QUESTIONS ON NOTICE
Additional Estimates 2013-2014

Cross Portfolio

Department of Employment Question No. EM0341_14

Senator Ludwig provided in writing.

Question

Website and accessibility - Freedom of Information

1) Does the department provide FOI PDFs for download on their website? 2) If not, what is the cost associated with staffing to require monitor email and collate and forward requested FOI documents? 3) How does the department test it is complying with accessibility standards for its websites? 4) Does the department comply with accessibility standards for all its websites? 5) What would be the effect on the accessibility rating of the department's website if FOI PDFs were provided on the department websites? 6) What accessibility testing of the website was done and what were the points of failure prior to this change in access for FOI documents? 7) Have the website accessibility standards been solely or partly responsible for not putting FOI PDF documents on the department websites? 8) How does the department facilitate anonymous access to the FOI disclosure files? 9) How many times were the last 20 FOI requests PDFs which were made available on the website downloaded? How often have the FOI requests only available by email request been sent?
10) 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 3 months?
11) What was the content of communications with other departments about the website accessibility standards and FOI PDFs? 12) Where did advice concerning the website accessibility certification and provision of PDFs come from and what was the content of that advice? 13) 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? 14) What efforts have been made to make FOI PDFs accessible to members of the public who have disabilities? 15) Has advice from the information commissioner been sought regarding providing FOI requests available by email request only? 16) Has any disability advice group or consultant been contacted regarding making the FOI requests accessible to people with disabilities? 17) Is this compatible with the information commissioners 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)"
18) 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'"? 19) Is not providing the FOI PDFs on the website a means of avoiding not conforming to the WCAG 2.0 or other guidelines?

Answer

Where the Department of Employment has relevant documents in accessible format, these are published on its website. However, due to the cost associated with converting documents to an accessible format, the department does not, as a matter

of course, place all documents released in response to an FOI request on the disclosure log.

It is more cost effective for the department to meet its FOI disclosure log obligations by publishing a list of information about documents that have been released under FOI, and advising that the documents can be obtained by calling the department's call centre and requesting a copy. Documents are then provided to the requester by their preferred method (e.g. emailed, posted, printed or accessible). The requester may remain anonymous. Since 18 September 2013 no requests have been made for copies of any documents listed on the department's disclosure log.

The department uses internal and/or external expertise to test for website accessibility conformance. The department also consults broadly with the Australian Government Information Management Office and other agencies about the Web Accessibility National Transition Strategy (NTS). Internally, website developers are guided by the department's web accessibility policy and web accessibility conformance checking process. Externally, the department has utilised the services of organisations such as Vision Australia to conduct conformance assessments.

When documents are published on the department's disclosure log, they are published in a minimum of two formats that have been optimised for accessibility. This approach is consistent with guidance from the Office of the Australian Information Commissioner and the department's Web Accessibility Policy, which aligns with the Department's obligations under the *Disability Discrimination Act 1992* (Cth) (DDA), the DDA Advisory Notes and the NTS.