

D17/18274

## **SUBMISSION BY THE DEPARTMENT OF THE SENATE**

### **INQUIRY INTO THE PRINTING STANDARDS FOR DOCUMENTS PRESENTED TO PARLIAMENT**

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#### **Introduction**

The compilation and sharing of information resources has increasingly moved into the digital realm. The committee's inquiry provides an opportunity to consider how best to present, publish and preserve the parliamentary record in this environment, and to ask what the residual role of physical printing standards should be during this transition.

There are significant advantages in the Parliament embracing the online publication of its records, and in particular (for present purposes) its tabled papers. These include enhancements in scrutiny and accountability, as well as productivity improvements in the parliamentary departments and across the broader public sector. These enhancements will be maximised if the online publication of tabled documents meets standards appropriate for the publication and preservation of digital records. Development of appropriate standards and processes for the Parliamentary Papers Series should not be examined in isolation, but as part of the question of appropriate requirements for receipt and publication of tabled documents more broadly. The first part of the submission deals with these requirements.

At the same time, the transition away from producing bulk copies of printed material requires us to rethink some of the assumptions underlying the existing printing standards, whose historical rationale has diminished over time. The printing standards are dealt with in the second part of the submission.

Finally, changes to the administration of the traditional and 'electronic' versions of the Parliamentary Papers Series (PPS, ePPS) warrant reconsideration of the committee's administrative work, which involves a degree of transactional 'red tape', which the two Houses may be minded to remove. This is dealt with in the last part of the submission.

I would be happy to provide the committee with further information on any of these matters.

#### **Online access to tabled papers**

One of the key directions for the Parliament in recent decades has been the online publication of the records of its work, particularly the work of its committees. Parliamentarians, the public and the media increasingly expect that these records will be available online, in usable, portable digital formats. Parliamentary committees have long published the vast majority of submissions they receive and the transcripts (and, increasingly, videos) of their hearings online, as well as the outcomes of their deliberations in discussion papers and formal reports.

One area where the parliament has not, to date, adopted a comprehensive program of online publication, however, is in its receipt and scrutiny of documents generated outside of the parliament but intended for tabling. The presentation of documents from ministers, departments and agencies underpins the accountability of the executive government to the legislature. Government documents, particularly reports required by statute to be tabled, form

a focus of debate in both Houses and in their committees. This is especially relevant to the work of Senate committees examining estimates and the administration of government.

Each of these functions will be enhanced by timely, accessible online publication of this material.

### ***Requirements for documents presented in digital form***

In the transition to an online setting for presenting, publishing and preserving documents of record, three requirements must be satisfied. Documents must:

- meet contemporary technical accessibility standards
- be easy to access and publish in a variety of formats
- be available for publication online as they are presented.

### ***Accessibility***

The creation of documents for online publication should be guided by best practice and by contemporary technical accessibility standards. The Commonwealth through its central agencies provides guidelines in this area that generally accord with international industry standards and norms. The committee's familiar role (in relation to printed documents) of developing and implementing specific printing standards might usefully be replaced here by a role in identifying which external standards ought apply and overseeing their implementation.

### ***Portability and presentation***

Documents tabled in the Houses form part of the public record of their proceedings. Parliamentarians and the public alike should be able to access, search and download tabled documents from a single, centralised location. To this end, the Senate department is working with other parliamentary and executive departments to develop a pathway for the delivery of government documents in digital format, for publication on a parliamentary repository. While the pilot of this project holds promise, at this stage there is no formal requirement for departments and agencies to deliver documents in digital format at all. It may be useful for the committee to recommend, as part of executive accountability to the parliament, that the provision of government documents in digital format become a formal requirement.

Developing a consolidated dataset of all tabled documents creates other opportunities for how this information can be used. For example, it can be repurposed for use in applications such as ParlWork (which provides multi-platform access to chamber information) and the *Dynamic Red* (the Senate's live program and informal record of proceedings), providing timely, intuitive, device-agnostic access to parliamentary information.

### ***Timeliness***

The timeliness of providing digital copies of documents proposed for tabling, together with ease of integration into parliamentary IT systems, is of paramount importance in the online setting.

Current processes for coordinating and managing the supply of documents for tabling, though well established, remain largely premised on receipt of printed documents. Annual reports and other documents authored by executive departments and agencies are physically delivered

under embargo by the Department of the Prime Minister and Cabinet. Parliamentary staff distribute and make documents otherwise available post-tabling.

Digital copies of tabled documents (to the extent that they are provided at all) are generally provided only *after* they have been tabled, which can involve significant delays in online publication. So long as there are delays in providing digital copies, arbitrary numbers of printed documents remain necessary, so that senators and members may examine them and refer to them in debates and committee processes. It is therefore highly desirable that documents are received in digital form prior to, and available for publication at the time of, tabling in either House. This is one of the key aims of the project referred to above.

To the same end, work is being undertaken on a new application to prepare and publish parliamentary committee reports. The application will continue to support the collaborative and iterative nature of committee report drafting, but with more efficient publishing capabilities, allowing reports to be published quickly online in different formats.

Importantly, this new application satisfies the three key considerations of accessibility, portability and timeliness in the online environment. I encourage the committee to apply these considerations in formulating recommendations in its inquiry.

### **The residual role of printing standards (terms of reference (a), (c) and (e))**

A different combination of costs and benefits adhere to the management of digital documents and a digital archive than those which have applied to the management of parliamentary papers in the past. While the requirement for prescriptive printing standards may have reduced, a different set of principles needs to be maintained during the continuing transition to a more digital environment. Some of those trends and principles are sketched out here.

#### ***The diminishing historical rationale***

The printing standards were developed to be applied to documents produced by the Commonwealth for presentation to the Parliament and for subsequent distribution to libraries and other institutions in the Parliamentary Papers Series (PPS). Excluding statutory instruments, approximately 50% of tabled documents are included in the PPS, consistent with long-term trends.

The PPS itself was developed to ensure that adequate copies of documents of ‘sufficient importance’ were (a) available to all interested persons and (b) available to be bound into volumes in a ‘convenient and accessible form as a permanent record’,<sup>1</sup> while managing the costs of producing and distributing the hardcopy volumes of the series. The balancing of

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<sup>1</sup> Joint Select Committee on Parliamentary and Government Publications, ‘Parliamentary and Government Publications’, 1964, p. 26. A resolution of either house to order a paper to be printed (under the *Parliamentary Papers Act 1908*) includes that document in the PPS. All other documents presented to the Parliament are considered by either the Senate or House Publications committee, or a joint meeting of both committees, which then recommend to the houses which documents should be included in the PPS.

access and the costs of production and distribution of the PPS<sup>2</sup> was therefore the primary consideration in the classification of documents as parliamentary papers.<sup>3</sup>

With the transition to the fully digital ePPS in 2017, the cost imperatives of administering the PPS as a physical collection begin to fall away. In this regard, and in the context of an increasing preference for digital formats, the printing standards are of diminishing value in promoting access to documents presented to the Parliament.

### ***Impacts on productivity***

Further, the printing standards in their current form may impair productivity in the digital environment. This is very much a function of the transformation of the print industry. Standards which promoted consistency and economies of scale in a centralised government printing office may have the opposite effect where tabled documents form only a small proportion of the documents produced by in-house publishers, agency by agency.

With the move to the ePPS from 2017, the current standards may introduce inefficiencies in the production of high-quality digital publications. For instance, prescriptive format, cover and binding standards may reduce the capacity of producing entities to undertake more cost-effective in-house design and printing. They could also delay online publication where documents need to be initially prepared for hard copy in accordance with the printing standards, before being reworked to accord with web content accessibility guidelines (WCAG) and other digital standards. Previous reviews have explicitly referred to the need to address these inefficiencies by relaxing or removing the printing standards.<sup>4</sup>

In relation to the impact of the standards on the House departments, the ePPS is intended to provide an enhanced level of access to general users of the series, but with a considerable reduction in the costs of administration and distribution that in the past attached to the management of the PPS.

However, to the extent that the ePPS facilitates a greater use of online documents by parliamentarians and more efficient print-on-demand style approaches of distribution, the printing standards do not allow the House departments to specify on a case-by-case basis the number of printed documents required for distribution to senators and members. More flexibility here would provide for greater administrative efficiency and better management of handling and storage space by the House departments. Specifically, the option to require fewer printed documents where timely, digital copies are made available may provide a useful incentive to government agencies seeking to reduce their costs.

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<sup>2</sup> The costs are borne jointly by the Parliament and by departments and agencies. The committee's 2010 report estimated that at that time the average distribution and reprinting cost of the PPS was \$120 000 per annum (p. 5). Author departments and agencies have been required to pay for the cost of printing the additional copies needed for the PPS since 1995.

<sup>3</sup> The balancing of access and costs has been a significant theme of previous inquiries into the PPS. See, for example, the Joint Select Committee on Parliamentary and Government Publications, 'Parliamentary and government publications', 1964; and Joint Committee on Publications, 'Future of the Parliamentary Papers Series', December 1997; 'Distribution of the Parliamentary Papers Series', May 2006; and 'Inquiry into the development of a digital repository and electronic distribution of the Parliamentary Papers Series', June 2010.

<sup>4</sup> See, in particular, Belcher, B. (2015), *Independent Review of Whole-of-Government Internal Regulation*, Chapter 12 Publishing and tabling, pp. 81-87, Department of Finance, Commonwealth of Australia, pp 86-87; Department of Finance, 'Australian Government Printing and Publications Review', pp 84-86.

## ***Conclusion***

The need for the printing standards is significantly reduced in the context of the transition to the ePPS and digital approaches to managing parliamentary information more broadly. The standards in their current form may also impose constraints and inefficiencies on government departments and agencies and the House departments. However, some pared down standards will need to be retained or developed in relation to hardcopies provided and retained as formal tabling and stock copies, so long as such requirements are retained.

The Department of the Senate therefore supports revision of the printing standards to ensure that they are best suited to the Parliament's contemporary requirements. The principles that might be applied in revising the print standards are discussed below.

### **Other requirements for tabled documents (terms of reference (b) and (f))**

#### ***Tabling and stock copies of documents***

As noted above, notwithstanding the move to the ePPS and digital approaches such as electronic tabling in the future, consideration must be given to retaining some standards for documents that are still required to be printed and provided to the Parliament as formal tabling copies and stock copies.

However, the majority of tabled documents are prepared and produced in digital formats to a publishing standard via proprietary software such as Adobe PDF, and documents produced and printed via proprietary applications such as this will generally provide adequate styles and formats for the printing of formal tabling and stock copies.

A minimum standard to provide sufficient quality and integrity of tabling and stock copies of documents could therefore simply require that documents provided for presentation to the Parliament are:

- prepared in an appropriate format
- appropriately bound and covered and
- printed on archive quality paper.

#### ***Accessibility requirements***

In terms of accessibility requirements for online tabled documents, such considerations fall within the broader development and administration of ICT policies of government and the parliamentary departments. Further, as the decision to transition to the ePPS from 2017 included consideration and assessment of issues around digital accessibility, storage and distribution, it is suggested that these considerations are not significant in the assessment of the impacts and continuing need for the printing standards and the future functions of the committee.

### **Transition to the electronic PPS (ePPS) from 2017 (terms of reference (g))**

The move to the exclusively digital ePPS from 2017 acknowledges the administrative and financial efficiencies of moving towards digital approaches, generally; advantages which have

been identified as far back as the committee's 1986 review of the cost of the PPS.<sup>5</sup> The Senate department favours the retention and separate identification of the PPS (now as a digital series) because there remains value in flagging the significance of the categories of documents it contains. Having said that, shifting the receipt, scrutiny and preservation of *all* tabled documents into the digital environment will enhance the transparency of parliamentary work and improve productivity, as discussed elsewhere, and is to be encouraged.

As to the consequences of the ePPS for the work of the committee, these may be best viewed in the context of the historical rationale of the committee. This context may also help guide the joint committee, and its constituent Senate and House committees, in determining their roles in a digital environment.

As noted above, the purpose of the PPS has been to strike a balance between providing sufficient access to tabled documents and the costs of producing and administering the series. The committee's main administrative function has been to strike this balance by making 'recommendations...on the printing of documents...which have not already been ordered to be printed'.<sup>6</sup> For the most part, however, the identification of documents for the PPS has become a function of the categories to which they belong. The committee typically adopts the recommendations of committee secretariats as to which documents will be included; recommendations which recognise and rely on clear distinctions and principles, applied at an administrative level, as to which classes of documents are significant enough to warrant inclusion in the series.

Given this, the Senate department considers that the function of identifying documents for inclusion in the PPS should be formally devolved to the administration of the Senate and House departments, with the committee approving appropriate administrative guidelines for this purpose. The committee may wish to recommend that the Procedure Committees of each House consider amendments to standing orders to achieve this change.<sup>7</sup>

Meanwhile, the Joint Publications Committee, and its constituent Senate and House of Representatives committees, should retain their advisory and oversight responsibilities, albeit with their focus moving away from printed towards digital publications.

(Richard Pye)  
**Clerk of the Senate**

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<sup>5</sup> Joint Committee on Publications, 'Future of the Parliamentary Papers series', December 1997, p. 5.

<sup>6</sup> Rosemary Laing (ed), *Odgers' Australian Senate Practice – as revised by Harry Evans* (Department of the Senate, 14<sup>th</sup> ed, 2016) p. 470. The order that a document be printed has the effect of including it in the PPS.

<sup>7</sup> Senate Standing Order 22(2) currently provides that 'All documents presented to the Senate which have not been ordered to be printed by either House of the Parliament shall stand referred to the committee, which shall make recommendations on the printing of documents'. See also House of Representatives Standing Order 219.