



Australian Government

Office of the Australian Information Commissioner

Information Publication Scheme AGENCY SELF-ASSESSMENT CHECKLIST

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Contents

Introduction	1
Background	1
Purpose of this self-assessment checklist	1
Checklist categories	2
1. Agency Plan	2
2. Governance and administration	3
3.1 IPS document holdings.....	3
Specified Information.....	3
3.2 Additional Information.....	4
3.3 Accurate, up-to-date and complete documents to be published	4
3.4 Exempt documents are considered for publication.....	4
4. IPS information architecture.....	4
5. Agency Compliance Review	5
Self-assessment response categories	6
Response categories	6
CRITERION 1: Agency Plan	7
CRITERION 2: Governance and administration.....	8
CRITERION 3: IPS document holdings	9
CRITERION 4: IPS information architecture	11
CRITERION 5: Agency compliance review	14

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Introduction

The Office of the Australian Information Commissioner (OAIC) has developed this self-assessment checklist to assist Australian Government agencies to comply with their obligations under the Information Publication Scheme (IPS), established by the *Freedom of Information Act 1982* (the FOI Act).

Background

Recent reforms to the FOI Act aim to promote a pro-disclosure culture across government and to build a stronger foundation for greater openness and transparency in government. The IPS aims to transform the FOI framework from one that responds to individual requests for access to documents to one that also requires agencies to take a proactive approach to publishing information.

From 1 May 2011, all Australian Government agencies subject to the FOI Act must comply with the IPS requirements which promote the disclosure of information held by individual agencies. Each agency must publish an agency plan outlining how they will meet the IPS requirements, including publishing specified categories of information. The scheme also provides a means for agencies to proactively publish other government information which the Australian community may find useful.

The OAIC will monitor and assess the scheme's operation in partnership with individual agencies.

Purpose of this self-assessment checklist

The IPS imposes continuing obligations upon agencies and the OAIC has designed this self-assessment checklist with a view to enabling agencies to assess, improve and progressively review their IPS compliance obligations. The checklist should assist agencies to identify any gaps which may need to be addressed prior to a review of the agency's IPS compliance being undertaken in the first five years.

Agencies are not required to provide any formal response back to the OAIC after completing this self-assessment checklist. However, the OAIC welcomes any feedback or suggestions from agencies using the checklist, especially about ways to improve its useability, content or usefulness.

The self-assessment checklist is designed to assist individual agencies to independently, objectively and systematically review their readiness and compliance with five key elements of the IPS, which are:

- 1 Preparation and publication of an individual agency plan
- 2 Creation of appropriate governance and administration frameworks to support IPS activities
- 3 Creation and maintenance of appropriate IPS Document Holdings for both 'Specified' and 'Additional' documents
- 4 Creation and maintenance of appropriate IPS Information Architecture, and
- 5 Agency compliance and review mechanisms to identify ongoing risks associated with the IPS.

Checklist categories

A short description of each of the five key assessment criteria follows, followed by a number of checklist questions for agencies to consider. This document should also be read in conjunction with:

- the [Part 13: Information Publication Scheme](#) guidance for agencies
- other relevant guidance, such as IPS icon use in [Guidance for Agency Websites](#) and
- the [FOI Fact Sheet 4: The information publication scheme for Australian Government Agencies](#).

1. Agency Plan

Each agency must publish (on its website) a plan showing how it proposes to meet the IPS requirements. The plan must indicate:

- what information the agency proposes to publish
- how (generally on its website), and to whom (generally to the Australian community), the agency proposes to publish the information
- how the agency otherwise proposes to comply with the scheme.

The intention of the scheme is that agencies will publish freely accessible information on their websites. The OAIC has prepared an [Agency Plan](#) which describes how the OAIC proposes to implement and administer its IPS entry in respect of its own information holdings. This plan may be used by agencies as a template for developing their own agency plan.

Please now complete the checklist for **CRITERION 1: Agency Plan**.

2. Governance and administration

Each agency should establish an appropriate governance and administration framework to support the implementation and maintenance of the IPS within the agency. The framework should include:

- appropriate IPS policies, business processes and procedures to guide the IPS within the agency
- clear allocation of responsibility for the implementation, ongoing maintenance and compliance review and reporting associated with the IPS
- the appointment of an Information Champion at an SES-level within the agency
- establishing appropriate information management processes to facilitate identification and publication of IPS documents
- measures to ensure that agency staff are aware of and understand IPS requirements.

Please now complete the checklist for **CRITERION 2: Governance and administration**.

3.1 IPS document holdings

The IPS applies to two categories of agency documents:

- documents that are required to be published under the IPS (Specified Information) and
- documents that the agency may publish which other members of the public could find useful (Additional Information).

Specified information

The FOI Act specifies ten categories of information that all agencies **must** publish:

1. an agency plan
2. details of the agency's structure (for example, in the form of an organisation chart)
3. details of the agency's functions, including its decision making powers and other powers affecting members of the public
4. details of statutory appointments of the agency
5. the agency's annual reports
6. details of consultation arrangements for members of the public to comment on specific policy proposals

7. information in documents to which the agency routinely gives access in response to requests under the FOI Act
8. information that the agency routinely provides to Parliament
9. details of an officer (or officers) who can be contacted about access to the agency's information or documents under the FOI Act
10. the agency's operational information (which is information that assists the agency to exercise its functions or powers in making decisions or recommendations that affect members of the public; this includes the agency's rules, guidelines, practices and precedents relating to those decisions and recommendations.)

3.2 Additional Information

The FOI Act expressly recognises that information held by the Australian Government is a national resource and is to be managed for public purposes.

Agencies may publish other information they hold that falls outside the ten categories listed above. For example, the agency may hold for their own purposes statistical information which researchers and other members of the public would find useful.

3.3 Accurate, up-to-date and complete documents to be published

Under s 8B of the FOI Act, agencies must ensure that information published under the IPS is accurate, up to date and complete.

3.4 Exempt documents are considered for publication

The scheme does not require agencies to publish information that is restricted, for example, if a document is exempt under the FOI Act or its publication is prohibited under other legislation. It should be noted that agencies may still choose to publish an exempt document.

Please now complete the checklist for **CRITERION 3: IPS document holdings**.

4. IPS information architecture

An agency's IPS entry should be supported by appropriate and consistent IPS information architecture. Publication of an IPS entry on an agency's website is expected to follow a number of standardised headings, covering the agency's response to the key compliance aspects of the IPS. The OAIC's Agency Plan sets out seven standard heading categories (see Checklist Criterion 4.1.1 to 4.1.7 below), which are complemented by a number of optional headings which cover 'Additional Information' published by the OAIC under s 8(4) of the Act.

Each agency is also expected to ensure that the IPS information holdings (and individual IPS documents) are easily discoverable, understandable and machine-readable.

In some instances (e.g. very large documents or datasets) it may not be practical for an agency to publish specific information or data on its website. As to these documents, the agency may need to provide access to this information in another way. Any fees or charges associated with making information available in another form (including reproduction costs) should be clearly specified, with access details and charges published on the agency's website.

Please now complete the checklist for **CRITERION 4: IPS information architecture.**

5. Agency Compliance Review

Under s 9 of the Act, each agency must (in conjunction with the Information Commissioner) complete a review of the operation of the IPS within the agency. This review will occur from time to time (as appropriate), or at least within five years of 1 May 2011.

Practically, it is expected that most agencies will review and revise their compliance with IPS obligations both independently of the OAIC and on an ongoing basis, as an additional part of a normal compliance program. Each agency is responsible for undertaking the day to day tasks associated with IPS compliance, such as the ongoing administration of the IPS information holdings and the implementation, review and revision of the agency plan. The agency's strategic planning cycle may provide an appropriate review or compliance framework around which IPS compliance review activities can be undertaken.

The OAIC will review the operation of the IPS within each agency within the first five years of 1 May 2011 (and at least every five years subsequently). This is in accordance with the Information Commissioner's powers and functions under ss 8F and 9 of the Act and *Part 13: Information Publication Scheme guidelines issued under s 93A*, which agencies must have regard for in their compliance with the IPS.

Please now complete the checklist for **CRITERION 5: Agency compliance review.**

Self-assessment response categories

The following response categories should be used when completing the self-assessment checklist.

Response categories	
Yes (Y)	A system, policy, strategy or process has been implemented in full across the agency
In progress (IP)	Management has decided on a particular course of action AND Implementation has commenced OR Is complete in part but not all of the agency
Required (R)	Management has identified this as a requirement, but has not yet commenced to address the issue
No/Not applicable (N/NA)	No systems, policies, strategies or processes are in place AND there is no immediate plan to develop any OR Not applicable

CRITERION 1: Agency Plan	Y	IP	R	N/NA	Comment	
1.1 AGENCY PLAN FOR THE IPS HAS BEEN PREPARED						
1.1.1 Plan shows what IPS information is proposed to be published						
1.1.2 Plan shows how, and to whom, IPS information is published						
1.1.3 Plan shows other ways agency complies with IPS requirements						
1.2 AGENCY PLAN IS PUBLISHED ON THE WEBSITE					s 8(1) met: YES / NO	
					Agency Plan criterion met?	
					Yes	No

CRITERION 2: Governance and administration	Y	IP	R	N/NA	Comment
2.1 APPROPRIATE GOVERNANCE FRAMEWORK ESTABLISHED					
2.1.1 An SES-level IPS 'Information Champion' has been appointed					
2.1.2 Appropriate formal IPS governance body created					
2.1.3 Relevant IPS Working Group(s) established					
2.2 MAINTAINANCE AND MONITORING OF IPS COMPLIANCE					
2.2.1 Responsibility for compliance monitoring has been assigned					
2.2.2 Responsibility for maintaining IPS register has been assigned					
2.2.3 Responsibility for improving awareness of IPS obligations within the agency has been assigned					
2.2.4 Responsibility for OAIC and ministerial reporting has been assigned					
2.3 PROCESSES TO IDENTIFY AND PUBLISH IPS DOCUMENTS					
2.3.1 Processes in place to identify/ prepare documents for publication					
2.3.2 Processes in place to publish IPS documents					
					Governance and admin criterion met?
					Yes
					No

CRITERION 3: IPS document holdings	Y	IP	R	N/NA	Comment
3.1 SPECIFIED DOCUMENTS ARE AVAILABLE ON WEBSITE					
3.1.1 Agency Plan					s 8(2)(a) met: YES / NO
3.1.2 Details of agency organisational structure					s 8(2)(b) met: YES / NO
3.1.3 Agency functions and decision-making powers					s 8(2)(c) met: YES / NO
3.1.4 Appointments of agency officers made under Acts (other than APS employees within the meaning of the <i>Public Service Act 1999</i>)					s 8(2)(d) met: YES / NO
3.1.5 Annual reports prepared by the agency laid before Parliament					s 8(2)(e) met: YES / NO
3.1.6 Consultation arrangements for members of the public to comment on specific policy proposals for which the agency is responsible, including how (and to whom) those comments are made					s 8(2)(f) met: YES / NO
3.1.7 Information in documents which the agency routinely gives access in response to requests under Part III (with exceptions)					s 8(2)(g) met: YES / NO
3.1.8 Information held by the agency routinely provided to the Parliament in response to requests and orders from the Parliament					s 8(2)(h) met: YES / NO
3.1.9 Contact details for IPS information or documents					s 8(2)(i) met: YES / NO
3.1.10 Operational Information (as defined in s8A)					s 8(2)(j) met: YES / NO
3.2 ADDITIONAL DOCUMENTS ARE AVAILABLE ON WEBSITE					
3.2.1 Agency has a mechanism for identifying additional information that the community would find useful					
3.2.2 Additional documents are made available and easily accessible					s 8(4) met: YES / NO

3.3 ALL IPS DOCUMENTS ARE ACCURATE, UP-TO-DATE AND COMPLETE					s 8B met: YES / NO	
3.3.1 All <i>specified</i> documents accurate, up to date and complete						
3.3.2 All <i>additional</i> documents accurate, up to date and complete						
3.4 'EXEMPT' DOCUMENTS ARE CONSIDERED FOR PUBLICATION					s 8C met: YES / NO	
3.4.1 Agency routinely identifies documents that are exempt from the requirements of the FOI Act						
3.4.2 Agency has a mechanism or process in place to decide whether or not to publish 'exempt' documents						
					IPS Document criterion met?	
					Yes	No

CRITERION 4: IPS information architecture	Y	IP	R	N/NA	Comment
4.1 STANDARDISED PUBLICATION OF IPS INFORMATION					
4.1.1 Agency plan					
4.1.2 Who we are					
4.1.3 What we do					
4.1.4 Our reports and responses to Parliament					
4.1.5 Routinely requested information and disclosure log					
4.1.6 Consultation arrangements					
4.1.7 Contact Information (i.e. appropriate contact details within your agency for FOI requests or enquiries)					
4.1.8 Examples of additional (optional) headings Our priorities Our finances Our lists (for grants, contracts and engagements) Our policies					

4.2 DOCUMENTS ARE EASILY DISCOVERABLE AND UNDERSTANDABLE					
4.2.1 Agency plan is easily discoverable on the agency website					
4.2.2 Website sitemap helps individuals identify the location of information published under ss 8(2) and 8(4)					
4.2.3 Agency has a mechanism for gathering feedback from the community regarding whether IPS information holdings (and individual IPS documents) are easily discoverable and understandable.					
<i>Best practice suggestions (optional)</i>					
4.2.4 OAIC IPS icon is easily visible on the agency website					
4.2.5 An alert service notifies subscribers of new publications under the IPS or other developments in relation to IPS					
4.3 DOCUMENTS ARE EASILY ACCESSIBLE AND MACHINE READABLE					
4.3.1 Online content provided in a format that can be searched, copied and transformed					
4.3.2 Direct links to documents suitable for online publishing are provided					
4.3.3 IPS information holdings are available for reuse on open licensing terms					
4.3.4 Agency has a mechanism for gathering feedback from the community regarding whether IPS information holdings (and individual IPS documents) are easily accessible and/or machine-readable.					

4.4 ACCESS TO NON-WEB BASED IPS DOCUMENTS					
4.4.1 If a direct link to a document is impractical, a summary of the document is provided and access arrangements are described clearly					
4.5 FEES AND/OR CHARGES					
4.5.1 The website sets out the terms on which non web-based information or documents are accessible, including applicable fees/ charges					
					Information architecture criterion met?
					Yes
					No

CRITERION 5: Agency compliance review	Y	IP	R	N/NA	Comment
5.1 AGENCY REVIEW					
5.1.1 Agency has internal systems and procedures in place to review the effectiveness of IPS compliance on an ongoing basis					
5.1.2 Agency has assigned responsibility for undertaking regular review of the IPS agency plan and implementation					Area responsible:
5.1.3 Agency has appropriate IPS compliant handling procedures in place					
5.1.4 Agency has scheduled a review and revision of the IPS implementation before 1 May 2016					Scheduled date:
5.1.5 Agency and OAIC IPS review completed by 30 April 2016					s 9 met: YES / NO Review date:
5.2 IPS REVIEW AND CONTACT WITH THE OAIC					
5.2.1 Agency has established a primary contact point with the OAIC					
5.2.2 Agency is represented on the IPS network managed by the OAIC					
					Agency Compliance criterion met?
					Yes
					No