCover has and may exercise all of its functions under both Acts.

Section 154G of the Workers Compensation Act enables the Nominal Insurer to enter into arrangements by contract or otherwise with scheme agents in connection with the exercise of the Nominal Insurer's functions.

Subject to any regulations, all records and other documents made and kept or received and kept by a scheme agent in the exercise of the Nominal Insurer's functions are the property of the Nominal Insurer. Section 154N of the Workers Compensation Act, states what ought to be included in such regulations, regarding the making, keeping, accessing and disclosing of information held by a scheme agent. However, no such regulations have been made.

For this reason, WorkCover holds information located at the scheme agent that relates to the management of specific claims by a scheme agent. Such information would be extended to any information or records that relate to its role as scheme agent. That role includes the management of claims. This includes any records of contact between the scheme agent and the applicant, and any contact between the scheme agent, the claimant's employer, WorkCover, health service providers and similar bodies.

Where information relates to the whole of the scheme agent's business and not just its role undertaking the functions of the Nominal Insurer, WorkCover is required to determine whether it has an 'immediate right of access' to the records (clause 12(1)(b) of schedule 4 to the GIPA Act). If it does not, then it does not 'hold' the records for the purpose of the GIPA Act. This test applies to all records held by private sector entities that fall within the scope of an access application.

Section 121 of the GIPA Act obligates agencies that enter into contracts with private sector entities for the provision of services to the public on behalf of the agency to ensure the contract provides for the agency to have an immediate right of access to certain information in the contractor's records. Section 121 does not, however, create a right to access records held by private sector entities if there is no such contractual provision in place.

Information that relates to the functions of the Nominal Insurer specifically with respect to the issuing of policies of insurance to employers and the calculation of premiums (but only in relation to individual employers), the management of specific claims and to asset and funds management and investment, is excluded information under the GIPA Act

Our review of the Scheme Agent Deed

We reviewed the Scheme Agent Deed. Other than it referring to the repealed FOI Act, we are satisfied that it meets the requirements in section 121 of the GIPA Act.

We recommend that WorkCover implement a process to ensure that when this contract is reviewed, and when other contracts it is a party to are reviewed or created, section 121 of the GIPA Act is satisfied.

Resources available to WorkCover

We considered the resources available to WorkCover in exercising its functions under the GIPA Act.

WorkCover's resources include the following:

- *Access Application File Running Sheet*,
- draft procedures manual,
- template documents,
- an estimation spreadsheet,
- resources from internal and external training about the GIPA Act,
- templates and guidance material published by the IPC,
- attendance at the Right to Information and Privacy Practitioners' Forums,
- personal and peer experience within the team, and
- access to the Unit's manager and senior staff.

We also considered the organisational support that the Unit has with respect to compliance with the GIPA Act, including with respect to searches for information.

It is our observation that the Right to Information Unit is well equipped with the resources to meet its obligations under the GIPA Act in relation to processing access applications. With the conclusion of this investigation we encourage WorkCover to review its resources for supporting compliance with other obligations under the GIPA Act. This includes obligations with respect to open access information, reporting and its proactive disclosure program.

Glossary

Acronym or abbreviation	Explanation
GIIC Act	<i>Government Information (Information Commissioner) Act 2009</i>
GIPA Act	<i>Government Information (Public Access) Act 2009</i>
GIPA Regulation	<i>Government Information (Public Access) Regulation 2009</i>
IPC	Information and Privacy Commission (NSW)
OIC	Office of the Information Commissioner (NSW) – now the IPC
WIMWC Act	<i>Workplace Injury Management and Workers Compensation Act 1998</i>
WorkCover	WorkCover Authority of NSW
Workers Compensation Act	<i>Workers Compensation Act 1987</i>