

Senate Standing Committee on Environment and Communications
Legislation Committee
Answers to questions on notice
Environment portfolio

Question No: 180
Hearing: Additional Estimates
Outcome: Corporate
Programme: Policy and Communications Division
Topic: Portfolio wide - Freedom of Information accessibility
Hansard Page: N/A
Question Date: 7 March 2014
Question Type: Written

Senator Ludwig asked:

1. 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?
2. How does the department test it is complying with accessibility standards for its websites?
3. Does the department comply with accessibility standards for all its websites?
4. What would be the effect on the accessibility rating of the department's website if FOI PDFs were provided on the department websites?
5. What accessibility testing of the website was done and what were the points of failure prior to this change in access for FOI documents?
6. Have the website accessibility standards been solely or partly responsible for not putting FOI PDF documents on the department websites?
7. How does the department facilitate anonymous access to the FOI disclosure files?
8. 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

Answer:

Department of the Environment (the Department)

1. No. The Department publishes a disclosure log on its website in accordance with Section 11C of the *Freedom of Information Act 1982*. Information described in the disclosure log may be obtained by contacting the FOI Contact Officer on (02) 6274 2098 or by email at foi@environment.gov.au.
 - a) The FOI team monitors the FOI inbox as part of FOI duties and does not maintain a record of costs for FOI disclosure log requests.
2. – 6. In accordance with the Australian Government Web Accessibility National Transition Strategy, the Department has established procedures and policies to assess existing online content for compliance against WCAG 2.0 and put in place strategies to increase compliance levels by December 2014.

Testing of content is undertaken through a combination of machine testing, and manual testing on sample areas across our portfolio websites.

Current compliance levels are good, results indicating that the majority of in scope content is at A or AA level. Areas of poorer compliance have been identified and strategies put in place to focus on solutions through a combination of technology, education and policy.

With regard to FOI documents in particular, provision of these documents online as PDF files would create additional accessibility concerns as the PDF format is not yet considered an independently accessible format. In a situation where documents are made available online in the PDF format alone, the accessibility rating of the website as a whole will decline.

7. Disclosure log requests to the Department can be made by email or phone. Identifying information is not required.
8. During 2014 the Department has received email requests for 23 disclosure log documents. All documents were provided electronically.

Bureau of Meteorology (the Bureau)

1. Yes.
2. The Bureau engages the services of Vision Australia or Accessibility One to conduct audits on all new products being developed for the web.
3. No, the Bureau has a large array of aged graphical web solutions which are technically difficult to make assessable. Work is underway to address these systems with it expected to be some time before they will be WCAG 2.0 AA compliant. The Bureau is investigating the introduction of a content management system to manage its 300,000 web pages.
4. As PDF files are photocopies of original documents it is expected that these documents will not comply with WCAG 2.0 AA standards.
5. A complete audit was performed using various tools, due to the size of the Bureau web presence the introduction of the FOI documents had little impact on a site that is currently not accessible.
6. Not at this time, but it would be expected that in the future when the website is compliant that these will be a cause of non-compliance.
7. By publishing FOI PDFs online (<http://www.bom.gov.au/foi/disclosure.shtml>). There is no requirement for a person making a request via the FOI Coordinator for the documents in another format to identify themselves or provide any reason why they require the alternative format.
8. The details of this are unknown to the Bureau.

Clean Energy Regulator

1. To date, the Clean Energy Regulator has not provided PDF copies of documents released under the *Freedom of Information Act 1982* (the FOI Act) on its website.
This is due to the large quantity and file sizes of the documents that have been released in response to the particular Freedom of Information (FOI) requests. As permitted by paragraph 8D(3)(c) of the FOI Act, the agency has published on its website details of how the information may be obtained.
 - a) The agency has only received two requests for copies of the documents from unrelated third parties. There has only been minimal (but unquantified) cost to the agency to monitor email and collate/forward the requested documents. For the two requests received, PDF copies of the requested documents were provided on a CD, at no charge to the persons requesting the documents.
2. An accessibility review was done of existing websites, and where possible work has either been undertaken or is planned to be addressed. Staff publishing to the agency website have undergone training in accessibility and also use accessibility tools to review and ensure the accessibility of content being published.
3. No.

4. It would not affect the accessibility rating of the agency's website if the PDFs were published. The agency website already contains PDFs that can't be made accessible due to the nature of their content.
5. The agency (and its website) commenced operation on 2 April 2012. There was therefore no accessibility testing of the website prior to the commencement of the Information Publication Scheme on 1 May 2011. However, the agency did conduct an internal website accessibility review on 14 August 2012.
6. No. FOI PDFs have not been published on the agency's website due to practical considerations other than website accessibility standards.
7. The agency does not currently facilitate anonymous access to the documents that have previously been released under the FOI Act. However, it is possible for a person to deal with the agency using their real name or a pseudonym when requesting copies of the documents.
8. No FOI PDFs have been downloaded. However PDF documents were provided on CD for two requests (refer to part 1a).

Climate Change Authority

1. No.
 - a. The cost is minimal as the Climate Change Authority has received only a small number of FOI requests.
2. The website was set up in accordance with the accessibility standards. All new content on the website is checked for compliance with accessibility standards.
3. Yes.
4. None.
5. Testing was conducted in consultation with the Department of Industry. No specific points of failure were identified.
6. No.
7. The Climate Change Authority has a FOI contact officer whom applicants could contact anonymously to request documents.
8. Not applicable.

Great Barrier Reef Marine Park Authority (GBRMPA)

1. No
 - a) Estimated 5 per cent of one APS 3 salary.
2. The GBRMPA website was redesigned to incorporate WACG 1.0 requirements (which was the benchmark at the time). Since the redesign, GBRMPA has been moving towards WACG 2.0 compliance. The website runs the funnelback compliance editor, as well as internal CMS compliance tools that allows for some compliance checking.
The next website upgrade, due within the next financial year, will incorporate a new editing platform with additional accessibility auditing tools. Most PDFs and word documents (where possible) available online incorporate the WACG 2.0 techniques in accordance with Microsoft and Adobe checking tools.
3. No. We are implementing a staged approach towards the December 2014 deadline to meet WACG compliance.
4. We do not provide the FOI documentation online. An accessible disclosure log is provided on our website and people wanting access to released information under FOI can contact the agency.

5. The website compliance was tested during and after development its new development in 2011. We are awaiting feedback from the all government accessibility audit, conducted by AGIMO, to see where the website needs compliance development. An accessible FOI disclosure log is provided on our website. People wishing to access released FOI information can contact the agency.
6. No.
7. GBRMPA has not been requested to facilitate anonymous access.
8. FOI request PDF's are not available on the GBRMPAs website. The GBRMPA has received seven email requests for documents released under the *Freedom of Information Act 1982*.

Murray-Darling Basin Authority (the Authority)

1. No
 - a) Responding to requests for copies of documents released under the Freedom of Information Act are part of the FOI Officer's normal duties and are not costed separately.
2. The Authority's Web team users a range of software tools to check all PDF, Word files and HTML pages to ensure they are fully accessible prior to their release for online publishing. In addition, a biannual audit is run by the Web team on sample HTML pages to ensure compliance.
3. The Authority aims to have its website conform to Level AA of the Web Content Accessibility Guidelines Version 2 (WCAG 2.0).
4. Nil, see answers to questions 2 and 3.
5. Not applicable as the Authority does not place FOI PDFs on the website.
6. No.
7. The option for anonymous access to FOI disclosure files is dealt with on a case by case basis with the applicant.
8. Nil, see answer to Question 1. From 1 November 2013 to 31 January 2014 there have been no requests for documents released under the *Freedom of Information Act 1982*.

National Water Commission (the Commission)

1. The Commission has not received a FOI request since the new FOI requirements have come into force.
 - a) not applicable
2. In accordance with the Australian Government Web Accessibility National Transition Strategy the Commission has established procedures and policies to assess existing online content for compliance against WCAG 2.0 and put in place strategies to meet AAA compliance levels by December 2014.
3. The Commission has one website.
4. In compliance with WCAG 2.0 guidelines PDF format documents are not yet considered an independently accessible document. Where such documents are provided on the Commission's website a second form of document is also usually attached.
5. The Commission has an internal quality assurance process when uploading content to the Commission's website which includes assessment for compliance with WCAG2.0 requirements. Independent testing of content is regularly undertaken and no issues of non-compliance have been identified.
6. Not applicable.
7. Not applicable.
8. Not applicable.

Sydney Harbour Federation Trust (SHFT)

1. The SHFT does not make FOI PDFs available for download on its website.
 - a) The Sydney Harbour Federation Trust does not have staff solely dedicated to work with FOI requests. The cost associated with staffing to monitor email and collate and forward requested FOI documents would be dependent on the complexity of the request.
2. – 8. The Department of the Environment monitors the SHFTs website and as such, the SHFT response would be in line with the Department's response.