



# INFORMATION PUBLICATION SCHEME PLAN

*Freedom of Information Act 1982*

**Date: January 2019**

**Version: 4.0**



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## Introduction

At **nbn**, our goal is to realise the Australian Government's vision for the development of a next generation Australian broadband network.

**nbn** is a wholly-owned Commonwealth company—a Government Business Enterprise—represented by the Minister for Communications and the Minister of Finance, as Shareholder Ministers.

On 11 June 2011, **nbn** became subject to the *Freedom of Information Act 1982 (FOI Act)* and its Information Publication Scheme (IPS) requirements. The IPS is a central part of reforms to the FOI Act introduced in stages between November 2010 and May 2011. To paraphrase the [Office of the Australian Information Commissioner's \(OAIC\) FOI Guidelines](#), the IPS underpins a pro-disclosure culture across government. Rather than being reactive and focussing on FOI applications, Commonwealth agencies, entities and Government Business Entities, like **nbn**, are expected to actively drive the publication of information through the IPS. Since its inception, **nbn** has embraced a proactive and pro-disclosure approach to its information assets. For that reason, members of the public will be able to find a large amount of information freely available on our [website](#).

Part 2 of the FOI Act requires **nbn** to publish an IPS Plan. **nbn** is committed to operating in a manner that is open, transparent and consistent with good corporate governance practises, as well as the principles in the FOI Act. Our IPS Plan plays a key role in that corporate framework. The IPS Plan includes details relating to **nbn**'s efforts in relation to the IPS and:

- Its implementation and administration
- Its information architecture
- Mandatory publication requirements
- Other optional information to be published
- Accessibility to published information
- Compliance reviews, among other matters.



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As outlined on our IPS webpage, we welcome any comments, feedback and suggestions regarding our IPS and our FOI processes generally. In that regard, please send any comments to [FOIofficer@nbnco.com.au](mailto:FOIofficer@nbnco.com.au) or via post to FOI Officer, c/- **nbn co limited**, Level 11/100 Arthur Street, North Sydney, NSW 2060.

## Purposes

The purposes of **nbn**'s IPS Plan are to:

- Assist **nbn** in continually planning and developing its IPS
- Set out details on the information holdings **nbn** plans to publish, how the information will be published and made accessible, and how we will comply with the IPS requirements (s8(1), FOI Act)
- Help **nbn** to establish appropriate procedures for proactively disclosing its information holdings in accordance with the objectives of the FOI Act
- Give the public an understanding of how **nbn** plans to meet its obligations under the IPS.

## Objectives

Our objectives are to outline the mechanisms and procedures that **nbn** uses to:

- Manage **nbn**'s information holdings relevant to the IPS
- Identify and publish all information required to be published, including this IPS Plan (FOI Act, s8(2))
- Identify and proactively publish certain other information (FOI Act, s8(4))
- Review and ensure that information published under the IPS is accurate, up-to-date and complete (FOI Act, s8B)
- Ensure that the information published under the IPS is easily discoverable, understandable, machine-readable, reusable and transformable



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- Ensure the format conforms, where possible, to the *Web Content Accessibility Guidelines 2.0* (WCAG 2.0) and provide alternative access arrangements
  - Review and monitor the success of **nbn**'s IPS.

## Establishing & Implementing the IPS

**nbn** recognises that our IPS is a living document, which will evolve over time and in line with the changing needs of the organisation. Our approach to developing and implementing the IPS is outlined in the following.

- **nbn** has established an IPS review process, undertaken by the Corporate Affairs Team, which is headed up by the Chief Corporate Affairs Officer.
- The Corporate Affairs Team is responsible for regularly considering and identifying relevant material for proactive release by **nbn**.
- The Corporate Affairs Team sends suggested documents for proactive release to the FOI Officer.
- The FOI Officer reviews material identified by the Corporate Affairs Team as well as other **nbn** staff. The FOI Officer advises and reports to the Corporate Affairs Team in relation to the documents' suitability for release, along with FOI matters generally.
- The Corporate Affairs Team has an Information Register to identify and list information that:
  - Is required to be published under s8(2) of the FOI Act
  - May be published under s8(4) of the FOI Act, and
  - Is made available to the public otherwise than by publication by the company (s 8A(2) of the FOI Act).
- The Corporate Affairs Team has also established a '[Disclosure Log](#)' for information to be released in response to FOI requests.
- **nbn** also takes steps to ensure that information published under the IPS is accessible, accurate, up-to-date and complete.



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## IPS Information architecture

We also make our IPS information holdings available on the **nbn** website. These holdings are published under the headings below. All section references are to the FOI Act.

- IPS plan (s8(2)(a))
- Who we are (s8(2)(b) and 8(2)(d))
- What we do – Functions of **nbn** (s8(2)(c) and 8(2)(j))
- Our reports and responses to Parliament (s8(2)(e) and 8(2)(h))
- How to contact us, including:
  - Consultation arrangements (s8(2)(f)), and
  - Contact details (s8(2)(i))
- Routinely requested information and Disclosure Log (s8(2)(g) and 11C)
- Operational information (s8A)
- Other information (s8(4)).

To ensure that the IPS information holdings (and individual IPS documents) can be easily identified and accessed, **nbn** has:

- Published an IPS icon on our website
- Published an FOI Disclosure Log icon on our website
- Designed and published an IPS entry point on our website
- Created links between the [IPS webpage](#), [FOI Disclosure Log](#) and [FOI webpage](#)
- Updated the sitemap for our website, to help individuals identify the location of information published under s8(2) and 8(4)
- Enabled the IPS page and Disclosure Log to be located via the search function for our website
- Made IPS documents available from a link on the IPS section of our website
- Published the information in multiple formats, where possible



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- Deposited copies of information in other locations, where possible and appropriate. Examples include the Commonwealth Library Deposit and Free Issue Scheme, National Sound and Film Archive, National Library of Australia and datasets via [www.data.gov.au](http://www.data.gov.au).

## Information published under the IPS

**nbn** publishes and regularly updates the following types of information (including data sets, where relevant) in accordance with s8(2) of the FOI Act:

- The IPS Plan
- Who we are? – This includes details about our organisational structure – [Board Members](#) and [Executive](#), details of statutory appointments (where applicable), key people and contact information
- What we do? – This includes information about **nbn**'s functions and decision-making powers, and rules, guidelines, practices and precedents that assist **nbn** in making decisions or recommendations affecting members of the public
- Our reports and responses to Parliament – This includes **nbn** [annual reports](#) and documents routinely tabled (or requiring publication) in Parliament
- Contact us – This provides details for the public to make policy submissions or to submit FOI applications and requests to the FOI Officer
- Routinely requested information and our '[Disclosure Log](#)'
- Operational information – including **nbn**'s [policies](#), [corporate values](#), priorities, [corporate plan and](#), [governance structures](#), among other information.



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## Administering the IPS

**nbn** will continue to meet its IPS obligations by:

- Maintaining a robust information and asset management framework
- Publishing, on an ongoing basis, information for members of the public by maintaining an Information Register and Disclosure Log
- Identifying, on an ongoing basis, any information that is required to be published under s8(2) of the FOI Act – information that must be published
- Identifying, on an ongoing basis, any information that may be published under s8(4) – optional information
- Identifying, on an ongoing basis, any information that is already otherwise available (s8A(2)) – operational information
- Ensuring the information published continues to be disclosed, accessible, complete, accurate, and up-to-date
- Ensuring the information about any charges to be imposed and how they will be calculated continues to be published (s8D(4) and 8D(5))
- Continually updating and refining our IPS plan.

At **nbn**, the person responsible for administering the IPS is the Chief Corporate Affairs Officer.

IPS documents, which are not available on **nbn**'s website, will be made available on request to the FOI officer, at [FOIofficer@nbnco.com.au](mailto:FOIofficer@nbnco.com.au). **nbn** may charge a person for accessing any IPS document where it is impracticable to publish the document online.



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## Accessibility under the IPS

Where required to publish information under the IPS, **nbn** seeks to ensure that all online content conforms, as far as possible, to WCAG 2.0 standards. **nbn** will seek to conform to WCAG 2.0 standards as far as possible, in relation to its optional information. In the event that an IPS or other document has not been made available in conformity with WCAG 2.0 standards, **nbn** will make such documents available upon request. In that regard, interested parties should contact us via email on [FOIofficer@nbnco.com.au](mailto:FOIofficer@nbnco.com.au). **nbn's** ability to provide documents in WCAG 2.0 standards may be subject to a small number of exceptions, including:

- PDFs made of images of scanned documents
- Documents that are out-of-date, but that are provided for historical reference (these will be supplied in the formats in which they are currently available)
- Charts, tables and forms (These can be supplied in accessible formats on request and in a convenient format for the requesting party).

## IPS Compliance Review

**nbn** plans to review its IPS Plan and its compliance with the IPS on a regular basis and as required by the FOI Act (s9(1)).

**nbn** welcomes any comments on its IPS Plan, addressed to [FOIofficer@nbnco.com.au](mailto:FOIofficer@nbnco.com.au).