



Aboriginal and Torres Strait
Islander Health Practice
Chinese Medicine
Chiropractic
Dental
Medical
Medical Radiation Practice
Nursing and Midwifery
Occupational Therapy
Optometry
Osteopathy
Pharmacy
Physiotherapy
Podiatry
Psychology

Australian Health Practitioner Regulation Agency

AGENCY PLAN

Joint Information Publication Scheme Agency Plan

May 2019

1. Introduction

The Health Practitioner Regulation National Law (National Law) establishes the National Registration and Accreditation Scheme to provide for the registration and regulation of health practitioners across 15 professions.

The National Law establishes a National Board for each regulated profession. National Boards develop codes and guidelines for professions, are involved in the accreditation of education providers and regulate the professions by making decisions about registration. The Australian Health Practitioner Regulation Agency (AHPRA) supports each National Board to perform its functions. AHPRA provides administrative and secretariat support and collects information to inform decision-making. AHPRA is governed by the Agency Management Committee (AManC).

The National Law provides that the *Freedom of Information Act 1982* (Cth) (FOI Act) applies, as modified by the Health Practitioner Regulation National Law Regulation, to AHPRA, the AManC and each of the National Boards (the agencies).¹

The FOI Act establishes the Information Publication Scheme (IPS), which requires agencies to publish information publication plans (agency plan) and specific categories of information.²

This joint agency plan is created in accordance with the FOI Act³ to outline how AHPRA, the National Boards and AManC will comply with the IPS by addressing:

- the administration of IPS entries
- information required to be published
- other information to be published
- information architecture, and
- IPS compliance review.

Although the IPS has been in place for Australian Government agencies since 1 May 2011, the requirement for National Boards, AManC and AHPRA to publish information under the IPS commenced on 1 June 2019.⁴

National Boards, AManC and AHPRA are committed to promoting public access to agency information in a manner that is consistent with the objectives and requirements of the FOI Act. This includes promoting a pro-disclosure culture and creating a foundation for open and transparent administration of the National Registration and Accreditation Scheme.

¹ Health Practitioner Regulation National Law, s215

² *Freedom of Information Act 1982* (Cth), s8

³ Ibid.

⁴ Health Practitioner Regulation National Law Regulation 2018, r15(d)

2. Purpose

This agency plan:

- establishes our shared commitment to implementing the IPS in a way that furthers the objectives of the FOI Act
- assists National Boards, AManC and AHPRA to publish IPS information in a manner that ensures ongoing compliance with the FOI Act
- describes information that is proposed to be published under the IPS
- outlines where IPS information will be published, and
- sets out how IPS compliance will be recorded and governed

3. Objectives

In implementing the IPS we aim to:

- manage our IPS entries in an accountable manner
- identify and publish all information required to be published under the IPS⁵
- promote openness and transparency by building a culture that encourages the disclosure of information⁶
- ensure that the information we publish is accurate, up-to-date and complete⁷
- ensure that the information we publish in compliance with the IPS is easily discoverable, understandable and accessible.

4. Administration of IPS entries

We maintain a register of information published to our IPS.

Our senior managers are responsible for ensuring that documents within their control are maintained, recorded on the register and published appropriately.

Managers are accountable to Executive Directors and, through these positions, to the Chief Executive Officer (CEO).

Our National Information Release Unit (NIRU) assists National Boards, AManC and AHPRA to collect, use and disclose information appropriately. NIRU advises and assists managers to make IPS decisions and assists in assuring ongoing compliance with our obligations under the FOI Act.

NIRU is managed by the Senior Legal Advisor (Information Release). This position is the point of contact for members of the public who have suggestions or concerns about this plan or the information we publish under the IPS. Information about how to contact the Senior Legal Advisor (Information Release) can be found on our IPS webpage.

The Senior Legal Advisor (Information Release) works with the National Director, Legal Services and the Executive Directors to coordinate IPS implementation, review and reporting activities.

Information asset management framework

The IPS entries of AHPRA, the National Boards and AManC are published and managed in accordance with the existing information management framework underpinned by corporate strategies, policies and standards.

Our arrangements for information management include:

- Creating, storing and managing information digitally
- Following established policies, procedures and processes relating to information and records management
- Publishing information online in a manner consistent with established policies and procedures relating to preparing, authorising and publishing web content

⁵ *Freedom of Information Act 1982* (Cth), s8(2)

⁶ *Ibid*, s8(4)

⁷ *Ibid*, s8B

- Conforming, to the extent possible, with Web Content Accessibility Guidelines

National Boards, AManC and AHPRA are subject to the Public Record Office of Victoria (PROV) Retention and Disposal Authority (RDA), which requires their records to be held and dealt with in accordance with the *Victorian Public Records Act 1973* (Cth) (PROS 18/1). The RDA / PROS18/1 applies to all agencies under the National Law except records created by predecessor agencies (legacy files). Legacy files pre-dating the 1 July 2010⁸ commencement of the National Registration and Accreditation Scheme are managed in keeping with the records management legislation of the relevant participating jurisdiction.

IPS Register of information

AHPRA, the National Boards and AManC maintain a register of our IPS information. This register records information about the documents that we publish under the IPS. The register contains details about:

- the name of the IPS document
- the location of the document within our information records management system
- the business area and officer responsible for the information, and
- whether a document has been assessed as requiring full or partial publication to the IPS

Additional information about IPS documents is maintained within our Information Records Management (IRM) system. This includes:

- when the document or information was last updated
- formats in which the document is available and file size
- when the information is next scheduled for review, and
- if a document is not published online, who the contact

Keeping information up-to-date

AHPRA, the National Boards and AManC ensure that IPS entries are accurate, up-to-date and complete by:

- adhering to internal policies, procedures and processes concerning:
 - IPS roles and responsibilities
 - IPS content management
 - notification and review processes for new IPS content
 - the review of existing IPS content to ensure that it is up-to-date and relevant
- publishing decisions and documents released as a result of FOI applications⁹
- updating the IPS in response to feedback identifying an issue

Charges

We will publish freely accessible information on the IPS website wherever possible. If an IPS document cannot be published in full, the existence of the document will be listed on our IPS webpage, and members of the public can contact AHPRA to seek access.

We may impose a charge to be reimbursed for certain reproduction or incidental costs. This may include costs involved in preparing a document in redacted form suitable for release, or providing a document in a particular form. In general, AHPRA will not charge for information provided by email. However, if a person requires a document in another format (such as a hard copy document to be sent by post), charges may be applied where the incidental costs for providing the information would be more than \$100.

The amount and rate of any charge will be calculated in a manner consistent with the *Freedom of Information (Charges) Regulations 1982* (Cth) (Regulations), as set out below. We will notify applicants in circumstances where we propose to impose a charge, and seek their agreement before processing their request.

⁸ Or the participation date for a profession joining the National Registration and Accreditation Scheme after this date.

⁹ *Freedom of Information Act 1982* (Cth), s11C

The following table sets out the maximum costs we may charge for documents not available on the website:

Format	Charges
Photocopy	\$10c per page
Copy (other than a photocopy) (e.g. a page containing redactions)	\$4.40 per page
Copy of a document in the form of a computer disk	An amount not exceeding the actual cost in producing the copy
Copy of the document to be sent to the applicant by post or delivered to the applicant	An amount not exceeding the actual cost of postage or delivery

Information architecture

National Boards, AManC and AHPRA are committed to publishing information to the IPS in an accessible digital environment.

To implement the IPS we have created a separate webpage that sets out the content that we are required to publish under the IPS. The design of our IPS webpage is consistent, to the extent possible, with web accessibility guidelines and our internal guidelines relating to information architecture. The way we publish our IPS information may enable content to be downloaded, provide links to content published on other webpages or sites or invite members of the public to contact AHPRA to seek access to information. Links to our IPS webpage can be found in the footer of each of our websites.

Our IPS webpage includes information about:

- Our IPS Joint Agency Plan
- Who we are and our structure
- What we do – operational information that assists the agencies to perform or exercise their powers and functions
- Annual Reports and information routinely provided to Parliament
- Consultation arrangements
- FOI and our disclosure log
- Our priorities – corporate and strategic plans, assessments and reviews undertaken of the agencies and other publications
- Our finances – financial information relating to pay and grading structures, procurement procedures, tendering and contracts
- Our lists – agency contracts, grants and appointments, links to datasets published by the agencies, information held in registers required by law, and other lists and registers relating to the agencies' functions
- Information about how to contact us to seek more information or provide feedback

5. Information required to be published under the IPS

National Boards, AManC and AHPRA have historically published a large amount of IPS information to our websites. This includes information about our roles and responsibilities, how we work, our key personnel, corporate information and our consultation arrangements.

Additional information is available through our IPS webpage and includes:

- a joint plan for the Information Publication Scheme (this plan)
- the structure of National Boards, AManC and AHPRA
- details of each agencies' functions, including decision-making powers and other powers affecting members of the public and/or the regulated health professions

- our Annual Reports
- details of consultation arrangements for members of the public and the regulated health professions to comment on specific policy proposals including how and to whom those comments may be made
- information which the agencies routinely release in response to FOI requests
- information held by the agencies that is routinely provided to Parliament in response to requests and orders from Parliament
- how we can be contacted about access to information or documents under the FOI Act
- our operational information

6. Other published information

Other information, in addition to that which we must publish under the IPS, can be found on our websites. This information includes:

- information about registered health practitioners (including links to past disciplinary decisions) that is published to the Public Register
- agreements and memorandums of understanding with other organizations, and
- the National Restrictions Library (a library of standard clauses developed for use within registration conditions and undertakings)

7. Reviewing our compliance with the IPS

AHPRA, the National Boards and AManC will review our compliance with the IPS every 12 months. We will conduct a further review of our IPS compliance in conjunction with the National Health Practitioner Ombudsman and Privacy Commissioner by 1 June 2024.

AHPRA will ensure that online content published in accordance with this plan is regularly reviewed for currency and accuracy with outdated information being replaced or archived as necessary.

Periodic analysis of website statistics is used to make informed decisions about the effectiveness of providing information online and the type of information being sought.

In evaluating the effectiveness of our IPS National Boards, AManC and AHPRA will take into account public feedback and any reduction in the number of requests we receive for access to information generally and under the FOI Act.

8. Comments invited

National Boards, AManC and AHPRA welcome feedback about our IPS:

Email: foi@ahpra.gov.au

Or by post to:

AHPRA
GPO Box 9958
Melbourne VIC 3001