



Private Health Insurance Ombudsman Information Publication Scheme 2011

Reforms to the *Freedom of Information Act 1982 (FOI Act)* promote a pro-disclosure culture across government, and build a stronger foundation for greater openness and transparency in government.

A significant change is the introduction of a new Information Publication Scheme (IPS) for Australian Government agencies. The scheme aims to transform the FOI framework from one that responds to individual requests for access to documents to one that requires agencies to take a proactive approach to publishing information. The scheme commenced on 1 May 2011.

The Information Publication Scheme:

- Requires Australian Government agencies to publish an information publication plan.
- Specifies categories of information that must be published.
- Provides a means for agencies to proactively publish other government information.

Information Publication Scheme Agency Plan

Introduction

The Private Health Insurance Ombudsman (PHIO) has prepared this Information Publication Scheme (IPS) Agency Plan in accordance with section 8(1) of the Freedom of Information Act 1982 (the FOI Act).

Purpose

The purpose of this plan is to explain how PHIO is implementing and administering the IPS.

Objectives

PHIO's objectives are to outline appropriate mechanisms and procedures to:

- manage the IPS information holdings;
- identify and publish all information required to be published under s 8(2) of the FOI Act;
- identify and publish optional information (s 8(4) of the FOI Act);
- review and ensure on a regular basis that the information we publish under the IPS is accurate, up to date and complete;
- ensure that the information published under the IPS is easily discoverable, understandable, machine-readable, re-usable and transformable;
- ensure satisfactory conformance with the *Web Content Accessibility Guidelines (Version 2)* (WCAG 2.0); and
- measure the success of our IPS contribution.

Establishing and Administering PHIO's IPS entry

1. PHIO's information holdings relevant to the IPS are managed by the Director, Programmes and Education, Senior Project and Policy Officer and the PHIO support services.
2. PHIO's IPS entry is being established and administered within the existing resources of the office.
3. The initial work in establishing the IPS entry was undertaken by a PHIO working group. The working group focused on identifying and, where necessary, updating all the information required to be published in accordance with s 8(2) of the FOI Act, and in establishing the information architecture.
4. Consistent with the objectives of the FOI Act, PHIO will identify and publish all additional information which may be relevant to members of the public by 1 July 2011, in accordance with s 8(4).
5. PHIO will establish a process to regularly review the information published under the IPS to ensure it is accurate, up to date and complete.
6. PHIO will establish an internal IPS Information Register to assist in identifying documents for publication, recording decisions made in relation to publication, and systematically reviewing the IPS information to ensure it is accurate, up to date and complete.
7. There will be no access charges for accessing information published under the IPS.

IPS Information Architecture

1. PHIO will publish IPS information to the general public on the PHIO website.
2. The information will be published under headings consistent with the relevant sections of the FOI Act.
3. The IPS entry will be notified by using the IPS icon (recommended by the Information Commissioner) to provide a direct link to relevant information.
4. PHIO's website includes a search function to assist in locating documents.
5. At present PHIO does not intend to provide an alert service for changes or additions to our IPS entry.
6. PHIO is exploring options to ensure our IPS entry will conform to WCAG 2.0 by 1 October 2011.
7. PHIO will invite comments on our IPS entry and compliance by including a 'request for comments' section under our main IPS entry. Any comments will be considered by the Senior Project and Policy Officer in the first instance, with the office's IPS Working Group to include an item on the IPS as a standing agenda item for its meetings.

Information required to be published under the IPS

1. PHIO has identified, and is publishing, the following information:
 - Our agency plan (required under s 8(2)(a) of the FOI Act)
 - details of the structure of the organisation (s 8(2)(b))
 - functions and decision-making powers (s 8(2)(c))
 - statutory appointments (s 8(2)(d))
 - annual reports and other reports provided to Parliament as required by legislation—the latter reports include State of the Health Funds Report, PHIO Quarterly Bulletin (s 8(2)(e))
 - information routinely provided to Parliament in response to requests and orders (s 8(2)(h))
 - contact details for access to information or documents under the FOI Act (s 8(2)(i))
 - operational information (s 8(2)(j)) including:
 - the PHIO Operational Manual which guides our decision making in relation to complaints.

2. At present PHIO does not have the following types of information that is required to be published under the IPS:

- arrangements to comment on policy proposals (s 8(2)(f))
- documents to which we routinely give FOI access (s 8(2)(g)).

Other information to be published under the IPS

Consistent with the objectives of the FOI Act, PHIO will identify and publish all additional information which may be relevant to members of the public by 1 July 2011, in accordance with s 8(4).

IPS compliance review

1. PHIO will review this agency plan by 1 October 2011, taking into account any feedback from members of the public. Following this, the plan will be reviewed on an annual basis.
2. As noted above, PHIO will review its IPS entry on a regular basis. All agencies are required to review their compliance with the IPS, in conjunction with the Information Commissioner, by 1 May 2016. We will consult with the Information Commissioner about the specific timeframe for review of the office's compliance.
3. By 1 October 2011, the office's IPS Working Group will explore options to measure the success of our IPS.