

The Carter Centre Implementation Assessment Tool

The South African Case Study

This document is a summary of the latest findings of the Open Democracy Advice Centre utilising the Carter Centre IAT tool. This provides a chance for civil society to reflect on the data and inform the study process.

Open Democracy Advice Centre
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Introduction

By utilising the Carter Centre's Implementation Assessment Tool (IAT) in the ministries of basic education, health, treasury, customs (SARS), agriculture and justice, the Open Democracy Advice Centre have collated a qualitative report that examines these entities on the basis of four broad categories of indicators i.e.:

1. ATI crosscutting functions,
2. The receipt and response to requests,
3. Proactive disclosure, and
4. Records management.

The IAT is based on a qualitative assessment, focusing on questions of agencies' capacity and preparedness to provide information and to respond to requests. Assessments were made through desk research, interviews, and review of key documents. In this respect, the tool also differs from past monitoring exercises on access to information which usually consist of making a number of requests and observing the different number of replies received from each agency. Those exercises then analyse quantitative data and obtain a percentage of compliance regarding access to information obligations. On the contrary, this tool is not meant to produce any type of percentage or numerical score. We have put together our findings and narratives to use as discussion points for further assessment, as a part of the review process.

Summary of Findings

As such, as summary of the narrative demonstrates the following:

Department of Agriculture

- Bottom-up development
- Some internal mechanisms
- Steady improvement
- Frontline staff awareness

- General perception of poor compliance
- Strong records management
- Poor administration of PAIA
- Overly litigious
- Under-resourced
- Lack of responsiveness

Department of Justice

Department of Health

- Poor implementation
- Good proactive disclosure

Department of Basic Education

- Poor compliance
- Good proactive disclosure
- Good website

National Treasury

- Extremely poor access
- Lack of will and awareness
- Poor frontline staff awareness

South African Revenue Services

- Average performance
- Lack of internal mechanisms
- Improvement plan in process

Key findings and highlights for the study

The application of the Carter Centre's AIT demonstrated that implementation of the access to information (ATI) laws and enabling policies remains at the bottom of the South African government's priorities despite South Africa being a founding member of the global and multiparty Open Government Partnership (OGP), and being the first African country to pass an FOI law.

a) Problems of senior leadership

It is worth noting that not a single of the six Ministers responsible for the six institutions sampled was available to be interviewed by the researchers as is required by the research protocol. This is largely because the matter of ATI implementation is regarded as an operational matter, and not a policy matter, and therefore does not fall within the scope of responsibilities of the political heads of the institutions: the Ministers. The assumption is instead that this issue falls within the scope of the responsibilities of the administrative heads of the institutions in the form of the Directors-General.

However, in practice it is evident that the Directors-General themselves further delegate this responsibility to their subordinates such as Directors and Chief-Directors. In none of the institutions sampled is the responsibility delegated to a Deputy-Director General. The delegation of responsibility to the levels of Director or Chief Director does not help promote the necessary political will to invest in effective implementation efforts. It also means that ATI does not enjoy the benefit of champions senior enough to make meaningful interventions to bolster compliance and implementation.

b) Findings per institution

The following highlights are worth noting per institution sampled:

i) The Department of Agriculture, Forestry and Fisheries (DAFF)

This is a fairly new department following the restructuring of the public service by President Jacob Zuma when he became the President of South Africa in 2009. It is made up of the agriculture component from the former Department of Land (DLA) Affairs, the forestry component from the former Department of Water Affairs (DWA) and the fisheries component from the Department of Environmental Affairs and Tourism (DEAT). All these former

departments were not departments that had distinguished themselves in terms of best practice on ATI implementation. This means that the new DAFF had to essentially start from the bottom up in setting up the enabling systems for better ATI practices and compliance.

Within a short space of time DAFF has done a lot to improve its compliance efforts on ATI. This began with:

- the drafting of a new manual for the new department;
- the construction of a new PAIA website;
- the relocation of the Deputy Information Officer (DIO) functions to the Communications Department which combines both IT and communications components;
- the incorporation of PAIA compliance procedures within the IT systems framework of the department; and
- the compilation of PAIA training materials that are available not only to members of staff, but to the public as well.

DAFF was also one of only two institutions where the researchers were easily transferred to the relevant official when conducting a simulated exercise aimed at testing the awareness of frontline members of staff. The other department was the Department of Justice (DOJ).

ii) The Department of Justice and Constitutional Development (DOJ)

The DOJ has statutory obligations in terms of not only its own compliance with PAIA, but also its administration. Ironically the ATI community in South Africa has been disappointed with the ATI practices within the DOJ. For example the prevailing view within the community of users of the South African ATI law is that the DOJ has not fully asserted its authority in encouraging proper compliance with the Act. Over the last ten years since the Act was passed, the Department of Justice's efforts have only included:

- Passage of regulations providing for prescribed information request forms and fees payable;
- Passage of regulations related to compilation and publication of manuals;
- Passage of regulations related to exemption of certain groups of requestors from payment of access fees (this was offered quite grudgingly by the Department following intensive lobbying by the SAHRC);
- Publication of booklets on the Act; and

- Conduct of information sessions on the Act throughout the civil service. (A survey by ODAC in 2002 and 2003 found that most officials who attended these sessions found them to be inadequate in empowering them to meet their compliance obligations.)

Over the ten year period since PAIA was enacted the department has been sued for information more than any other public institution, and in a number of cases they have had to settle out of court. The department has been roundly criticised for engaging in unnecessary litigation on the Act. The department, together with the SAHRC, are co-guardians of the law and so if this department does not set a positive tone for implementation it's unlikely that the rest of the public service will improve its efforts.

The department seems to be plagued by a chronic lack of specialist and empowered human resources that can elevate its position to being an exemplar of best practices in terms of the ATI. It appears, unfortunately, that so far the department has adopted a very cautious approach towards ATI implementation. This is evident in the cautious manner in which the respondent officials within the department chose to engage with the researchers and the inability of the researchers to get answers to specific questions in terms of the IAT methodology. It is also demonstrated in the fortress-like entry into the department's head office building where visitors are not allowed to bring cameras or any recording devices when visiting officials within the building. Under such circumstances, public reading rooms are out of the question, unlike the vast open reading centres in departments such as in the Department of Health.

iii) Department of Health (DOH)

The department of health (DOH) presents an interesting unit of study for further research and analysis. This is because historically the DOH has suffered instances of chronic non-compliance with the PAIA, even winning in 2009 the Rusty Padlock Award (awarded by ODAC for the worst performance in PAIA implementation). Yet research in terms of the IAT shows that, together with the Department of Basic Education, the DOH has done more than most in terms of voluntary or proactive disclosure of information. The DOH provides a good website, reading room, a small public library and the information desk at the foyer of the head office building, and many pamphlets that they produce to provide the public with lots of information related to the work of the DOH, the services the public is entitled to, and various types of health information.

The DOH is a conundrum because of its poor implementation of PAIA, while at the same time it is arguably setting a benchmark for proactive or voluntary disclosure of information, particularly service delivery information.

iv) Department of Basic Education (DBE)

This is yet another new department launched by President Zuma following the splitting up of the Department of Education (DOE) into two distinct departments, namely; the Department of Basic Education (DBE) and the Department of Higher Education (DHE).

Historically the DOE was not one of the top performers in terms of PAIA compliance; and, unfortunately, it appears that the DBE may have inherited some of those weaknesses. This assessment has been confirmed in a peer review bilateral discussion between the researchers and the South African Human Rights Commission (SAHRC), which has been monitoring implementation of PAIA by public institutions. The SAHRC indicated that DBE has since its creation continuously failed to fulfil its reporting obligations in terms of section 32 of PAIA.

Again, much like the DOH, the DBE has set a benchmark for proactive and voluntary disclosures, particularly through their website. The DBE website contains a lot of information on the educational sector in South Africa. A lot of this information is produced from data sets and statistics compiled by the Education Management Information System (EMIS).

v) The National Treasury

The National Treasury, falling within the responsibility of the Minister of Finance, is a critically important department (with some even calling it a government within a government), yet it has consistently showed weak implementation efforts on ATI. The prevailing sentiment within the National Treasury (NT) is that its clients are not individual members of the public but institutions and therefore there is no need for them put in place mechanisms to make ATI easier for members of the public. The prevalence of this idea was confirmed in a peer review bilateral discussion with the SAHRC.

The NT's poor performance was clearly demonstrated when the researchers conducted a site visit to their offices in Pretoria. A comedy of errors ensued when the researcher visited the offices on 240 Vermuelen Street and 40 Church Square, to verify whether there were any public reading rooms, and to assess the levels of awareness of NT's ATI procedures among staff.

Firstly, the frontline officials at both sites are not internal employees of the NT but contracted security officials who were not aware of the NT's ATI procedures and certainly had never heard the term "PAIA" or "Promotion of Access to Information Act" before. Needless to say they were not in a position to assist the researcher who was posing as a member of the public who wanted to know who to talk to if he wanted to know more about the NT's ATI procedures (the researcher's assumption is that the researcher would ultimately be referred to the DIO) . Even though they did not know how to assist the requestor, the security officials were most courteous and helpful - even making numerous calls throughout the building in order to find out who could assist the researcher. A total of 9 NT internal staff members were interacted with: either through phone calls by the security officials, or through a random sample of officials that were stopped by the security officials to find out if they knew who could help the researcher. What was a concern is that none of those officials knew who the department's DIO was.

It was during one of these random approaches that one member of staff suggested that the researcher should try the Communications Unit because they "think access to information may have something to do with Communications".

The Communications Unit is housed at the NT's other site – 40 Church Square - which is about 350 metres from 240 Vermuelen. Upon arrival at 40 Church Square the researcher discovered that the front-desk there too was manned by security officials, and not by internal members of staff. The security official did not know anything about the NT's ATI procedure or who was responsible for these. However, she called the Communications Unit and they suggested that the issue is handled by the Knowledge Management Unit based at 240 Vermuelen!

The security official was kind enough to call the reception at 240 Vermuelen in order to find out who at the Knowledge Management Unit would be able to assist. A name of an official was given and the security official called this official a number of times, but there was no answer. When the researcher asked the security official for this official's number so that he could try calling the official himself, he was informed that the security officials are not allowed to give out office telephone numbers of officials!

Yet another number was tried by the security official, and it turned out to be the number for the Human Resources office. After close to two hours of trying to see if the officials at NT would be able to transfer the researcher to the relevant NT DIO, the researcher finally gave up on attempting to get in contact with the DIO through the NT members of staff or agents posted at the public access points.

vi) The South African Revenue Service

The South African Revenue Service (SARS) is the agency responsible for both Customs and Internal Revenue agencies in South Africa. SARS falls within the responsibility of the Minister of Finance.

SARS neither belongs to the group of top performers, nor the worst performers in terms of ATI and PAIA implementation in South Africa. The ATI and PAIA functions are located within the Legal Department. The two DIOs are quite competent individuals that do their work well. However, SARS has not developed any built-for-purpose internal mechanisms for handling ATI compliance issues. This is a risk because then the agency's performance in terms of ATI and PAIA compliance rests on these two individuals. What if one or both of these individuals become indisposed and are replaced by less competent members of staff?

Sustained and fool-proof compliance requires institutional mechanisms and frameworks that continue to produce desirable results regardless of who is in charge. SARS has realised how important it is to build these internal mechanisms and has put together a project plan in order to achieve this. This plan involves the establishment for an internal PAIA Unit.

Exploring the data tables

We will now review the data tables in more detail. To assist interpretation, we used the following traffic light system to rate performance:

Green: Indicates that the administration has done well and has met the defined best practice; 

Yellow: Demonstrates that there has been some activity/engagement, but does not meet the defined best practice; 

Red: Shows that the administration has either not engaged or done very little to advance on this part of its implementation; and 

White: Indicates that no data was available. 

The data tables follow, **Figure 1**.

Justice	ATI crosscutting functions	Receive and Respond to Requests	Proactive Disclosure	Records Management
Leadership (directs)	 Direction/Engagement  Strategic planning process	 Engagement	 Engagement	 Engagement
Rules (guide)	 Policies and regulations  Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan
Systems (order)	 Classification  Internal oversight  Public awareness raising	 System for receiving  System for responding	 System for proactive disclosure	 System to manage  System to retrieve
Resources (enable)	 Designated information officer  Staffing  Training  Infrastructure  Allocation of resources	 Responsible officer/staff  Training  Infrastructure	 Responsible officer/staff  Training  Infrastructure	 Responsible officer/staff  Training  Infrastructure
Monitoring (adjust)	 Reporting  Performance monitoring	 Capturing of statistics	 Capturing of statistics	 Performance monitoring

Agriculture	ATI crosscutting functions	Receive and Respond to Requests	Proactive Disclosure	Records Management
Leadership (directs)	 Direction/Engagement  Strategic planning process	 Engagement	 Engagement	 Engagement
Rules (guide)	 Policies and regulations  Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan
Systems (order)	 Classification  Internal oversight  Public awareness raising	 System for receiving  System for responding	 System for proactive disclosure	 System to manage  System to retrieve
Resources (enable)	 Designated information officer  Staffing  Training  Infrastructure  Allocation of resources	 Responsible officer/staff  Training  Infrastructure	 Responsible officer/staff  Training  Infrastructure	 Responsible officer/staff  Training  Infrastructure
Monitoring (adjust)	 Reporting  Performance monitoring	 Capturing of statistics	 Capturing of statistics	 Performance monitoring

SARS	ATI crosscutting functions	Receive and Respond to Requests	Proactive Disclosure	Records Management
Leadership (directs)	 Direction/Engagement  Strategic planning process	 Engagement	 Engagement	 Engagement
Rules (guide)	 Policies and regulations  Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan
Systems (order)	 Classification  Internal oversight  Public awareness raising	 System for receiving  System for responding	 System for proactive disclosure	 System to manage  System to retrieve
Resources (enable)	 Designated information officer  Staffing  Training  Infrastructure  Allocation of resources	 Responsible officer/staff  Training  Infrastructure	 Responsible officer/staff  Training  Infrastructure	 Responsible officer/staff  Training  Infrastructure
Monitoring (adjust)	 Reporting  Performance monitoring	 Capturing of statistics	 Capturing of statistics	 Performance monitoring

Education	ATI crosscutting functions	Receive and Respond to Requests	Proactive Disclosure	Records Management
Leadership (directs)	 Direction/Engagement  Strategic planning process	 Engagement	 Engagement	 Engagement
Rules (guide)	 Policies and regulations  Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan
Systems (order)	 Classification  Internal oversight  Public awareness raising	 System for receiving  System for responding	 System for proactive disclosure	 System to manage  System to retrieve
Resources (enable)	 Designated information officer  Staffing  Training  Infrastructure  Allocation of resources	 Responsible officer/staff  Training  Infrastructure	 Responsible officer/staff  Training  Infrastructure	 Responsible officer/staff  Training  Infrastructure
Monitoring (adjust)	 Reporting  Performance monitoring	 Capturing of statistics	 Capturing of statistics	 Performance monitoring

Health	ATI crosscutting functions	Receive and Respond to Requests	Proactive Disclosure	Records Management
Leadership (directs)	 Direction/Engagement  Strategic planning process	 Engagement	 Engagement	 Engagement
Rules (guide)	 Policies and regulations  Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan	 Guidelines/SOPs  Implementation plan
Systems (order)	 Classification  Internal oversight  Public awareness raising	 System for receiving  System for responding	 System for proactive disclosure	 System to manage  System to retrieve
Resources (enable)	 Designated information officer  Staffing  Training  Infrastructure  Allocation of resources	 Responsible officer/staff  Training  Infrastructure	 Responsible officer/staff  Training  Infrastructure	 Responsible officer/staff  Training  Infrastructure
Monitoring (adjust)	 Reporting  Performance monitoring	 Capturing of statistics	 Capturing of statistics	 Performance monitoring

Treasury	ATI crosscutting functions	Receive and Respond to Requests	Proactive Disclosure	Records Management
Leadership (directs)	<input type="radio"/> Direction/Engagement <input type="radio"/> Strategic planning process	<input type="radio"/> Engagement	<input type="radio"/> Engagement	<input type="radio"/> Engagement
Rules (guide)	<input type="radio"/> Policies and regulations <input type="radio"/> Guidelines/SOPs <input type="radio"/> Implementation plan	<input type="radio"/> Guidelines/SOPs <input type="radio"/> Implementation plan	<input type="radio"/> Guidelines/SOPs <input type="radio"/> Implementation plan	<input type="radio"/> Guidelines/SOPs <input type="radio"/> Implementation plan
Systems (order)	<input type="radio"/> Classification <input type="radio"/> Internal oversight <input type="radio"/> Public awareness raising	<input type="radio"/> System for receiving <input type="radio"/> System for responding	<input checked="" type="radio"/> System for proactive disclosure	<input type="radio"/> System to manage <input type="radio"/> System to retrieve
Resources (enable)	<input type="radio"/> Designated information officer <input type="radio"/> Staffing <input checked="" type="radio"/> Training <input checked="" type="radio"/> Infrastructure <input type="radio"/> Allocation of resources	<input checked="" type="radio"/> Responsible officer/staff <input type="radio"/> Training <input type="radio"/> Infrastructure	<input type="radio"/> Responsible officer/staff <input type="radio"/> Training <input checked="" type="radio"/> Infrastructure	<input type="radio"/> Responsible officer/staff <input type="radio"/> Training <input type="radio"/> Infrastructure
Monitoring (adjust)	<input type="radio"/> Reporting <input type="radio"/> Performance monitoring	<input type="radio"/> Capturing of statistics	<input type="radio"/> Capturing of statistics	<input type="radio"/> Performance monitoring

Data Collection Table (without Treasury)

Figure 2.

#	Question	Education	Health	Justice	Agriculture	SARS
1	Does the Minister or Deputy Ministers actively participate in the development and/or review/revision of ATI policies, regulations, and/or oversight of implementation?	Red	Red	Red	Red	Red
2	Does the agency's strategic plan incorporate ATI-specific goals, objectives, and/or outcomes?	Green	Red	Green	Red	Red
3	If an implementation plan exists, does the highest level official (HLO) actively participate in the setting and/or reviewing/revising of agency implementation plan?	Red	Red	Green	Green	Red
4	How often does a HLO participate in meetings with program managers and operative personnel specifically dealing with ATI policy/regulations (including receiving and responding to requests, proactive disclosure, records management)?	Red	Red	Green	Yellow	Red
5	Does the Agency have specific regulations and/or policies on ATI?	Green	Green	Red	Red	Red
6	How often are ATI regulations and/or policies revised?	Yellow	Green	Red	Yellow	White
7	Does the agency make guidelines/standard operating procedures available for reference?	Green	Red	Green	Green	Red

8	Has the agency established guidelines/standard operating procedures for classification of documents?	Green	Green	Green	Green	Green
9	Does the agency have a specific implementation plan?	Green	Red	Red	Green	Red
10	Does the implementation plan have the following components?	Green	Red	Red	White	Red
11	How often is the implementation plan reviewed and/or revised?	Red	Red	Red	Yellow	Red
12	Has the agency disseminated the implementation plan internally?	Green	Red	Red	Yellow	Red
13	Has the agency established a system for classifying documents?	Green	Green	Green	Green	Yellow
14	Does the agency's internal oversight system monitor ATI functions and provide for sanctions?	White	Red	Red	Red	Red
15	Does the agency's public outreach strategy specifically include a component regarding the agency's ATI procedures?	Yellow	Red	Yellow	Yellow	Red
16	Has a public official been specifically appointed as designated information officer (DIO) in charge of ATI functions and duties?	Green	Yellow	Green	Green	Green
17	Does the DIO report to the Minister or Deputy Minister?	Red	Red	Red	Red	Red

18	Has the name of the designated information officer been made public?	Green	Red	Green	Green	Green
19	How are the DIO's duties allocated?	Green	Red	Green	Green	Yellow
20	What level of hierarchy is the DIO?	Yellow	Red	Yellow	Yellow	Red
21	Does the DIO have the time needed to fulfill his/her DIO duties and functions?	Red	White	Green	Green	Green
22	Does the DIO have the (staff) human resources needed to fulfill the agency's duties and functions?	Yellow	Red	Green	Yellow	Yellow
23	Are all public officials made aware of basic ATI principles (ie openness, value of transparency, and very basics on procedures – have to accept requests, where to send)?	Yellow	Yellow	Yellow	Yellow	Yellow
24	Does the DIO and his/her staff receive training to fulfill their ATI functions and duties?	Red	Red	Green	Yellow	Yellow
25	Are all general and specific training materials related to ATI functions created and maintained for future reference and use by public officials?	Red	Red	Yellow	Green	Yellow
26	Has the agency created physical spaces for public viewing of information requested or proactively disclosed?	Red	Green	Red	Green	Green
27	Does the agency's budget specifically include a line item for ATI costs?	Red	Red	Green	Red	Red

28	Does the agency specifically determine the cost of the following components necessary for fulfilling its ATI obligations and duties?					
29	Does the agency regularly undertake monitoring of its ATI functions and duties?					
30	Does the agency prepare and release an annual report related to its ATI functions and duties?					
31	Does the agency's assessment of public officials' performance include ATI functions and duties?					
32	Is a Minister or Deputy Minister involved in the setting and reviewing/revising policies related to receiving and responding to requests, including internal appeals?					
33	Has the agency established guidelines / standard operating procedures for receiving requests?					
34	Has the agency established guidelines / standard operating procedures for processing requests?					
35	Has the agency established guidelines / standard operating procedures for transferring requests to other agencies?					
36	Has the agency established guidelines / standard operating procedures for responding (release or deny) to requests?					

37	Has the agency established guidelines / standard operating procedures for internal appeals?	Red	Red	Red	Yellow	Red
38	Does the implementation plan specifically include references to the following components or actions necessary for receiving and responding to requests?	Yellow	Red	Yellow	Yellow	Red
39	Has the agency established a system for logging and tracking requests and responses?	Red	Red	Yellow	Green	Red
40	Has the agency established a system for issuing and serving responses?	Red	Red	Red	Red	Red
41	Is there a designated office for receiving and responding to requests?	Green	Red	Green	Green	Red
42	Are the duties of the public officials in charge of receiving and responding to requests allocated formally?	Green	Yellow	Green	Green	Green
43	Does the public official in charge of receiving and responding to requests have the time needed to fulfill his/her duties and functions?	Red	Red	Green	Green	Green
44	Are public officials responsible for receiving and responding to requests trained to comply with their duties?	Red	Red	Yellow	Red	Red
45	Do public officials responsible for receiving and responding to requests have regular access to computers with internet, scanners, and photocopy machines?	White	Green	Green	Green	Green

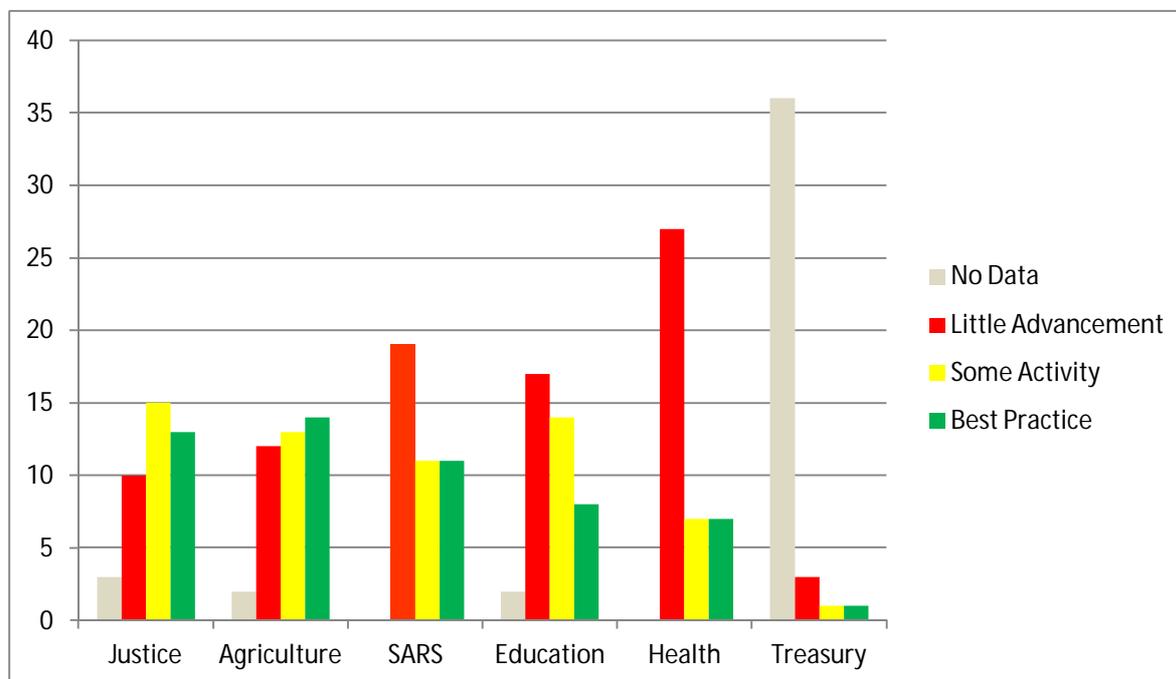
46	Does the agency capture statistics related to receiving and responding to requests?	Red	Red		Green	Green
47	Is a Minister or Deputy Minister involved in the creation of the publication scheme?	Red	Red	Red	Red	Red
48	Has the agency established guidelines/standard operating procedures for establishing a publication scheme?	Red	Red	Red	Red	Red
49	Has the agency created guidelines/standard operating procedures for placing the information/ documents included in the scheme in the public realm, via website, reading room, or by appointment?	Green	Red	White	White	Red
50	Does the implementation plan include references to the publication scheme through the following components?	Red	Red	White	Yellow	Red
51	Does the implementation plan include references to the proactive disclosure of the documents identified in the publication scheme, through the following components?	Red	Red	White	White	Red
52	Has the agency established a system for proactive disclosure?	Yellow	Red	Yellow	Yellow	Yellow
53	Are the duties of the public officials in charge of the publication scheme and proactive disclosure allocated formally?	Green	Yellow	Green	Green	Green

54	Does the public official responsible for the publication scheme and proactive disclosure have the time necessary to fulfill his/her duties and functions?					
55	Are the public officials responsible for actions pertaining to the publication scheme and proactive disclosure trained to comply with their duties?					
56	Does the public official responsible for proactive disclosure have access to computers with internet, scanners, and photocopy machines?					
57	Does the agency have a functioning website with proactively disclosed information and/or publication scheme?					
58	Does the agency capture statistics related to proactive disclosure?					
59	Is a Minister or Deputy involved in setting and reviewing/revising records-management policy and guidelines?					
60	Has the agency created guidelines/standard operating procedures for records management?					
61	Has the agency established guidelines/standard operating procedures for completing and updating an inventory of documents?					
62	Does the implementation plan reference a records-management system, through the following components?					

63	Has the agency established a system to manage its documents and records?	Green	Green	Green	Green	Green
64	Has the agency established a system for retrieval of documents/records?	Green	Green	Green	Green	Green
65	Are the duties of the public officials in charge of inventory and records management allocated formally?	Green	Green	Green	Green	Green
66	Has the agency allocated sufficient (staff) human resources to fulfill its records-management functions and duties?	Green	Yellow	White	White	Yellow
67	Does the public official responsible for inventory and records management have the time necessary to fulfill fulfill his/her duties and functions?	Green	Green	White	White	Red
68	Are public officials responsible for records management trained to comply with their obligations and duties?	Green	Yellow	Yellow	Yellow	Yellow
69	Has the agency created space for storage (including electronic records) and archives of records?	Yellow	Yellow	Green	Green	Green
70	Do public officials responsible for records management have regular access to computers, scanners, and photocopy machines?	Green	Green	Green	Green	Green
71	Are all public officials made aware of basic records management procedures?	Yellow	Green	Green	White	Green
72	Does the agency regularly undertake monitoring of the records management system?	Red	Yellow	Green	Yellow	Green

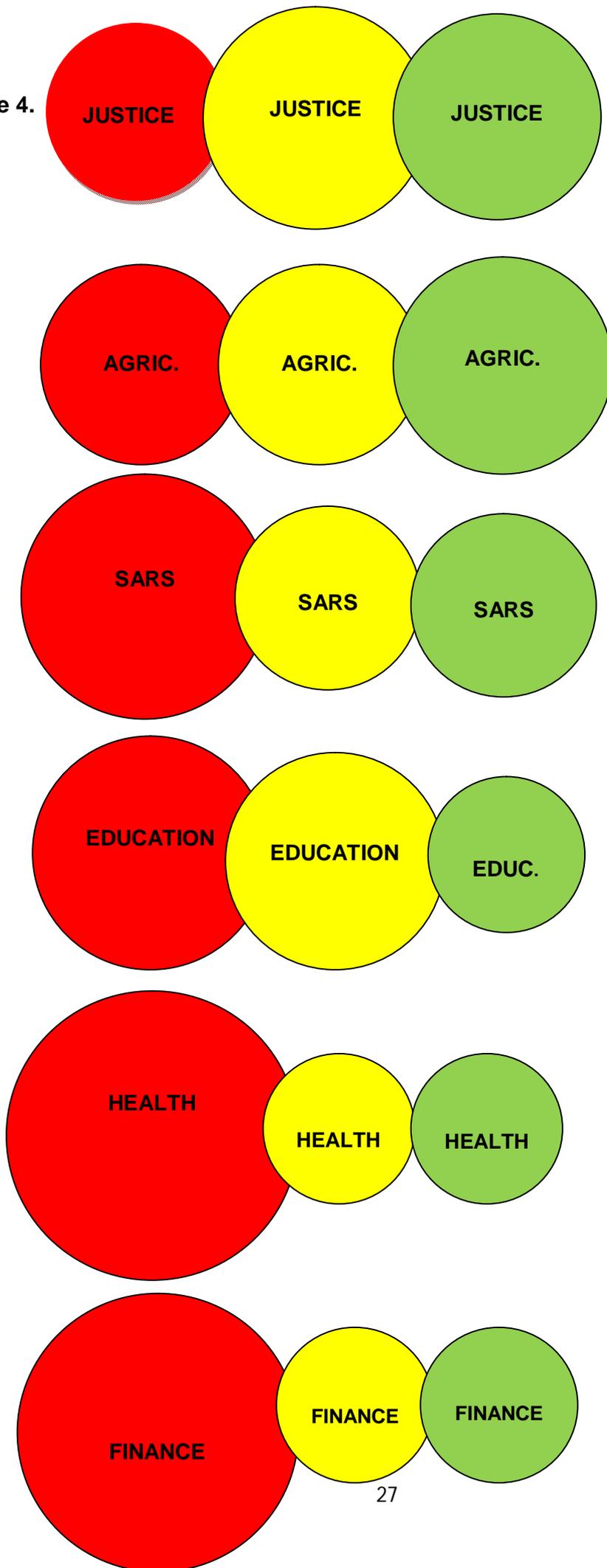
Comparison of average performance

Figure 3.



Reviewing the chart we can see that Treasury had little available data on which to assess their performance. This lack of data also makes it difficult to accurately compare the six entities and their performances over the indicators. As you can see in Figure 2 above, the significant lack of data for Treasury made their results inappropriate for a comprehensive table. However, if we remove the “no data” results” and adjust the resulting scores over a common denominator, some kind of comparative data can be used. Accordingly, we have proportionally adjusted the scores and arranged them into “bubble” representations to give a visual reference for indicator performance (see Figure 4).

Figure 4.



Questions for reflection

To help facilitate discussions, we have the following questions for reflection:

1. Are these findings indicative of PAIA users' experiences with the sampled departments/ministries/agencies?
2. Are there practical examples of how these findings are inconsistent with PAIA users' experiences with the sampled departments/ministries/agencies?
3. What weaknesses do you think are evident in the methodology used in this assessment?
4. How can the methodology be improved?