

CONSULTATION ON PART 13 OF THE FOI GUIDELINES – INFORMATION PUBLICATION SCHEME (IPS)

DEPARTMENT OF THE TREASURY

SECTION	TREASURY SUBMISSION
Overlapping publication requirements [13.24] - [13.25]	Retaining duplication of publishing requirements under these points seem inefficient and administratively burdensome. We consider that maintaining a single required publication would promote a simpler user experience for the public.
Structure and contents of the agency plan [13.33] AND Publication on a website [13.154]	We note that the IPS icon published by the Information Commissioner does not meet the minimum Web Content Accessibility Guidelines (WCAG).
Information required to be published under the IPS [13.51] AND Statutory appointments [13.75] - [13.78]	The requirement to publish appointments of officers of the agency under section 8(2) of the Freedom of Information (FOI) Act duplicates the requirements of Senate Order 15. The guideline also does not specify if the publication of appointments need to be completed separately from Senate Order 15 reporting. We recommend including additional text to state that reporting under Senate Order 15 meets the requirements of the FOI Act.
Information required to be published under the IPS [13.51]	Where agencies provide information to be published on Parliament of Australia’s website it seems unnecessary to provide additional links to this on each agency’s IPS website. Given the increase in volume of material being requested by Parliament, this seems particularly administratively heavy.
Functions and powers [13.66]	Duplication of agency functions and powers as part of IPS reporting seems administratively burdensome when these are already provided in annual reports. We consider this could be removed from the guidelines.
Parliamentary information [13.104]	We note that Senate Orders 15, 16, 21 and 22 reporting appears to be missing from the list provided.