



# Freedom of Information (FOI) Information Publication Plan April 2014

## Introduction

1. The Department of Infrastructure and Regional Development (Department) has prepared this Information Publication Plan (Plan) in accordance with section 8(1) of the *Freedom of Information Act 1982* (FOI Act).

## Purpose

2. The primary purpose of this Plan is to:
  - (a) comply with section 8(1) of the FOI Act, and
  - (b) assist the Department to put appropriate procedures in place to proactively disclose its information holdings, in accordance with the objects of the FOI Act.

## Objectives

3. The Department's objectives in relation to this Plan are to outline its mechanisms and procedures to:
  - (a) manage the information holdings relevant to the Information Publication Scheme (IPS)
  - (b) proactively identify and publish all information required to be published, including this Plan (under s8(2) of the FOI Act)
  - (c) proactively identify and publish all optional information (under s8(4)) of the FOI Act
  - (d) review and ensure on a regular basis that information published under the IPS is accurate, up-to-date and complete (under s8B of the FOI Act)
  - (e) ensure that information published under the IPS is discoverable, understandable and re-useable
  - (f) ensure that the format of online content conforms with the Web Content Accessibility Guidelines (Version 2), and
  - (g) measure the success of the Department's IPS.

## Implementing the Information Publication Scheme

### Establishing an Information Publication Scheme

4. The Department's approach to its IPS is set out below.

### Responsibility

- (a) The General Manager Governance and Reporting Branch is responsible for leading the Department's work on implementing the FOI reforms, including the establishment and administration of the IPS.

### Information asset management

- (b) The Department has an existing information asset management framework that meets the new IPS requirements. The framework consists of policies and processes for records management, communications, intellectual property and internet content as well as an internal IPS register (see below). The Department's content management system is TeamSite 6.7.2.0.

### *Registers of information*

- (c) The Department maintains an internal register of information required to be published under the IPS. It contains information about:
- the documents available for access and publication meeting the terms of the IPS
  - the division that is responsible for the document, and the contact officer
  - when the document was last updated
  - the formats the document is available in and the file size
  - whether the document contains exempt material, and
  - if the document is not published online, who the contact is to obtain a copy.

### *Identification of information*

- (d) The Department will identify information that is required to be published under s8(2) of the FOI Act, information that may be published under s8(4) of the FOI Act, and information that is made available to the public otherwise than by publication (s8A(2) of the FOI Act) by:
- undertaking an annual audit (based on the initial audit undertaken to establish the IPS), of information holdings that fall within the categories defined by the Office of the Australian Information Commission (OAIC)
  - ensuring that policies under the information asset management framework include guidance about the IPS, and
  - requiring divisions to comply with an internal IPS policy.

### *Access and currency*

- (e) The Department will ensure that information published under the scheme is discoverable, understandable, machine-readable, accessible, useable, as well as accurate, up-to-date and complete by:
- conforming with the Australian Government's Web Accessibility National Transition Strategy (Web Content Accessibility Guidelines version 2.0 (WCAG 2.0))
  - conforming as much as possible with the OAIC recommended framework for consistent presentation of information with other agencies
  - including an FOI/IPS icon or link on the departmental home page
  - providing a link to, or description of, the departmental website index or sitemap
  - using plain language to describe documents
  - minimising the number of clicks needed to access the information
  - requiring divisions to comply with an internal IPS policy
  - issuing regular reminders about revised documents
  - maintaining the current schedule of regular reviews of the Department's internet content
  - following existing departmental internet guidelines and procedures that are consistent with the Australian Government Information Management Office web publishing guide (for example, the use of proper page structure and headings), and
  - archiving documents in accordance with the policies of National Archives of Australia.

### *Charges*

- (f) The Department will publish freely accessible information on its website as much as possible. However in some circumstances the Department may need to apply charges in order to be reimbursed for specific reproduction costs, or other specific incidental costs, incurred in giving access to particular information (s8(D)(4) of the FOI Act).

In determining whether or not to charge for information made available under the IPS, the Department will take account of the 'lowest reasonable cost' objective of the FOI Act (s3(4)). The amount or rate of any charge applied by the Department will be informed by the *Freedom of Information (Charges) Regulations 1982*.

The Department's approach to impose charges and how these will be calculated (under ss8D(4) and 8D(5) of the FOI Act) are as follows:

- the Department may charge 10 cents per page plus postage costs to produce a hard copy of documents, or in certain circumstances the actual cost incurred of reproducing a document
- charging on a full cost-recovery basis will reflect the cost of the resources used in producing the service. For example, where it is appropriate to fix a charge for producing a document by computer, the actual cost where the Department uses its own computer facilities will include:
  - the cost of labour directly; that is, readily and specifically associated with the production of an output
  - the cost of materials and services directly consumed in the production process
  - an appropriate share of indirect labour costs, both cash and accruing
  - accommodation costs
  - a share of indirect materials and services, and
  - capital costs, including depreciation, imputed interest on working capital and a return on non-current assets employed, based on current values.
- if the Department has to use outside computer facilities, the amount charged for production will be based on actual costs. For example, the time spent by employees when making arrangements for an applicant to hear a recording or view a film or videotape (or making copies of a recording, film CD-ROMs or videotape) will be charged. That amount will be calculated on an hourly rate (pro rata), based on the salary of the employee performing the task, plus any additional cost for overheads.
- applicants will be formally informed of this cost prior to the commencement of the request for information being processed.

### **Information architecture**

#### *Reaching the website and finding published information*

5. The Department will publish information to members of the public on its website at <[www.infrastructure.gov.au](http://www.infrastructure.gov.au)>, and both an FOI-IPS icon and link will appear on the departmental home page. The FOI page will be accessible from the website sitemap and navigation.

The Department's IPS will be published at <[www.infrastructure.gov.au/ips/](http://www.infrastructure.gov.au/ips/)> and will be accessible from the website sitemap and navigation. The IPS page will provide links to the web pages containing published information and details of how other information can be obtained.

The Department's register will be structured as follows:

- Agency plan (s8(2)(a))
- Who we are (ss8(2)(b) and 8(2)(d))
- What we do (ss8(2)(c) and 8(2)(j))
- Our reports and responses to Parliament (ss8(2)(e) and 8(2)(h))
- Routinely requested information and disclosure log (ss8(2)(g) and 11C)
- Consultation arrangements (s8(2)(f))
- Contact us (s8(2)(i))

#### *Format and language*

6. The Department will publish information in as many formats as practicable and will offer contact details for requesting alternative formats.

The Department will publish information predominantly in English. Some publications are offered in other languages as appropriate. Contact details for enquiries by members of the public will be provided.

The majority of departmental web pages have 'ReadSpeaker' functionality.

#### *Deposit copies of information in other locations*

7. The Department may deposit copies of information in other locations. Information of the following types may be deposited as follows:

- (a) information published in hard copy form may be provided to the Commonwealth Library Deposit and Free Issue Scheme
- (b) information published in audio or audio-visual form may be provided to the National Film and Sound Archive
- (c) documents published on the internet may be provided to the National Library of Australia, through its Pandora program, and
- (d) datasets may be published at <[www.data.gov.au](http://www.data.gov.au)>.

#### ***Information required to be published***

8. The Department already publishes the majority of the information required by the IPS on its web presence at <[www.infrastructure.gov.au](http://www.infrastructure.gov.au)>. The IPS will provide an overlaying menu to increase accessibility to these documents. Documents not currently published will be published where appropriate and made available through the Department's IPS webpage/s. The types of information (including data sets) the Department publishes, or will publish, in accordance with s8(2) of the FOI Act includes:

- (a) this Plan (s8(2)(a) of the FOI Act)
- (b) who we are (s8(2)(b) and s8(2)(d) of the FOI Act), including our organisational structure and statutory appointments, and appointments of officers of the agency that are made under Acts, and functions of bodies established by executive action
- (c) what we do (ss8(2)(c) and 8(2)(j) of the FOI Act), including our functions, decision making powers and other powers affecting members of the public (or any particular person or entity or class of persons or entities), operational information including rules, guidelines, practices and precedents that assist the Department to make decisions or recommendations affecting members of the public and decisions of the Government such as ministerial announcements
- (d) our reports and responses to Parliament (ss8(2)(e) and 8(2)(h) of the FOI Act), including our annual report, documents required by law to be tabled in Parliament and documents routinely tabled in accordance with Senate Standing Orders
- (e) routinely requested information, including that information to which the Department routinely gives access in response to FOI requests (except information that is otherwise exempt), and an FOI disclosure log of decisions made on, and information released, under FOI requests from 1 May 2011 (ss 8(2)(g) and 11C of the FOI Act). However, information attached to or referred to in the Department's disclosure log may be removed after 12 months, unless the information has enduring public value.
- (f) consultation (s8(2)(f) of the FOI Act), including regulatory plans and consultation arrangements for members of the public to comment on specific policy or proposals for which the Department is responsible including how and to whom those comments may be made, and

- (g) how to contact us (s 8(2)(i) of the FOI Act), including the title, telephone number and email address of those employees who can be contacted about access to the Department's information or documents under the FOI Act.

### ***Administering the agency IPS***

9. The Department will monitor and regularly review its IPS obligations by:
- (a) maintaining a robust information asset management framework
  - (b) the use of a Content Management System for departmental websites along with a regular review process to check content currency and relevancy
  - (c) maintaining an internal information register and disclosure log
  - (d) identifying on an ongoing basis any information that is required to be published under s8(2) of the FOI Act
    - the departmental standard procedures for processing FOI requests includes a prompt to ensure that information released is reflected in the disclosure log
    - an internal IPS policy which sets out roles and responsibilities and procedures to manage the IPS page, consultation page and other pages, and
    - regular reviews and prompts
  - (e) identifying on an ongoing basis any information that may be published under s8(4) of the FOI Act – optional information through:
    - an internal IPS policy which sets out roles and responsibilities and procedures to manage the IPS page, consultation page and other pages, and
    - regular reviews and prompts
  - (f) identifying on an ongoing basis any information that is already otherwise available (s8A(2) of the FOI Act) through:
    - an internal IPS policy which sets out roles and responsibilities and procedures to manage the IPS page, consultation page and other pages, and
    - regular reviews and prompts
  - (g) ensuring the information published continues to be discoverable, accessible, useable, as well as accurate, up-to-date and accessible by:
    - undertaking the activities set out in section 4(e) of this Plan
    - reviewing published information in accordance with any additional OAIC recommendations and advices
    - continually reviewing published information and other information holdings in the light of WCAG2.0 and Gov 2.0 requirements as progress is made
    - requiring compliance with an internal IPS policy, and
    - undertaking an annual audit and review of information.
  - (h) ensuring the information about any charges to be imposed and how they will be calculated continues to be published (ss 8D(4) and 8D(5) of the FOI Act)
    - undertaking an annual review of the charges information set out in section 4(f) of this Plan
  - (i) continually updating and developing the IPS by taking steps to:
    - regularly reviewing the material published to ensure it meets the requirements of this plan
    - regularly reviewing information produced and assess the need to publish or to make an assessment to pro-actively publish information
    - considering any guidelines and advice issued by the OAIC
    - observing and considering best practice as demonstrated by other agencies, and
    - inviting client feedback on the IPS.

**Review**

10. The Department proposes to review the operation of its IPS, in conjunction with the Information Commissioner, before 1 May 2016 as required by ss8F(a) and 9(1) of the FOI Act.

The Department will regularly self-assess the operation of its IPS and will use guidance prepared by the OAIC to undertake the compliance review. The operation of the IPS will also be assessed based on:

- any feedback from the public and users of the Department's website
- any complaints regarding access or the readability or useability of published information, and
- any reduction in formal requests under the FOI Act as a result of more publicly available information.