

Public Service Board summary of responses to the survey conducted on the Committee's behalf on the resource implications for government agencies of the Freedom of Information Bill

Question 1:

What steps have already been taken by departments to identify the 'manuals or other documents containing interpretations, rules, guidelines, practices or precedents' which would need to be made available under clause 7 of the Freedom of Information Bill 1978?

Departments

ABORIGINAL AFFAIRS

Most of these documents are already available to the public although material may need to be excised from the Loans Commission manual.

ADMINISTRATIVE SERVICES

Most of these documents have already been identified and can be made available though some need editing before general release.

'A range of documents which have not been identified are those which make up the Department's policy in many areas of its operations.'

ATTORNEY-GENERAL'S

A survey of the Department was conducted in May 1978. However, there is still considerable work to be done to identify all manuals and other documents which would need to be made available under clause 7.

BUSINESS AND CONSUMER AFFAIRS

No specific steps have been taken to date. A number of departmental manuals is already publicly available but 'there will be a considerable effort involved in not only rendering the balance in a form suitable for public dissemination but in identifying and locating that balance'.

CAPITAL TERRITORY

In May 1978, Division Heads were asked to list categories of documents which would become available under the legislation. In June 1978 a minute was prepared for all Branch Heads explaining the effects of the Bill. A similar procedure was adopted in the statutory authorities in the Minister's portfolio.

In December 1978 the Department issued guidelines for the preparation of departmental manuals. Manuals will be needed to cover more than 400 functions.

DEFENCE

No direct steps have been taken to identify manuals, etc. Although there has been a broad appraisal, it appears that the relevant area will be that of conditions of service both for public servants and members of the Defence Force.

EDUCATION

There has not been an in-depth examination of this area. It is a major on-going activity of the Department.

EMPLOYMENT AND YOUTH AFFAIRS

Department is currently considering implications of legislation for CES. It has compiled a list of the schemes and programs in respect of which manuals,

guidelines, etc., may have to be published. The National Committee on Discrimination in Employment and Occupation has separately provided a submission to the Senate Committee on this and other aspects of the legislation.

FINANCE

The Department has identified manuals, etc., subject to a clearer definition of the word 'available'.

FOREIGN AFFAIRS

About a dozen manuals, etc., have been identified. All need to be vetted and some will have to be re-written.

HEALTH

The Department's preliminary estimates are:

- (a) 169 documents or categories of documents (cl. 6 (1)(a)(ii)).
- (b) 176 manuals exceeding 17 000 pages (cl. 7 (1)(a)).
- (c) 10 guidelines and interpretations (cl. 7 (1)(b)).

HOME AFFAIRS

Work has been started in all areas of the Department but limited staff resources, other urgent priorities and uncertainties about the date of effect and final content of the legislation will lead to delays until this work is completed.

HOUSING AND CONSTRUCTION

The Department has conducted a preliminary survey which resulted in the identification of 5 manuals which would come under clause 7.

IMMIGRATION AND ETHNIC AFFAIRS

Preliminary lists of such documents have been compiled by the Department's central office. The Department is still surveying the local practices of outpost offices. Existing manuals cover only part of the Department's procedures. There will be numerous separate documents, some of which cannot easily be put into standard manual form.

INDUSTRY AND COMMERCE

The Department has established a working group to examine and make recommendations on the likely effects of the Freedom of Information Bill on departmental operations and procedures.

An early task of the group will be to examine the subject of manuals and other interpretative documents.

INDUSTRIAL RELATIONS

Some manuals, etc., have been identified: those maintained by the Trades Qualifications and Industrial Training Branch will require major effort to review and revise ready for public scrutiny. Manuals, etc., relating to other areas of the Department have not yet been specifically identified. 'Even with provision of extra staff several months could be needed for a thorough review and consolidation of the instructions.'

NATIONAL DEVELOPMENT

The Department is carrying out investigations to identify those areas where new documentation or collation of existing instructions is required.

POSTAL AND TELECOMMUNICATIONS

'Overall, considerable progress has been made in identifying manuals, etc., and no difficulty is seen in publishing a list.'

PRIMARY INDUSTRY

The Department has identified and determined the availability of manuals, etc., under clause 7. Many of these need revision and updating.

PRIME MINISTER AND CABINET

The Department has no responsibilities for enactments or schemes of the type envisaged by clause 7.

PRODUCTIVITY

The Department has allocated a Class 6 officer to co-ordinate identification of manuals, etc. Action is proceeding.

SCIENCE AND THE ENVIRONMENT

These documents are currently being identified.

SOCIAL SECURITY

Instructions and guidelines from central office are embodied in 9 different manuals, which are currently being prepared. Of these, some contain material which would be exempt under clause 7 (4). Accordingly, those manuals are being prepared in two cuts, the first part being available for perusal and purchase by members of the public. Some of the manuals are so technical that lay persons would require some assistance in interpretation. There are also plans for the preparation of additional manuals. The State offices sometimes supplement the manuals with instructions relative to local conditions. These will also need to be covered. There are also manuals covering operational procedures, e.g., for making payments, for guarding against fraud, which will be exempt. Finally, availability of manuals is a matter for consideration.

SPECIAL TRADE REPRESENTATIVE

'It is considered that the Department holds little information which would require preparation for public access.'

TRADE AND RESOURCES

The Department has few manuals or other documents stemming from enactments or schemes administered by the Department. The degree to which 'broad guidelines' would, or should, be recorded in the form of manuals has not been investigated.

TRANSPORT

A list has been prepared of the categories of documents which will become publicly available under the legislation. Work is still underway on a 'Catalogue of Information Sets' held by the Department.

TREASURY

The only document that might be caught under clause 7 is the *Handbook of Practices and Procedures for Processing Foreign Investment Review Board Papers*. Pending clarification of status of organisations associated with Treasury, e.g., the Reserve Bank, the inquiry as to whether they possess such documents is in abeyance. Other organisations, e.g., the Government Actuary and the Life Insurance Commissioner have said they do not have such documents.

VETERANS' AFFAIRS

A survey has been made of the material of all the State Branches and Central Office. The information is extensive but has not yet been edited or analysed.

Statutory Authorities

AUDITOR-GENERAL

The practical implications of the Bill are still under examination. One view is that the Auditor-General's Office will have no obligations under clause 7 as presently drafted.

AUSTRALIAN BROADCASTING TRIBUNAL

The *Broadcasting and Television Act* 1942 specifies the areas in which the Tribunal operates, including publication of relevant material.

AUSTRALIAN BUREAU OF STATISTICS

The Bureau has taken no action to date to identify documents under clause 7. There may be some internal guideline documents, e.g. relevant to the *Australian Bureau of Statistics Act* 1975 and the *Census and Statistics Act* 1905 which would come within the operation of clause 7.

AUSTRALIAN ELECTORAL OFFICE

The Office has identified 9 categories of records and materials which relate to the operation of its functions.

AUSTRALIAN GOVERNMENT RETIREMENT BENEFITS OFFICE

Many of these documents are yet to be identified. Some documents such as manuals are already available or in course of preparation but there is still much work to be done.

AUSTRALIAN TAXATION OFFICE

The Office has established a working party to examine the effect of clause 7.

INDUSTRIAL RELATIONS BUREAU

The Bureau has taken no steps as yet although it will shortly be producing documents setting out its policies for the information and guidance of its own staff.

INDUSTRIES ASSISTANCE COMMISSION

There are no manuals, etc., within the Commission which are used for 'making decisions or recommendations'. The Commission sets out the reasons for its recommendations in its public reports.

PUBLIC SERVICE BOARD

The Board has initiated work to identify manuals, etc., produced in accordance with its responsibilities. Preliminary results indicate at least 60 documents or categories of documents which would be covered by clause 7.

TRADE PRACTICES COMMISSION

Some preliminary work has been done. This is now being followed up in detail. It is intended to re-draft standing instructions where that is appropriate. The task will probably be completed by 1 January 1980.

Question 2:

- (i) What is the number of people wholly or partly employed at present in preparing such manuals or other similar documents and in supplying information to the public?
- (ii) Is it anticipated that the introduction of the Freedom of Information Bill 1978 (as drafted) would require an increase in those numbers?

Departments

ABORIGINAL AFFAIRS

- (i) Officers who provide information to the public number one officer per region (full-time or part-time) other than the Northern Territory, and one officer full-time and one part-time in central office. The production and maintenance of manuals, etc., is estimated at less than one man-year p.a.
- (ii) No extra staff would be needed in the Information Section which would probably be used only as a first point of reference.

ADMINISTRATIVE SERVICES

Total resources involved in preparation of manuals, etc., is equivalent to about 10 man-years p.a.

It is expected that only a minimal increase of staff relative to total staff numbers will be required to implement clause 7.

However, the AGPS has estimated that it will need an additional 40 staff to meet increased publishing and printing demands from other Departments and authorities.

ATTORNEY-GENERAL'S

- (i) Divisions are continually preparing and reviewing manuals, etc., and it is not easy to quantify the staff involved.
- (ii) Increases required are conservatively estimated as 1-2 for receipt and recording of requests; 3-5 for information retrieval; and 6-7 (from Senior Legal Officer to Senior Assistant Secretary level) for processing of requests.

In addition, the Department's role in general administration of the legislation will require a further 5-6 staff with an addition of 5-6 in the Crown Solicitor's Division.

BUSINESS AND CONSUMER AFFAIRS

The introduction of the Bill would mean a substantial increase of effort in terms of the preparation and distribution of manuals. Overall, it would involve many staff who currently contribute as part of their duties to the preparation, amendment and/or dissemination of manuals. Additionally, these and other officers would provide ' . . . some information to the public . . . '

CAPITAL TERRITORY

- (i) Currently, the manual preparation is an additional task for existing staff involving at least one officer in each of the 20 functional areas plus a fluctuating number of officers who supply to the public information which may later be put in manual form.
- (ii) The enactment of the Bill would require an increase of staff throughout the Department. In particular, the Administrative Law Review Section will employ a Class 8. The Information and Public Relations Section has estimated it will require 6 positions to edit and publish manuals.

DEFENCE

It is not possible to give an estimate of total resources used in the preparation of manuals, etc. However, the Department's Directorate of Instructions, Orders and Manuals operates with a full-time staff of nine, assisted by five typists. Similarly, it has not been possible to estimate how many people currently supply information to the public. Increases in resources devoted to the above activities are not anticipated as a result of Freedom of Information legislation.

Additional resources will be necessary to prepare for the implementation of the Freedom of Information legislation and further increases will be needed to administer requests once the legislation is enacted. The extent of the latter will depend on the type and number of requests.

EDUCATION

Preparing these sorts of documents and providing information to the public are major on-going activities within the Department.

The impact of the Freedom of Information legislation will depend on the number and likely complexity of inquiries and the response times which are stipulated under the legislation.

EMPLOYMENT AND YOUTH AFFAIRS

Department has provided detailed analysis of staff required in situation of low and high estimated demand in year 1 and in subsequent years in respect of each relevant clause of the Freedom of Information Bill.

Under *low* estimated demand it estimates requirement for:

- (i) Clauses 6 and 7 —21 additional staff in year 1
9 additional staff in subsequent years.
- (ii) Other clauses —91 additional staff in year 1
47 additional staff in subsequent years.

FINANCE

At present, four people of Class 9 level or below are heavily involved in continuous up-dating of the Finance Manual—three senior officers are involved part-time. Other officers are involved part-time on relevant duties in other areas.

'No firm indication of additional resources needed to prepare or consolidate manuals, etc. can be given until we have a clearer understanding of precisely what will need to be "available".'

FOREIGN AFFAIRS

- (i) One Class 8 officer is engaged part-time on up-dating manuals, etc.
- (ii) The process will require considerable effort and time and could not be achieved under existing staff ceilings. Additional qualified staff would need to be assigned on a temporary basis to prepare new manuals, etc.

HEALTH

Not possible to give exact numbers. However, every function of the Department is involved and a substantial proportion of Central Office staff, at least, would be involved in preparation of manuals, etc. A significant proportion of Central Office and Divisional Office staff are also employed in providing information to the public.

The Freedom of Information Bill would result in additional work in both areas. The only way to cope would be either by re-allocation of work priorities or by provision of additional staff.

HOME AFFAIRS

The equivalent of 7 full-time staff prepare such documentation, primarily in the Archives area. The equivalent of 98 full-time officers are engaged in the provision of information (mainly in the Archives area but also through ministerial correspondence, answers to monthly lists of relevant Parliamentary Questions and in the Office of Women's Affairs Shopfront).

The anticipated number of additional staff that would be needed following enactment of Freedom of Information legislation is 30 officers. The breakdown is:

Archives (19); Functional Policy areas (4); Management Services (6); Freedom of Information Co-ordinator (1).

HOUSING AND CONSTRUCTION

There are no staff employed in preparation of manuals at present. Most existing manuals are in the form of internal instructions which will need to be collated, reviewed and edited before being made available to the public. The staff required will be 4 Clerks (Class 9) for about 9 months, then for 4 weeks every year to update. A Class 11 or Level 1 would be needed for policy direction.

With regard to supplying information, it is envisaged that a small 'Freedom of Information' unit will be set up to apply disclosure guidelines and organise action for disclosure. It will comprise a Class 10, 2 Class 9s, 4 Class 7s, and other officers as required.

IMMIGRATION AND ETHNIC AFFAIRS

- (i) Central Office has the equivalent of 8 officers full-time and most branches have at least 1 officer engaged part-time on the preparation of manuals, etc. It is envisaged that a small unit of about 11 officers could be formed to collate and standardise departmental operational manuals for freedom of information purposes. In the short-term, this should be a force of 16 officers for speedy production.
- (ii) At present, up to 500 staff supply information to the public. Assuming people pursue their right to know, an increase of 125 positions (including support staff) would be a conservative estimate.

INDUSTRY AND COMMERCE

At present operating procedures are decided on in the areas responsible for policy. They aren't necessarily in manual form. Once the working group has defined the need for manuals, it is likely that each of the five Divisions of the Department will need to allocate at least one officer on a part-time basis for this task.

In the Public Relations Section, three officers are involved in supplying information. Their duties are unlikely to be affected by Freedom of Information legislation.

INDUSTRIAL RELATIONS

The Department has not indicated the number of staff still engaged on preparing manuals and providing information to the public, and has not estimated possible increases required under Freedom of Information legislation.

NATIONAL DEVELOPMENT

No officers are currently employed in preparing manuals of the 3 main areas handling requests for information at present:

- (a) there are 31 people in the Public Information and Sales Section;
- (b) 30 people would handle direct requests to Divisions;
- (c) 4 officers are engaged full-time on ministerial correspondence plus drafting by officers in policy Divisions.

The Department anticipates no increase in group (a). Groups (b) and (c) are expected to encounter a significantly increased workload, the former for information on how decisions were taken in granting or withholding Commonwealth assistance, the latter in handling specific requests for information.

POSTAL AND TELECOMMUNICATIONS

An estimated 10 staff are engaged on the preparation of manuals each year. The Freedom of Information legislation will not necessitate an increase.

PRIMARY INDUSTRY

The Department estimates the accumulated man-hours devoted to preparing manuals, etc., would be the equivalent of 43 full-time staff.

The staff required to update manuals, etc., under clause 7 would be minimal (estimated 3). However, because of the technical nature of the subject-matter, professional staff would need to be involved.

PRIME MINISTER AND CABINET

The equivalent of 45 officers are involved full-time in providing information to the public.

It is anticipated that there will be an increase in the volume of requests as a result of the Freedom of Information Bill. This will be in the form of direct requests arising out of a general growth in desire for information on government activities, from campaign mail, and from referrals from other Departments. The demand or resources may be equivalent to 10–20 officers—often at senior level.

PRODUCTIVITY

Three full-time officers are preparing and updating manuals assisted by senior staff also, whenever possible.

The Public Relations Section (3 officers) in Central Office provides information on demand to inquiries.

At least 20 people would be involved part-time in any one year in the preparation and up-dating of manuals, etc.

Extra staff needed to cope with freedom of information activities in general would be:

Regions 3–6 (up to one each).

Central Office 2 additional to existing resources.

SCIENCE AND THE ENVIRONMENT

The Department estimates that about 1% of its manpower would be involved in the preparation of manuals, etc.

The effect of the Bill would be to bring about a need for current resources to be doubled in the short term with perhaps a levelling out once the initial impact of the Bill has receded.

SOCIAL SECURITY

In Central Office, the equivalent of 7 full-time officers are engaged in the preparation of manuals, etc. The anticipated effect of the Freedom of Information legislation is that additional temporary staff would be required, initially equivalent to a total of 5½ man-years at a cost of about \$82 000. The equivalent of another 2 full-time officers would be needed at an additional cost of \$20 000. For State offices, it is estimated that ½ man-year each will be required to put the instructions into suitable form and one full-time officer to maintain the system thereafter.

With regard to the supply of information to the public, there are several categories. There are 59 positions for supplying brochures and general information. No increase is anticipated. A team of 3 officers would be needed to complete and consolidate a list of decision-makers. A team of 3 senior officers for one year would be needed to co-ordinate departmental activities under the Freedom of Information legislation. The Registry system would need revision

with an overall addition of 45 permanent staff, and 13 temporary positions. Training programs would be devised by a team of 4 officers over 9 months. 380 extra staff would be needed to keep up productivity as well as coping with the Freedom of Information legislation. Depending on the volume of requests for personal files, there would need to be a considerable increase in staff, especially as there may be more than one file on a particular person and they may be held in more than one location.

SPECIAL TRADE REPRESENTATIVE

Resource demands for indexing and cataloguing of material or the preparation of manuals for public use are expected to be minimal. Requests for information have been confined to ministerial correspondence and it is not expected that the legislation will have much impact on staff resources.

TRADE AND RESOURCES

The Department receives inquiries for information mainly from different types of trading and producer bodies in Australia and overseas. These will continue to be dealt with as part of the day-to-day work of the Department.

The Department would need an increase in numbers if its clientele widened to include academics, pressure groups, the media and members of the general public.

TRANSPORT

There are three groups of officers involved in responding to requests for information: (a) a group of 2 or 3 officers in each Regional Office and Central Office whose work includes the preparation of manuals, etc.; (b) a group of about 60 people who are involved in activities relating to all printed material produced by the Department; (c) a large proportion of all staff who write for publication and answer individual requests in their areas.

For monitoring and administration, it would take 3 officers in Central Office and 10 across the Regions, 14 man-months on these tasks with a progressively increasing involvement in other tasks associated with administrative review.

TREASURY

Eleven officers have been involved full-time or part-time in preparing the *Handbook of Practices and Procedures for Processing Foreign Investment Review Board Papers*. It would require revision again before public release. Overall, 150 persons would be involved part-time during the year in the processing of ministerials imparting information. The Freedom of Information legislation would require an increase in these numbers.

VETERANS' AFFAIRS

The number of officers involved in the preparation of manuals, etc., is equivalent to 55 full-time staff. The Department does not anticipate a need for much increase in this area in the long term.

There are the equivalent of 245 full-time staff supplying information to the public.

It is considered that about 30 additional staff would be required to cope with work generated by the Bill.

Statutory Authorities

AUDITOR-GENERAL

The Office spends an insignificant amount of time responding to requests and supplying information to the public.

AUSTRALIAN BROADCASTING TRIBUNAL

The Tribunal is required to publish material, including evidence, except where there are overriding considerations of commercial confidentiality.

AUSTRALIAN BUREAU OF STATISTICS

Few resources are currently employed in preparing and distributing internal guidelines documents.

The Freedom of Information legislation would mean an increase in manpower requirements, particularly for the removal of exempt material. The Bureau estimates a requirement for 2 additional full-time positions p.a.

AUSTRALIAN ELECTORAL OFFICE

One Class 10 officer is working part-time on the identification of categories of material for publication. 150 staff are engaged full-time in supplying information to or for the public with a further 372 doing so on a part-time basis.

To deal with routine index inquiries, the Office would require an additional 30 clerical assistant positions, and for access to policy files another 20 clerical and clerical assistant positions would be required.

AUSTRALIAN GOVERNMENT RETIREMENT BENEFITS OFFICE

The equivalent of 2-3 full-time staff work on the preparation of manuals. Many officers provide information as part of their routine work.

It has been estimated that a minimum of 4 additional staff of appropriate status (at least one Class 9) would be needed for a period of 18 months in order that the initial requirements of clause 7 (and clause 6) could be met. A minimum of a further 4 additional staff would be required to handle day-to-day requests for information. There may be a significant impact on senior staff as well.

AUSTRALIAN TAXATION OFFICE

750 officers prepare manuals or other documents that would be covered by clause 7. About 3500 officers supply information to the public, some on a part-time basis.

To implement Part II of the Bill would require 250 man-years at a senior level, plus support staff. Once guidelines have been established, probably existing staff could cope. There would also need to be facilities in each Branch Office and Head Office to provide information for direct requests, plus skilled staff to provide written answers.

INDUSTRIES ASSISTANCE COMMISSION

'There are no staff presently employed in preparing manuals, etc., or in supplying information to the public; nor is it envisaged that passage of the legislation would require special deployment of staff for this purpose.'

INDUSTRIAL RELATIONS BUREAU

Production of the *Bureau's Operations Handbook* involves four officers on a part-time basis and is expected to involve an additional five (part-time) following acquisition of additional functions. Eight officers on a part-time basis would service other information systems of the Bureau. There would also be support staff.

The Bureau anticipates no particular need for additional staff following enactment of the Freedom of Information Bill.

PUBLIC SERVICE BOARD

The preparation of manuals, etc., and the provision of information is part of the normal duty of many of the Board's officers. At any one time about 30 Third and Fourth Division officers would be so engaged full-time. Associated duties would amount to a further 3 man-years of the time of senior staff.

In the first year after enactment of the Freedom of Information Bill, preparation and up-dating of manuals, etc., would probably take 15 man-years. The Board estimates it would require 2 additional full-time positions in Central Office and 8 additional part-time staff in Regional Offices to implement the legislation as drafted.

TRADE PRACTICES COMMISSION

No officers currently prepare manuals.

A number of officers, equivalent to 4 officers full-time, obtain documents for inspection under the existing law.

About 2 officers would be needed to prepare manuals in the near future.

Further officers would be needed for training staff on the implications of the Freedom of Information Bill.

Question 3:

- (a) To what extent does the department anticipate an increased demand for information under the Freedom of Information legislation if disclosure were to be required of past or existing documents?
- (b) What percentage of material is stored on computer?
- (c) What is the age of the material expressed in percentage terms (i) 0-5 years (ii) 5-10 years (iii) 10-30 years (iv) over 30 years?

Departments

ABORIGINAL AFFAIRS

- (a) 96% of the information held by the Department is less than 10 years old. However, most requests will probably be for current documents. Therefore, probably no increase in staff will be necessary.
- (b) None.
- (c) (i) 56.3%, (ii) 40.6%, (iii) 3.1%, (iv) Nil.

ADMINISTRATIVE SERVICES

- (a) Some increase in demand would be inevitable because the range and number of available documents would be greater and there would probably be a need to extend access to related documents to give an historical perspective. All this would entail extensive research and would have 'significant impact on scarce resources'.
- (b) Less than 10%.
- (c) (i) 65%, (ii) 26%, (iii) 7%, (iv) 2%.

ATTORNEY-GENERAL'S

- (a) A considerable increase in demand for information could be expected 'because of the use of precedents and legal opinions in the administration of enactments and schemes for this and other Departments. It would also involve a great deal of work to process requests for information which would normally be caught under clause 10 (2) for the reason that many or most of the prior or existing documents are necessary to explain current decisions'.
- (b) Negligible.
- (c) (i) files 29%, opinions 30%, (ii) files 15%, opinions 15%, (iii) 31%, 25%, (iv) 25%, 30%.

BUSINESS AND CONSUMER AFFAIRS

- (a) There would be increased demand 'because of the thereby increased population of accessible documents'.
- (b) Department is unable to estimate percentage of information held on computer or otherwise.
- (c) Department is unable to estimate percentage of documents by age.

CAPITAL TERRITORY

- (a) Assuming this question is directed primarily to the effect of Part III of the Bill, the demand for access (or information under Part II) 'would be a function of the level of charges that may be levied for the material produced and/or made available'—whether it is a token charge (larger demand) or realistic (less demand because expensive).
- (b) Impossible to estimate percentage of total records held on computer.
- (c) (i) 40%, (ii) 25%, (iii) 22%, (iv) 13%.

DEFENCE

- (a) The impact of this extension is unpredictable. Two obvious effects are the increased volume of requests and the difficulties in locating prior documents.
- (b) A substantial proportion of the Department's records are on computer.
- (c) (i) 60%, (ii) 25%, (iii) 14%, (iv) 9%.

EDUCATION

- (a) Extension of this provision could cause extremely time-consuming searches and would depend on the assistance of archival agencies.
- (b) A proportion of the department's records is computer based.
- (c) Virtually all records would be less than 10 years old.

EMPLOYMENT AND YOUTH AFFAIRS

- (a) Department anticipates no significant increase in demand if provisions of clause 10 were extended to prior documents.
- (b) Records of CES and of training schemes are not computerised.
- (c) CES records on individual job seekers are destroyed 12 months after job seeker no longer requires CES help. Records of current employment programs are less than 5 years old.

FINANCE

- (a) The Department cannot make any meaningful estimate.
- (b) Considerable amount of information is computerised.
- (c) (i) 4.7%, (ii) 5.3%, (iii) 16.2%, (iv) 73.8%.

FOREIGN AFFAIRS

- (a) The initial impact on the Department would probably be significantly greater.
- (b) —
- (c) Current file holdings (including ADAB) estimated to contain 6 million documents, the bulk of which are less than 10 years old. For ADAB only:
 - (i) 60%, (ii) 30%, (iii) 10%.

HEALTH

- (a) The Department receives a high level of correspondence, most of which represents requests for information. The Minister receives 16 000 letters p.a. It is difficult to predict what the increase would be. Estimates are based on 3 alternatives, viz.: an increase of 16 000 (low), 32 000 (medium) and 48 000 (high).

Additional staff resources required could range from 23 to 55.

The additional cost could range from \$750 000 to \$1 890 000 p.a.

HOME AFFAIRS

The main areas that would be affected would be Archives, particularly as to its services to other agencies, and which would need up to 20 additional staff, and the Office of Women's Affairs. The records of the latter are mostly less than 5 years old. The balance of the Department would have some difficulty if records prior to December 1977 were available as all functional areas have been through a series of reorganisation over recent years. Inquiries should be minimal. The Department does not have appreciable record holdings on computer. It has not estimated the age of material held on file.

HOUSING AND CONSTRUCTION

- (a) In light of recent experience, the Department anticipates demands for past documents to be negligible.
- (b) Approximately 20% of current records is stored on computer.
- (c) (i) 50%, (ii) 30%, (iii) 20%.

IMMIGRATION AND ETHNIC AFFAIRS

The Department offered no specific comment but pointed out that there could be a certain amount of cross reference between personal files (which could be separated into migration and citizenship files) and earlier files or even to security files. Citizenship files are maintained indefinitely. Location in Central Office, State or overseas offices might also provide a logistics problem. The Department raises some 250 000 files each year, of which 56 000 would relate to immigrants.

INDUSTRY AND COMMERCE

There would be some increase in demand for information on the Department's files of which about 14 000 are less than 5 years old. The Department anticipates no significant increase in requests under the Freedom of Information legislation whether or not prior documents are available for access.

INDUSTRIAL RELATIONS

The Department has not estimated increased demand for information if disclosure of prior documents was required: it opposes such disclosures. Its files are held jointly with Employment and Youth Affairs. It estimates that combined file holdings at Central Office would be 50 000 files of which 15 000 relate solely to DIR functions. None is held on computer. Thousands of files are also held in each State office. Some 2500 DIR files are created each year.

If access was given to records under 5 years old, possibly 2 senior and 1 junior additional staff would be required.

NATIONAL DEVELOPMENT

- (a) This would initially create a major problem because the present staff is largely unfamiliar with past records. The problem of exemptions would be accentuated.
- (b) No comment.
- (c) (i) 40%, (ii) 28%, (iii) 18%, (iv) 14%.

POSTAL AND TELECOMMUNICATIONS

- (a) No comment.
- (b) No records held on computer.
- (c) The Department estimates the age of its documents by division.

PRIMARY INDUSTRY

- (a) Workload would more than double. Combined with the possibility of a shorter period for replies, it would make the legislation unworkable unless there were substantial increases in staff.
- (b) Less than 10%.
- (c) (i) 20%, (ii) 40%, (iii) 39%, (iv) 1%.

PRIME MINISTER AND CABINET

- (a) Possibly the workload would double. In particular, if access to policy papers was allowed, the demand could be heavy and the material would require vetting in order to decide whether there should be deletion or exclusion of exempt matter in accordance with clause 20 of the Bill.
- (b) No information stored on computer.
- (c) Registry files (i) 30 141, (ii) 31 138, (iii) 95 000. Cabinet files are listed separately.

PRODUCTIVITY

- (a) The Department has information pre-dating 1976 only in relation to the Defence Production function. Information on this would probably be sought from or through the Department of Defence. It anticipates little demand for prior documents on other areas.
- (b) No comment.
- (c) Percentages are listed separately for the Department, the Patents Office and the Industrial Research and Development Incentives Board.

SCIENCE AND THE ENVIRONMENT

The Department has a rather limited clientele in a number of selective services. Because of the nature of the material provided by these areas, no more than a moderate increase in demand would be expected under Freedom of Information legislation.

SOCIAL SECURITY

The Department currently holds an enormous amount of material. However, it is difficult to quantify the likely public demand under the Freedom of Information legislation. Moreover, even though the Bill, as currently drafted, excludes prior documents from access, it would not be possible for the Department to refuse an individual access to papers on his person files even though some were created before the enactment of the Bill.

SPECIAL TRADE REPRESENTATIVE

The Department is relatively new, is performing a specialised function and has a very small establishment. It anticipates few requests under Freedom of Information legislation.

TRADE AND RESOURCES

The Department would have some problems in ascertaining whether it still held or ever had held certain documents because of the different identities which it has had. 'If unrestricted access to retrospective material was to be sanctioned it would undoubtedly increase workloads.'

TRANSPORT

- (a) It could be assumed that there would be a very much higher demand for information in the early phase of the Act's operation but that the effect of this would decline at an accelerating rate over a period of about two years. This situation would not be affected by the extent of back-dating.
- (b) No comment.
- (c) (i) 45%, (ii) 30%, (iii) 20%, (iv) 10%.

TREASURY

An informal guess is that the demand might be double that for current documents. It is not possible to estimate the age of documents held but it should be noted that all Treasury documentation is held permanently and is never destroyed.

VETERANS' AFFAIRS

- (a) Generally, past documents would be required to understand documents which would be made available as envisaged by the Bill.
- (b) 1%.
- (c) (i) 24%, (ii) 22%, (iii) 34%, (iv) 20%.

Statutory Authorities

AUDITOR-GENERAL

- (a) If the Bill includes prior documents, probably the full-time services of a Class 9 officer would be required, at least for the first year. Auditor-General expects few requests under Freedom of Information legislation.
- (b) A small amount of data is stored on computers.
- (c) (i) 50%, (ii) 30%, (iii) 20%.

AUSTRALIAN BROADCASTING TRIBUNAL

The Tribunal expects the Freedom of Information legislation to have little or no effect on its activities.

AUSTRALIAN BUREAU OF STATISTICS

- (a) There would be a significant increase in demand if prior documents were accessible. An estimate would be 5-10 man-years of effort in the first year of the law's operation, 2-5 man-years in the second year and 0-2 man-years in the third.
- (b) 5% of relevant material is computer stored.
- (c) (i) 75%, (ii) 15%, (iii) 10%, (iv) negligible.

AUSTRALIAN ELECTORAL OFFICE

There could be a substantial increase in the requests received from academic institutions and students. Some election records date back to the early 1900s. An estimate of staff numbers needed to satisfy this expected demand has not been made.

AUSTRALIAN GOVERNMENT RETIREMENT BENEFITS OFFICE

It is anticipated that the bulk of requests will be from individuals who are members of the various schemes seeking information about their own cases that is not already available. These fall into two categories: (a) medical examination reports and (b) computer history records. Unless a charge is made, imposing a deterrent, there could be up to 10 000 requests p.a. to see or be provided with a copy of this material. If the Bill also gives access to prior documents, the requests could

double in the first instance. There could also be problems with referrals where other agencies held the reports. AGRBO has provided total figures on files and other records held by the Department.

AUSTRALIAN TAXATION OFFICE

- (a) It has been the Office's practice to provide as much information as possible to the public at large. No increase in routine requests is expected and probably the total number of requests would not be excessive, at least in early years.
- (b) 20-25% stored on computer.
- (c) (i) 20%, (ii) 49%, (iii) 26%, (iv) 5%.

INDUSTRIES ASSISTANCE COMMISSION

It is not expected that Freedom of Information legislation will produce any significant increase in demand.

INDUSTRIAL RELATIONS BUREAU

- (a) Due to publicity and public interest in its establishment and role, the Bureau would expect a substantial demand for prior documents especially those related to the most recent past (1977 and 1978).
- (b) A negligible proportion of documents is stored on computer.
- (c) (i) 46%, (ii) 26%, (iii) 22%, (iv) 6%.

PUBLIC SERVICE BOARD

- (a) The Board cannot make any objective estimate of increased demand if access to prior documents were available. If demand was concentrated on material less than 5 years old, the area (i.e. number of files) within which information would have to be researched would be increased by a factor of five or six.
- (b) The Board has not estimated the proportion of information held on computer in respect of its own office: it would be negligible.
- (c) (i) 17%, (ii) 23%, (iii) 60%.

TRADE PRACTICES COMMISSION

- (a) This would mean an increased workload.
- (b) None of the Commission's primary documentation is stored on computer.
- (c) All of the current Commission's documents are less than 5 years old: documents inherited from the previous Commission date back to 1967.

Question 4:

What is the anticipated impact on staff resources if decisions on request for access were to be notified within

- (a) 60 days, (b) 28 days, or (c) 14 days?

Departments

ABORIGINAL AFFAIRS

- (a) No comment.
- (b) Would be difficult until impact of legislation was ascertained but would settle down.
- (c) Would not necessarily cause a need for extra staff but could cause pressure from competing priorities.

ADMINISTRATIVE SERVICES

- (a) Preferred.
- (b) Since the Department is decentralised and has diverse functions it would be difficult to satisfy this deadline in terms of the logistic aspect alone.
- (c) ' . . . the greater the reduction below 60 days, the greater would be the demands on departmental resources which could only result in a greater allocation of staff to meet the requests for information.'

ATTORNEY-GENERAL'S

Additional staff would be required. The number would depend on the number and pattern of requests. The workload on senior staff would be increased as response time diminished.

- (a) Up to 14 extra staff would be required.
- (b) Additional resources to (a).
- (c) Additional resources to (b).

BUSINESS AND CONSUMER AFFAIRS

- (a) May prove manageable.
- (b) Would be difficult unless inordinate resources were deployed.
- (c) Impossible, on basis of experience with AAT Act.

CAPITAL TERRITORY

- (a) The only possible period in light of existing staff resources though Department would make every effort to comply with the request as soon as possible.
- (b) Full consideration and response within 28 days requires diversion of staff resources.
- (c) —

DEFENCE

The impact on staff resources is unpredictable. However, any period shorter than 60 days would impose a correspondingly heavier administrative burden which could necessitate more staffing resources at the operational level and also impinge on the other functions of senior policy officers who would be required to review documents. The geographical spread of the Department and the Defence Force presents substantial communication problems if a period less than 60 days were implemented.

EDUCATION

Twenty-eight days 'would be ample in the vast majority of cases'. However, there would be problems if there was a great demand during peak processing periods (December to April).

EMPLOYMENT AND YOUTH AFFAIRS

- (a) (b) Bulk of requests would probably be for access to personal records and could be handled, with most other more formal requests for information, within 28 days.
- (c) Department estimates a 10% increase in workload with requirement for additional staff of from 2.5 to 7 in year 1 and from 1.5 to 2.5 in subsequent years.

FINANCE

- (a) Even the 60-day limit is going to require a re-arrangement of priorities and an increase in staffing. The busiest areas would be PRA administration and ex-gratia payments and waivers.

- (b) If the response time was 28 days, at least one additional position would be required in ex-gratia payments and waivers.
- (c) Full-time positions would be required to answer all requests. This would mean one additional position in PRA and two in ex-gratia payments and waivers plus one for each Division—a total of 8 additional positions.

FOREIGN AFFAIRS

The time taken to answer a request would depend on its nature. A 60-day response time is regarded as reasonable. The Department would generally wish to clear its books as soon as practicable anyway but a 60-day period provides enough latitude for unexpected contingencies.

HEALTH

Unless there were additional resources to handle requests, the majority of requests could not be handled promptly, regardless of statutory deadline.

- (a) Endorsed.
- (b) Doubtful for some requests regardless of reasonable resources.
- (c) Impracticable.

HOME AFFAIRS

- (a) All questions have been answered on the assumption of a 60-day limit; additional staff as indicated would be required.
- (b) This would not affect staff levels much but would affect other priority tasks in Archives and should be manageable in the Office of Women's Affairs.
- (c) This would place considerable strain on Archives even with augmented resources while it would affect priorities in other areas.

HOUSING AND CONSTRUCTION

- (a) Requests could be dealt with in this period provided that the Department can establish a separate freedom of information unit staffed by a class 10, 2 class 9s, 4 class 7s and 4 extra staff in central and regional registries.
- (b) The result could be to treble the effect on resources.
- (c) Impracticable except for the simplest inquiries.

IMMIGRATION AND ETHNIC AFFAIRS

The Department did not comment on this question.

INDUSTRY AND COMMERCE

- (a) While this period is a necessary upper limit, in cases of complex requests the Department would always attempt notification as soon as possible.
- (b) Difficulties in complying, particularly where complex requests are involved.
- (c) Difficult.

INDUSTRIAL RELATIONS

- (a) The Department implies that it could cope with a 60-day response period without additional staff.
- (b) The appointment of 'responsible officers' in Canberra and Melbourne would be required; severe pressure would be imposed on Branch Heads.
- (c) Specialist officers, full-time, in Canberra and Melbourne would be required but the Department would not be able to meet a 14-day limit in more than a few cases.

NATIONAL DEVELOPMENT

If reduced response periods were imposed, this would make necessary either an increase in resources or a re-ordering on priorities within the Department.

- (a) Preferred option.

- (b) The increase in workload would be substantial though not as drastic as if the limit were 14 days.
- (c) This would double the workload involved in implementing the legislation. It would deploy staff needed for the mainstream of the Department's work.

POSTAL AND TELECOMMUNICATIONS

- (a) No problems.
- (b) Would be possible though there could be some difficulties if requests were made to Regional Offices and authority to release was only available from Central Office.
- (c) Would only be possible with an increase in staff (at least two) because of the widespread geographical location of the Department.

PRIMARY INDUSTRY

- (a) Reasonable. The applicant has recourse to the Ombudsman if any delay appears inordinate.
- (b) Would mean an unacceptable situation where freedom of information requests 'would take precedence over all current work except ministerial and other priority tasks'. Would require 5 extra staff.
- (c) Impracticable.

PRIME MINISTER AND CABINET

Any period shorter than 60 days means that senior staff will have to forego work on current policy responsibilities in order to concentrate on requests for clearances. Referrals from other departments would be difficult to cope with in less than 60 days from the date of first receipt if there was any delay in initial referral. If resource time was less than 60 days, additional senior staff would probably be needed.

PRODUCTIVITY

- (a) Regions: 3-6 staff; Central Office: another 2.
- (b) Regions: no change; Central Office: 1 additional position.
- (c) Regions: no change; Central Office: 2 additional positions.

SCIENCE AND THE ENVIRONMENT

On the basis of additional 1% increase in resources:

- (a) No problem.
- (b) Most decisions could be managed.
- (c) Timescale could be met with one or two extra staff.

SOCIAL SECURITY

The Department has different categories of information, viz., personal information, manuals of instruction and policy and administrative data, for which different time limits would be appropriate.

- (a) Within existing resources, this limit is necessary with regard to supply of policy and administrative data. It is a necessary maximum for the supply of amendments to manuals.
- (b) —
- (c) This period is desirable for the supply of personal information although logistics problems may sometimes arise.

SPECIAL TRADE REPRESENTATIVE

Because the Department's establishment is a small one, if there is a greater demand for information than anticipated, the impact will be considerable. It will be even greater if the response period is shortened to 28 or 14 days.

TRADE AND RESOURCES

'If the time to comply with requests for information were to be progressively shortened, clearly this would have an impact on present staff resources; either necessary day-to-day activity would have to be correspondingly deferred or more staff obtained.'

TRANSPORT

The Department offered no comment.

TREASURY

- (a) Five extra staff (plus probably about 3 support staff).
- (b) Eight extra staff (6 support staff).
- (c) Fourteen extra staff (12 support staff).

VETERANS' AFFAIRS

Based on predictions of future workload and adequate staff.

- (a) Little adverse effect on the Department's operation.
- (b) Possible on most occasions.
- (c) Difficult.

Statutory Authorities

AUDITOR-GENERAL

Assuming the Bill does not cover prior documents:

- (a) No increase in staff resources.
- (b) Probably no increase in resources.
- (c) One full-time officer.

AUSTRALIAN BROADCASTING TRIBUNAL

The Tribunal expects the Freedom of Information legislation to have little or no effect on its activities.

AUSTRALIAN BUREAU OF STATISTICS

On the assumption that ABS will not be inundated with requests:

- (a) Satisfactory.
- (b) Probably practicable.
- (c) Difficult. Would require greater use of senior staff.

AUSTRALIAN ELECTORAL OFFICE

The length of time will depend upon the staff resources which can be applied, how complicated the request is and so on. However, the provision of information should not be allowed to interfere with the performance of the Electoral Office's specific statutory functions.

AUSTRALIAN GOVERNMENT RETIREMENT BENEFITS OFFICE

Assuming additional staff was provided, as outlined in answer 2.

- (a) Would be necessary for more complex requests and transferred requests.
- (b) This would be feasible for straightforward requests, not including prior documents.
- (c) Impracticable: would require re-ordering of priorities at the expense of other essential work and additional staff.

AUSTRALIAN TAXATION OFFICE

- (a) The majority of information requests now take about 5-7 weeks to answer.
- (b) Totally unreasonable with existing resources. Diversion of resources would detract from tax-collecting function.
- (c) Totally unreasonable with existing resources.

INDUSTRIES ASSISTANCE COMMISSION

The Commission expects the legislation to have little impact on its operations.

INDUSTRIAL RELATIONS BUREAU

- (a) 4 full-time, 4 part-time staff.
- (b) 12 full-time staff.
- (c) Impracticable.

PUBLIC SERVICE BOARD

Work or decisions taken under a statutory deadline, especially if the period is relatively short, will result in a distortion of work priorities and impose a heavy burden on senior officers and their staff. It would also necessitate a significant increase in clerical staff.

- (a) Favoured.
- (b) Difficult.
- (c) Impracticable.

TRADE PRACTICES COMMISSION

- (a) No comment.
- (b) Decisions could be achieved in most cases.
- (c) The extra burden would require about 5 additional full-time staff.

Question 5:

On the basis of the department's experience of requests for information at present, what is the anticipated annual number of requests under the Freedom of Information legislation?

Departments

ABORIGINAL AFFAIRS

Has no accurate statistics. Does not expect a great volume.

ADMINISTRATIVE SERVICES

It is expected that initially requests under the legislation would be about 1000 p.a.

ATTORNEY-GENERAL'S

The level of requests will fluctuate depending on whether there is a contentious issue currently under scrutiny. The estimate is at least 3000-5000 requests p.a.

BUSINESS AND CONSUMER AFFAIRS

Has not kept statistics. Probably would not help anyway since it is too difficult to assess the likely effect of the Bill.

CAPITAL TERRITORY

No accurate statistics but amounts to hundreds per month. Department unable to make any accurate forecast as to the proportion of requests that would arise from the Bill. Topical areas where manuals would not be enough and applicants would seek access to files include: the ratings area; housing; transport; welfare and municipal management.

DEFENCE

Past experience is not a reliable guide to estimating anticipated annual numbers of requests under Freedom of Information legislation especially as the Department supplies information through a wide variety of channels.

EDUCATION

The majority of requests would be from existing or potential beneficiaries of student assistance schemes administered by the Department while there would

be some from education interest groups. With regard to the former, there are now about 250 000 inquiries p.a. Any appreciable increase (e.g. 5–10%) would require additional staff.

EMPLOYMENT AND YOUTH AFFAIRS

Current experience does not provide an appropriate guide to estimate probable number of requests under Freedom of Information legislation. Estimates in response to question 2 based on an annual throughput of 2 million employment and training records and on the assumption of a high rate of requests for access (25% in year 1, 10% in subsequent years) or a low rate (10% and 5% respectively).

FINANCE

The Department currently receives 2000 ministerial representations p.a. A considerable number of these could be covered under the Freedom of Information legislation, e.g. 500 requests p.a. requiring a detailed response or refusal.

However, too much uncertainty is involved to predict accurate figures.

FOREIGN AFFAIRS

The Department already provides a lot of information to inquiries from a wide cross-section of the community. Any increase arising from the Freedom of Information Bill is difficult to forecast. Could be of the order of 300 to 400 requests p.a. Requests for access are likely to be more onerous than requests for information and the workload may be disproportionately spread over the Department. Also, there will be inquiries on matters affecting individuals and another category on broader policy issues, e.g. from academic researchers.

HEALTH

The present best guess is that about 16 000 additional requests may emerge in Central Office.

HOME AFFAIRS

The Department provided annual statistics which were admittedly incomplete. They were—ministerial correspondence (2100); parliamentary questions (114); Shopfront (3000); Women's Film Fund (300).

The anticipated increases were: Archives—substantial; Office of Women's Affairs (350–400 requests p.a.); Sports and Recreation Branch (20 p.a.); Administration of National Estate—some increase; and a flow-through to supporting areas in management area.

HOUSING AND CONSTRUCTION

The Department anticipates that the current number of requests (about 10 000 p.a.) will increase by about 10%, i.e. there will be about 1000 inquiries p.a. as a result of the Freedom of Information legislation. Most of these will be routine but a significant number (about 100 p.a.) may be very much more complex and fall into the category of disclosure of specific documents. 'It is possible that in the order of 10% of decisions will result in appeal actions and therefore involvement of senior Second Division officers would be significant in some actions.'

IMMIGRATION AND ETHNIC AFFAIRS

The Department expects requests for information related to a number of subject-matters. They are: files on applications to immigrate—a feasible figure is 50 000 requests p.a.; ministerial letters related to appeals against decisions—possible 20 000 requests p.a.; files on change of status—possibly 500 requests p.a.; refusals

of citizenship applications—2000 requests p.a.; refusals of visitor's permits—1000 requests p.a.; files on overseas student applications could be more than 30 000 requests p.a.; refusals of grants-in-aid—100 requests p.a.; requests from researchers—100 requests p.a. It should be noted that sometimes there may be duplicate requests from the same individual. One could also compare the use of the Ombudsman—163 complaints lodged in Australia and 12 complaints lodged overseas last year.

INDUSTRY AND COMMERCE

The Department anticipates that requests for information would number at most 50 to 100 p.a.

INDUSTRIAL RELATIONS

Department receives normally about 50 requests per year. Provided campaigns against the Department or issue-oriented publicity did not produce unusual peaks in requests under Freedom of Information legislation, the Department would not anticipate major increase in the normal level of requests following enactment of the Freedom of Information Bill.

NATIONAL DEVELOPMENT

Requests are at about the rate of 6000 p.a. to the Information Section. The anticipated increase as a result of the Freedom of Information Bill would be 600 p.a. An unquantifiable additional increase is expected in ministerial correspondence, etc.

POSTAL AND TELECOMMUNICATIONS

This is impossible to quantify. However, much of the Department's documentation is already freely available. The Department does not expect much of its information will be of great interest to the public at large. The Department should be able to meet additional requests without difficulty.

PRIMARY INDUSTRY

On the basis of current requests, there could be up to 12 500 formal requests in the first year. If there is major public interest in a particular issue, the figure would be higher.

PRIME MINISTER AND CABINET

Over recent years, some 800 requests p.a. would have been within the perview of the Freedom of Information legislation had it existed.

The anticipated increase would be at least 1000 requests p.a. In addition, there would probably be another 1000 requests p.a. by referral.

PRODUCTIVITY

Perhaps about 1500 requests p.a. could be expected under the Freedom of Information legislation.

SCIENCE AND THE ENVIRONMENT

Apart from information services of the Bureau of Meteorology, the Department would anticipate about 400 requests p.a.

SOCIAL SECURITY

The Department has not quantified its estimates of increases in inquiries likely under Freedom of Information legislation. Page 24 of its submission contains detailed breakdown of current inquiry levels.

SPECIAL TRADE REPRESENTATIVE

The Department does not expect that there will be any significant change to the current pattern of requests for information which, at present, is generally confined to ministerial correspondence.

TRADE AND RESOURCES

Any estimate could only be speculative. 'It is expected that the overall increase in the Department's workload could well be substantial.'

TRANSPORT

It would be hard to choose a figure anywhere between 50 to 500 as an estimate of the likely number of requests for information. If the requests were regular and about 50 p.a., the impact on people handling the published material would not be great. However, an increase of 2 or 3 positions may be required if several hundred requests were received or if the flow of requests was not regular.

The impact on the Department generally would be diffuse and might result in the need for an increase of staff depending on the number and nature of requests.

TREASURY

The freedom of information demand could be of the order of 600 requests p.a. or 12 requests per week. This includes ministerials and 'raw-source' information. Specialised researchers could take the demand up to 20 per week though the latter could, to some extent, be 'event-orientated'.

VETERANS' AFFAIRS

The annual number of requests is anticipated at about 6000.

Statutory Authorities

AUDITOR-GENERAL

At present the Office receives about 20 requests p.a. It would anticipate 100 to 150 requests p.a. under the Bill.

AUSTRALIAN BROADCASTING TRIBUNAL

The Tribunal expects the Freedom of Information legislation to have little or no effect on its activities.

AUSTRALIAN BUREAU OF STATISTICS

At a rough guess, the Bureau estimates 300 requests in the first year and 200 requests p.a. thereafter.

AUSTRALIAN ELECTORAL OFFICE

There is no data on which to base reliable estimates. It notes, 'If only 1% of electors each year were involved, there would be 86 000 index inquiries'. The Office anticipates large numbers of requests from people inquiring about the index, 'commercial' inquiries (e.g. insurance companies, debt collection agencies) and researchers.

AUSTRALIAN GOVERNMENT RETIREMENT BENEFITS OFFICE

It is expected that AGRBO will receive about 10 000 requests p.a. This figure would initially double if access were also given to prior documents.

AUSTRALIAN TAXATION OFFICE

The Office has well-established regional inquiry facilities already (265 officers nationally). In addition, the equivalent of some 80 officers respond to some 4000 written inquiries p.a.

Tax has not estimated the likely number of requests under Freedom of Information legislation but anticipates a heavy appeal workload.

INDUSTRIES ASSISTANCE COMMISSION

The Commission does not expect that the Freedom of Information legislation will cause any significant increase in the amount of requests for information, either in relation to particular or general inquiries. It is expected that the majority of requests will be readily answered by reference to the Commission's reports and other published information.

INDUSTRIAL RELATIONS BUREAU

The Bureau has provided a detailed breakdown of complaints and requests for information received during the 1977-78 financial year. It estimates additional requests under Freedom of Information legislation at 600 p.a.

PUBLIC SERVICE BOARD

The Board and its offices currently respond to about 10 000 ad hoc requests for information p.a. Most of these require individual written responses.

The Board estimates an increase of 20-50% in this figure under Freedom of Information legislation.

TRADE PRACTICES COMMISSION

The Commission currently receives about 2000 formal requests for information p.a. There are also oral inquiries. The Commission expects about 2000 additional requests p.a. under Freedom of Information legislation.

Question 6:

What consideration, if any, has been given to the staff levels at which officers will be delegated power to grant and/or deny access to information under Freedom of Information legislation?

Departments

ABORIGINAL AFFAIRS

At Central Office, the Branch Head (Level 1) will approve or deny access to information with the Division Head or Deputy Secretary responsible for reviews under clause 38 of the Bill.

In the regions, the decision-maker will be the Regional Director except where reference to Central Office is required.

ADMINISTRATIVE SERVICES

Initially, approval to grant or deny access would most likely be given at Branch or Division Head level.

ATTORNEY-GENERAL'S

Initially, a decision to grant or deny access would be made at least at 2nd Division level. The decisions in contentious matters could rest with Division Head, a Deputy Secretary or the Permanent Head.

BUSINESS AND CONSUMER AFFAIRS

Due to the sensitivity of the information, would have requests centrally handled by the Administrative Review Section of the Legislation Branch in consultation with 'line Branch' officers. The delegated decision-maker would be at least at Director (Class 11) level and in cases of disagreement would be referred to a more senior level.

CAPITAL TERRITORY

These decisions would be made by the Minister, the principal officer of the department or by an authorised officer. No detailed consideration has been given and no decisions made as to the level of authorised officers for this power. It would probably be delegated to the officer responsible for the function or area to which the document sought refers, i.e. Section Head (Class 10-11) or Branch Head (Level 1).

DEFENCE

This has not yet been determined. Since the respondent will need to be aware of and recognise both the implications for release and the overall defence, national security and freedom of information considerations, the decision will have to be made by an officer at high level.

EDUCATION

Guidelines for the availability of particular categories of information would be developed by Central Office. Eventually, delegations for the release of information could be issued to State offices. Delegations for denial of access may need to be at a higher level, possibly Class 10 or equivalent. Subsequent review/appeal action may absorb time of senior staff.

EMPLOYMENT AND YOUTH AFFAIRS

With regard to CES matters, Class 11 level in Central Office and Class 8 level at Regional Offices.

With regard to other matters, Branch Head (Level 1) in Central Office, and Branch Head (Level 1 to Class 7) in the Regions.

FINANCE

A general delegation to approve release of information might be placed at Branch Head level although the release of freely available documents might be placed at Class 8 level. For cases falling within the exemption clauses, decisions could be at Branch or Division Head level. For the most sensitive cases, the decision would be with the Secretary.

FOREIGN AFFAIRS

The Department envisages establishing a Section within the Public Affairs and Cultural Relations Division with a structure of one Class 11 (Section Head), a Class 9, a Class 5 or 6, a Clerical Assistant/Registrar and a Stenographer. The Section would act principally as a co-ordinator of the distribution of requests and of the answers from the relevant Branches. The Department would provide accommodation for counter inquiries and for training of the staff to be involved.

HEALTH

Probably the powers to grant or withhold information would be delegated to the Commonwealth Directors of Health in all States, First Assistant Directors-General in charge of Divisions and Directors of outrider bodies.

HOME AFFAIRS

Officers handling freedom of information matters within the Department will be at Class 9-11 (3rd Division) level. Decisions under the legislation will require the authorisation of a 2nd Division officer. Those handling Archives duties arising out of freedom of information inquiries directed to Departments will be classified at the level appropriate to their duties.

HOUSING AND CONSTRUCTION

It is anticipated that senior Third Division officers will grant access in accordance with departmental guidelines and will also be responsible for initial recommendations on exempt documents. Initially, the final decision whether to deny access to information will be delegated to one Division Head (First Assistant Secretary) in Central Office.

IMMIGRATION AND ETHNIC AFFAIRS

Initially, denial of access would be delegated to Assistant Secretaries and above in Central Office, to Regional Directors in the State offices and to senior migration officers in overseas posts.

Authority to grant access would be delegated to section leaders in Central Office (Class 11), to Assistant Regional Directors in State offices (Class 8 to Class 11) and to the senior migration officer in overseas posts.

INDUSTRY AND COMMERCE

Initially, decisions on access would be delegated no lower than Divisional Head level, i.e. at and above Level 3, Second Division.

INDUSTRIAL RELATIONS

Central Office Branch Heads could decide most cases: refusal of access would be delegated only to First Assistant Secretaries or the Deputy Secretary. State offices would not be delegated authority to release material under freedom of information.

NATIONAL DEVELOPMENT

Initially, responsibility would be delegated to Second Division officers.

POSTAL AND TELECOMMUNICATIONS

'It is intended to delegate to the most junior level of officer the power to grant access to identified documents. Requests for documents not identified for general release will be forwarded to Central Office . . . for decision on granting access. This decision will be made at Clerk Class 10 level. A decision to deny access will be made by a Second Division officer.'

PRIMARY INDUSTRY

Initially, the decision would be at least at Branch Head level (2nd Division, Level 1). With experience, decisions on routine requests could be delegated to Section Head (senior 3rd Division) level.

PRIME MINISTER AND CABINET

Probably delegation to grant access would be limited to Senior Advisers (Class 11) and Branch Heads. In addition, the Secretary to the Executive Council and the Secretary of the Department would be involved in particular cases because of their prescribed responsibilities under the Bill.

PRODUCTIVITY

The Department has not considered the matter.

Access would probably be granted at about the level of Central Office Co-ordinator. Refusals would initially be limited to the Permanent Head and/or 'Secretarial line officers'.

SCIENCE AND THE ENVIRONMENT

The matter is under review.

Delegations would probably rest at Branch Head level with some devolution dependent on the nature of requests.

SOCIAL SECURITY

With regard to the preparation of the Manuals of Instruction, where part of the manual will contain exempt material, the determination of exemption will probably follow the present procedure where the decision is made either by the relevant First Assistant Director-General or by the Director-General. This will also apply to policy and administrative data. Authority to grant access to personal information would be delegated to either review officers or office managers.

SPECIAL TRADE REPRESENTATIVE

The Department offered no comment.

TRADE AND RESOURCES

Because it is impossible to assess what kind of requests will be made under the Freedom of Information legislation, it is impossible to categorise at what level access would be granted or denied. Initially, probably considerable time of senior officers would be involved.

TRANSPORT

The authority to grant access will be given to Assistant Secretaries and Assistant Directors in Regional offices; the authority to deny access will be given to First Assistant Secretaries and Directors of Regions.

TREASURY

The Department would establish a co-ordinating section/sub-section to process freedom of information requests, consisting of an officer in charge (Class 8-10), a second in command and a number of support staff. Refusal of access would require Division Head clearance, at least initially.

VETERANS' AFFAIRS

In the Regions, the authority to grant access should be with group leaders (Class 5-8) and to withhold it with the Regional Managers or Assistant Managers (Class 9-11). At Central Office, the granting of access would be at Section Leader level (Class 8-11) and denial of access would be vested in Division Heads.

Statutory Authorities

AUDITOR-GENERAL

'The special independence and responsibilities of the Auditor-General are such that no delegation of his power is envisaged in the short term.'

AUSTRALIAN BROADCASTING TRIBUNAL

The Tribunal expects the Freedom of Information legislation to have little or no effect on its activities.

AUSTRALIAN BUREAU OF STATISTICS

This responsibility should be with line managers. In Central Office this would be the Director (Class 11) level, in State Offices, at the Director (Class 9) level. Initially, however, Central Office would handle requests and decision making would be at Assistant Statistician level.

AUSTRALIAN ELECTORAL OFFICE

Initially, politically and electorally sensitive matters including individual privacy should be decided on a 'case by case' basis by a senior officer—probably at Class 8 to 10, Third Division.

AUSTRALIAN GOVERNMENT RETIREMENT BENEFITS OFFICE

The level of staff will depend on the nature of the material for release.

- (a) The kind of information *currently* made available to an individual about his own case will continue to be provided in writing signed by officers in Class 6-8 range.
- (b) Information *not presently* provided to an individual will be authorised by Class 9 level or above.
- (c) Request for information other than by an individual about his own case will be handled at Class 10-11 level or above.
- (d) Only Level 1 officers and above will have authority to deny access.

AUSTRALIAN TAXATION OFFICE

No formal consideration has yet been given to staff levels at which decisions would be taken. By analogy with responses to inquiries at present decisions would probably be at least at Level 1, Second Division.

INDUSTRIES ASSISTANCE COMMISSION

In view of the small effect expected, the Commission has not considered it necessary to make formal arrangements at this stage on delegations to grant or deny access to its information.

INDUSTRIAL RELATIONS BUREAU

Due to the sensitive nature of the subject-matter, initially decisions on access would be made at Director or Deputy Director level. Later, it could be delegated to State Executive Officer level (i.e. N.S.W., Vic.—Level 1, 2nd Division; other Regions—Classes 9 and 8, 3rd Division).

Also, of the number of refusals, some could be expected to go to the Administrative Appeals Tribunal. This could mean one full-time position in the Central Office.

PUBLIC SERVICE BOARD

Initially, where the matter has significant implications for the Board, Board members may have to make the decision. Once the impact of the legislation has been assessed, 'routine' requests can be handled by relatively junior clerical staff while more complicated decisions would need to be taken at least at Second Division/Regional Director level.

TRADE PRACTICES COMMISSION

Initially decisions on access will be taken by relatively senior officers in Canberra (Second Division or perhaps senior Third Division level).