

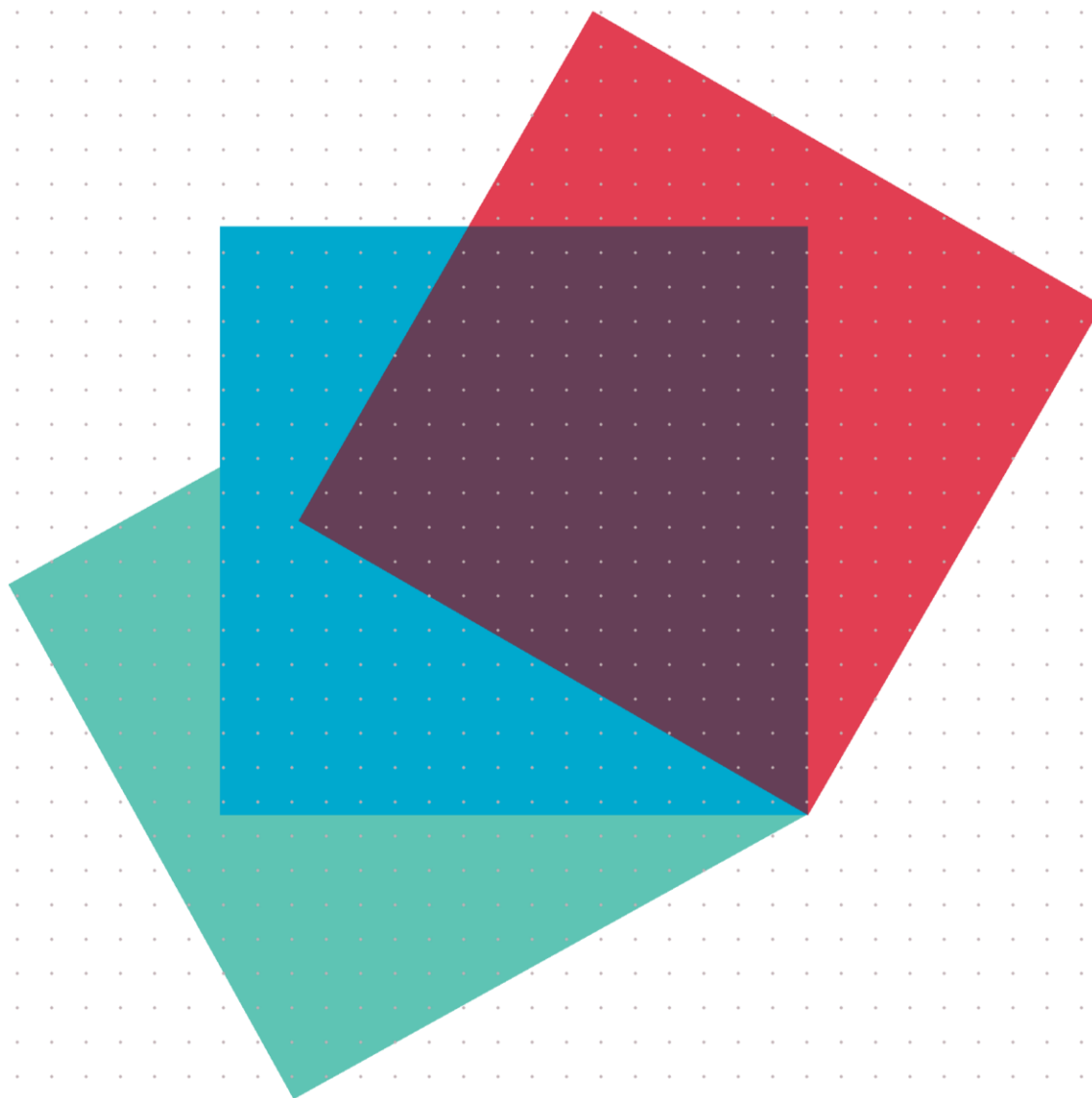


Australian Government
**Office of the Australian
Information Commissioner**

Information Publication Scheme

Survey of Australian
Government Agencies

oaic.gov.au



OAIC

Survey Report

Survey undertaken: May to August 2018 Report issued: June 2019

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1. Foreword

The Information Publication Scheme (IPS), marked by proactive release and publication of government information, continues to be an important element in ensuring information held by Australian government agencies is managed for public purposes and is treated as a national resource.

Compliance with the IPS is an ongoing statutory responsibility for agencies subject to the *Freedom of Information Act 1982* (FOI Act). Agencies must publish an IPS Plan, select information for publication, ensure that information is accessible and useable by the community, establish internal governance arrangements to support the IPS, align the agency's information assets with IPS objectives and regularly review the agency's performance.

The Office of the Australian Information Commissioner (OAIC) undertook an initial survey of agencies' compliance with IPS obligations in June 2012, one year after the scheme was adopted. The 2012 survey results demonstrated a strong commitment across government to comply with the new IPS requirements and principles.

In 2018, the OAIC commissioned ORIMA Research to conduct a second survey of Australian Government agencies' compliance with their IPS obligations. The focus of the 2018 survey was similar to the 2012 survey to facilitate a comparison of results between the two surveys and to measure changes in agency compliance levels over time.

A total of 190 agencies participated in the survey out of 232 agencies that were invited to take part, representing a solid response rate of 82%, above the 2012 response rate of 78%.

The results confirmed a continued commitment across government to IPS requirements and principles. However a decline was observed in each of the four key areas of compliance measured by the survey in 2012 and 2018. Larger agencies generally reported higher levels of compliance with IPS requirements and better practice principles, compared with micro, extra small and small agencies.

The results of the survey help both the OAIC and agencies identify areas where improvements can be made to support the proactive publication of information held by Australian government agencies. The involvement of senior leaders in agencies will be key to promoting the value of the IPS in enabling a proactive approach to releasing information into the future.

Both the volume of information handled by agencies and the manner in which the public accesses information has changed since the first survey was conducted in 2012. The OAIC will review its guidance and other resources to assist with agency compliance and support better practice, taking into account changes in the operating environment.

I look forward to working together with agencies as we continue to promote a proactive approach to publishing government information by further strengthening the IPS.

Angelene Falk
Australian Information Commissioner
June 2019

2. Executive summary

2.1. Background

In April 2018, ORIMA Research was commissioned by the Office of the Australian Information Commissioner (OAIC) to conduct a survey of Australian Government agencies compliance with the Information Publication Scheme (IPS) under the *Freedom of Information Act 1982* (FOI Act). A total of 190 agencies participated in the survey out of 232 agencies that were invited to take part, representing a strong response rate of 82 per cent.

In June 2012, the OAIC conducted the initial survey of agencies' compliance with IPS obligations and management and publication of public sector information by agencies.¹ The 2018 IPS survey aligns with the 2012 survey to allow tracking of changes in agency compliance levels over time.

2.2. IPS compliance

Agency IPS operation review



82% of agencies
**have now completed
a review of the
operation of the IPS
in their agency**

Eighty two per cent of agencies completed the 2018 IPS survey and are now considered by the Information Commissioner to have reviewed the IPS in their agency².

Fourteen per cent of agencies had completed a review of the operation of the IPS in their agency prior to participating in the survey.

Among agencies that completed an IPS Operation Review before the survey, 44 per cent completed this review in the last 12 months and 41 per cent did so more than two years ago³.

At least 90 per cent of agencies who completed an IPS review before completing the survey covered each of the five key elements of IPS compliance set out in Part 13 of the FOI Guidelines:

¹ A report of the 2012 IPS Survey results is published on the OAIC website at <https://www.oaic.gov.au/freedom-of-information/foi-resources/foi-reports/information-publication-scheme-survey-of-australian-government-agencies>.

A separate report on agency implementation of the Principles on open public sector information was published in February 2013 on the OAIC website at <https://www.oaic.gov.au/information-policy/information-policy-resources/open-public-sector-information-from-principles-to-practice>.

² Section 9(1) of the FOI Act requires agencies to complete a review of the operation of the IPS within their agency, as appropriate from time to time and within five years of the commencement of the IPS (by 1 May 2016), in conjunction with the Information Commissioner. The Information Commissioner considered that the completion and submission of the 2018 IPS agency survey satisfied agencies' requirement to complete a review of the operation of the IPS.

³ Calculated from the last day of the extended fieldwork period (17 August 2018).

- almost all agencies reviewed their IPS document holdings (96 per cent), agency plan (96 per cent) and IPS information architecture (96 per cent)
- ninety-three per cent indicated that their reviews included coverage of their agency compliance review and governance and administration.

Agency IPS plan

The proportion of agencies that had published an Agency IPS Plan in 2018 was 88 per cent, compared to 94 per cent in 2012. Reasons provided by agencies for not publishing an IPS plan included the plan currently being in development, having insufficient resources to do so, not being aware of the requirement or the plan not being considered relevant.

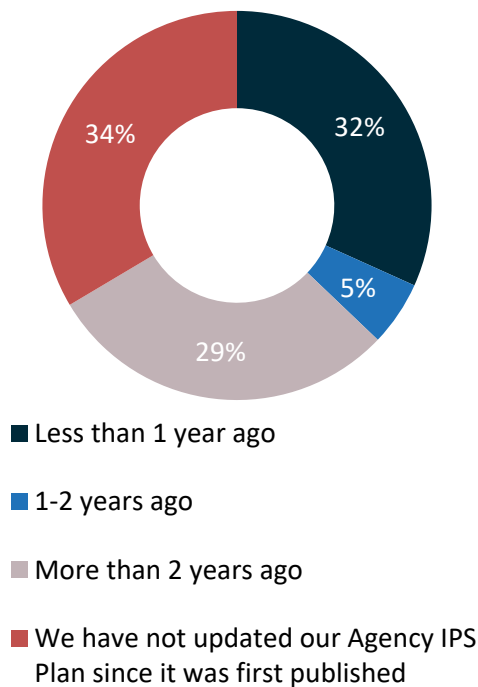


88% of agencies have **published an Agency IPS plan**

Of those agencies with a published IPS agency plan, 89 per cent used some or all of the standard headings recommended by the OAIC. This is lower than the 96 per cent recorded for the same measure in 2012. The proportion using all five standard headings declined from 76 per cent in 2012 to 62 per cent in 2018. Most agencies that did not use the standard headings indicated that they used similar headings and language that reflected the intended content and which were, for some agencies, considered more user friendly. The OAIC will consider this feedback when updating the FOI Guidelines.

In 2018, coverage of recommended content in IPS agency plans was lower than in 2012. At least two-thirds of agencies included most of the matters specified in the FOI guidelines. However, only 37 per cent of agencies indicated that their plan specified whether an internal IPS information register had been developed (down from 50 per cent in 2012). Twenty two per cent specified the measures (if any) being taken to improve the agency's information asset management framework to support its IPS compliance, down from 53 per cent in 2012.

Time since last update of Agency IPS Plan



The survey also found that the practice of updating agency IPS plans was inconsistent.

While 32 per cent of agencies had updated their Agency IPS Plan within the last year, 29 per cent had updated their plan more than two years ago and 34 per cent had not updated their plan since it was first published (which was most commonly either over five years ago (68 per cent) or three to five years ago (16 per cent)).

Sixty-two per cent of agencies indicated they have a timetable for formally reviewing their Agency IPS Plan—compared with 84 per cent recorded in 2012. Among agencies that have a timetable, 59 per cent planned to review the plan at least every 12 months, and five per cent planned to review it every six months.

IPS governance and administration

76% of agencies have appointed a senior executive officer to lead the agency's work on IPS compliance

Seventy-six per cent of agencies indicated they have appointed a senior executive officer to lead the agency's work on IPS compliance. This result is lower than the 93 per cent recorded in 2012.

Only 27 per cent of agencies indicated they have a formal IPS governance structure, down from 47 per cent in 2012. The most common reasons noted for not having a formal IPS governance structure were related to agency size and resourcing constraints.

Among those with a formal IPS governance structure, this was most likely to be some 'other' governance structure (55 per cent). These 'other' governance structures included IPS-related project teams, FOI contact officers or units and Boards, such as a Corporate Governance Board. A relatively smaller proportion of agencies identified that their formal IPS governance structure(s) consisted of a working group (37 per cent) and/or steering committee (14 per cent).

Fifty-four per cent of agencies have assigned responsibility for the management or coordination of staff training and awareness of IPS obligations – below 73 per cent in 2012. Sixteen per cent of agencies indicated that induction training for new staff includes information on the IPS (compared to 23 per cent in 2012), while 25 per cent indicated they provide staff with other specific training on IPS obligations, lower than the 49 per cent recorded in 2012.

54% of agencies have assigned responsibility for the management or coordination of staff training and awareness of IPS obligations

IPS entry



Over 70% of agencies publish each of the required types of information on their website

In 2018, over 70 per cent of agencies indicated they publish each of the required types of information on their website. Information relating to annual reports, organisation structures, agency's functions and decision making powers, and contact details for FOI information or

documents were most commonly published (by at least 95 per cent of agencies in 2018, which remains broadly similar to the results recorded in 2012). However, the proportion of agencies publishing other types of information has declined since 2012. The types of information that were least likely to be published and also had the greatest rate of decline since 2012 included:

- information in documents to which agencies routinely give access in response to requests under Part III of the FOI Act – s 8(2)(g) (79 per cent, down from 86 per cent in 2012)
- consultation arrangements for members of the public to comment on specific policy proposals for which the agency is responsible (72 per cent, down from 86 per cent in 2012).

Forty-two per cent of agencies indicated they have made a decision not to publish information under the IPS due to the personal or business information exception in s 11C of the FOI Act, higher than the 36 per cent recorded in 2012.

Thirty-eight per cent of agencies indicated that they maintain an IPS information register. Fifty-three per cent of agencies without an IPS information register indicated that they plan to develop one in the next 12 months.

A minority of agencies with IPS information registers indicated that they reviewed their registers every six (14 per cent) or every 12 months (22 per cent), with a larger share indicating that they reviewed their registers only when significant IPS changes occur (36 per cent) or that they did not know when the review occurred (28 per cent).

More agencies (73 per cent) indicated that they do not charge for information required or permitted to be published under the IPS in 2018, up from 68 per cent in 2012.

IPS information architecture



More than 70% of agencies use **six out of the 10 recommended standardised headings and structure**

While most agencies present their IPS information using the 10 recommended headings specified in the FOI Guidelines, there has been a reduction in usage of each of these headings since 2012. More than 70 per cent of agencies used six out of the 10 recommended headings, compared with more than three-quarters of agencies that used seven out the 10

recommended headings in 2012. Agencies were most likely to use headings such as 'Contact us' (85 per cent) and 'What we do' (79 per cent) in 2018. However, less than half of agencies indicated that they presented their information under the headings 'Our priorities' (49 per cent), 'Our finances' (46 per cent) and 'Our lists' (39 per cent).

There was a substantial improvement in the accessibility of IPS documents in 2018. In particular, 69 per cent of agencies indicated that all or most documents they have published under the IPS are in a format (or multiple formats) which conform to Web Content Accessibility Guidelines (WCAG) 2.0 requirements, which is considerably more than 50 per cent in 2012.

The survey also found considerable variation in the proportion of agencies that provide access to website features that assist in the discoverability and understanding of information published under the IPS.

For example:

- sixty-three per cent of agencies reported they have a search function that can access information published within an agency's IPS entry, down from 81 per cent in 2012
- twenty-five per cent of agencies indicated that the OAIC IPS Icon is visible on the homepage of their website, less than half the proportion recorded in 2012 (59 per cent).

2.3. Management and publication of public sector information

Open access to information

Thirty-five per cent of agencies indicated that they have adopted a strategy for increasing open access to public sector information held by their agency, in addition to the information required to be published in the IPS and Disclosure Log (up from 27 per cent in 2012). The proportion of agencies indicating that this strategy is under development in 2018 declined from 2012 (26 per cent, down from 48 per cent). The proportion who indicated that they have not adopted this strategy has increased (from 25 per cent to 39 per cent).



35% of agencies have adopted a **strategy for increasing open access to public sector information**

Sixty-seven per cent of agencies indicated that they used social media sites to publish or promote access to public sector information (including linking to information published on their agency's website). They were most likely to use Twitter (62 per cent), followed by YouTube (47 per cent) and Facebook (46 per cent).

Discoverability

In 2018, the majority of agencies indicated that most (36 per cent) or all (24 per cent) of the public sector information that they have published was in an open and standards based format—notably higher than the proportions recorded in 2012 (37 per cent).

In 2018, 46 per cent of agencies indicated they routinely apply metadata to public sector information they publish on the internet (compared to 49 per cent in 2012) and that they were

most likely to only use the Australian Government Locator Service (AGLS) metadata standard (57 per cent) when doing this.

Challenges to publishing public sector information

When agencies were asked to identify the top four challenges they face when publishing public sector information (apart from publishing information in the IPS and Disclosure Log), the aspects most commonly identified were:

- open access to information (77 per cent) including obtaining sufficient budgetary resources to enable open access; identifying information, in addition to the IPS and Disclosure Log, that can be published; and ensuring compliance with privacy and secrecy requirements
- robust information asset management (48 per cent) including establishment and maintenance of an information asset register and providing up-to-date staff training in information management
- effective information governance (35 per cent) including instigating strategic planning about information resource management and establishing an appropriate focal point, officer, or centralised department responsible for furthering access to public sector information



77% of agencies identified **open access to information** as the most **significant challenge** faced when **publishing public sector information**

- facilitating discoverable and useable information (33 per cent) including ensuring compliance with WCAG 2.0 and agency costs (including staff time) associated with compliance with WCAG 2.0.

3. Introduction

3.1. Background

Since 1 May 2011, compliance with the Information Publication Scheme (IPS) is an ongoing statutory obligation for agencies subject to the *Freedom of Information Act 1982* (FOI Act), where agencies are required to proactively publish a range of documents and information on their websites, and are encouraged to publish additional information beyond that required by the FOI Act. The IPS underpins a pro-disclosure culture in government, marked by proactive release and publication of government information.

Part 13 of the Guidelines issued by the Australian Information Commissioner under s 93A of the FOI Act to which agencies must have regard in performing a function or exercising a power under the FOI Act (FOI Guidelines) provides agencies with guidance for conducting a review of agency IPS compliance. The FOI Guidelines provide that agencies should focus on five key elements of IPS compliance when undertaking a review of the IPS. The five key elements are:

1. *Agency plan* — has the agency published a comprehensive plan for its IPS compliance?
2. *Governance and administration* — does the agency have appropriate governance mechanisms in place to meet its IPS obligations, including an information management framework?
3. *IPS document holdings* — has the agency reviewed its document holdings to decide what information must be published under s 8(2) and information that can be published under s 8(4)? Is the agency IPS entry accurate, up-to-date and complete?
4. *IPS information architecture* — does the agency have a publication framework in place and has it taken the necessary steps to ensure that information in its IPS entry is easily discoverable and accessible to the Australian community?
5. *Agency compliance review* — does the agency have appropriate processes, systems and resources in place to monitor and review its IPS compliance and to make necessary improvement in the agency's IPS implementation?

In June 2012, the Office of the Australian Information Commissioner (OAIC) conducted an initial survey of Australian Government agencies' compliance with IPS obligations. Part A of the survey assessed compliance with the four key IPS criteria set out in the FOI Guidelines.

The 2012 survey was undertaken by ORIMA Research on behalf of the OAIC. The survey found that agencies displayed a high level of compliance with many aspects of the IPS, including almost all agencies publishing an IPS plan, publishing required information on their websites and assigning responsibility for the IPS to a senior officer within their agency⁴. The results of the 2012 survey confirmed a serious commitment across government to compliance with IPS requirements and

⁴ A [report](#) of the 2012 IPS Survey results is published on the OAIC website.

principles. However, the survey also identified areas where improvement was required such as IPS governance and administration and IPS information architecture.

The 2012 IPS survey was conducted in conjunction with a survey of the management and publication of public sector information. Part B of the survey sought general information about the management of public sector information by agencies and the publication of other public sector information under s 8(4) of the FOI Act. The responses to the survey helped to build a picture of the types of public sector information that is held and published in a way that facilitates reuse by the community. The survey also helped to identify areas in which agencies could benefit from assistance or further guidance. The survey results were published in February 2013.⁵

The methodology used to collect this information in 2018 differed to the approach used in 2012, with only a small number of questions relating to the management and publication of public sector information included as part of the 2018 IPS survey. Information collected about the management and publication of public sector information in 2018 is presented in Sections 2.3 and Section 5 of this report.

In 2012, the OAIC planned to undertake a further survey of Australian Government agencies in 2014. However, around the time the second survey was to be undertaken, the Government announced plans to disband the OAIC by the end of 2014 and for policy responsibilities to be undertaken by the Attorney-General's Department, including the Information Publication Scheme. As a result, the OAIC was unable to undertake a second survey in 2014. However, the OAIC was not disbanded in 2014 and FOI functions were confirmed as remaining with the OAIC in July 2016. In January 2018, the OAIC Executive undertook to conduct the second survey during 2018.

In early 2018, the OAIC commissioned ORIMA Research to conduct a second survey of Australian Government agencies' compliance with their IPS obligations. The survey assessed compliance with the five key IPS criteria set out in the FOI Guidelines.

The focus of the 2018 survey was similar to the 2012 survey to facilitate a comparison of results between the two surveys and to allow tracking of changes in agency compliance levels over time. The 2018 survey also included a number of new topics and questions, including an additional section to measure the extent to which agencies had complied with their obligation under s 9 of the FOI Act to conduct a review of the operation of the IPS within their agencies by 1 May 2016⁶. The OAIC considered submission of the IPS survey to have satisfied an agency's requirement to conduct this review. The survey also included a small number of questions about the management and publication of public sector information.

A total of 190 agencies participated in the survey out of 232 agencies that were invited to take part, representing a solid response rate of 82 per cent⁷. A higher proportion of agencies participated in the 2018 survey than the 2012 survey, where a total of 191 out of 245 agencies participated (response rate of 78 per cent).

⁵ [Open public sector information: from principles to practice](#), OAIC, February 2013.

⁶ Section 9 of the FOI Act requires agencies to complete a review of the operation of the IPS within their agency, within five years of the commencement of the IPS. The review is to be done in conjunction with the OAIC.

⁷ (n=15) micro agencies participated via duplication of responses of their parent agency in cases where the parent agency advised ORIMA or OAIC that they managed the IPS on behalf of the micro agency (please also refer to section 3.5 that discusses this issue).

This report presents the results from the 2018 IPS Agency survey, which was conducted between May and August 2018.

3.2. Research objectives

The results of the research have been used by the OAIC to develop this report about IPS compliance across all Australian Government agencies subject to the FOI Act. The research was also designed to provide:

- a review of the operation of the IPS within Australian Government agencies
- information and feedback about the administration of agencies' IPS obligations under the FOI Act
- an indication of areas where the OAIC can provide assistance or further guidance to agencies
- an assessment of agencies' compliance with their IPS obligations
- a comparative analysis against agency compliance reported in August 2012
- information on the direction of the OAIC's work in policy, compliance and communications as the national FOI regulator
- an opportunity to promote a pro-disclosure culture in government.

3.3. Methodology

The 2018 IPS Survey of Australian Government Agencies was conducted online as a census of all agencies subject to the FOI Act⁸. The methodology adopted in 2018 was consistent with the approach used in the 2012 survey, which also involved an online census of relevant agencies.

The survey fieldwork was conducted between 29 May and 12 June 2018. Largely to give agencies more time to approve their responses through the appropriate clearance channels, fieldwork was extended until 15 June 2018 and a few agencies were provided a further extension until 17 August 2018 to clarify or finalise their responses. Fieldwork was extended until 17 August 2018 to boost the overall response rate to ensure that agencies of varying sizes, particularly larger agencies, were represented in the final survey data.

A total of 232 agencies were invited to complete the survey, of which 190 responded. This represents a strong response rate of 82 per cent.

Before fieldwork, the Australian Information Commissioner wrote to all agency heads to inform them of the upcoming survey and that ORIMA had been engaged to conduct the survey on behalf of the OAIC.

At the start of the fieldwork period, all invited agencies were sent an invitation email to their FOI email address. This email contained the survey link and a unique password for their agency to

⁸ Ministers are not required to comply with the IPS so were excluded from the IPS agency survey.

access the survey online. Courtesy calls were also made towards the end of the first week of fieldwork to confirm whether invitations had been received and to identify whether they needed to be re-sent to alternative contacts. Reminder emails were sent to non-responding agencies on 4 June, and reminder telephone calls were made in the days leading up to the initial fieldwork close date of 12 June to encourage participation. On 12 June, an email was sent to all non-responding agencies advising that the survey close date had been extended until 14 June. As noted previously, the survey remained open until 17 August largely for selected agencies requiring more time to seek approval of their responses through their appropriate clearance channels. The OAIC also contacted agencies directly in July and August to encourage non-responding agencies to participate.

The survey data was reviewed and underwent a validation process, which involved follow up emails and telephone calls to selected agencies to verify their responses and, in some cases, to verify that their responses were ready for submission.

IPS risk mitigation index

The report presents the results of an IPS risk mitigation index to provide a high-level summary of the survey results overall and against five compliance criteria set out in the FOI Guidelines. The methodology used to calculate the index is consistent with the approach employed in 2012. The index does, however, have a number of compositional differences from 2012 associated with changes to questions in the two surveys. The most significant change was due to the inclusion of an additional compliance criterion (Agency IPS Operation Review) in 2018.

The risk mitigation index provides an index score from 0 to 100 that represents the extent to which agencies comply with the relevant IPS aspects measured in the survey. Higher index scores represent a greater level of compliance (or greater risk mitigation) and therefore more positive results.

Nearly all questions included in the risk mitigation index are yes/no questions where agencies receive 2 points if they provide a yes response (indicating that they comply with the relevant IPS requirement) and zero if they do not comply. An index score is calculated for each agency on the basis of the number of points recorded divided by the number of possible points, multiplied by 100. An index score of 100 would therefore represent an agency complying with each of the aspects included in the risk index, while a score of zero would represent compliance with no aspects.

Index scores between 0 and 100 can be interpreted⁹ as roughly representing the average level of compliance amongst agencies with the measures included in the index (e.g. an index score of 50 can be interpreted as roughly half of agencies complying with the range of measures included in the risk mitigation index).

⁹ This interpretation is because most of the measures in the index either attract a score of 2 (for compliance) or 0 (for non-compliance), therefore if an agency complies with 3 of the 6 measures they would receive a risk mitigation index score of 50 – representing compliance with 50 per cent of the assessed measures. While Appendix G provides more detail about the calculation of the risk mitigation index and shows that a small number of questions feed into the index in a different way, this represents a rough interpretation of the risk mitigation level.

Six risk mitigation indices are presented in this report, one overall risk mitigation index and five risk mitigation indices for each of the key assessment criteria. The overall IPS index is a weighted average of the five criteria risk mitigation indices as outlined in Table 1 below. Weights for each criterion were determined by the OAIC based on an assessment of the relative importance of each of the criteria in the overall IPS and to maintain the relativities between the four component indices measured in 2012.

Table 1: Weight of each IPS component on the overall risk mitigation index

Criteria	Weight in overall index
Agency IPS Operation Review	28.6
Agency IPS Plan	10.7
IPS Governance and Administration	21.4
IPS Entry	28.6
IPS Information Architecture	10.7

3.4. Profile of respondents

The OAIC notified ORIMA Research that some agencies were responding to the survey on behalf of smaller agencies within their portfolio. This has been reflected in the data, with each of these smaller agencies treated as a separate response to the survey. In these cases, the smaller agency responses were identical to the larger agency responses, as the 'parent agency' is responsible for the management and implementation of IPS obligations.

As shown in Table 2, 190 agency responses were included in the final survey data of which 175 were 'unique' responses and 15 were duplicated from parent agencies. This approach was also followed in the 2012 survey, where 140 unique responses were collected and 51 were duplicated from parent agencies. The reduction in duplication of responses in 2018 reflects several parent agencies indicating that they no longer manage the IPS on behalf of other agencies in their portfolio. The other agencies identified were often 'micro' or 'extra small' agencies.

Table 2: Profile of agencies that responded to Information Publication Scheme: Survey of Australian Government Agencies

	2018 number of agencies	2018 % of total responding sample	2012 number of agencies	2012 % of total responding sample
<i>Agency Size</i>				
Micro agency (less than 20 staff)	28	15%	21	11%
Extra small agency (20 – 100 staff)	44	23%	30	16%
Small agency (101-250 staff)	30	16%	25	13%
Medium agency (251 – 1,000 staff)	37	19%	33	17%
Large agency (1,001 – 10,000 staff)	31	16%	24	13%
Extra large agency (more than 10,000 staff)	5	3%	4	2%
Not answered (includes ‘duplicate’ agencies where the agency size data was not duplicated from the parent agency’s response)	15	8%	54	28%
Total	190		191	
<i>Number of FOI requests</i>				
None (0 requests)	45	24%	41	21%
Low (1 – 10 requests)	52	27%	39	20%
Medium (11 – 100 requests)	49	26%	41	21%
High (101 – 500 requests)	20	11%	11	6%
Very high (more than 500 requests)	9	5%	3	2%
Not answered (includes ‘duplicate’ agencies where the number of FOI requests data was not duplicated from the parent agency’s response) ¹⁰	15	8%	56	29%
Total	190		191	

¹⁰ The number of FOI requests in 2012 has been re-calculated using a method consistent with the 2018 data – agencies whose number of FOI requests has been duplicated from a parent agency’s response has been removed and calculated as part of the ‘not answered’ category.

3.5. Presentation of results

In 2018, the online survey provided to agencies was programmed to ensure that agencies could only submit their survey response if all mandatory questions were answered. Only agencies that completed the submission process have been included in this report (i.e. agencies that did not formally submit their responses or provided an incomplete response have been excluded).

Consistent with 2012, a number of agencies' responses were covered by 'parent' agencies. In these cases, the response from the 'parent' agency was duplicated in the survey dataset and included as part of the results in this report.

Percentages shown in this report are based on the total number of respondents to the survey (n=190), except where the question did not apply to them (i.e. a response to one question sequenced them past a question further along the survey – see Appendix A: Questionnaire for a full representation of these 'skips'). In these cases, the percentages in the report are based on the number of respondents where the question applied to them.

Percentage results throughout the report may not add up to 100 per cent due to rounding, or where questions allow for respondents to provide more than one answer.

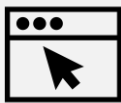
3.6. Quality standards

This project was conducted in accordance with the international quality standard ISO 20252 and the Australian Privacy Principles contained in the *Privacy Act 1988*.

4. IPS compliance

4.1. Agency operation review¹¹

IPS operation overview



82% of (in-scope¹²) agencies **completed the 2018 IPS survey**



14% of responding agencies **completed a review of the operation of the IPS prior to completing the 2018 IPS survey**

The 2018 Information Publication Scheme (IPS) Survey of Australian Government Agencies found that 82 per cent of agencies completed the 2018 IPS Survey (and have now therefore reviewed the IPS in their agency¹³), while only 14 per cent of agencies had completed a review prior to completing the survey.

Among agencies that completed a review before the survey, a large minority (44 per cent) completed this review within the last 12 months and around two-fifths (41 per cent) did so more than two years ago (see Figure 1).

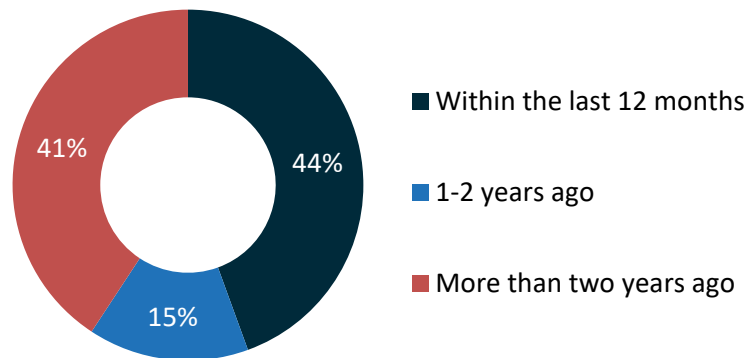
¹¹ 'Agency operation review' was referred to as 'Criterion Five' in 2012 as set out in the FOI Guidelines to assess IPS compliance. This criterion could not be measured in 2012 due to the requirement for each agency to complete a review of its IPS Compliance by 1 May 2016 under the FOI Act.

¹² All Australian Government agencies subject to the FOI Act were in scope for the IPS agency survey.

¹³ Section 9(1) of the FOI Act requires agencies to complete a review of the operation of the IPS within their agency, as appropriate from time to time and within five years of the commencement of the IPS (by 1 May 2016), in conjunction with the Information Commissioner. The Information Commissioner considered that the completion and submission of the 2018 IPS agency survey satisfied agencies' requirement to complete a review of the operation of the IPS.

Figure 1: Time since the completion of reviews

Base: Agencies who completed a review of the operation of the IPS prior to this survey (n=27)



Further analysis by agency characteristics

The extent to which agencies completed a review of the operation of the IPS did not vary significantly by agency size or the number of FOI requests received.

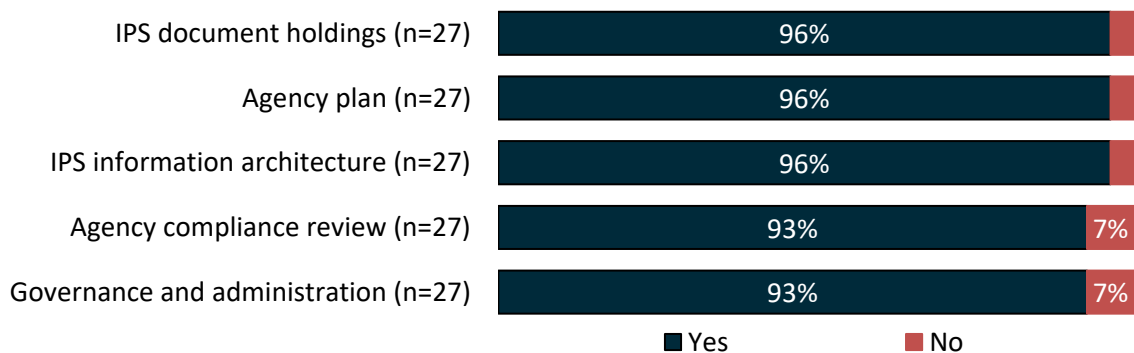
Five key elements of IPS compliance

As shown in Figure 2, at least 90 per cent of agencies who completed a review of the operation of their IPS covered the five key elements of IPS compliance as set out in Part 13 of the Freedom of Information (FOI) Guidelines:

- almost all agencies reviewed their IPS document holdings (96 per cent), agency plan (96 per cent) and IPS information architecture (96 per cent)
- just under 10 per cent indicated that this review did not include coverage of their agency compliance review (seven per cent) or governance and administration (seven per cent).

Figure 2: Coverage of the five key elements of IPS compliance in review of the operation of agencies' IPS

Base: Agencies that completed a review of the operation of the IPS





Agencies that completed a review of the operation of the IPS in their agency were asked to briefly describe the outcomes of this review. Key outcomes identified by agencies included:

- they were generally compliant with the expectations of the operation of the IPS in their agencies:

‘The self-assessment found full compliance with all expectations and objectives of the Australian Office of the Information Commissioner.’

‘The review found the department was compliant with the five key elements of IPS Compliance.’

- agency websites have been updated with regard to layout and content:

‘The review provided the opportunity to ensure website and documentation was accurate and up-to-date.’

‘Some minor improvements [were] identified, particularly to the layout of information provided on our website.’

- specific actions needed to be taken to ensure compliance:

‘Manage its IPS information holdings.’

‘Update of IPS plan.’

Complaint handling

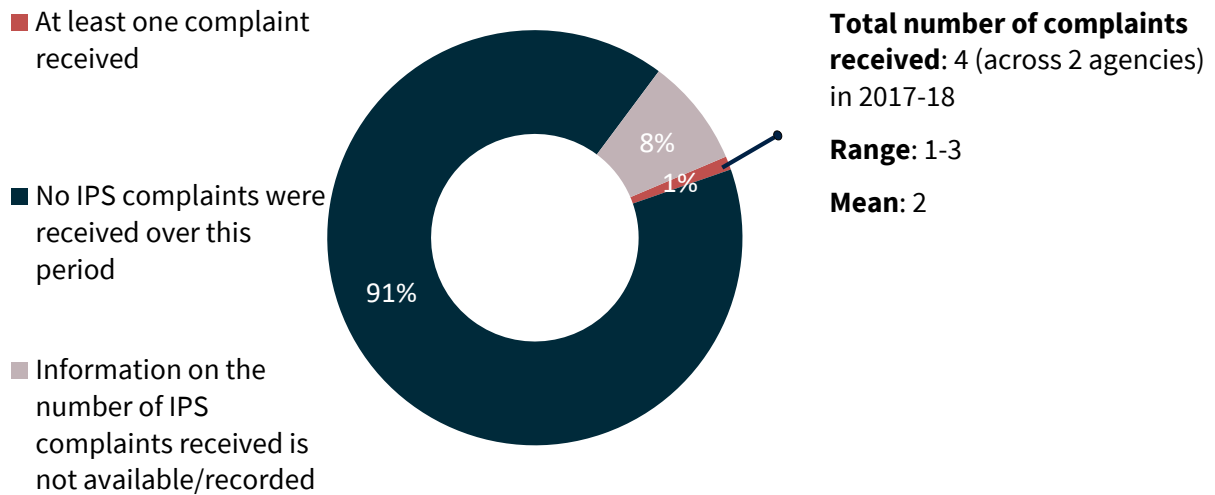


54% of agencies’ websites provide information about how to make an IPS complaint

Fifty-four per cent of agencies’ websites provided information about how to complain about an agency’s IPS entry. The majority of agencies (91 per cent) did not receive any complaints specifically related to the IPS since 1 July 2017 (see Figure 3).

Figure 3: Complaints received since 1 July 2017 about the IPS

Base: All agencies (n=190)



Further analysis of complaints handling by agency characteristics

Micro agencies were the least likely to indicate that their website provides information about how to make an IPS complaint about their agency’s IPS (39 per cent compared 55–70 per cent for other agency sizes).

Agencies with a very high number of FOI requests were less likely than other agencies to provide information about how to make an IPS complaint on their agency’s website (33 per cent) compared to around half or more of agencies with a lower number of requests.

Information Contact Officer Network (ICON)

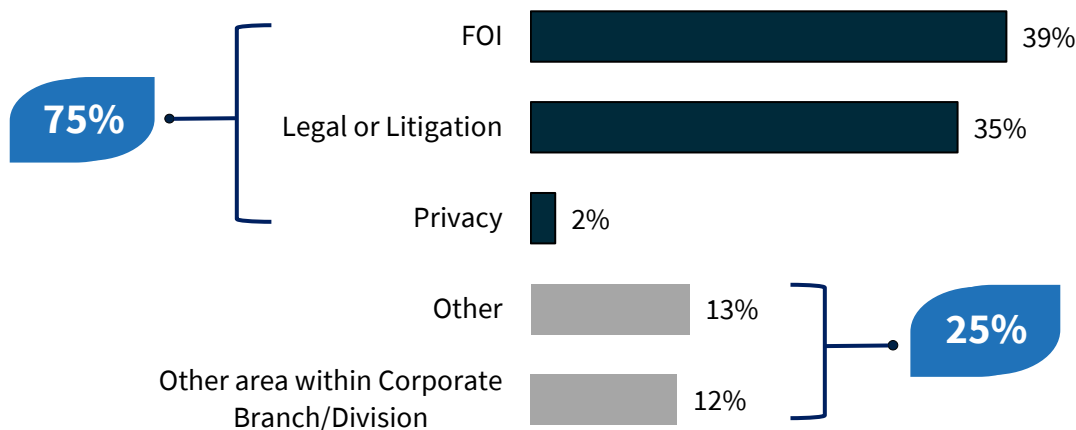


53% of agencies' have an **Information Contact Officer who participates in ICON**

Just over half of agencies indicated that they have an Information Contact Officer who participates in ICON¹⁴ and they were most commonly identified as being located in the FOI (39 per cent) and legal or litigation (35 per cent) areas of their agency (Figure 4).

Figure 4: Location of ICON officer

Base: Agencies who have an Information Contact Officer who participates in ICON (n=101)



Further analysis of Information Contact Officers by agency characteristics

Medium sized (78 per cent), large (65 per cent) and extra large (60 per cent) agencies were most likely to have an Information Contact Officer who participates in ICON, compared to smaller sized agencies (25 per cent for micro agencies, 39 per cent for extra small agencies and 47 per cent for small agencies).

Agencies with a medium (71 per cent) or high (75 per cent) number of FOI requests were also more likely to have an Information Contact Officer that participates in ICON compared to those with nil (36 per cent), low (38 per cent) and very high (44 per cent) numbers of FOI requests.

¹⁴ Question wording difference –2012: ‘Does your agency have a representative who attends the ICON (Information Contact Officer Network) forum run quarterly by the OAIC?’ and in 2018 it was: ‘Does your agency have an Information Contact Officer who participates in ICON?’

4.2. Agency IPS plan¹⁵

Agency IPS Plan published

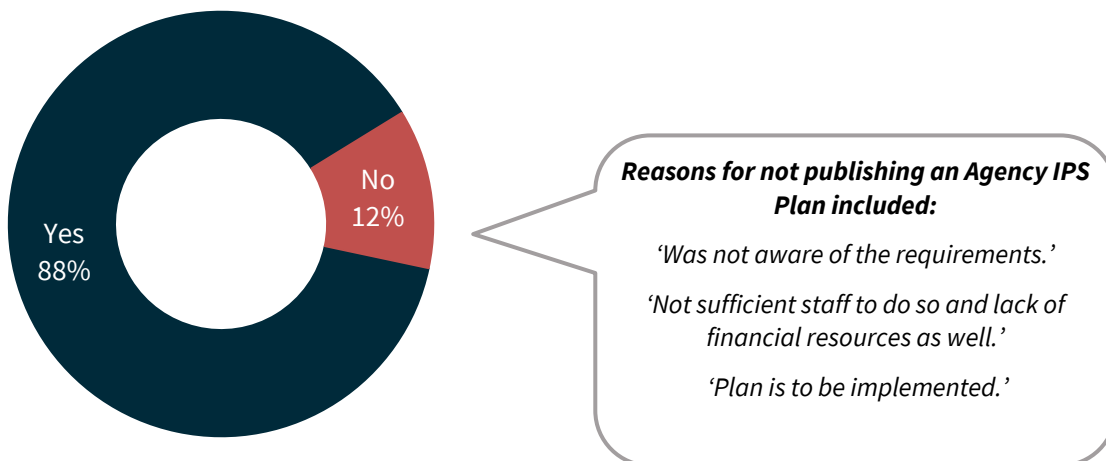


88% of agencies have **published an Agency IPS plan**

In 2018, 88 per cent of agencies have published an Agency IPS plan, slightly lower than the 94 per cent in 2012.¹⁶ Reasons for not publishing an IPS plan as reported by agencies included not being aware of requirements, insufficient resources and the plan currently being in development.

Figure 5: The extent to which agencies have published their Agency IPS Plan

Base: All agencies (n=190)



Further analysis of Agency IPS Plans published by agency characteristics

Micro agencies were the least likely to indicate that they have published an Agency IPS Plan (68 per cent) compared to relatively larger agencies (87–97 per cent). Agencies with nil numbers of FOI requests were also the least likely to indicate they have published an Agency IPS Plan, while those with very high numbers of FOI requests were most likely to publish a plan (100 per cent).

¹⁵ 'Agency IPS Plan' was referred to as 'Criterion One' in 2012 as set out in the FOI Guidelines to assess IPS compliance.

¹⁶ Question wording difference – 2012: 'Has your agency prepared and published an Agency IPS Plan?', and in 2018 it was: 'Has your agency published an Agency IPS Plan?'

Agency IPS Plan follows OAIC structure and content recommendations

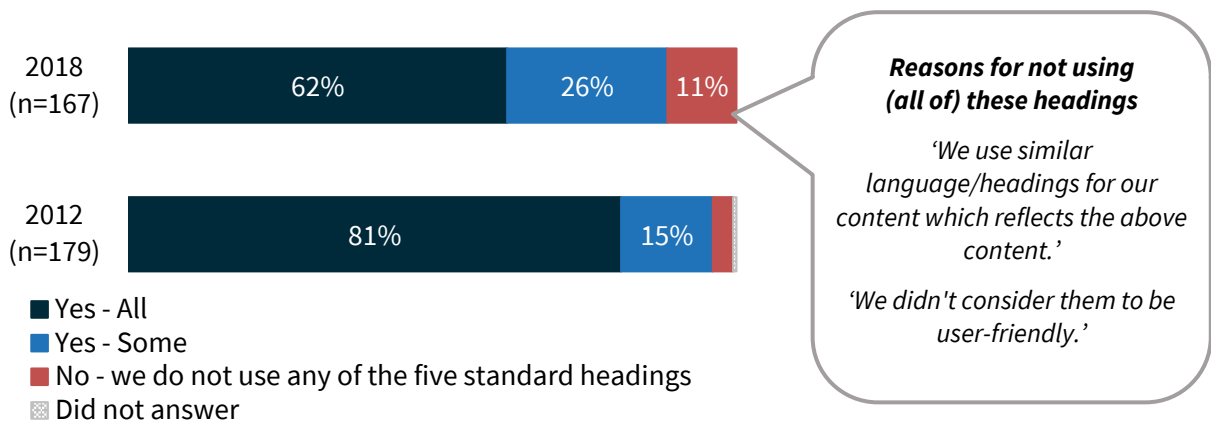


89% of agencies use some or all **of the standard recommended headings** in their **Agency IPS Plan**

Eighty-nine per cent of agencies use some or all of the standard recommended headings in their Agency IPS Plan. This proportion was lower than the 96 per cent recorded in 2012 and the proportion who indicated they use all five standard headings fell from 81 per cent in 2012 to 62 per cent in 2018. Eleven per cent of agencies indicated they do not use any of the standard headings. Most agencies explained that they did not use these specific headings, but used similar headings that still reflected the intended content.

Figure 6: The extent to which agencies use the five standard recommended headings in their Agency IPS Plan

Base: Agencies who have published an Agency IPS Plan



Update and maintenance of Agency IPS Plan



At least 70% of agencies indicated that their IPS Agency Plan included four of the nine areas of **recommended** content outlined in the FOI Guidelines.

Paragraph 13.16 of the FOI Guidelines recommends that the Agency IPS Plan address the nine matters outlined in Figure 7:

- The survey showed that 70 per cent or more of agencies complied with the first four of these recommendations, ranging from specifying the process for identifying information under s 8(4) (70 per cent) to specifying the measures being undertaken to ensure that the agency's IPS entry is accurate, up-to-date and complete (80 per cent, considerably lower than 96 per cent in 2012).
 - The proportion of agencies that indicated their IPS plan includes the details of any charges imposed for accessing information published under the IPS and how charges are calculated was the only measure that recorded higher results in 2018 (69 per cent) than 2012 (65 per cent).
- However, around one-third or less of agencies indicated that their Agency IPS plan specifies:
 - whether the agency has developed an internal IPS information register (37 per cent, lower than 54 per cent in 2012)
 - the measures (if any) being taken to improve the agency's information asset management framework to support its IPS compliance (22 per cent – less than half the proportion in 2012 (57 per cent)).



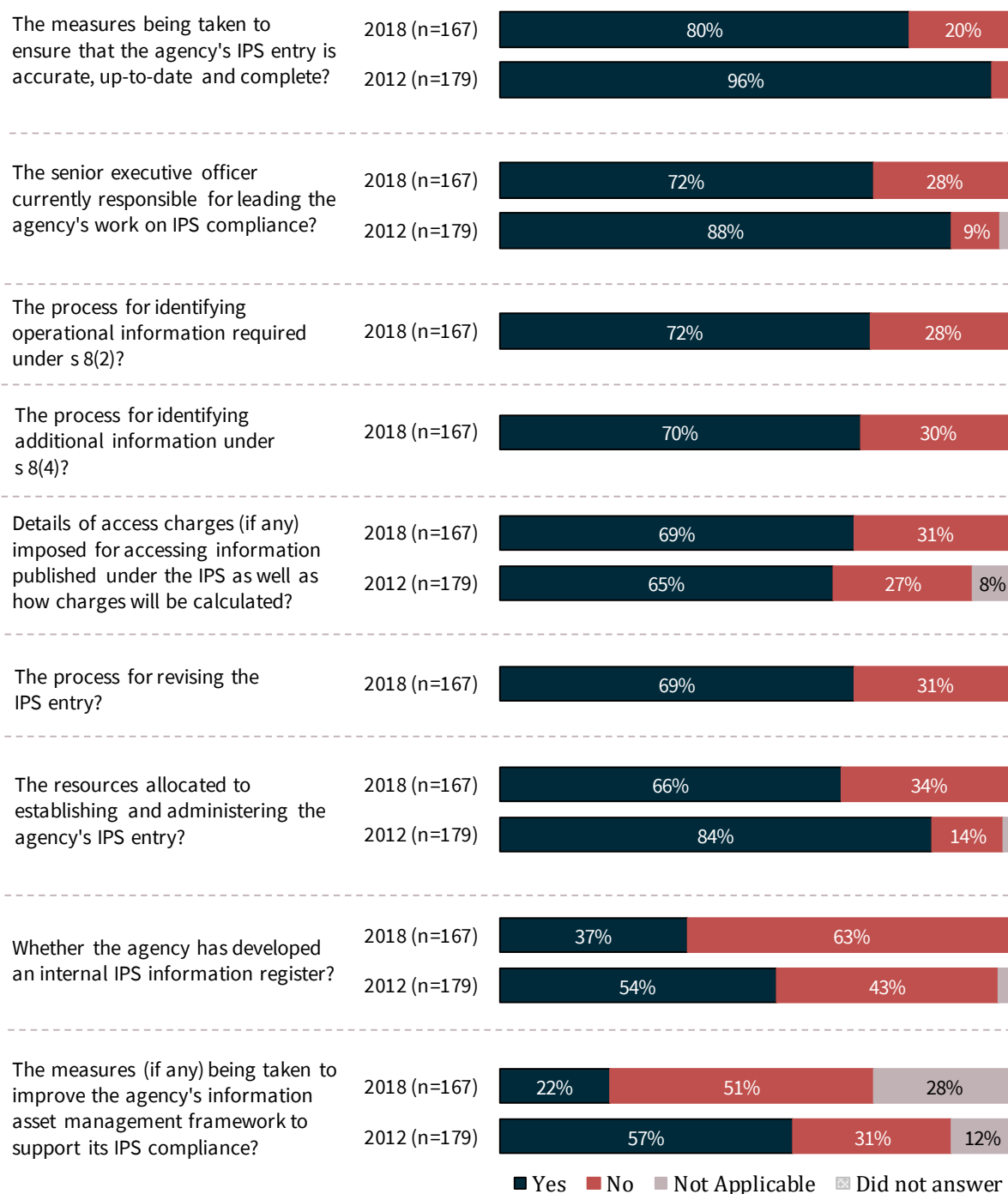
Further analysis of the coverage of recommended content in Agency IPS Plans by specific agency characteristics

The survey showed that larger agencies and those with a higher number of FOI requests were generally more likely to have at least some of the recommended content in their Agency IPS Plans. However, agencies with a high number of FOI requests were the least likely to indicate that their plans have specified that they have developed an internal information register (16 per cent, compared to 36–56 per cent for other agencies with low, medium or very high numbers of FOI requests) and those with a very high number of FOI requests were the least likely to indicate that their plans specify the process for revising the IPS entry (44 per cent, compared to 62–74 per cent for other agencies with smaller numbers of FOI requests).

Figure 7: Coverage of recommended content in Agency IPS Plans

Base: Agencies who have published an Agency IPS Plan

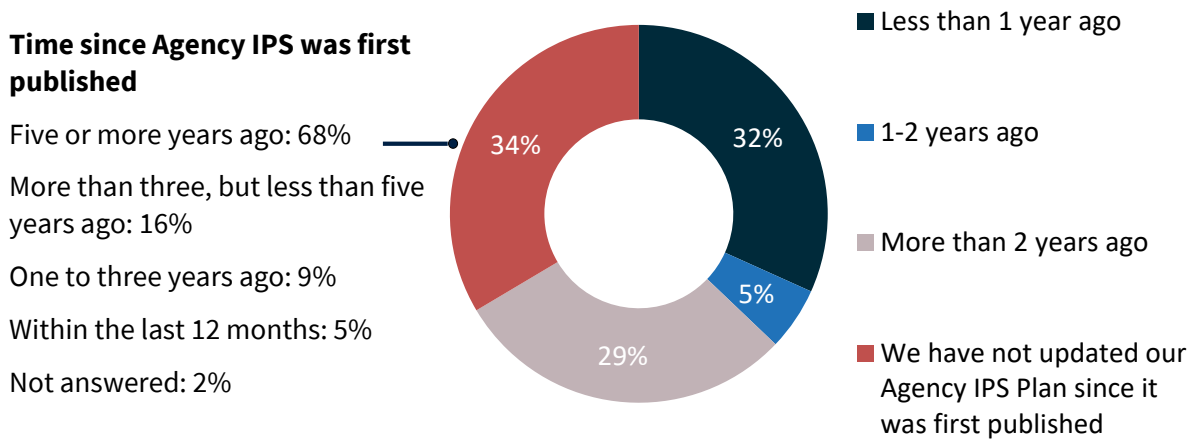
Does your Agency IPS Plan specify/address:



As shown in Figure 8, 32 per cent of agencies updated their Agency IPS Plan less than one year ago and 29 per cent updated their plan more than two years ago. Just over one-third of agencies indicated they have not updated their plan since it was first published and 68 per cent of these agencies published this plan five or more years ago.

Figure 8: Time since last update of Agency IPS Plan

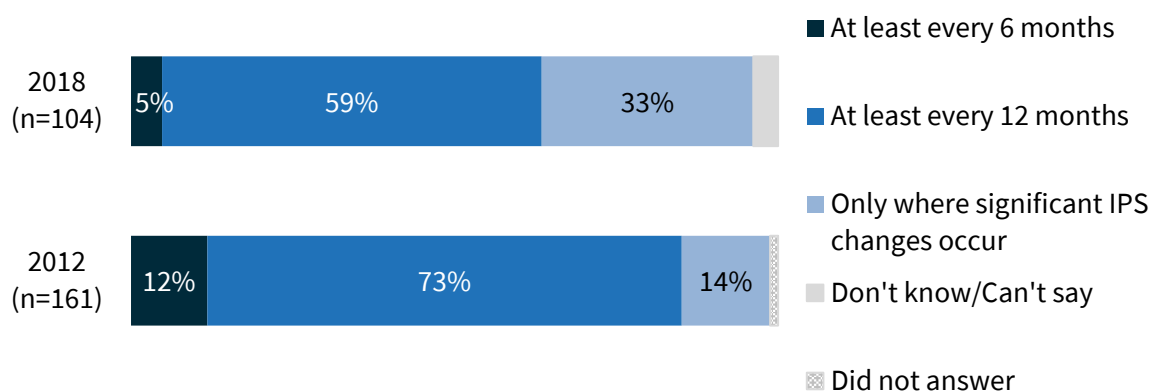
Base: Agencies who have published an Agency IPS Plan (n=167)



Sixty-two per cent of agencies have a timetable for formally reviewing their Agency IPS Plan—lower than the 90 per cent recorded in 2012. Among agencies that have a timetable, they were most likely to review their Agency IPS Plan at least every 12 months (59 per cent).

Figure 9: Timetable for formally reviewing Agency IPS Plans¹⁷

Base: Agencies who have a timetable for formally reviewing Agency IPS Plans



¹⁷ Question wording difference – 2012: ‘If you have a timetable, how often is a review of the Agency IPS Plan undertaken?’ and in 2018 it was: ‘If you have a timetable, how often is a formal review of the Agency IPS Plan scheduled to be undertaken?’

4.3. IPS governance and administration ¹⁸

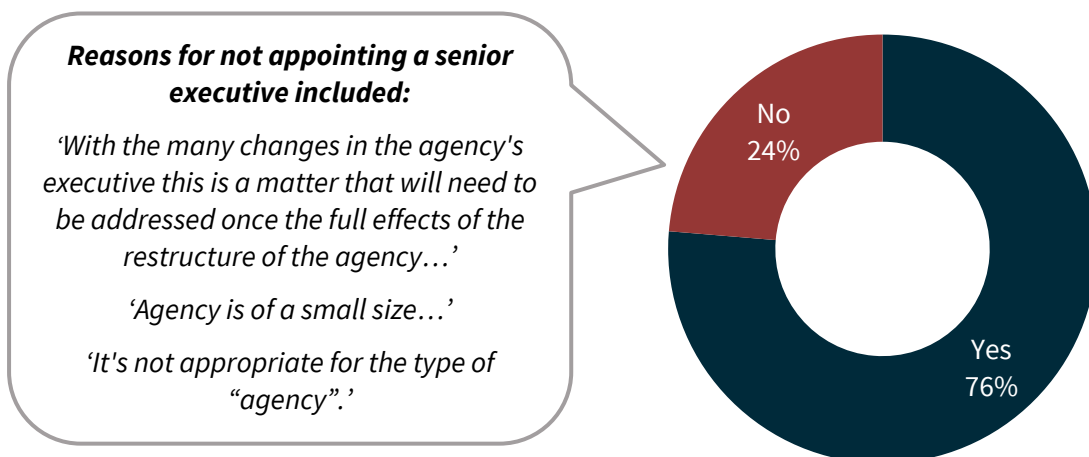
Governance/structural arrangements have been made



Around three-quarters (76 per cent) of agencies indicated they have appointed a senior executive officer to lead the agency’s work on IPS compliance. This result is lower than the 93 per cent recorded in 2012. Reasons for not appointing a senior executive officer among the 24 per cent of agencies that did not do so included the impact of changes to their agency structure, resourcing restrictions, and their small size and characteristics (particularly for tribunals, authorities, and advisory committees).

Figure 10: Extent of agencies appointing a senior executive officer to lead the agency’s work on IPS compliance

Base: All agencies (n=190)



¹⁸ ‘IPS Governance and Administration’ was referred to as ‘Criterion Two’ in 2012 as set out in the FOI Guidelines to assess IPS compliance.



Further analysis of governance/structural arrangements by specific agency characteristics

All extra large agencies and agencies with a very high number of FOI requests had appointed a senior executive with responsibility for leading the agencies' work on IPS compliance (100 per cent), compared with around three-quarters or less of comparatively smaller sized agencies and those with a lower number of FOI requests.

Twenty-seven per cent of agencies indicated they have a formal IPS governance structure, lower than 47 per cent in 2012. Among the 73 per cent of agencies who did not have a formal IPS governance structure, the most common reasons for this were related to their agency size and resourcing constraints.

Among the 27 per cent of agencies with a formal IPS governance structure, this was most likely to be some 'other' governance structure (55 per cent). These 'other' governance structures included IPS related project teams, FOI contact officers or units and Boards, such as a Corporate Governance Board. A relatively smaller proportion of agencies identified that their formal IPS governance structure(s) consisted of a working group (37 per cent) and/or steering committee (14 per cent).

Figure 11: Extent of formal IPS governance structure in agencies

Base: All agencies (n=190)

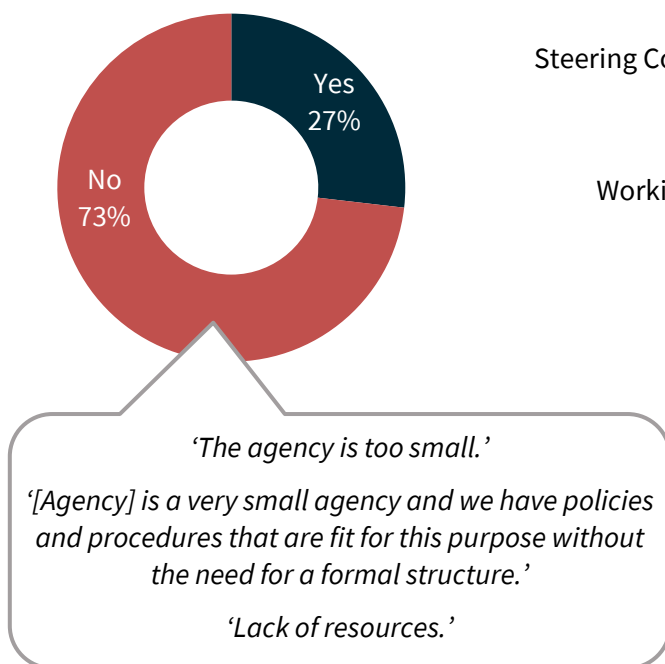
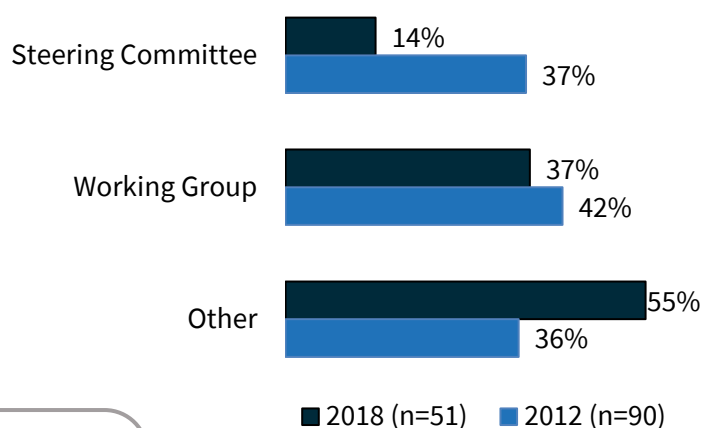


Figure 12: Types of formal IPS governance structure(s)

Base: Agencies with a formal IPS governance structure (n=51)





Further analysis of IPS governance structures by specific agency characteristics

Agency size was cited as one of the main reasons that agencies did not have a formal IPS governance structure and this was reflected in the quantitative survey data, particularly among micro agencies who were the least likely to indicate that they have a formal IPS governance structure (18 per cent) compared to relatively larger agencies (26–40 per cent).

IPS policies and procedures



67% identify and prepare documents for IPS publication



74% publish IPS documents

Sixty-seven per cent of agencies indicated they have policies and procedures in place to identify and prepare documents for IPS publication (less than the 78 per cent in 2012) and 74 per cent indicated that they have policies and procedures in place to publish IPS documents (less than the 81 per cent in 2012).



Further analysis of IPS policies and procedures by specific agency characteristics

Extra large agencies (100 per cent) were more likely than relatively smaller agencies (61–78 per cent) to have policies and procedures in place to publish IPS documents. Extra large agencies (80 per cent) were also more likely to identify and prepare documents for IPS publication compared to relatively smaller agencies (60–70 per cent).

Resources allocated to IPS functions



Number of staff allocated to IPS functions

2018

Total: 655 across 190 agencies

Range: 0-100

Mean: 3.4

2012

Total: 923 across 187 agencies

Range: 0-38

Mean: 4.9

In 2018, there were 655 staff allocated to IPS functions across 190 agencies – an average of three staff per agency. This is lower than the average of five staff recorded in 2012.



Further analysis of resources allocated to IPS functions by specific agency characteristics

Extra large agencies recorded a higher average number of staff allocated to IPS functions (22 staff) compared to relatively smaller sized agencies (average of one to five staff). Agencies with a very high number of FOI requests recorded the highest average (21 staff) compared to agencies with nil, low, medium and high numbers of FOI requests (average ranged from one to four staff).

Staff training undertaken/staff awareness developed



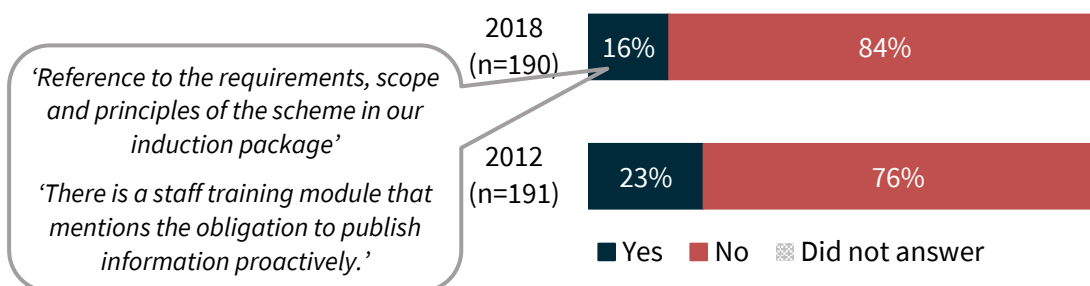
54% of agencies have **assigned responsibility** for the **management or coordination of staff training and awareness of IPS obligations**

Fifty-four per cent of agencies have assigned responsibility for the management or coordination of staff training and awareness of IPS obligations – lower than 73 per cent in 2012¹⁹. Areas where this responsibility has been assigned as described by agencies included corporate governance, human resources, legal, secretariat and freedom of information.

Sixteen per cent of agencies indicated that induction training for new staff includes information on the IPS (lower than 23 per cent in 2012). Agencies generally described this type of information as references or mentions of IPS requirements as part of induction training.

Figure 13: Extent of induction training for new staff that includes information on the IPS

Base: All agencies



¹⁹ Question wording difference – 2012: 'Has responsibility for staff training and awareness of IPS obligations within the agency been assigned?' and in 2018 it was: 'Has responsibility for the management or coordination of staff training and awareness of IPS obligations within the agency been assigned?'

Figure 14 shows that 25 per cent of agencies provide staff with other specific training on IPS obligations, lower than the 49 per cent recorded in 2012. Among agencies that provide staff with other specific training, they were most likely to do so via on the job training (45 per cent, lower than 65 per cent in 2012), self-paced online training (15 per cent, compared with zero per cent in 2012) and specific formal training (13 per cent, similar to nine per cent in 2012). Twenty-eight per cent of ‘other’ types of training included training that was incorporated as part of FOI training and practice group instruction.

Figure 14: Extent of agencies providing staff with other specific training on IPS obligations

Base: All agencies

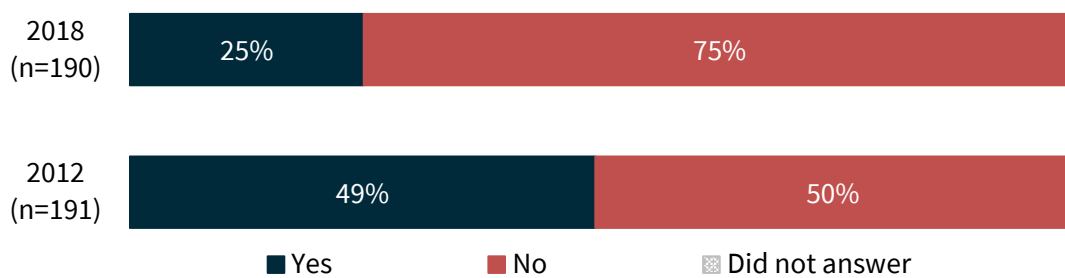
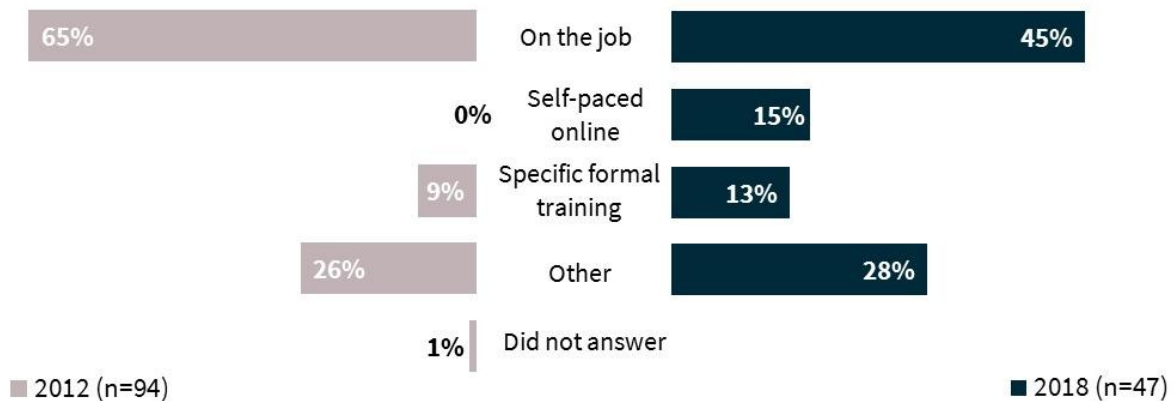


Figure 15: Main ways that staff are trained in the agency’s IPS obligations

Base: Agencies that provide staff with other specific training on IPS obligations





Further analysis of staff training undertaken/awareness developed by specific agency characteristics

There were variations in the extent to which staff training has been undertaken and awareness developed by agency size:

- extra large agencies were more likely to indicate that the management or coordination of staff training and awareness of IPS obligations within the agency has been assigned (80 per cent), compared to smaller agencies (43 per cent to 68 per cent)
- micro (21 per cent), extra small (18 per cent) and small (23 per cent) agencies were more likely to include information on the IPS as part of induction training for new staff compared to medium (11 per cent), large (16 per cent) and extra large (0 per cent) agencies
- extra large agencies were more likely to provide staff with other specific training on IPS obligations (60 per cent), compared to smaller agencies (16–41 per cent).

There was also variation by the number of FOI requests:

- all agencies with a very high number of FOI requests indicated they had assigned responsibility for the management or coordination of staff training and awareness of IPS obligations, compared to 45–61 per cent of agencies with lower numbers of FOI requests
- agencies with lower numbers of FOI requests (18–20 per cent) were more likely to indicate that their induction training includes information on the IPS, compared to agencies with higher numbers of FOI requests (5–11 per cent)
- other specific training was more likely to be provided by agencies with very high numbers of FOI requests (56 per cent) compared to those with relatively lower numbers of FOI requests (22–27 per cent).

4.4. IPS entry²⁰

Information required to be published



Over 70% of agencies **publish** each of the **required types of information on their website**

Figure 16 shows that in 2018, over 70 per cent of agencies indicated they publish each of the types of information required to be published under s 8(2) of the FOI Act on their website. Information relating to the annual reports, organisation structure, agency's functions and decision making powers and contact details for FOI information or documents were most commonly published (each of these types of information was published by at least 95 per cent of agencies in 2018, which remains broadly similar to the results recorded in 2012). However, around 10 per cent or more of agencies indicated that they do not publish the other types of information required to be published under the FOI Act and the proportion indicating that they publish the other types of information required to be published declined since 2012 (where comparable), and represent a larger compliance gap.

These types of information included:

- information released in response to FOI access requests via an Agency Disclosure Log – s11C (91 per cent)
- appointments of agency officers made under Acts (85 per cent, down from 91 per cent in 2012)
- operational information – the rules, policies, principles, and procedures that agencies apply in making decisions or recommendations that affect members of the public (84 per cent, down from 94 per cent in 2012)
- information held by agencies that it routinely provides to Parliament in response to requests and orders from the Parliament (82 per cent, slightly down from 86 per cent in 2012)
- information in documents to which agencies routinely give access in response to requests under Part III of the FOI Act – s 8(2)(g) (79 per cent, down from 86 per cent in 2012)²¹
- consultation arrangements for members of the public to comment on specific policy proposals for which the agency is responsible (72 per cent, down from 86 per cent in 2012).

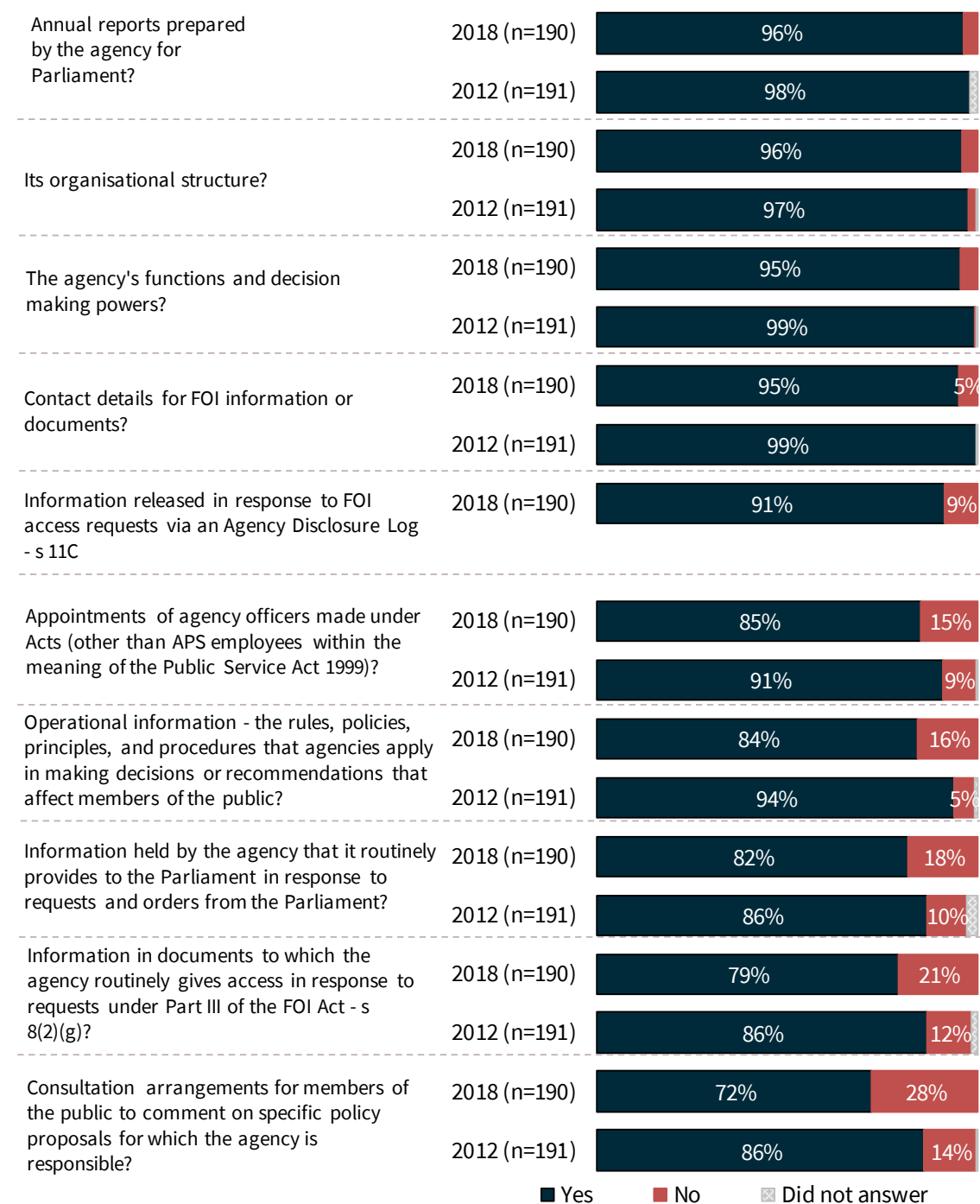
²⁰ 'IPS Entry' was referred to as 'Criterion Three' in 2012 as set out in the FOI Guidelines to assess IPS compliance.

²¹ Question wording difference – 2012: 'Has your agency published on its website details of: Information in documents to which the agency routinely gives access in response to requests under Part III of the FOI Act (with exceptions)?' and in 2018 it was: 'Information in documents to which the agency routinely gives access in response to requests under Part III of the FOI Act - s 8(2)(g)?'

Figure 16: Information required to be published under the FOI Act

Base: All agencies

Does your agency publish on its website details of:





Further analysis of information required to be published by specific agency characteristics

There was some variation in the likelihood of agencies publishing each of the types of information required to be published under s 8(2) of the FOI Act on their website by agency size:

- micro agencies were generally the least likely to publish each of the required types of information compared to relatively larger agencies, particularly in relation to information held by the agency that it routinely provides to the Parliament in response to requests and orders from the Parliament (54 per cent, compared to 80 to 100 per cent for other agency sizes).

There was some variation by the number of FOI requests, where agencies with:

- no FOI requests were generally the least likely to indicate they publish each of the required types of information on their website
- a higher number of FOI requests were more likely to publish each of the required types of information, however, agencies with a very high number of FOI requests were least likely to publish information held by the agency that it routinely provides to the Parliament in response to requests and orders from the Parliament (67 per cent, compared to 64 to 95 per cent for agencies with a lower number of FOI requests) and consultation arrangements for members of the public to comment on specific policy proposals for which the agency is responsible (44 per cent, compared to 62 to 85 per cent for agencies with a lower number of FOI requests).

Other information to be published under the IPS



59% of agencies have **mechanisms for identifying other information that can be published under the IPS**



52% of agencies **publish other information under the IPS**

Fifty-nine per cent of agencies indicated they have mechanisms for identifying other information that can be published under the IPS. This result is down from 71 per cent in 2012. Fifty-two per cent of agencies indicated they publish other information under the IPS and this included information about agency priorities, information released under administrative access arrangements, scientific data, statistics, research reports, fact sheets and submissions to Parliamentary inquiries.



Further analysis of other information to be published under the IPS by specific agency characteristics

The extent to which other information is published under the IPS varied by agency size and the number of FOI requests:

- agencies with very high numbers of FOI requests were more likely to indicate they have a mechanism for identifying other information that can be published under the IPS (89 per cent), compared to agencies with smaller numbers of FOI requests (45 to 63 per cent)
- the likelihood of agencies publishing other information under the IPS increased by both agency size (from 29 per cent (micro agencies) to 100 per cent (extra large agencies)) and numbers of FOI requests (from 33 per cent (nil numbers of FOI requests) to 89 per cent (very high numbers of FOI requests)).

Exceptions – personal and business information

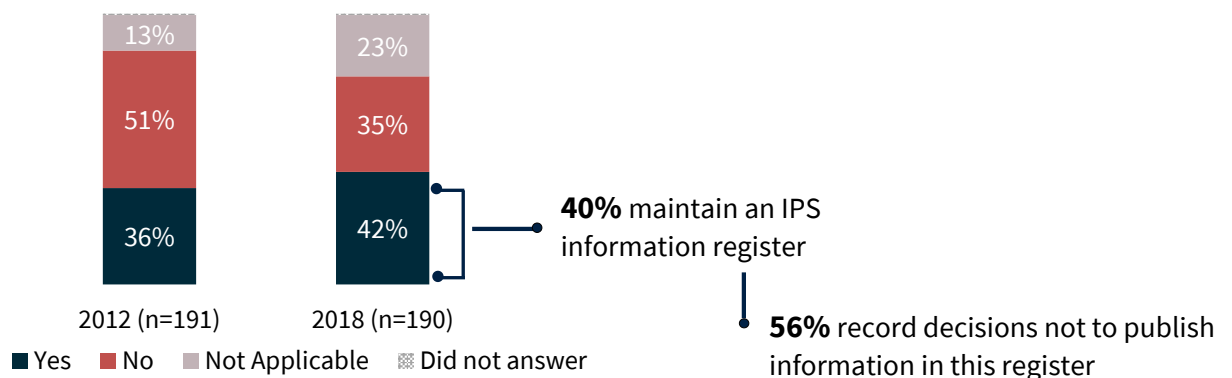


42% of agencies have made a **decision not to publish information under the IPS** due to the **personal or business information exception**

Forty-two per cent of agencies indicated they have made a decision not to publish information under the IPS due to the personal or business information exception under ss8(2)(g)(i) or (ii) and is higher than the 36 per cent recorded in 2012. Among agencies that have made this decision, 40 per cent maintain an IPS information register²² and more than half (56 per cent) of these agencies record decisions not to publish information recorded in their IPS information register (Figure 17).

Figure 17: Extent to which agencies have made a decision not to publish information under the IPS due to the personal or business information exception

Base: All agencies



²² In 2012, this was referred to as an 'information asset register'



Further analysis of exceptions (personal and business information) by specific agency characteristics

The extent to which agencies have made a decision not to publish information under the IPS due to the personal or business information exception under ss 8(2)(g)(i) or (ii) varied according to agency size and the number of FOI requests, with the likelihood of making this decision to not publish increasing with agency size (from 21 per cent (micro agencies) to 100 per cent (extra large agencies) and larger numbers of FOI requests (from 22 per cent (nil number of FOI requests) to 89 per cent (very high numbers of FOI requests)).

IPS information register²³



38% of agencies **maintain an IPS information register**



53% of agencies **intend to develop an IPS information register in the next 12 months**

Among the 38 per cent of agencies who maintain an IPS information register, a large minority (36 per cent) indicated that their agency's IPS information register is reviewed only when significant IPS changes occur. Smaller proportions indicated this review is conducted at least every six months (14 per cent) or 12 months (22 per cent) – see Figure 18 and Figure 19.

Figure 18: Extent to which agencies maintain an IPS information register

Base: All agencies

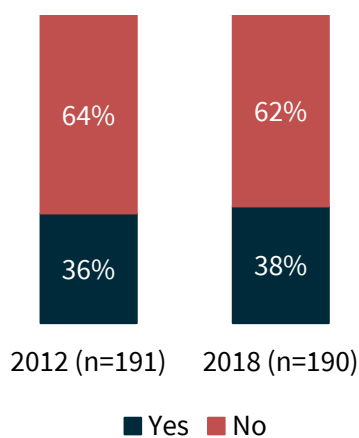
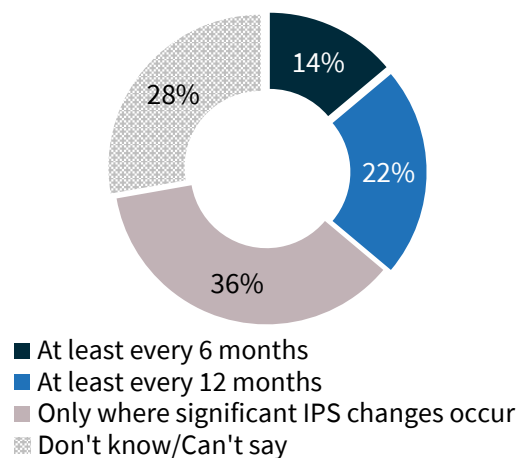


Figure 19: Frequency at which agencies review their IPS information register

Base: Agencies that maintain an IPS information register



²³ In 2012, this was referred to as an 'information asset register'.

Fees and charges

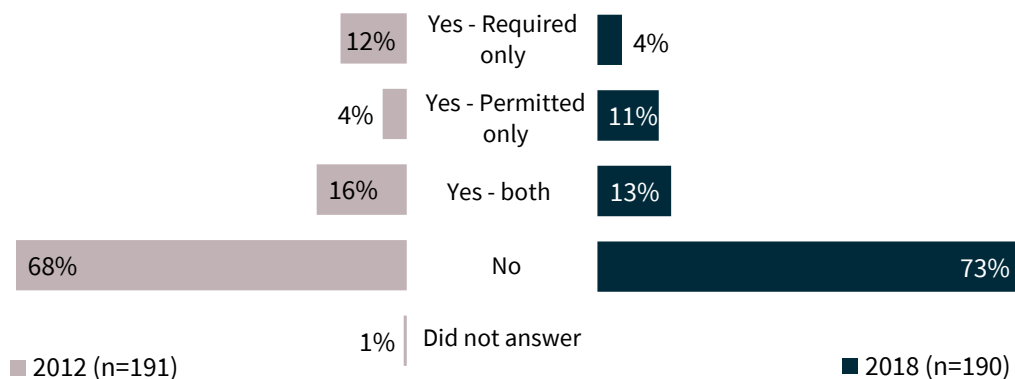


59 per cent of agencies have a **policy** that **specifies or covers** its approach to **charging for access to information under the IPS**

As shown in Figure 20, the majority (73 per cent) of agencies in 2018 do not charge for information required (s 8(2)) or permitted (s 8(4)) to be published under the IPS. This is slightly higher than 68 per cent in 2012. While the proportion of agencies that charge for information required only decreased from 12 per cent in 2012 to four per cent in 2018, the proportion charging for information permitted only *increased* from four per cent in 2012 to 11 per cent in 2018.

Figure 20: Fees for information required or permitted to be published under the IPS

Base: All agencies



Consistent with 2012 (93 per cent), 94 per cent of agencies use the FOI Charges Regulations for calculating and imposing a charge for access under the IPS in 2018 (see Figure 21).

The survey also found that a considerable minority of agencies impose fees and charges for reasons outside those allowed under the FOI Act.

- Nineteen per cent of agencies indicated that the charge was *not* for providing access to information that cannot be downloaded from a website— *lower* than the proportion in 2012 (30 per cent).
- Nineteen per cent of agencies indicated that the charge was *not* for reimbursing the agency for specific reproduction (or other incidental) costs associated with giving access—higher than the eight per cent recorded in 2012.
- Similar to 2012 (18 per cent), 21 per cent of agencies did not publish details of these charges on their website in 2018.



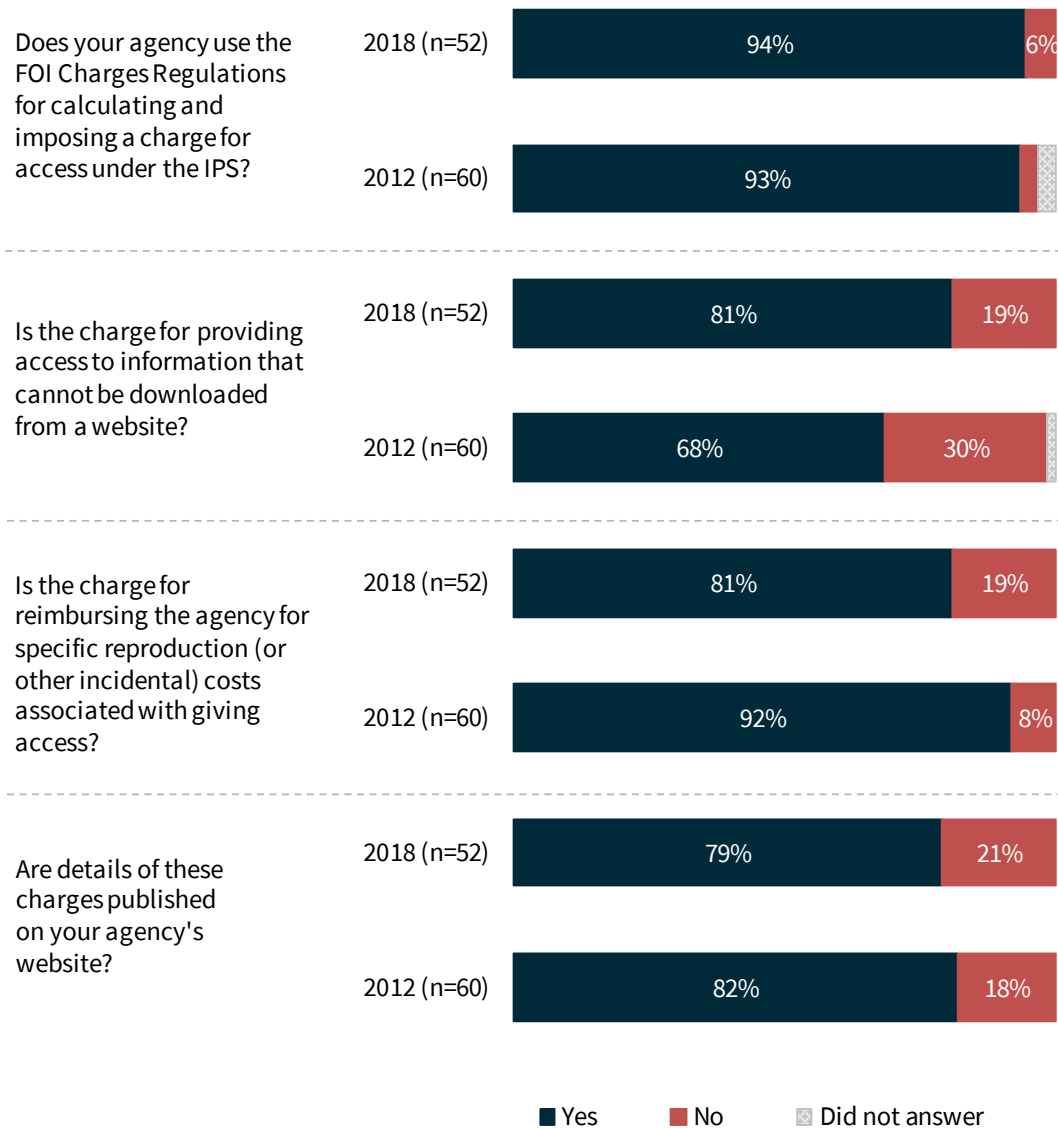
Further analysis of fees and charges for information under the IPS by specific agency characteristics

Approaches to imposing fees and charges for information under the IPS varied according to agency size and the number of FOI requests:

- large (71 per cent) and extra large (100 per cent) agencies were most likely to have a policy that specifies or covers its approach to charging for access to information under the IPS compared to 53–59 per cent for relatively smaller agencies)
- micro (11 per cent) and extra small (16 per cent) agencies were the least likely to charge for information required or permitted to be published under the IPS compared to 30 to 60 per cent for larger agencies) and agencies with very high numbers of FOI requests were more likely to charge for this information (67 per cent), compared to those with smaller numbers of requests (13–33 per cent)
- the likelihood of agencies using the FOI Charges Regulations for calculating and imposing a charge for access under the IPS was higher for smaller agencies (100 per cent for micro, extra small and small agencies), compared to medium (91 per cent), large (90 per cent) and extra large (67 per cent) agencies
- micro (33 per cent) and extra small (57 per cent) agencies were least likely to indicate that the charge for reimbursing the agency for specific reproduction costs is associated with giving access compared to other agency sizes (82–100 per cent), and agencies with a higher number of FOI requests were more likely to implement this charge (100 per cent for both high and very high numbers of FOI requests), compared to those with nil or smaller numbers of requests (67–91 per cent).

Figure 21: How agencies impose fees and charges for accessing IPS information

Base: Agencies that charge for information required (s 8(2)) or permitted (s 8(4)) to be published under the IPS



4.5. IPS information architecture²⁴

Use of recommended standardised headings and structure



More than 70% of agencies use **six out of the 10 recommended standardised headings and structure**

Although agencies are not *required* to use the headings or language specified in the FOI Act for presenting their IPS information, the Information Commissioner published Guidelines in October 2011 advising that it would be easier for the public to locate IPS information if there was a consistent format of publication on agency websites. The OAI is updating this guidance to ensure that it reflects web publishing and online searching techniques commonly used in 2019.

The FOI Guidelines recommend the use of ten headings for the Agency Publication Framework.

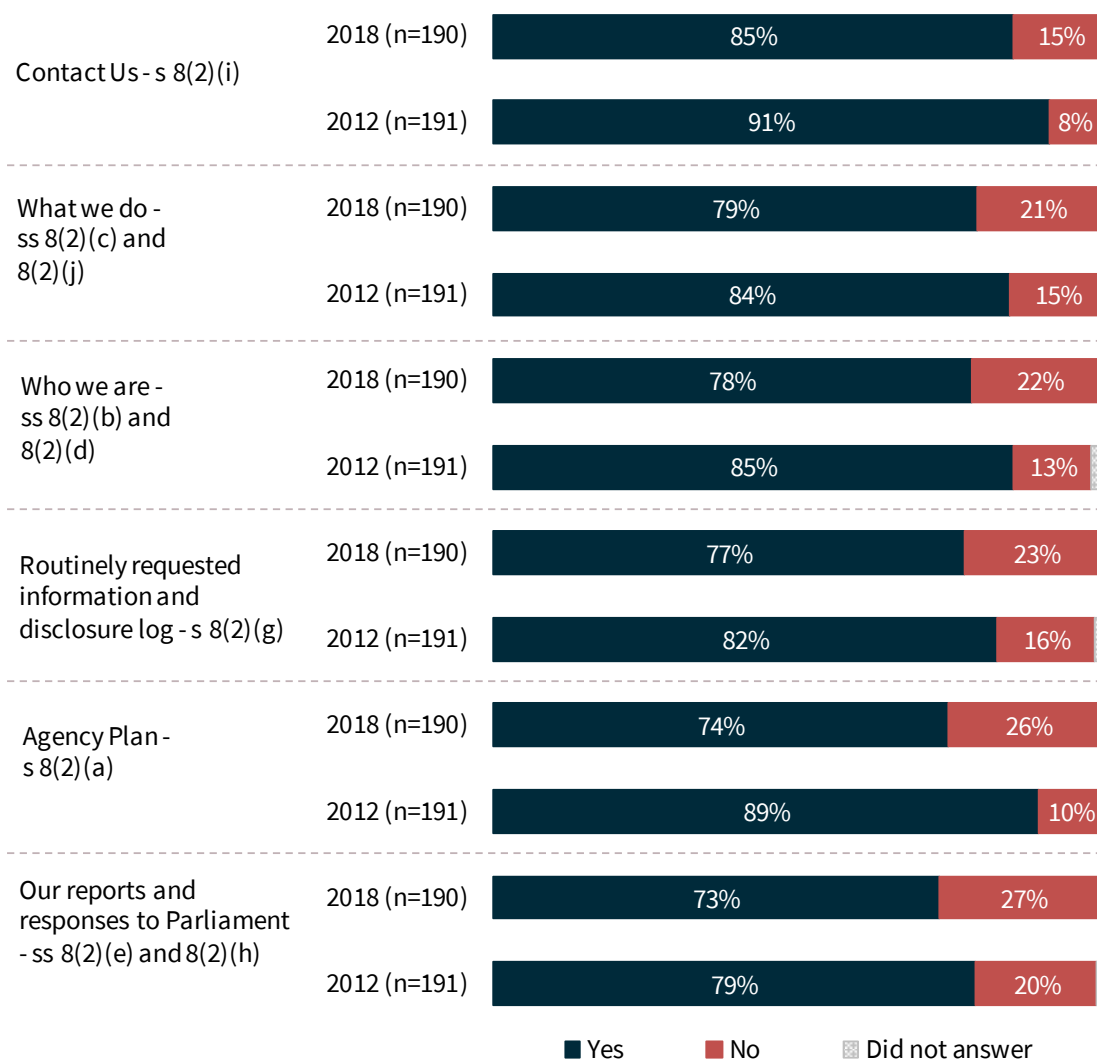
Figure 22 and Figure 23 shows that:

- more than 70 per cent of agencies used six out of the 10 recommended headings—this is lower than the proportion identified in 2012 where more than three-quarters of agencies used seven out the 10 recommended headings
- the proportion of agencies using each recommended heading in 2018 was also less than the proportions recorded in 2012, with the greatest declines recorded for ‘Agency Plan’ down 15 percentage points (pp) and ‘Consultation arrangements’ (down 15pp)
- less than two-thirds of agencies used the remaining headings, with less than half of agencies using ‘Our priorities’ (49 per cent, down from 55 per cent in 2012), ‘Our finances’ (46 per cent, down from 51 per cent in 2012) and ‘Our lists’ (39 per cent, down from 49 per cent).

²⁴ ‘IPS Information Architecture’ was referred to as ‘Criterion Four’ in 2012 as set out in the FOI Guidelines to assess IPS compliance.

Figure 22: Use of recommended standard headings and structure (most commonly used)²⁵

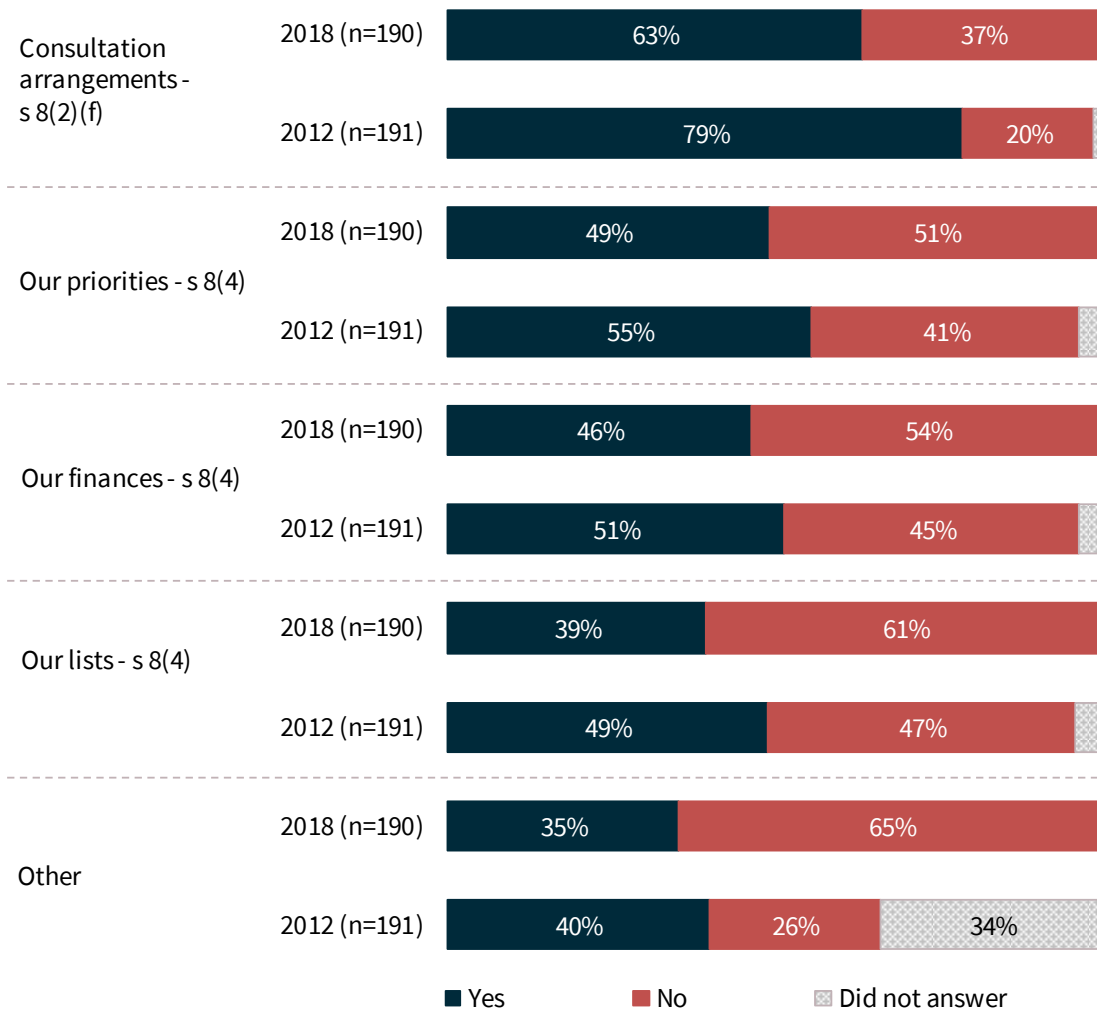
Base: All agencies



²⁵ Question wording difference for 'Routinely requested information and disclosure log - s 8(2)(j) in 2012 was: 'Routinely requested information and Disclosure Log - ss 8(2)(g) and 11C'

Figure 23: Use of recommended standard headings and structure (less commonly used)

Base: All agencies



Documents are easily discoverable and understandable



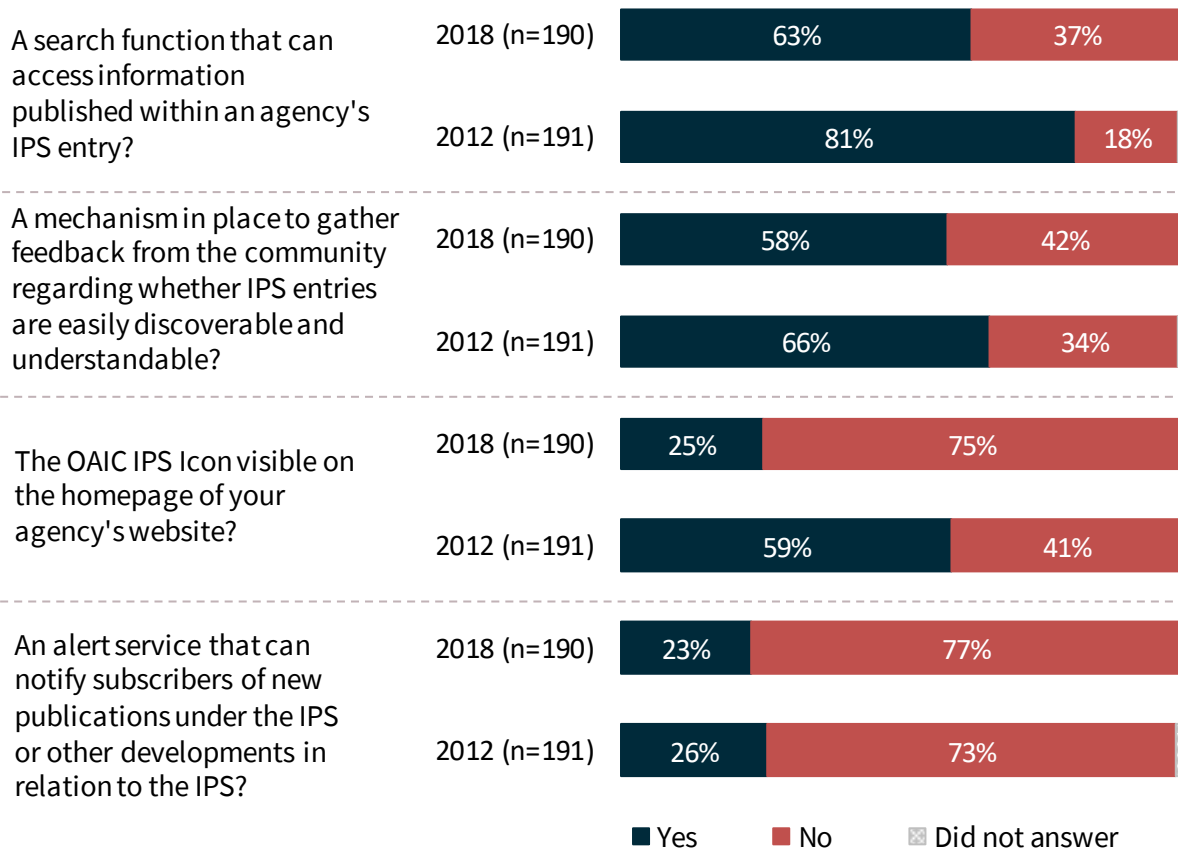
63% of agencies have a **search function** that can access information published within an agency's **IPS entry**

A guiding principle to help agencies meet their IPS obligations is that information published under the IPS should be easily discoverable and understandable. Figure 24 shows that there was wide variation in the proportion of agencies that provided access to a range of website features that may assist in this regard and the proportion of agencies who used these features also decreased since 2012. These included:

- sixty-three per cent of agencies reported they have a search function that can access information published within an agency's IPS entry (down from 81 per cent in 2012)
- fifty-eight per cent of agencies indicated they have a mechanism in place to gather feedback from the community regarding whether IPS entries are easily discoverable and understandable (down from 66 per cent in 2012)
- twenty-five per cent of agencies indicated that the OAIC IPS Icon is visible on the homepage of their website – less than half the proportion recorded in 2012 (59 per cent)
- twenty-three per cent of agencies indicated that they have an alert service that can notify subscribers of new publications under the IPS or other developments in relation to the IPS (compared with 26 per cent in 2012).

Figure 24: Extent to which agencies provide access to a range of website features to assist with the discoverability and understanding of information published under the IPS

Base: All agencies



OAIC IPS Icon visible on the homepage of agency websites among the 25 per cent of agencies with this icon.

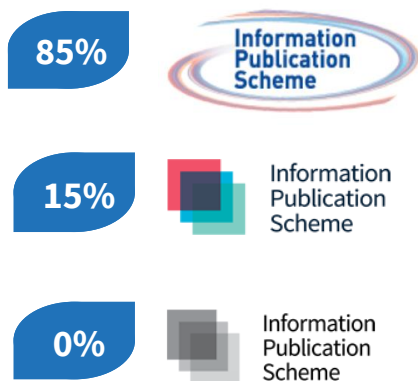
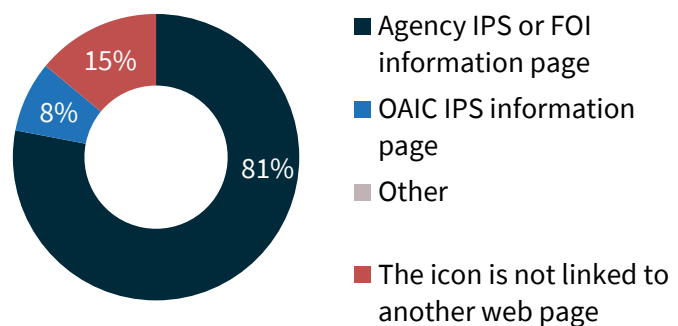


Figure 25: Link reached when OAIC IPS Icon is clicked

Base: Agencies that have the OAIC IPS Icon visible on the homepage of your agency's website



Documents are easily accessible and machine readable



69% of agencies have published **all or most documents under the IPS in a format** (or multiple formats) that **conform to WCAG 2.0 requirements**

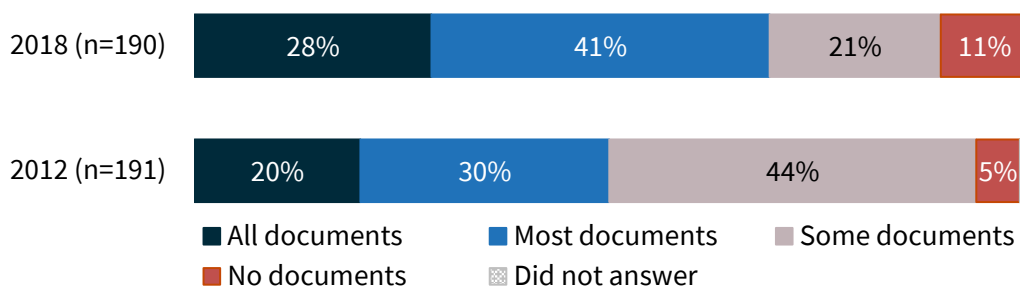
The FOI Guidelines state that accessibility of published information by all members of the community is an important principle underlying the IPS. Web Content Accessibility Guidelines (WCAG) 2.0 cover a wide range of recommendations for making Web content more accessible.

Figure 26 shows that in 2018, agencies were more likely to have published documents under the IPS in a format (or multiple formats) which conform to WCAG 2.0 requirements. More specifically:

- twenty-eight per cent of agencies indicated that all documents they have published under the IPS are in a format (or multiple formats) which conform to WCAG 2.0 requirements, which is more than 20 per cent in 2012
- a further 41 per cent of agencies indicated that most of their documents comply (up from 30 per cent in 2012)
- twenty-one per cent of agencies indicated that some documents comply (substantially down from 44 per cent in 2012)
- eleven per cent of agencies indicated that none of their documents comply (up from five per cent in 2012).

Figure 26: Extent to which documents published under the IPS are in a format (or multiple formats) that conform with WCAG 2.0 requirements

Base: All agencies



4.6. IPS risk mitigation index

The survey found that agencies assessed their compliance with the IPS moderately overall, with several areas showing considerable scope for improvement.

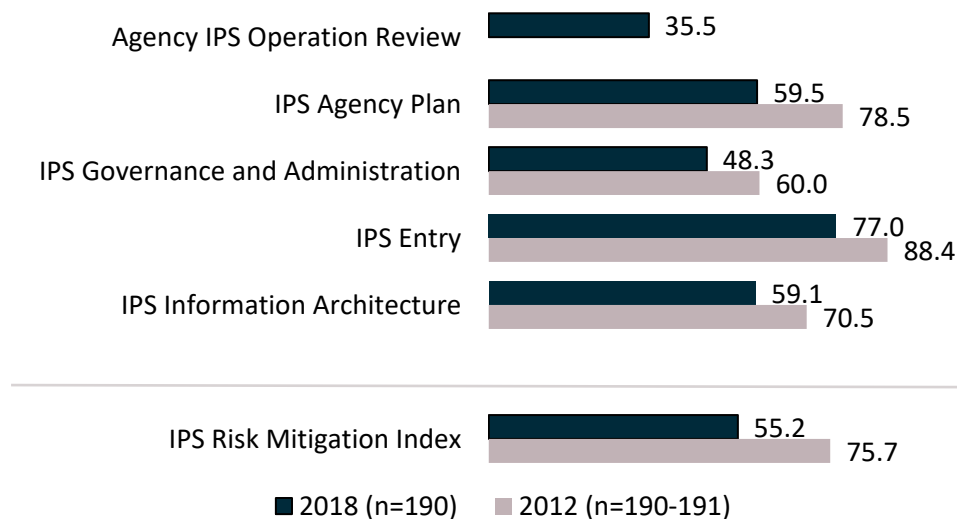
Figure 27 presents the results of an overall ‘risk mitigation index’ that summarises agencies’ responses across five key aspects of IPS compliance measured in the survey. This figure shows

that agencies recorded an overall risk mitigation level of 55.2 index points²⁶ in August 2018. This index level is consistent with agencies (on average) indicating that they comply with just over half of the IPS requirements measured in the survey.

This figure also shows the IPS risk mitigation index has declined since 2012 from an index level of 75.7 to 55.2. While the 2018 risk mitigation index has a different composition to 2012, due to the inclusion of a new measure about the Agency IPS Operation Review and other changes to the questionnaire, most components were consistent between the two surveys and the broad methodology remained consistent. This suggests that comparing the index levels between 2012 and 2018 is useful and the reduction in compliance levels evident in this figure are reflective of the results in the two surveys.

Figure 27: Risk Mitigation Indices

Base: All agencies. Higher index levels reflect better mitigation against the various forms of risk



The risk mitigation index also shows that the agencies' ratings of their compliance with the criteria varied considerably but were all lower than corresponding measures in 2012.

- The most favourable assessments were recorded for agencies' IPS Entry, which recorded a high level of 77.0 index points (ip) but was lower than the level of 88.4ip recorded in 2012.
- More moderate rates of compliance were recorded for IPS Agency Plan (59.5ip, below 78.5ip in 2012) and IPS Information Architecture (59.1ip, below 70.5ip in 2012).

The lowest rates of compliance were recorded for Agency IPS Operation Review (35.5ip) and IPS Governance and Administration (48.3ip, below 60.0 in 2012).

²⁶ The risk mitigation index is derived based on the *mean* rating of agencies for relevant questions included under the five IPS criterion outlined in Figure 27. Higher index levels are more positive and represent greater levels of compliance with IPS requirements and therefore a higher level of mitigation of the risks associated with a lack of compliance. Page 15 provides more detail about how the risk mitigation indices are calculated.

5. Management and publication of public sector information

5.1. Open access to information

Open access to information

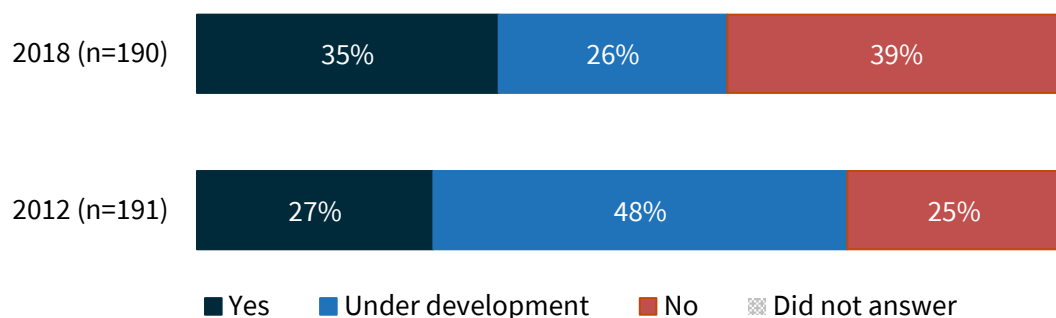


35% of agencies have adopted a **strategy for increasing open access to public sector information**

As shown in Figure 28, 35 per cent of agencies surveyed in 2018 indicated that they have adopted a strategy for increasing open access to public sector information held by their agency, in addition to the information required to be published in the IPS and Disclosure Log. While the proportion of agencies indicating that this strategy is under development in 2018 declined from 2012 (26 per cent, down from 48 per cent), the proportion who indicated that they have not adopted a strategy has increased (from 25 per cent to 39 per cent).

Figure 28: Extent to which agencies have adopted a strategy for increasing open access to public sector information

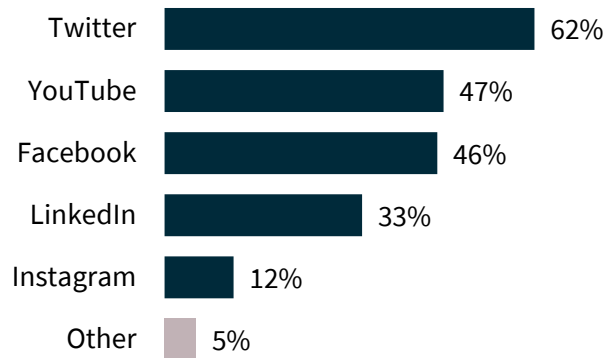
Base: All agencies



Around two-thirds (67 per cent) of agencies used social media sites to publish or promote access to public sector information (including linking to information published on their agency's website). They were most likely to use Twitter (62 per cent), followed by YouTube (47 per cent) and Facebook (46 per cent).

Figure 29: Social media sites used to publish or promote access to public sector information

Base: All agencies



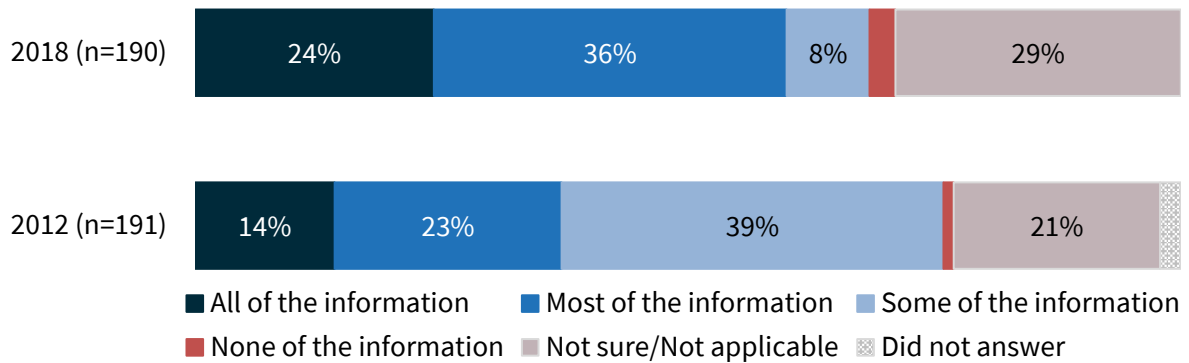
5.2. Discoverability

In 2018, the majority (60 per cent) of agencies indicated that at least most of the public sector information that they have published has been in an open and standards based format and is notably higher than the proportions recorded in 2012 (37 per cent). More specifically, Figure 30 shows that:

- twenty-four per cent of agencies publish all public sector information in an open and standards based format (up from 14 per cent in 2012)
- thirty-six per cent publish most of the information – around one-quarter in 2012 (23 per cent)
- eight per cent publish some of the information – around five times lower than the proportion in 2012 (39 per cent)
- similar to 2012 (21 per cent), a sizeable minority (29 per cent) indicated they were not sure or indicated it was not applicable that public sector information has been published in an open and standards-based format.

Figure 30: Extent to which public sector information that agencies have published has been in an open and standards-based format

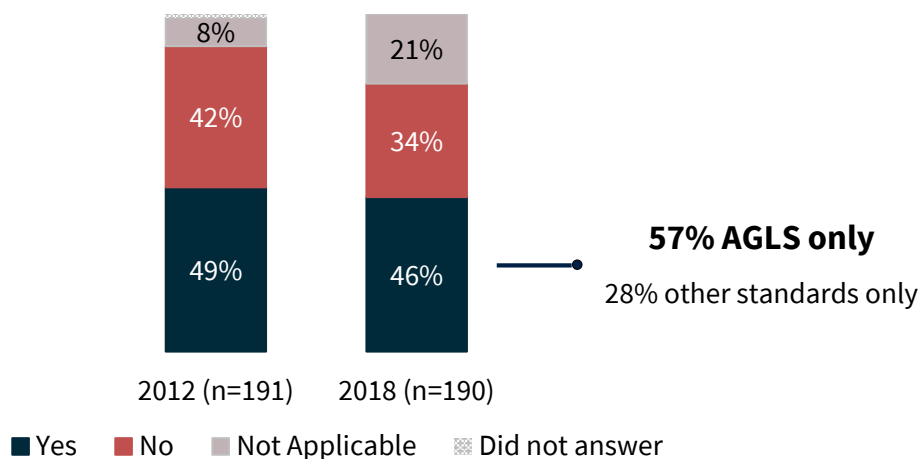
Base: All agencies



In 2018, 46 per cent of agencies indicated they apply metadata to public sector information it publishes on the internet (similar to 49 per cent in 2012) and were most likely to use Australian Government Locator Service (AGLS) only (57 per cent). While the proportion who indicated they did not apply metadata in 2018 (34 per cent) decreased from 2012 (42 per cent), the proportion that indicated that it was not applicable to apply metadata increased substantially from eight per cent in 2012 to 21 per cent in 2018 – see Figure 31.

Figure 31: Extent to which agencies apply metadata to the public sector information it publishes on the internet

Base: All agencies





Further analysis of discoverability by specific agency characteristics

Aspects of discoverability generally varied according to agency size rather than the number FOI requests:

- extra large agencies (80 per cent) were most likely to maintain an IPS information register compared to agencies of other sizes (32–41 per cent) and review their register more frequently (50 per cent do so at least every six months) compared to relatively smaller sized agencies (7–20 per cent)
- micro agencies (25 per cent) were least likely to routinely apply metadata to the public sector information it publishes on the internet compared to larger agencies (34–60 per cent)
- micro (43 per cent) were more likely to use other metadata standards only compared to other agency sizes who were more likely to use AGLS only (40–73 per cent).

5.3. Challenges to publishing public sector information



77% of agencies identified **aspects of open access to information** as the most **significant challenge** faced when **publishing public sector information**

The 2018 survey asked agencies to identify the four most significant challenges they face when publishing public sector information in addition to the information required to be published in the IPS and Disclosure Log. As shown in Figure 32 and Table 3:

- the majority (77 per cent) of agencies identified aspects of open access to information in their top four challenges and these were mainly in relation to:
 - obtaining sufficient budgetary resources to enable open access to public sector information (30 per cent) – this is consistent with the high proportion of agencies indicating that they do *not* have a formal IPS governance structure (73 per cent) and the associated reason of having a lack of resources
 - identifying information, in addition to the information required to be published in the IPS and Disclosure Log, that can be published (29 per cent)
 - ensuring compliance with privacy and secrecy requirements when publishing public sector information (25 per cent)
- forty-eight per cent identified aspects of robust information asset management as part of their top four challenges and these were most likely to be in relation to:
 - establishment and maintenance of an information asset register (18 per cent)
 - providing up-to-date staff training in information management (15 per cent)
- agencies were least likely to identify aspects of appropriate charging for access (four per cent) and transparent enquiry and complaints process (five per cent) as part of their top four challenges.

Figure 32: Most significant challenges agencies face when publishing public sector information in addition to the information required to be published in the IPS and Disclosure Log

Base: All agencies

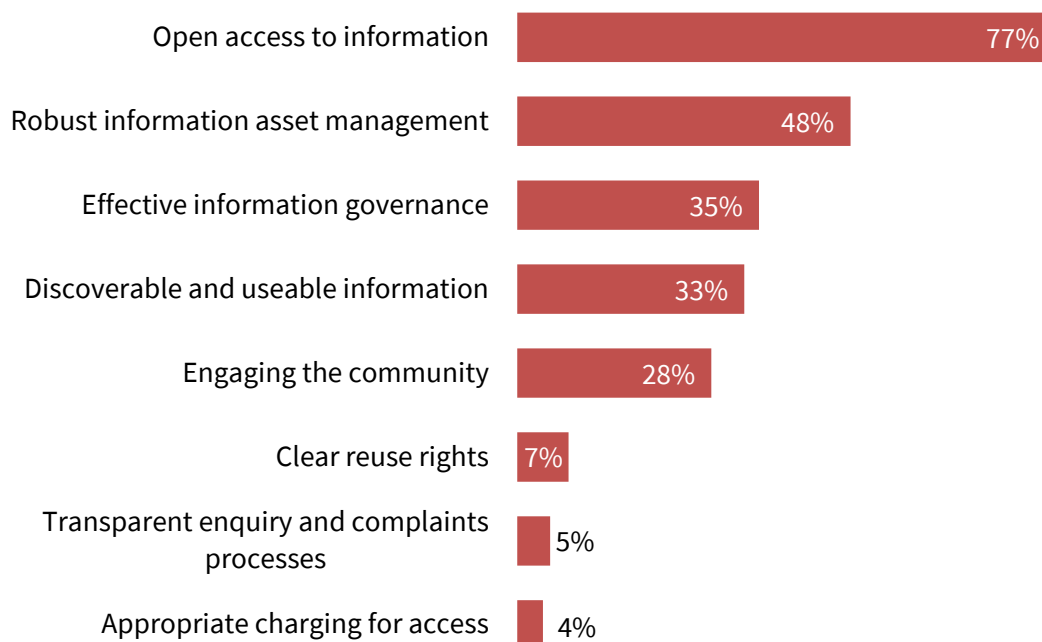


Table 3: Most significant challenges agencies face when publishing public sector information (challenges selected by at least five per cent of agencies)

Challenge	% selected
Open access to information	77%
Obtaining sufficient budgetary resources to enable open access to public sector information	30%
Identifying information, in addition to the information required to be published in the IPS and Disclosure Log that can be published	29%
Ensuring compliance with privacy and secrecy requirements when publishing public sector information	25%
Transitioning to a culture of open access and proactive publication	15%
Producing a plan or strategies for increasing open access to public sector information	13%
Robust information asset management	48%
Establishment and maintenance of an information asset register	18%
Providing up-to-date staff training in information management	15%

Challenge	% selected
Establishing clear procedures and lines of authority for decisions on information release and publication	13%
Protecting information against inappropriate or unauthorised use, access or disclosure	12%
Effective information governance	35%
Instigating strategic planning on information resource management	20%
Establishing an appropriate focal point, officer, or centralised department that is responsible for furthering open access to public sector information	16%
Discoverable and useable information	33%
Ensuring compliance with the WCAG 2.0	15%
Agency costs (including staff time) associated with ensuring compliance with the WCAG 2.0	12%
Providing information in an open and standards based format	6%
Attaching high-quality metadata to information for discoverability	5%
Indexing or cataloguing information for discoverability	5%
Engaging the community	28%
Identifying re-users	9%
Establishing effective processes to consult the community regarding what information to publish	5%
Establishing channels for re-users to provide feedback about the quality, completeness, usefulness and accuracy of published information	5%