

Senate Community Affairs Committee

ANSWERS TO ESTIMATES QUESTIONS ON NOTICE

HEALTH PORTFOLIO

Additional Estimates 2013 - 2014, 26 February 2014

Ref No: SQ14-000335

OUTCOME: 0 - Whole of Portfolio

Topic: Freedom of Information

Type of Question: Written Question on Notice

Senator: Ludwig Joe

Question:

Does the department provide FOI PDFs for download on their website?

- a) If not, what is the cost associated with staffing to require monitor email and collate and forward requested FOI documents?
- b) How does the department test it is complying with accessibility standards for its websites?
- c) Does the department comply with accessibility standards for all its websites?
- d) What would be the effect on the accessibility rating of the department's website if FOI PDFs were provided on the department websites?
- e) What accessibility testing of the website was done and what were the points of failure prior to this change in access for FOI documents?
- f) Have the website accessibility standards been solely or partly responsible for not putting FOI PDF documents on the department websites?
- g) How does the department facilitate anonymous access to the FOI disclosure files?
- h) How many times were the last 20 FOI requests PDFs which were made available on the website downloaded?
- i) How often have the FOI requests only available by email request been sent?
- j) How long does it take for requests for disclosed FOI files to be processed? What was the average turn around from request to sending of files in the last three months?
- k) What was the content of communications with other departments about the website accessibility standards and FOI PDFs?
- l) Where did advice concerning the website accessibility certification and provision of PDFs come from and what was the content of that advice?
- m) Does the department consider that not providing direct download of PDFs is more accessible for people with disabilities and the general public than providing the links?
- n) What efforts have been made to make FOI PDFs accessible to members of the public who have disabilities?
- o) Has advice from the information commissioner been sought regarding providing FOI requests available by email request only?
- p) Has any disability advice group or consultant been contacted regarding making the FOI requests accessible to people with disabilities?
- q) Is this compatible with the information commissioner's guidelines- specifically that "published information should be accessible — in particular, it should comply with an agency's obligation to meet the Web Content Accessibility Guidelines (Version 2)"
- r) How does email PDF provision meet the information commissioner's requirement that "13.124 Information that forms part of the IPS must be published 'to members of the public generally'"?

- s) Is not providing the FOI PDFs on the website a means of avoiding not conforming to the WCAG 2.0 or other guidelines?
- t) Does the department have a separate email address or inbox for receiving and responding to FOI requests?
 - i..If so, list each email account
 - ii. List the officers who can assess and reply from those separate accounts, broken down by staffing classification level
- u) Do FOI officers ever receive or respond to applicants from their individual email account as opposed to from a central account?
 - i. If so, how does the officer distinguish between communication related to their task as a decision maker and their primary work task ? How do FOI decision makers that receive emails related to FOI decisions in their normal work capacity distinguish these emails from FOI decision emails?

Answer:

a) – i)

As the Department of Health currently publishes material released under the *Freedom of Information Act 1982* (FOI Act) in PDF format some of the questions are not relevant, however wherever possible and where information is readily available the Department has provided responses to those aspects with particular relevance to the Department.

Freedom of Information Disclosure Log

The Department publishes material released under the FOI Act in accordance with the requirements of the FOI Act. When publication of documents occurs they are provided for down load in PDF format. In addition, the Department seeks to provide a summary description of released documents to assist those seeking access to released documents.

Because access to published material is done through the download of PDF format documents, individuals are not required to make contact with the department and can therefore remain anonymous. The Department is not aware of any instances in the past 12 months where access to material published on the disclosure log has been provided on request by email.

As a result of the last 20 FOI requests 87 documents were made available on the Department's website, of which PDF versions were downloaded 7,441 times.

Website Accessibility

The Department uses a number of tools to help test websites for accessibility compliance, including checklists and automated system-wide and page-level checkers. The Department is implementing a strategy to improve web accessibility by December 2014 which is consistent with the AGIMO National Transitional Strategy (NTS). The strategy involves remediating sites of greatest risk and impact as a priority, with governance rules in place to ensure that all new and updated content meets accessibility requirements. The Department consults internal advisors on accessibility matters.

Freedom of Information email account

The department has a dedicated email account and telephone number that are used for all to Freedom of Information matters. Departmental officers that have access to the shared email account are an Executive Level 2, Executive Level 1, APS5 and APS4. The email address is FOI@health.gov.au

The officers that have access to the email account do not make decisions in relation to FOI matters. They use the shared email account to provide information and general assistance about requests to those areas that are undertaking the processing and decision making.

General practice is that all FOI matters are handled via the FOI email account and not through an officer's individual departmental email account. However, there have been occasions where officers have used their own individual department email accounts to make contact with applicants.

An email account specific for FOI purposes provides a central point of contact with the department that is convenient and easy to remember for potential FOI users and its use is consistent with many other Commonwealth departments and agencies. While the public may contact the department in other ways in relation to FOI matters there is sufficient knowledge within the department for such contacts to be forward to the appropriate area for attention