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INFORMATION PUBLICATION SCHEME PLAN

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TABLE OF CONTENTS

1	INFORMATION PUBLICATION SCHEME PLAN	3
1.1	INTRODUCTION	3
1.2	PURPOSE.....	3
1.3	OBJECTIVES	3
2	IMPLEMENTING THE INFORMATION PUBLICATION SCHEME	5
2.1	ESTABLISHING AN INFORMATION PUBLICATION SCHEME	5
2.2	INFORMATION ARCHITECTURE.....	5
2.3	INFORMATION REQUIRED TO BE PUBLISHED	6
2.4	OPTIONAL INFORMATION	7
2.5	ADMINISTERING CRIMTRAC'S INFORMATION PUBLICATION SCHEME	8
2.6	REVIEW	8

1 INFORMATION PUBLICATION SCHEME PLAN

1.1 INTRODUCTION

CrimTrac has prepared this Information Publication Scheme Plan (the Plan) in accordance with section 8(1) of the *Freedom of Information Act 1982* (Cth) (the FOI Act).

Section 8(1) of the FOI Act provides:

An agency must prepare a plan showing the following:

- a) what information the agency proposes to publish for the purposes of this Part;
- b) how, and to whom, the agency proposes to publish information for the purposes of this Part;
- c) how the agency otherwise proposes to comply with this Part.

1.2 PURPOSE

The primary purpose of the Plan is to:

- comply with section 8(1) of the FOI Act; and
- assist CrimTrac develop appropriate procedures to proactively disclose its information holdings in accordance with the objects of the FOI Act.

1.3 OBJECTIVES

CrimTrac intends that the Plan provide the appropriate guidance to support the:

- management of its information holdings relevant to the Information Publication Scheme provided in the FOI Act;
- identification of all information required by the FOI Act to be identified for publication;
- provision of the appropriate mechanisms and procedures for the publication of all information required to be published under the FOI Act;
- identification and publication of all optional information, as provided by section 8(4) of the FOI Act;
- revision and evaluation program of the information published under the Information Publication Scheme, particularly to ensure:
 - accuracy;
 - currency; and
 - completeness.
- principle that information published under the Information Publication Scheme is discoverable, understandable and re-useable;

- principle that the format of online content conforms with the *Web Content Accessibility Guidelines*¹; and
- evaluation and measurement of CrimTrac success with regard to the Information Publication Scheme.

¹ The Australian Government Information Management Office advises that agencies, in publishing information on the Web, are required to conform to the *Web Content Accessibility Guidelines*. Further information can be sourced at www.finance.gov.au/publications/wcag-2-implementation/index.html. The requirements of each level of the staged compliance model are available at www.w3.org/TR/WCAG20/.

2 IMPLEMENTING THE INFORMATION PUBLICATION SCHEME

2.1 ESTABLISHING AN INFORMATION PUBLICATION SCHEME

Reforms to the FOI Act have introduced a number of fundamental changes to the way information, held by government, is managed and made accessible to the public. CrimTrac is committed to meeting its obligations under the FOI Act, by:

- providing leadership, at the Executive Leadership Team level, for the Agency's work on implementing FOI reforms, including establishing and administering the Information Publication Scheme (the Scheme);
- providing CrimTrac with a dedicated Freedom of Information Officer, appropriately placed within the Legal and Policy Team, and a recognised function of the Chief Executive Officer's Team;
- ensuring the most stringent security and privacy protections are provided to the personal and sensitive information that CrimTrac is responsible for;
- ensuring that the FOI function is appropriately resourced;
- ensuring that CrimTrac appropriately complies with the delivery obligations in the reform package, including:
 - the development of an information asset management framework that meets the requirements of the FOI reforms (CrimTrac's Information Architecture);
 - the development of a register of CrimTrac-held information required or permitted to be published under the FOI Act; and
 - the development of a register indicating what information is made available to the public otherwise than by publication (a Disclosure Log);
- committing to the pro-disclosure principles outlined in the reforms to the FOI Act and its supporting framework at all levels of staff by:
 - ensuring comprehensive guidance is provided to the public on the CrimTrac website (www.crimtrac.gov.au) that details what information is published under the Scheme, how that information is produced and accessed, as well as what steps CrimTrac will take to ensure the information made available by CrimTrac is accurate, up to date and complete; and
 - provide clear indication on the CrimTrac website, of any changes that CrimTrac intends to implement as part of the FOI reforms, to support access to CrimTrac information.

2.2 INFORMATION ARCHITECTURE

CrimTrac was established in 2000 through an Inter-Governmental Agreement (IGA) between the Commonwealth, states and territories. Underpinning the IGA is the collaborative

willingness of each of the parties to create the most effective information sharing solutions for operational police to help combat crime in Australia.

CrimTrac's primary role is to facilitate, manage and administer information sharing solutions to support police and law enforcement agencies's work in crime prevention, detection and reduction.

CrimTrac is not directly involved in operational police work. While CrimTrac holds information collected by operational police, the CrimTrac staff does not collect information relating to crime, criminal activity, or persons of interest.

In practice, CrimTrac could be likened to a library. CrimTrac provides the reference system, the storage structure, the shelving framework and arrangement, and the tools necessary to both store and retrieve information. CrimTrac does not stock the library with information; however, it provides: the tools for access; the security and protection conditions for access; the tools for delivery and viewing; and the tools for referencing and cross-referencing information it holds.

The information provided to CrimTrac is, with few exceptions, personal information of a sensitive nature. The information has been collected by police and statutory law enforcement agencies as part of investigations into crime and criminal activity. CrimTrac must consult with the all Australian police services who provision the information to CrimTrac when considering the appropriate response to an FOI request. CrimTrac does not own the records it holds, and it must provide for the appropriate expert opinion of the information owners (the police) when considering FOI obligations.

A limited amount of information held by CrimTrac can be made available to the public.

In meeting its obligations under the FOI Act CrimTrac will ensure compliance with subsection 47F (1) - Public interest conditional exemptions—personal privacy –, which provides:

- (1) A document is conditionally exempt if its disclosure under this Act would involve the unreasonable disclosure of personal information about any person (including a deceased person).

2.3 INFORMATION REQUIRED TO BE PUBLISHED

Ensuring maximum security and privacy protections to the sensitive information CrimTrac holds, CrimTrac will make the following types of information available to the public on its external website (www.crimtrac.gov.au):

- this Scheme;
- CrimTrac's organisational structure in the form of an organisation chart;

- details of CrimTrac's functions through the publication of the IGA and the Partnership Approach Memorandum of Understanding, and a CrimTrac document titled *CrimTrac Governance, Program Delivery and Management*²;
- details of CrimTrac appointments that are made under Acts outside of the *Public Service Act 1999* (Cth);
- publication of publically available agreements CrimTrac is party to, such as those that support the governance of the National Criminal Investigation DNA Database;
- CrimTrac's annual reports from 2000/2001 onwards;
- CrimTrac's Legal Services Reporting Statement for the previous financial year;
- relevant files for the Senate File List, in compliance with Senate Continuing Order No. 10³, from 2003;
- information relating to any tenders sponsored by CrimTrac for the relevant period of the tender (this information will also be provided at www.tenders.gov.au);
- CrimTrac Strategic Plans from 2004 – 2007 onwards;
- CrimTrac's Fraud Management Policy;
- contact details for CrimTrac's Freedom of Information Officer; and
- other relevant operational information relating to CrimTrac's functions.

The information types listed above will be made available in Microsoft Word-compatible format and provided in English.

2.4 OPTIONAL INFORMATION

In addition to the information identified as being required to be published for the purposes of the FOI Act, CrimTrac, in demonstration of its pro-disclosure principles, will also ensure that the following information is made available on its website (www.crimtrac.gov.au):

- information relating to CrimTrac's priorities, including:
 - the CrimTrac Strategic Plan;
 - nationally identified priorities relating to CrimTrac as, and when, released by the Commonwealth Government;
 - identified and agreed to priorities relating to CrimTrac as, and when, released by state and/or territory governments;
 - nationally agreed research and development priorities to which CrimTrac is a sponsor, contributor or leader;
 - publicly available results of any inspections, investigations or audits on CrimTrac business; and

² Published December 2010

³ 'Relevant' files includes files relating to the policy advising functions of the department or agency, including any relating to the development of legislation and other matters of public administration.

- any publicly available results of any government or non-government reviews on CrimTrac business or functions.
- information relating to CrimTrac employment including:
 - agreed outcomes relating to CrimTrac enterprise bargaining processes;
 - financial information relating to CrimTrac pay and grading structures; and
 - publicly available tender, procurement and contract procedures and processes; and
- publicly available information relating to file lists, appointments, disclosure logs and datasets.

2.5 ADMINISTERING CRIMTRAC'S INFORMATION PUBLICATION SCHEME

CrimTrac is committed to maintaining its commitment to, and motivation for, upholding its obligations under the FOI Act, and in particular to the Scheme.

To demonstrate this, CrimTrac will:

- review, annually, the Scheme for accuracy, contemporariness and application;
- review, annually, the CrimTrac Information Asset Management Framework;
- ensure that the Freedom of Information officer is appropriately resourced to meet the ongoing requirements of maintaining an information register and disclosure log on the CrimTrac website, to provide appropriate information to members of the public;
- provide a mailbox dedicated to FOI issues to support incoming FOI enquiries;
- provide a mailbox dedicated to FOI issues to support public suggestions for inclusion in publication of appropriate CrimTrac related information;
- initiate quarterly reviews to assess against information that is required or permitted to be published under the FOI Act;
- identify, through the CrimTrac website, information that is already otherwise available for public perusal;
- ensure that accuracy is maintained about any charges that CrimTrac imposes for access to information, and how the charge is calculated;
- ensure that the information published is maintained to the highest standard to support accessibility, usability and accuracy; and
- publish any additional information of the review schedule for the Scheme and Information Asset Management Framework.

2.6 REVIEW

One month prior to the anniversary of publication of this Scheme, CrimTrac will publish a revised Information Publication Scheme Plan on its website for a public comment period of two weeks.

The revised Information Publication Scheme Plan will be amended, if necessary, to take account of any recommendations made by the Office of the Australian Information Commissioner (OAIC) during the course of the previous year.

CrimTrac Freedom of Information Information Publication Scheme

Prior to publishing a revised Information Publication Scheme Plan, CrimTrac will submit the final draft (incorporating as appropriate public comment on the Revised Scheme) to the OAIIC for endorsement.

CrimTrac will, during the course of its review, conduct a comparative environmental scan of information publication scheme plans developed by similarly placed agencies. Through this, CrimTrac is confident that it will maintain the currency and appropriate application of its Scheme.