



THE RIGHT TO INFORMATION ACT

NATIONAL IMPLEMENTATION PLAN FOR THE REPUBLIC OF VANUATU

*An Implementation Plan to guide the administration of the
Right to Information Act in the Republic of Vanuatu*



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ABBREVIATIONS

ARTIO	Association of Right to Information Officers
ICT	Information and Communication Technology
MAV	Media Association of Vanuatu
NGO	Non-Government Organisation
OGCIO	Office of the Chief Government Information Officer
PARBICA	Pacific Regional Branch International Council on Archives
PMO	Office of the Prime Minister
RIO	Right to Information Officers
RTI	Right to Information
VANGO	Vanuatu Association of NGOs
VCC	Vanuatu Christian Council
VIPAM	Vanuatu Institute of Public Administration and Management

ACKNOWLEDGEMENTS

The Final RTI Implementation Plan was reviewed by the RTI Unit in December 2016. The National RTI Implementation Plan was initially prepared by the Office of the Prime Minister, in partnership with the UNDP Pacific Centre. The Plan has been informed by the publication, *Information Disclosure Policy: A Toolkit for Pacific Governments, 2006*, produced by the Commonwealth Human Rights Initiative,¹ and source materials generously provided by the Access to Information Unit of the Government of the Cayman Islands.

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FEEDBACK

Comments and feedback regarding any aspect of the National RTI Implementation Plan are welcome and should be directed to:

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FOREWORD

¹ *Information Disclosure Policy: A Toolkit for Pacific Governments, 2006*, Charmaine Rodrigues, Right to Information Programme, Commonwealth Human Rights Initiative, <http://www.humanrightsinitiative.org>

INTRODUCTION AND BACKGROUND

The Vanuatu Government recognizes that information is a public resource entrusted to it by its citizens. An effective information disclosure regime has the potential to empower the general public to access information about the government's policies and decisions, to understand how their daily lives and future are affected and to empower them to participate in the decision making process. Conversely, a lack of, or minimal, openness strengthens perceptions of exclusion from opportunity or unfair advantage of one group over another and closes direct channels of communication between citizens and the government.

The introduction of an effective information disclosure regime will provide the following benefits:

- a. Increased government accountability and a reduction in corruption;
- b. Increased public participation in governance and a deepening of public trust in the government;
- c. Greater understanding of policies and programmes;
- d. Enhancement of public administration and the control of corruption;
- e. Development of an improved records and information management system;
- f. Facilitation of improved media reporting and responsibility; and
- g. Concrete actions to honour Vanuatu's local, regional and international obligations
- h. the support and protection of human rights
- i. the protection of the environment,
- j. encouragement of investment

In July, 2012, the Council of Ministers of Vanuatu approved the development of a Right to Information (RTI) Policy, Bill and Implementation Plan. In November 2016, the Vanuatu Parliament passed the Right to Information (RTI) Bill. The RTI Legislation was gazetted on 6th February 2017. This development signaled the Government of Vanuatu's continuing commitment, at the regional and international levels, to the recognition of access to information as a human right, and as a cornerstone of established democratic principles of good governance.

While there has been no formal consultation on the framework for the Plan itself, the draft Policy and RTI Act have provided a substantial guide to its development. The strategies outlined under the Plan are reflective of those contained in the National RTI Policy and RTI Act. The activities to be carried out by government bodies and some private entities are guided by the Policy framework and the processes required to be followed under the RTI Act. Timelines for completion of activities under the Plan have been framed to accommodate activities which the Policy requires with resources available to be commenced immediately (*see 8. Prioritized Activities*), and as specified in the RTI Act itself. Upon its establishment, the RTI Unit will be required to establish more specific time frames according to resources available in the Unit.

The Plan provides details of the *budgetary implications* for RTI implementation. Actual costs however have not been included as further consultations would be required in addition to assessments by the entities themselves of actual costs to their organizations (*see 4.2.3 Baseline (Readiness) Assessments and Organizational Plans*). Except for those activities which may be prioritized and commenced immediately where possible, public bodies will have the opportunity to make provision for RTI budgetary support at the start of the 2018 budget period.

2. KEY PROVISIONS OF THE RTI BILL

The RTI Act will provide a defined framework for accessing and disseminating information held by public bodies and some private bodies;

2.1 Scope

The RTI Act guarantees the right of access to information to all persons, irrespective of citizenship or residency and will apply to all public bodies, and private bodies that perform public functions or services, whether wholly or partially and whether funded in whole or in part by public or other funds. These are referred to as “**Relevant Private Bodies**”. Private bodies that do not fall within this category but from whom information is required for the exercise or protection of a right are also covered. The RTI Act excludes from its scope the *Kastom* system of traditions, traditional knowledge and practices, the private functions of relevant private bodies, and the confidential sources of publicly owned media bodies.

2.2 Types of Information Available

All types of information will be accessible by the public. Entities covered by the RTI Act will be under an obligation to proactively disclose specified types of information through a broad network of existing and innovative channels and to respond to requests for information within 30 days. Information that is classified as secret will still be subject to the provisions of the RTI Act notwithstanding its previously determined status.

2.3 Exemptions

The RTI Act provides for the application of narrowly drawn exemptions in recognition that in specific cases, some information will need to be treated as confidential where there will be a greater harm than benefit in its disclosure. Exempt information falls under nine (9) categories that are based on the protection of:

- Personal information;
- Legal privilege;
- Commercial and confidential information;
- Health and safety of an individual;
- Law enforcement;
- Defense and security
- Public economic interests
- Policy making and operations of Public Bodies and some private bodies;
- Information relating to heritage sites and the protection of the environment.

Exemptions will not be applicable to information that is more than 10 years old and their application to any information requested will be subject to a public interest test. Information determined to be exempt will be subject to revision within 2 years of its classification as exempt. A request for information may also be refused on the grounds that it is repetitious and has already been decided on by the Information Commissioner or the Court or that, given the large amounts of information requested, it may unreasonably divert the resources of the entity in question given the time associated with searching for and retrieving it.

2.4 Phased Implementation

The RTI Act provides for the phased implementation of its provisions over a period of two and a half years (30 months). Phased implementation means that the entities to which the law will apply will, by orders made by the Minister responsible for Information, be allowed to commence the administration of the Act at specified times according to their assessed states of readiness. First agencies will be determined according to the baseline assessment outcome and will be considered to begin the process based on the importance and demand for the information held by them.

2.5 Proactive Disclosure by Public Bodies and Relevant Private Bodies

An information disclosure regime requires the easy accessibility of information by the public from government entities. To facilitate this objective, these entities are required to publish as much information and as frequently

as necessary to reduce the number of direct RTI requests that are made by the public. This has the added advantage of reducing costs to government agencies to search and review information. Proactive disclosure of information is most effective when websites are used. Entities will be required to make initial statements of the information held by them available on their own websites or through the government's portal at www.governmentofvanuatu.gov.vu. The key information to be published includes –

- a. a description of its structure, functions and duties;
- b. a list of the entities falling under it including their location, opening hours, and subjects handled;
- c. the title and business address of the principal officer;
- d. particulars of its finances;
- e. a directory of its officers and employees and a brief description of the powers and
- f. duties of its officers and employees;
- g. the procedure followed in the decision making process, including channels of supervision and accountability;
- h. a simple guide to its information-keeping systems;
- i. a statement of the types and forms of information and categories of documents that are held by it or used by its employees in the discharge of its functions;
- j. relevant details concerning any services it provides directly to members of the public;
- k. the procedure to be followed in making a request for information, the particulars of facilities available to citizens for obtaining information, including the working hours of a library or reading room, if maintained for public use;
- l. request or complaints mechanisms;
- m. information related to any pending projects the reasons for the project and any important background material;
- n. information related to tenders for contracts and the process of tendering;
- o. information about finalized contracts including the name of the contractor, scope and duration of the contractual services, the value of the contract, payment schedules and criteria for payment, completion dates and penalties due from either party to the contract in the event of any breach or non-compliance;
- p. the names, designations and other particulars of its Information Officers;

Under the RTI Act, this information must be published by entities within 6 months of any of them being specified to commence administration of the law. (*see 2.4 Phased Implementation*). However, the Implementation Plan requires that proactive disclosure must, in line with the draft RTI Policy, be undertaken prior to any order for commencement (*see 8. Prioritized Activities*). Updates of the information must be published within 12 months of its first publication and thereafter at intervals of not more than 6 months, or such shorter or longer period as may be necessary in the public interest.

2.6 Proactive Disclosure by the State

The government will also be required to proactively disclose information. Information to be published includes:

- (a) all laws, rules or guidelines applicable to elections;
- (b) electoral rolls for public inspection;
- (c) the broadcast of sessions of Parliament across Vanuatu;
- (d) transcripts of parliamentary proceedings;
- (e) copies of all bills, draft Rules, final legislation and final regulations;
- (f) terms of reference, submissions and final reports of Parliamentary Committees;
- (g) Court decisions

Transcripts of parliamentary proceedings, copies of bills, regulations, draft rules, final legislation and regulations that are tabled in Parliament, and terms of reference, submissions and final reports of Parliamentary

Committees must also be deposited with the office of the Clerk of Parliament and the Parliamentary library for inspection and general availability to the public.

The heads of Provincial Governments will act as information collection and disseminators and will be required to disseminate similar information in the Provinces through websites, notice boards, village announcements, forums.

2.7 Making and Managing Requests - The RTI Process

Where information required by any member of the public is not already published, requests for information may be made. A request for information may be made in writing, in person, electronically, or by telephone. Once received, the request triggers the following basic processes:

Step 1 - The receipt of the request is acknowledged within 5 days of receipt, the request is registered into an electronic or paper based system, and a case file is created;



Step 2 - The request is sent to the RIO within the entity to determine its scope and to establish whether the information lies with the entity. If this is the case, public officials begin to examine and prepare the information. Exemptions are then considered to determine whether they apply.



Step 3 - The response and the information that will grant access are reviewed by an RIO and all relevant records and documents are attached. The process is completed when the information is released to the requester. Where the request is denied, the applicant must also be notified and informed of the right to appeal.

All these steps must be completed within 30 days. (*see Annex I Responsibilities for RTI Process and Records Management Duties* for a more detailed breakdown of the RTI process).

2.8 Appeals and Complaints

Members of the public will have the right to appeal to an Information Commissioner and may appeal to the Supreme Court if dissatisfied with any decision of the Information Commissioner. Appeals and complaints may be made about any matter related to RTI administration and the Commissioner will have powers of investigation on those appeals or complaints or on his own initiative.

2.9 Protection, Offences and Sanctions

RTI officials are protected under the RTI Act from any legal, administrative or employment-related actions where they mistakenly, but in good faith, release information or where they release information on wrongdoing, or information concerning a serious threat to health, safety or the environment. Any official, including heads of public and private bodies, who undermines or intentionally fails to implement the law, will face fines and/or imprisonment. The Information Commissioner is empowered to impose fines and penalties.

2.10 Other Key Provisions

The RTI Act makes provision for:

- a. The establishment of an RTI Unit to guide the implementation process;
- b. The appointment of an independent RTI Information Commissioner to enforce, monitor and evaluate implementation of the right to information through a process of appeals and complaints, monitoring, and reporting obligations. The RTI Act provides the option to appoint the Ombudsman of Vanuatu as the Information Commissioner;
- c. The engagement of RIOs at central and provincial government offices and in private bodies that are covered to act as central points of contact between entities covered and the public and to manage the request process;
- d. The ability of members of the public to apply for the amendment or annotation of personal information;
- e. The training of officials;
- f. The making of regulations by the Minister to give better effect to the provisions of the RTI Act;
- g. The review of the legislation after 5 years of commencement.

3. RTI MANAGEMENT AND OVERSIGHT

3.1 The RTI Unit

The RTI Unit will be the lead body charged with managing implementation activities under the Implementation Plan, train and sensitize officials, develop training modules and a training manual, develop and execute a public awareness campaign, collect statistics, establish reporting relationships and engage civil society. The RTI Unit will be located within DSPPAC under the PMO. The RTI Unit is required to submit quarterly reports on RTI implementation to the Information Commissioner and monthly reports to the RTISC.

3.2 The Information Commissioner

The Information Commissioner provides independent oversight of the implementation of the RTI Act and regulations and acts as an independent appellate body to investigate complaints and appeals. The Commissioner will work with the RTI Unit to promote general awareness of the RTI Act and the public's rights under it. He is empowered to investigate any matter having to do with the RTI Act, and to make orders and impose sanctions for offences or non-compliance with his orders. The information Commissioner must report to Parliament annually and make recommendations for reform.

3.3. The RTISC

This multi-agency steering committee will have general oversight of the RTI Unit's activities, and will oversee the planning and progress of implementation activities. Its members will include senior government representatives from key Ministries and Portfolios (eg. Finance/Public Service/PMO), the Public Service Commission, National Archives , OGCIO, RTI Unit Manager, and a representative from VANGO and the Chamber of Commerce in Vanuatu. The Terms of Reference for the RTISC include:

- a. The review of the RTI Implementation Plan and co-ordination of a successful strategy to ensure effective implementation of the Vanuatu RTI Act;
- b. Identification of challenges and solutions to address the needs of specific agencies;
- c. Development of a strategy for comprehensive training and awareness of the public sector;
- d. Oversight of the progress of sound record management practices in public bodies;
- e. Identification or creation of an appropriate IT system for RTI;
- f. The development of a strategy for an effective Public Education and Awareness Campaign;
- g. The development of RTI regulations;

- h. Ensure the review of all laws inconsistent with the RTI Act and recommend necessary reform, repeal or retention of the status quo.

Members of the RTISC have the expertise necessary to perform the above functions. The Committee may create from among its membership sub-committees which will work almost on a daily basis with the RTI Unit on particular matters, and report back to the general membership. The RTISC will liaise with the Office of the Information Commissioner and report to the PMO.

3.4 RIOs and Records Officers

RIOs and Records Officers will be responsible, on a daily basis, for carrying out proactive disclosure obligations, managing RTI requests and ensuring proper records management within their agencies and organisations. RIOs must submit monthly reports to the RTI Unit and appear before the Information Commissioner as may be required regarding any RTI appeals.

4. COMPONENTS OF THE IMPLEMENTATION PLAN

The summary of the provisions of the RTI Act makes it clear that the measures and conditions necessary to take full advantage of an RTI regime span a range of inter-related areas. Effective implementation of an information disclosure regime is therefore a complex undertaking that will require detailed project management and dedicated resources. This creates the framework for the development of the Implementation Plan and the schedule of work and activities that must be undertaken.

4.1 STRATEGIES

The Plan is developed around the eight (8) key strategic areas for action under the RTI Policy. They are:

- a. Proactive (Voluntary) Disclosure
- b. Legal, Regulatory and Policy Framework
- c. Records and Information Management
- d. Implementation
- e. Monitoring and Reporting
- f. Professional and Capacity Development
- g. Infrastructure
- h. Resources

4.2 ACTIVITIES

These strategies have been further broken down into the following primary supporting activities:

4.2.1 Appointment of Management Structure

The management and coordination of the implementation activities under the Plan will be carried out by the RTI Unit, the RTISC and RIOs. All will be appointed/established by the specified agencies under the Plan as a matter of priority (*see 8. Prioritised Activities*). The Unit will act as the secretariat for the RTISC and will therefore require strong budgetary support in order to function in a dual capacity.

4.2.2 Implementation Plan Progress Reporting

Under this activity the RTI Unit and the RTISC are engaged in overseeing and reporting on the progress of implementation activities under the Plan. Reporting relationships are established between the Unit, the RTISC and the PMO.

4.2.3 Baseline (Readiness) Assessment and Organizational Action Plans

Entities covered by the RTI Act will be required to complete Baseline (Readiness) Assessments to determine the adequacy of their existing resources and to identify those that will be required based on the activities

outlined under this Plan. Assessments will next provide the basis for the completion of Organizational Action Plans. These will address, among other things, the procedures for granting access to information, the conduct of records surveys, creation of file plans, payment of fees, the production and retrieval of records, the attendant resource requirements and the timelines in which each agency expects to complete these activities. The Unit will review and modify (if necessary) the templates of both the Assessment and the Action Plan at Annexes II and III and issue to entities within the first 3 months of its establishment. Assessments and Organizational Plans will next be used by the Minister, under the guidance of the RTI Unit, to determine a schedule for the phasing of implementation.

4.2.4 RTI Guidance Materials and Publications

Under the RTI Act, the Information Commissioner is required to publish a Users' Guide, a Guide on Proactive Disclosure and RTI Unit and National Archives to publish a Code of Practice on Records Management. The government desires that entities begin proactive disclosure upon, or ideally, even prior to, the approval of the Policy. Likewise, it has been decided that the RTI Unit will be established early on and prior to the appointment of the Information Commissioner. The Unit will therefore provide guidance on proactive disclosure in the interim and will collaborate with the Information Commissioner in developing the official Guide on Proactive Disclosure. The Information Commissioner will collaborate with the National Archives to formulate the Code of Practice on Records Management.

4.2.5 Proactive Disclosure and Publication Schemes

The development of initial statements of functions required by the RTI Act will be commenced by entities upon approval, or even prior to, the approval of the Policy. This is a time consuming activity that is key to the proactive disclosure obligation and will also help entities to develop a firmer grasp and understanding of the information they hold. The RTI Act specifies the broad range of information pertaining to public functions that must be disseminated and made widely available (*see 2.5 & 2.6 above*). Both government entities and the State itself will have to undertake proactive disclosure. The government's website will facilitate e-publication of publication schemes by entities which currently have no websites. Under the *ICT for All* Policy currently being implemented by the OGCIO, the development of new websites and strengthening of intra-government communication systems will be prioritized for RTI purposes.

4.2.6 Records and Information Management and Training

Implementation of the RTI Act will not succeed without good record keeping. This activity is therefore centered on the creation of effective and improved systems for the creation, management, storage, archiving and disposal of records held in any form by entities. The National Archives will provide guidance and lead training on basic records management practices. This is one of the activities which must be undertaken upon the approval of the Policy and will be an ongoing endeavor as more agencies commence phased implementation of the RTI Act. In recognition of the National Archives' limited resources, the Plan proposes that it focusses its activities (such as the conduct of records surveys and organizing of records database) on each group of entities that is scheduled to begin phased implementation.

4.2.7 ICT Requirements

Information technology will be necessary to support the implementation of the RTI Act in the tracking, monitoring and reporting of RTI requests, support for e-based publications and the development of document retrieval systems. All government entities will require support to develop systems to enable proactive disclosure, to manage the RTI process by enabling intra-government communication and to organize records databases for easy access and retrieval. The OGCIO will, under the existing I-government policies, lead the development, testing and implementation of necessary systems and websites prior to the enactment of the RTI Act.

Not all agencies have an Internet presence or access to the Government website. The government website at www.governmentofvanuatu.gov.vu has been designated to be a primary central point for the dissemination of

information by those entities that do not have individual websites. The government portal will require support for this additional function. Access to government internet websites must be provided at public libraries and within government buildings.

4.2.8 RTI Training and Sensitization

Training and sensitisation of the public sector to the RTI Act is one of the central roles of the RTI Unit. Sustained training ensures a clear understanding of the RTI Act, its impact and the procedural and administrative issues associated with it. Sessions will include content that is tailored to the needs of:

- Chief Officers, CEOs, principal officers of statutory authorities
- Heads of Department by Portfolio/Ministry
- RIOs and Records Officers
- Customer-facing staff
- General Civil Service

Training will be conducted at three primary levels:

- By VIPAM, through the introduction of RTI in its training modules for the civil service;
- By the RTI Unit, through structured 3-4 day training modules using RTI Act for RTI officials;
- By RIOs within their own entities upon receiving training from the RTI Unit.

The Unit will develop a training schedule upon enactment of RTI Act and conduct training. A training manual must also be developed to ensure consistency and on-message training across government. One of the first duties of the Unit, upon enactment of the RTI Act will be to provide sensitization briefings for Heads of agencies, Parliamentarians, RIOs and customer facing staff etc. These are sessions that provide an introduction to the concept of RTI and to generally provide information and answer queries.

4.2.9 Stakeholder Partnerships

Civil society will play an integral role in implementation. The existing National Media Policy and RTI Committee will transition into this role once it completes its current terms of reference and its membership is revised to reflect a non-government agenda. A Volunteer Attorneys' Panel will also be established comprising private attorneys who have an interest in RTI and who are open to assisting the Unit as training presenters and helping members of the public who wish to appeal to the Supreme Court. A National Records and Information Management Development Committee will be established to develop National Records Standards and assist in the development of a Code of Practice for information and records management. The Unit must be represented at these meetings.

4.2.10 Public Education and Awareness

Building the demand side of an information disclosure regime is vital to its success. The public and civil society must therefore be made aware of how an RTI Act benefits them and its value to their daily lives. The Plan sets out activities that will provide the foundation for an energetic and inclusive public education and awareness programme. They include the holding of public forums at popular venues, and RTI Open Days at in-demand agencies where the public will have the opportunity to personalize RTI, meet with RIOs and make on-the-spot requests for information. RTI Essay competitions and the inclusion of RTI on high school curricula and at the university level are also activities that must be pursued by the Unit. The RTISC, the Information Commissioner and the RTI Unit will be tasked with developing additional strategies that will help the public to understand their rights and to use the RTI Act.

4.2.11 Appointment of Information Commissioner and Setting up of Office

This activity sets out the basic process to be followed in selecting the Information Commissioner, in setting up his office and the agencies that will be involved. Where the Ombudsman acts as the Information Commissioner, additional resources will be required to strengthen that office.

4.2.12 Legal, Regulatory and Policy Framework

The State Law Office will be the lead agency for establishing a cohesive legislative and policy framework that facilitates the right to information. Activities include the revision of Policies and Laws inconsistent with RTI and the development of policies for the protection of whistleblowers and personal information.

4.2.13 Annexes

The Implementation Plan is supported by four (4) Annexes:

- **ANNEX I – RESPONSIBILITIES FOR RTI PROCESS & RECORDS MANAGEMENT DUTIES**
- **ANNEX II – BASELINE (READINESS) ASSESSMENT**
- **ANNEX III – MODEL ORGANISATIONAL ACTION PLAN**
- **ANNEX IV – SAMPLE INFORMATION OFFICER JOB DESCRIPTION**

5. COST IMPLICATIONS

The implementation of any RTI regime will require making provision for critical budgetary elements. Budgetary requirements are largely determined by the number of functions that the RTI Act requires to be carried out. Under the RTI Act, these functions span the proactive publication of information, the processing of requests (including the search and review of records), the organization of records, the development and dissemination of publication schemes, the training of officials, acquisition of computer support systems, tracking and monitoring systems, the development of websites, engagement of staff and the mounting of a public education and awareness campaign. These key requirements are put at risk where there is insufficient budgeting.

Given the competing priorities with which the government is faced, the Plan proposes the use of existing facilities, personnel, networks and work programs, such as VIPAM, the I-Government/ Universal Access Policy currently underway. Government and extra-budgetary sources of funding must nonetheless be identified as early as possible to address primary resource requirements and all entities will have to assess their particular circumstances to determine specific costs to their organizations (*see 4.2.3 Baseline (Readiness) Assessment and Organizational Action Plans above*) Government agencies will need to include provision for RTI implementation into their budgets from 2018 onwards. The Strategic Policy Planning, Aid Coordination and Corporate Services Unit of the PMO has been mandated to identify extra-budgetary sources of funding for implementation activities for the RTI Unit.

Costs Supported by Central Funding

There are a number of implementation activities that will be centrally funded by the government. These include:

- RTI Training;
- Public education campaigns;
- Tracking and monitoring systems;
- Computer systems;
- Provision of international expertise on RTI to the Government;
- Provision of technical support to allow for e-based publication schemes.

Costs supported by Individual Entities

Costs that will have to be supported by the budgets of individual organizations include:

- The hiring of RIOs/ Records Officers;
- Researching and responding to requests;
- The conduct of records survey and implementation of records management standards;
- Equipment purchases such as computers, printers, photocopiers, scanners and fax machines;
- Provision of adequate infrastructure such as storage facilities, cabinets, paper and office supplies;
- Maintenance and updating of computer systems;
- Enforcement/litigation costs
- Accommodation of RTI activities such as the preparation of publication schemes, and in-house training

Start-Up Budgets and Operating Budgets

This Implementation Plan will attribute the above cost implications to the expected Budget source. However, all entities will need to categorize such costs as start-up budgets and operating budgets under their Organizational Action Plans.

- Start-up budgets capture costs associated with preparing for the new law, for example preliminary training for public officials, reviewing existing archives and record-keeping systems, development of new systems, acquisition of tracking and monitoring systems, equipment and software purchases for processing requests, establishing the RTI Unit and the Information Commissioner's office;
- Operating budgets capture on-going, recurrent costs such as annual salaries, ongoing training, promotion and awareness raising, overhead rentals for offices, equipment maintenance, paper and office supplies

Provision will also need to be made for exceptional costs such as special guest seminars/conferences, and retreats. The use of **Baseline (Readiness) Assessments** and **Organizational Action Plans** will assist in establishing realistic start-up and operating budgets.

6. MITIGATING COST CONSIDERATIONS

All entities must consider the following as factors that will tangibly mitigate implementation costs:

- Emphasising and supporting proactive disclosure to minimize the public's need to make requests;
- The use of existing programs where staff and equipment can be shared or reallocated to the RTI programme;
- Strengthening the RTI request process so that compliance is increased and delays are reduced. Unnecessarily delaying information requests and spending an undue amount of time trying to justify withholding information has been found to have the effect of increasing the number of appeals, thereby driving up the operating costs of the Information Commissioner's office;
- The use of existing networks to disseminate information (the church, social media, VANGO, MAV);
- The creation of strong and amicable civil society partnerships that will encourage buy-in and the desire to assist pro-bono where possible (eg. free or reduced-cost placement of RTI advertisements and announcements by the media)
- Establishing strong links with the donor community to assist with extra-budgetary funding.

7. RTI RISK AND MITIGATION FACTORS

The introduction of an information disclosure regime will meet with some resistance. It should however be kept in mind that where one RTI component is not achieved, all others will be affected or undermined. A change in the approach of public officials to the sharing of information with the public on a wide scale will have to be

consistently encouraged and facilitated. Entities that have been designated to carry out specified activities should consider the following risk factors and how to avoid them if a culture of change is to be facilitated:

RISK	MITIGATION
Lack of buy-in from DGs, CEOs, Secretaries General and Heads of Department	Conduct early briefings and sensitisations and keep these officials informed and involved in the implementation. Ensure the voicing of opinions and concerns and attempt to address them through discussions
RTI Regulations not passed in a timely manner	Resources and skills identified early to ensure Regulations are prioritized
Failure to meet the minimum Records Management requirements	Prioritise training for RIOs and Records officers; the creation of an RTI project team in each entity
Inappropriate delegation of activities associated with the implementation of RTI, to existing staff within entity	Critical to have someone at the managerial level designated as Information Manager to ensure confident decision-making on RTI requests
Insufficient Budget	Consideration of pooling of resources or, where costs are defined, supplementary budget for RTI. Use of existing staff is supported with amendment of job descriptions
Extra workload on existing staff	Provide support from RTI team within each entity, and provide incentives program for progress
Resistance to change to a culture of openness	Promotion of openness based on consistent leadership from the top and the communication of messages that dispels the <i>“them against us”</i> tendency and replaces with <i>“I am also a member of the public outside of my public officer role”</i>
RIOs not designated or appointed or frequent staff turn over	Job descriptions and templates for these jobs prepared and distributed. Urgency placed on this activity and recognition of Information Managers role
Designation of software requirements, development of an IT system, and identification of costs	Assessment of packages for purchase or decision to develop in-house system as early as possible
Inconsistency of RTI Act with other laws	A review of all laws that may be inconsistent with RTI to be completed by State law office, Law Reform Commission and Attorney-General’s Department

8. PRIORITISED ACTIVITIES

The following is a list of activities that must be undertaken by the specified entities upon enactment of the RTI Act:

SPECIFIED AGENCIES	PRIORITISED ACTIVITIES
PMO	<ul style="list-style-type: none"> ▪ Review of any administrative orders that conflict with this Policy and issue of administrative order/circular reinforcing the applicability of this Policy ▪ Establishment of the RTI Unit, and the RTISC. The RTI Unit will provide secretariat services for the RTISC. PMO should determine any additional resource needs that may be required to equip the Unit to undertake this role
PMO/JUDICIAL SERVICE COMMISSION	Establishment of the Information Commissioner's Office
STRATEGIC POLICY PLANNING AND AID COORDINATION	<ul style="list-style-type: none"> ▪ The identification of extra-budgetary sources of funding for the establishment of the RTI Unit and the RTISC, and the additional resourcing of the National Archives to enable it to carry out the activities below; ▪ The review of existing information disclosure policies to ensure convergence RTI Policy and inclusion of RTI principles in new ones.
OGCIO	<ul style="list-style-type: none"> ▪ Inclusion of RTI principles in policies relating to information management; ▪ Prioritized support for the technological needs of public bodies in carrying out their proactive disclosure activities ▪ Development of RTI web portal to facilitate information requests
RTI UNIT	<ul style="list-style-type: none"> ▪ The review of the National RTI Implementation Plan; ▪ Commence development of a Code of Practice on Information and Records Management ▪ Revision of the Baseline (Readiness) Assessment Template (ANNEX II) and the Organisational Action Plan (ANNEX III) and issue to Public Bodies that are expected to commence RTI Policy implementation for use by them in determining their RTI budgetary requirements for the next budget period; ▪ The development of training modules and commencement of training and sensitisations on basic RTI/Open Government principles.
PUBLIC BODIES	<ul style="list-style-type: none"> ▪ Development of start-up RTI budgets in anticipation of next budget period; ▪ Prepare for Proactive disclosure (see Paras 2.5 & 2.6) ▪ Designate RIOs and Records Officers
OFFICE OF THE PUBLIC SERVICE COMMISSION	<ul style="list-style-type: none"> ▪ Appointment of RIOs and Records Officers in Public Bodies

VIPAM	<ul style="list-style-type: none"> ▪ VIPAM to commence the inclusion of RTI principles in relevant modules and roll-out at the earliest opportunity.
NATIONAL ARCHIVES	<ul style="list-style-type: none"> ▪ Lead National RIM Development Committee to develop National RIM Policy ▪ Assist and lead as many Government bodies as possible in the conduct of records surveys; ▪ Commence the development of an e-records management policy.

NATIONAL RTI IMPLEMENTATION PLAN

NOTES:

1. This Implementation Plan is based on the RTI Act passed through Parliament
2. Activities and time lines for their commencement and completion have been broadly based on the commencement of certain activities by specified agencies under that Policy and the RTI Act and resources available to carry them out.
3. The RTI Act will apply to Public Bodies, Relevant Private Bodies (being Private bodies that carry out public functions or services whether in whole or in part and whether funded wholly or partially by public funds or some other source) and Private Bodies that do not fall within this category but from which information may be sought by any member of the public to exercise or enforce a right.
4. In this Plan, all the above Bodies are referred to as "Entities"
5. The Plan does not detail all the preparatory steps required to be taken by each entity, neither does it provide details of actual component costs for the primary activities which entities must carry out. With the guidance of the RTI Unit, each entity will however prepare Baseline (Readiness) Assessments and Organizational Action Plans which will provide specifics of their individual plans for RTI implementation, resource requirements and budgets. Templates are attached at ANNEXES II & III
6. Entities will be guided by this Implementation Plan in identifying the primary activities which must be undertaken by them

ACTIVITY	COMPLETION TIMEFRAME	RESPONSIBLE BODY/PERSON	INDICATOR	REMARKS	BUDGET SOURCE
I. APPOINTMENT OF MANAGEMENT STRUCTURE					
1. Establishment of RTI Unit	As soon as possible upon approval of RTI Policy (see 8. Prioritised Activities)	PMO/Public Service Commission	Unit established	Minimum staff for effective operation will include Manager, RIM Officer, Education/Training Officer and Publications Officer	PMO/DSPAC
2. Appointment of RTISC	Upon approval of Policy (see 8. Prioritised Activities)	PMO	RTISC appointed	Confirm appointment by Prime Minister on gazettal of Act	PMO
3. Identify & Appoint/Designate RIOs & Project Team to lead Implementation in Public Bodies & Relevant Private Bodies	Upon approval of RTI Act	Heads of Entities /Public Service Commission	RIOs/Project Team appointed or designated	Define roles and responsibilities of RIOs and Records Officers to determine job grading. Determine whether persons currently in charge of records management in Ministries can be co-opted as RIOs. The appointment of RIOs to be prioritized in the following entities which will likely be among the first to be specified by the Minister:	Entities
4. Identify and appoint Records Officers to lead	Upon passing of RTI Act	Heads of Entities /Public Service	Records officers		Entities

records management activities		Commission	appointed or designated		
II. IMPLEMENTATION PLAN					
5. Review Draft Implementation plan	Upon passing of RTI Act	Lead - RTI Unit RTISC	Draft Plan reviewed		RTI Unit/DSPPAC
6. Obtain stakeholder feedback on Plan	Upon passing of RTI Act	RTI Unit	Comments received		RTI Unit/DSPPAC
7.. COM approval of Plan	Within two months of passing of RTI Act	RTI Unit	Plan approved		
8.. Publish Plan	Upon approval of Plan by COM	RTI Unit	Plan published	Publish document on government website & advertise in newspapers Include circular at section XV 18	RTI Unit/DSPPAC
III. RTI IMPLEMENTATION PROGRESS REPORTING					
10. Progressive review meetings of DGs & Principal Officers of Bodies	Upon implementation of Organizational Action Plans (<i>see Item V below</i>)	Lead – RTI Unit RIOs	Review meetings held	The purpose of the meetings is to heads of Entities to review progress of implementation activities within their organizations	RTI Unit
11. Review of progress of implementation activities	Monthly Progress reports to RTI Unit	RIOs	Monitoring report prepared and submitted every Month	Report prepared by RIOs and submitted to RTI Unit Unit establishes format for report and monthly deadlines for the submission of reports	Entities
12. Review of progress of implementation activities	Monthly progress reports to RTISC Quarterly progress reports to the Information Commissioner	RTI Unit	Monitoring report prepared and submitted every month Quarterly report prepared and submitted each quarter	RTI Unit monitors websites of public bodies to ensure compliance with proactive publication obligations.	RTI Unit
13. Review of progress of implementation activities	Quarterly/ad hoc reports to PMO and COM	RTISC	Monitoring report prepared and submitted monthly and on ad hoc basis between reports		RTISC
14. Review of progress of	Annual report to	Information	Annual report	RTI Unit will assist to	Information

implementation activities	Parliament	Commissioner	prepared and submitted annually	prepare 2017 annual report	Commissioner
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ACTIVITY	COMPLETION TIMEFRAME	RESPONSIBLE BODY/PERSON	INDICATOR	REMARKS	BUDGET SOURCE
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IV. BASELINE (READINESS) ASSESSMENT

1. Review RTI Baseline (Readiness) Assessment template	Complete	RTI Unit	Assessment Template prepared and vetted by RTISC	Baseline Assessments will be used to assess existing conditions in entities and varying states of readiness. This will in turn inform the development of Action Plans which will detail prioritized activities, lead persons and timelines. See Template at ANNEX II	RTI Unit
2. Entities briefed on RTI Baseline (Readiness) Assessment	Upon passing of RTI Act	Lead-RTI Unit RIOs	Briefing completed	RTI Unit explains purpose of assessment to RIOs and project team within entities	
3. Entities complete RTI Baseline Assessment	Within 1 month of briefing at 2.	Lead - RIOs	Baseline Assessment completed	Deadline for completion will be set by RTI Unit RIOs will be assisted by RTI project team to complete assessment	Entities

V. ORGANISATIONAL ACTION PLANS

NOTE:

The RTI Act requires the commencement and administration of the Act in phases. The information that will be available on the completion of these Plans (see ANNEX III) will provide the information necessary for the Minister to develop a Phased Implementation Schedule.

4. Review and revise Model Organisational Action Plan	Complete	RTI Unit/RTISC	Model Action Plan prepared	Model Action Plan at Annex III used as guide	RTI Unit
5. Present Model Action Plan to heads of Entities	Upon completion of RTI Baseline Assessment	RTI Unit	All heads of entities and key staff attend presentation		RTI Unit
6. Entities finalise Action Plans	Within 2 months of briefing at 5.	RIOs/Project team	Action Plans finalized		Entities
7. Entities with specific RTI requirements/challenges confirmed		Lead-RIOs RTI Unit	Special RTI requirements challenges identified	RTI Unit will assist with assessing requirements and provision of specialist advice/training	

				where needed to assist these Entities.	
8. Progressive implementation of individual Entities' Action Plans	According to Action Plan timelines	RIOs/Project Teams	Action plans implemented according to timelines		Entities
9. Entities test internal RTI systems & processes established under Action Plans	First Phase entities test before first ministerial order	Entities	Systems & processes successfully tested	Entities should progressively test systems and processes as they come on-line. Feedback provided to RTI Unit on problems or recommendations for improvement.	Entities

ACTIVITY	COMPLETION TIMEFRAME	RESPONSIBLE BODY/PERSON	INDICATOR	REMARKS	BUDGET SOURCE
VI. RTI GUIDANCE MATERIALS AND PUBLICATIONS					
<u>NOTES:</u> GUIDANCE MATERIALS SHOULD BE MADE AVAILABLE IN VARIOUS FORMATS AND WIDELY DISSEMINATED. (SEE PARA TO ENTITIES)					
1. Develop Users' Guide	Upon passing of the RTI Act	RTI Unit	Guide completed and disseminated	This Guide will precede the Information Commissioner's Guides at 2. & 3 and will contain similar information for the guidance of RIOs.	RTI Unit
2. Produce Guide to Using the RTI Act	Within 12 months of commencement of Act	Lead- Information Commissioner RTI Unit	Guide completed and disseminated	The Law requires the Minister to specify within 6 months of enactment those entities which will commence administration of the Law. The Information Commissioner should seek to prepare the Guide at the earliest time within that period to provide an official version of the Guide at 1. Guide will Include: A Master List of all Government entities, their functions and portfolio responsibilities, Heads of entities, location and contact information of entities and RIOs, telephone, fax numbers and email addresses of RIOs	Information Commissioner

				Guide should also provide recommended procedures and practices for the RTI request process, general considerations regarding the Public Interest Test, and develop template Response Form Letters for responses in various scenarios.	
3. Develop Guide on Proactive Publication	Upon passing of the RTI Act	RTI Unit		Guide will precede the Information Commissioners Guide at 4.	RTI Unit
4. Develop Guide on Proactive Disclosure and Publication of Information	Within 6 months of appointment of Commissioner	Lead- Information Commissioner RTI Unit	Guide prepared and disseminated		Information Commissioner
5. Develop Code of Practice on Records Management	Within 12 months of commencement of Act	Lead-National Archives RTI Unit	Code of Practice developed and disseminated	National Archives will be instrumental in developing the Code.	RTI Unit/National Archives
6. Brief RIOs and Project team on use of Guides at 1, 2, 3 and 4.	Upon approval of Guides	Information Commissioner RTI Unit	RIOs and Project team briefed	Approval of Guides by RTISC Specific schedule to be determined by Unit and national Archives RIOs will receive formal technical training at Items IX & XI below	RTI Unit
7. Brief RIOs & Record Officers on Code of Practice at 5.	Upon approval of Code	National Archives/RTI Unit	RIOs/Record Officers briefed	Specific schedule to be determined by Unit and National Archives	RTI Unit

ACTIVITY	COMPLETION TIMEFRAME	RESPONSIBLE BODY/PERSON	INDICATOR	REMARKS	BUDGET SOURCE
VII. PROACTIVE DISCLOSURE AND PUBLICATION SCHEMES <i>NOTE: Proactive Disclosure of information will be carried out by all Entities and the State. See Para. 3.5 & 3.6 for the types of information required to be published.</i>					
1. Prepare Guidance on how to create Publication Schemes	Within 6 months of appointment of Information Commissioner	Lead-Information Commissioner National Archives RTI Unit	Guidance prepared and disseminated documented	The Draft RTI Act requires that the Information Commissioner prepares a Guide on Proactive Disclosure. See Item VI (2) &(4) above	RTI Unit/Information Commissioner
2. (a) Diagnose the characteristics of available information in Entities	Ongoing	All Entities/State	Documented diagnosis	Entities can commence this activity straight away if they have staff	Entities/PMO

				able to do it.	
(b) Document information for release and include fees, if any		All Entities/State	Documentation ready		Entities/PMO
3. Finalisation and implementation of form in which information is to be released		All Entities /State	Publication Scheme completed	The Draft RTI Act requires Publication Schemes to be formally implemented by entities within 6 months of being specified by order of the Minister to commence implementation of the Law	Entities/PMO
4. Publication Scheme disseminated		All Entities/State	Approved Publication Scheme implemented and disseminated to the public		Entities/PMO
5. Update of Publication Scheme		All Entities/State	Publication schemes updated as required	The Draft RTI Act requires updates of Publication Schemes to be done within 12 months of initial publication and every 6 months thereafter. It is recommended however that updates are done whenever there is any additional information that is in the public interest	Entities/PMO

ACTIVITY	COMPLETION TIMEFRAME	RESPONSIBLE BODY/PERSON	INDICATOR	REMARKS	BUDGET SOURCE
VIII. RECORDS AND INFORMATION MANAGEMENT					
1. Consult with entities to view Registries, identify deficiencies in records management systems and recommend solutions	Upon approval of Policy	National Archives/RTI Unit	Records management deficiencies and solutions determined	<p>The resources of the National Archives are limited. Bearing this in mind, focus is to be on those Entities that are expected to be among the first group to commence administration of the RTI Act under phased implementation</p> <p>A similar approach is to be adopted for other groups of Entities under a Phased Implementation schedule. (See Item V above)</p>	

2. Report on Records Management readiness, based on available statistics and information	Upon approval of Policy	Records Officers/National Archives	Report submitted to RTI Unit/RTISC		Entities/National Archives
3. Formation of National Records and Information Management Development Committee	Upon passing of RTI Act	RTI Unit/National Archives	Association formed	This Committee will develop National standards on Records and Information Management (See 4 below) The National Archives and the RTI Unit must be represented at its meetings.	RTI Unit
4. Develop & disseminate full & accurate standards for records management	Within 12 months of gazettal of RTI Act	Lead- National Archives RTI Unit	Full & accurate standard completed and disseminated	The National Archives will be among those entities specified at 8. Prioritised Activities to begin or continue reinforcing best practices for records management. National Archives to continue to use established standards and guidelines under PARBICA Toolkit This activity will precede but also inform the development of the Code of Practice by the RTI Unit at VI. (4) above	National Archives
5. Complete Records Survey	Ongoing	Entities	Records Survey forms completed in accordance with National Archives guidelines and for each records series in Entity	Advice provided by National Archives to each Entity	Entities
6. Progressive implementation of RM tools and standards	On-going	Each Entity seeks advice from National Archives as required	Implementation of standards a continuous process	RIOs & Records Officers will require continued training by National Archives	Entities
7. Develop e-records management policy and guidelines	Within one year after enactment of RTI Act	National Archives	E-records management policy and guidelines developed	This timeline is in keeping with the RTI Policy and information from the National Archives that the regional body on Records management, PARBICA, has recommended that this should only be attempted after a proper paper based	National Archives

				records system is in place. Given the rate at which e-records are being created, the National Archives must be provided with more resources to enable it to complete this activity within a shorter time-frame.	
8. Review information management policies of Ministries and bring in line with RTI Policy	Ongoing	State Law Office RTI Unit	Policies reviewed		State Law Office
IX. RECORDS MANAGEMENT TRAINING					
9. Prepare Training Schedule for Records Management Guidelines	Ongoing	RTI Unit/National Archives	Training Schedule prepared	Training Schedule needs to include references to RTI requirements and importance RTI Unit collaborates with National Archives to carry out training and make brief presentations on RTI requirements	RTI Unit
10. Notify Record Officers of Training Schedule		RTI Unit	Training Schedule disseminated		RTI Unit
11. Conduct Training	According to Schedule at 11	Lead- National Archives RTI Unit	Training conducted		National Archives
12. Report on progress of training and any other issues pertaining to records management	At end of each module/session or as directed by RTI Unit	National Archives	Report submitted to RTI Unit		National Archives
13. Review & amend Records Management training modules and workbooks	Ongoing	National Archives /RTI Unit)	Review completed, workbooks & material updated	This applies to updating National Archives training modules, work books etc	National Archives

ACTIVITY	COMPLETION TIMEFRAME	RESPONSIBLE BODY/PERSON	INDICATOR	REMARKS	BUDGET SOURCE
X. ICT REQUIREMENTS					
1. Develop strategy for provision of appropriate ICT		OGCIO/RTI Unit RTISC	ICT Strategy Prepared	Strategy must address: RTI website structure; e-based publication pages; RTI request tracking system; RTI staff training	RTI Unit

systems for RTI					
2. Develop/Acquire tracking and monitoring system for RTI request process		RTI Unit/ RTISC/OGCIO	Requirements developed	Decision needed re develop or acquire	PMO/RTI Unit/Donor community
3. Run Pilot trial of the tracking system		OGCIO	Pilot completed		OGCIO
4. Refine system based on Pilot findings		OGCIO	Refinements complete		OGCIO
5. Implement RTI requests tracking system		OGCIO	System rolled-out		OGCIO
6. Deliver training on tracking system		OGCIO	RIOs trained in RTI IT requirements	OGCIO delivers training.	OGCIO
7. Preparation of e-based publication pages of information for Entities		OGCIO /RTI Unit	E-based publication pages prepared		OGCIO
8. Develop RTI websites and links to government website		OGCIO/RTI Unit/ RIOs	Websites developed	Agencies without web-sites to use government portal at www.governmentofvanuatu.gov.vu	RTI Unit: RTI website, & any development issues Entities: their own websites
9. Upgrade and update Government website		OGCIO/RTI Unit	Government website upgraded and updated	RTI Unit will provide guidance on website content in accordance with government Proactive Disclosure obligations.(see 2.6 Proactive Disclosure by the State)	PMO
10. Upgrade and update parliamentary website		OGCIO/RTI Unit	Parliamentary website upgraded and updated	RTI Unit will provide guidance on website content in accordance with government Proactive Disclosure obligations.(see 2.6 Proactive Disclosure by the State)	PMO
11. Develop on-line/web-based training resources		OGCIO/RTI Unit	Training resources prepared and ready for implementation	RTI Unit determines schedule	RTI Unit to fund

ACTIVITY	COMPLETION TIMEFRAME	RESPONSIBLE BODY/PERSON	INDICATOR	REMARKS	BUDGET SOURCE
XI. RTI TRAINING AND SENSITISATION <u>Note:</u> <i>Training will be conducted at 3 primary levels:</i> <i>VIPAM will include RTI in its training modules generally for the civil service</i> <i>The RTI Unit will set schedules for and conduct on-going training and sensitization sessions</i> <i>RIOs will carry out in-house training for staff with assistance from the Unit where requested and identified RTI trainers.</i>					
1. Develop Training strategy		RTI Unit/RTISC	Training Strategy prepared	Strategy to involve collaboration with VIPAM for inclusion of RTI on training modules	RTI Unit
2. Develop Training content		Lead-RTI Unit VIPAM/RTISC	Training content determined	Training/Sensitisation Content to include: Value and benefit of the RTI; Interpretation of provisions of RTI Act and exemption provisions; Records Management basics; Case Studies on Interpretation; Global Case Studies on RTI in action; Change Management; FAQs	RTI Unit
3. Develop Training Manual		RTI Unit/VIPAM	Training manual prepared	Manual to be developed in consultation with VIPAM. Manual to provide RTI training consistency whether delivered by VIPAM or by RTI Unit	RTI Unit
4. Identify Trainers/Presenters		RTI Unit	Trainers identified	Use RTI Director, Government Lawyers who have an interest and possibly those from Attorney General's Chambers.	
5. Preparation of training materials/ sensitization materials for: · DGs · Department Heads/RIOs · Civil Service		RTI Unit	Material prepared		RTI Unit
6. Training Schedule prepared		RTI Unit	Training Schedule prepared	RTI Unit will determine specific dates Training Schedule must be disseminated to all entities as far as possible.	RTI Unit
7. RTI sensitization of staff of Entities	prior to formal training sessions at 10 below	RTI Unit	Staff sensitisation complete	RTI Unit and Entities collaborate to provide staff with a familiarisation briefing Customer facing Staff	RTI Unit

				must be sensitized at this session RTI Unit sets exact dates/times	
8. RTI Sensitization sessions for COM, Parliamentarians, DGs, CEOs, Secretaries General of Provinces		RTI Unit	Sensitisation completed		RTI Unit
9. Conduct RTI training courses for RIOs		Lead-RTI Unit VIPAM	Formal RTI Training Course for RIOs completed	Proposal – 3 day modules for each Entity followed by specialist training in alternate weeks	RTI Unit
10. Facilitation of training for agencies with specific requirements/challenges		RTI Unit/Entities	Training completed	Baseline Assessment provides data.	RTI Unit
11. Training of customer-facing staff		RIOs assisted by RTI Unit VIPAM	Training completed	Training should be conducted closer to passage of RTI Act and must be repeated frequently	Entity
12. Top level Joint workshops for RIOs, DGs, CEOs, Secretaries-General		RTI Unit/Entities	Joint work shops across agencies held	Includes international consultants	RTI Unit provides venue, consultants, transport costs

ACTIVITY	COMPLETION TIMEFRAME	RESPONSIBLE BODY/PERSON	INDICATOR	REMARKS	BUDGET SOURCE
XII. STAKEHOLDER PARTNERSHIPS					
1. Establish Association of RIOs (ARTIO)		RTI Unit	ARTIO established	This body will comprise all RIOs. Its purpose is to meet among themselves and with RTI Unit to share experiences and solutions related to information disclosure under RTI	
2. Convene first meeting to select head and establish Terms of Reference and meeting times		RTI Unit	First meeting of ARTIO convened	RTI Unit will be represented at ARTIO's meetings	RTI Unit
3. Collaborate with the Media to advance awareness of RTI regime/legislation and		RTI Unit	Outreach initiated	Arrange with Media to write about RTI, its objectiveness and use in every day matters	

promotion of RTI rights				and to also indicate when media stories or reports are the result of having gained access under RTI whenever this is the case).	
4. Establish Collaboration with Government Legal Officers in State Law Office		RTI Unit	Agreement reached	These Officers will be “on call” to assist in interpreting the law generally and providing opinions on the application of exemptions. Creating this direct line of communication will help public bodies to keep within response timelines.	
5. Establish Volunteer Panel of Attorneys		RTI Unit	Body established	Body of private attorneys who are willing to volunteer their services for training and to assist RTI applicants wishing to appeal to Information Commissioner and the Supreme Court	
6. Establish Regional & International Partnerships		RTI Unit	Outreach established	Develop regular involvement of experts through the UNDP Pacific for example for presentations at forums such as RTI Open Days, , Annual Retreats and specialized training exercises.	RTI Unit
7. Develop programmes to recognize the performance of RIOs		RTI Unit/Public Service Commission	Recognition award/system developed		RTI Unit

ACTIVITY	COMPLETION TIMEFRAME	RESPONSIBLE BODY/PERSON	INDICATOR	REMARKS	BUDGET SOURCE
XIII. PUBLIC EDUCATION & AWARENESS					
NOTE:					
<i>The RTI Unit should seek the assistance of sister Government agencies, NGOs and the wider civil society to use already established information dissemination networks to ensure extensive outreach, particularly to communities in out-lying provinces. Alliances should be formed with Local Government Bodies, Libraries, Post offices, VANGO, the Vanuatu Council of Churches, Youth Against Corruption and parent Association. Social media must be used in all instances where appropriate to communicate with the public. Public Education activities must be equally focused on islands other than Efate.</i>					
1. Undertake analysis of publics' needs		RTI Unit/ RTISC/	Analysis complete		RTI Unit
2. Develop PR/Public Education & Awareness plan		RTI Unit/ RTISC	Plan prepared		RTI Unit
3. Compile contact information for RIOs and relevant entities and publish in Telephone Directory		Lead-RTI Unit Information Commissioner	Telephone number, fax and e-mail of RIOs published in Telephone Directory	Disseminate via social media	RTI Unit
4. Plan RTI Event to mark passage of the RTI Act		RTI Unit	Event implemented		RTI Unit
5. Produce and disseminate RTI promotional literature		RTI Unit	Literature disseminated	Literature to include Brochures, bumper stickers, flyers, posters Disseminate Pamphlets/Posters at all forums /training sessions etc	RTI Unit
6. Produce RTI newsletter for regular dissemination internally and externally		RTI Unit	Newsletter produced and disseminated		RTI Unit
7. Establish RTI lecture series with University		Lead - RTI Unit Relevant authorities	Lecture series created	Members of Volunteer Attorney's Panel and Government lawyers who are interested to be utilized to present lectures	
8. Hold RTI Open Days and RTI exhibitions/displays at critical Ministries/Agencies		RTI Unit/RIOs		Devote an entire day to to RTI requests in these entities, invite public to attend and request information Highlight day's events in the media.	RTI Unit
9. Hold RTI Open Days and exhibitions in Provinces		RTI Unit/RIOs		See 8 above. Secretaries-General and RIOs must be consulted and involved in the planning of this event	RTI Unit
10. Convene RTI Public				These forums must	RTI Unit

Forums at Churches, and other popular meeting venues.				also be held at the Provincial level	
11. Hold Annual National RTI Essay Competitions		RTI Unit	Competitions held annually	This will be promoted at the High School level Unit to determine time-frame	RTI Unit
13. Include RTI modules on Curricula of High Schools		Lead-RTI Unit Relevant authorities	Modules included on curricula	To help in creating the culture of change and fostering understanding and appreciation of the value of RTI from an early age	
15. Arrange for the introduction of RTI at the University level		Lead- RTI Unit Relevant authority	RTI introduced at University Level		
16. Observe International Right to Know Day each year	Sept. 28 each year			Collaborate with Civil Society in planning activities and ensure official Parliamentary Recognition of the day.	RTI Unit

ACTIVITY	COMPLETION TIMEFRAME	RESPONSIBLE BODY/PERSON	INDICATOR	REMARKS	BUDGET SOURCE
XIV. APPOINTMENT OF INFORMATION COMMISSIONER & SET UP OF OFFICE					
Appointment of Commissioner 1. Develop Job Description for Information Commissioner		RTISC/Judicial Service Commission	JD developed and evaluated		PMO
2. Seek nominations for the post and do technical vetting		PMO/Judicial Service Commission	Nominees vetted		PMO
3. Process to select Commissioner		PMO/Judicial Service Commission	Candidate(s) selected	Public participation in the appointment process is also required. A selection panel will propose a nominee(s) for approval by the Judicial Service Commission	PMO
4. Commissioner approved		PMO/Judicial Service Commission	Commissioner approved		
Set-up office & recruit support staff					

5. Set up Commissioner's Office		PMO/Judicial Service Commission	Office set up		PMO
6. Preparation of office organization and staff roles		Commissioner/Judicial Service Commission	JDs written & evaluated Office designed	Commissioner is involved with interviewing and selection. Formalisation of budget arrangements for the IC is also part of the set-up process In 2017 PMO will find budget to support Information Commissioner	PMO
7. Recruit Staff and develop office		Commissioner/Public Service Commission	Staff recruited Office developed		Commissioner
8. Develop internal procedures		Commissioner	Procedures developed	Allows for involvement of new staff	Commissioner

ACTIVITY	COMPLETION TIMEFRAME	RESPONSIBLE BODY/PERSON	INDICATOR	REMARKS	BUDGET SOURCE
XV. LEGAL, REGULATORY & POLICY FRAMEWORK					
RTI Policy					
1. Finalise Draft RTI Policy	To be determined	Policy Unit/RTI Unit/RTISC	Procedural guidance developed	To be developed with specialist support. Rationale of guidance is needed	RTI Unit
2. Circulate for Public Consultation, Comments, etc		PMO/RTI Unit			PMO
3. Revise Draft		Policy Unit			PMO
4. Submit Final Draft for COM approval		PMO			
Policy on Whistleblowers and Privacy Protection					
5. Develop policy on Whistleblowers and Privacy Protection	Upon gazettal of RTI Act	TA		This should be commenced at the earliest time to provide greater definition of this critical component of an RTI regime.	PMO
RTI Act					
6. Prepare Draft RTI Act	2016	Lead-State Law Office RTI Unit	Draft prepared		PMO

7. Circulate Law for Public Consultation, Comments		State Law Office/RTI Unit			
8. Revise Draft		State Law Office			
9. Submit Final Draft for COM approval		State Law Office			
10. Enactment of RTI Law		Parliament			
RTI Regulations 11. Prepare drafting instructions for matters to be addressed under RTI Regulations	Upon gazettal of RTI Act	RTI Unit/RTISC	Outline prepared		RTI Unit
12. Obtain comments on proposed Regulations		RTI Unit	Comments received		RTI Unit
13. Obtain approval of Drafting instructions		RTI Unit	Approval obtained	RTISC will consider these final proposals and endorse	RTI Unit
14. Prepare draft Regulations		State Law Office	Regulations drafted & ready for submission to COM		State Law Office
15. Obtain approval from COM		RTI Unit	COM approval obtained		
16. Gazette Regulations		RTI Unit	Regulations gazetted		State Law Office
Review of laws, Regulations & Policies inconsistent with RTI 17. Review Laws, Policies & Regulations which may be inconsistent with RTI		Lead- State Law Office/Law Reform Commission RTI Unit	Laws reviewed & amended	Priority needs to be given to Laws & Regulations which require a Declaration of Secrecy RTI Unit can facilitate and expedite process by requiring RIOs to audit their own entities and provide a list of such laws/regulations/administrative circulars that require employee secrecy Review of measures to provide administrative release of information outside of RTI is included within the review	PMO
18. Issue administrative circular to instruct that RTI Policy/Law re the release of information for RTI purposes		PMO	Circular released		PMO

applies notwithstanding Laws or regulations to the contrary					
19. Gazette Amendments		State Law Office	Committee completes work on review of inconsistent laws. Laws amended.		State Law Office

READINESS INDICATORS

Public Bodies and Relevant Private bodies can be considered to be ready to commence administration of the RTI Act when:

- ✓ RIOs are trained
- ✓ Organisational Action Plans are completed, approved and project team has implemented it;
- ✓ Records survey is complete and Records Officers are trained on Records management basics;
- ✓ RTI processes are tested and working;
- ✓ RTI request tracking system is functional;
- ✓ Publication Scheme is developed and available;
- ✓ Website is functional or there is access to the government portal.

ANNEX I

RESPONSIBILITIES FOR RTI PROCESS & RECORDS MANAGEMENT DUTIES

Activity	Responsible Person
Publish and update Initial statement of Functions on website	RIOs
Receive application requests for information	RIOs
Assist members of the public to formalize the nature of their request	RIOs
Acknowledge receipt of the application	RIOs
Identify if the information is held within the Entity, forwarding to relevant entity if not	RIOs
Identify if the information is already in the public domain	RIOs
Locate/retrieve the information	Records Officer
Identify if the information is subject to exemptions	RIOs
Redact (Sever) exempt information if necessary	RIOs
Disclose the relevant information, determining if inspection or provision of copy is appropriate	RIOs / Records Officer
Ascertain the form information is to be provided and make information available in form requested	RIOs / Records Officer
Grant or refuse access to information (with reasons) in writing	RIOs
Collect any fees payable	Government cashier for Government Agencies Identify responsible individual within each private entity
Make amendments /arrange for amendments to records containing information relating to an individual if the individual can prove the information is inaccurate	RIOs / Records Officer
Contact third parties where request is for information belonging to third parties	RIOs
Provide information/testify to the Commissioner/Court if appealed externally	RIOs
Track and monitor requests and provide statistical information to the RTI Unit	RIOs / Records Officer
Receive complaints regarding the performance of the entity in relation to information disclosure	RIOs
Maintain an RTI web site that is Ministry/Portfolio specific which falls in line with requirements of the RTI Unit (must include name, function and contact details of RIOs	Identify responsible individual within each entity

Related Records Management Tasks	Person responsible
Maintain full and accurate records of entity's functions and activities	Records Officer and Project Team
Create, manage and dispose of records in accordance with prescribed National Archives records management standards	Records Officer and Project Team
Develop a file plan and corresponding retention schedule for entity's operational records	Records Officer and Project Team
Apply approved disposal schedules developed by National Archives for records, including any schedules developed under an e-records management policy	Records Officer and Project Team
Conduct a records survey using guidance from the National Archives	Records Officer and Project Team
Promote good records keeping practices throughout the entity	Records Officer and Project Team
Participate in the preparation for and execution of disaster control plans through the identification and protection of vital records for the entity following guidelines established by the National Archives.	Records Officer and Project Team

ANNEX II

RTI BASELINE (READINESS) ASSESSMENT TEMPLATE

This Assessment is intended to:

- assist your organisation to develop an action plan to ensure your preparedness for RTI Implementation
- enable the Right to Information Unit (RTI Unit) to assess the current needs of your organisation and its ability to prepare to implement the Right to Information Law.

Instructions for completing the form:

1. Ensure that responses cover your entire organisation, its records and its capabilities, including:
 - dependent boards, committees etc. which do not manage their own records
 - records held in all media i.e. paper, electronic, photographic etc and stored in various locations
2. Return the completed form to the RTI Unit at rti@vanuatu.gov.vu
3. If you have any questions about the assessment, contact the RTI Unit at *ph 33000 ext: 2680* or by email to rti@vanuatu.gov.vu

<u>Q. 1 General Information</u>	
1. Name of person completing form:	
2. Position:	
3. E-mail:	
4. Name of Body:	
4. Type of Organisation 5. <u>(eg. Ministry, Department, SOGE)</u>	
Address:	
Telephone:	
Date:	

<u>Q2 -RTI Awareness</u>	
Do you think the impact of the law will be positive? [Please add comments below]	
Do you believe the RTI Act will:	
a. improve records management systems	a. Y N

<ul style="list-style-type: none"> b. engage communities and the public in the work of government c. make my organisation more transparent and accountable d. not affect my organization in any way e. increase secrecy in government 	<ul style="list-style-type: none"> b. Y N c. Y N d. Y N e. Y N <p>Explain why below as additional comments</p>
<p>3. What are the problems your organisation may face in implementing RTI:</p> <ul style="list-style-type: none"> a. Inadequate budgeted resources b. Poor knowledge of records held and how to find them c. Training all of your key staff within your organisation on RTI d. Making RTI a priority e. Timeline to be prepared by <i>(insert date)</i> f. Other- explain below in additional comments 	<ul style="list-style-type: none"> a. b. c. d. e. .
<p>6. What general information could the RTI Unit provide your staff to increase awareness:</p> <ul style="list-style-type: none"> a. RTI brochures b. RTI posters c. Other – Indicate comments below 	<ul style="list-style-type: none"> a. b. c.

Additional Comments:

Q-3 Records Management
Proper Records Management practices and the supporting infrastructure will be key to retrieval and provision of information requested under RTI.

1. Has your organisation conducted a record with assistance from the National Archives (using the Record Keeping for Good Governance Toolkit?)	Y	N
2. Do you believe your staff is sufficiently trained to conduct such a records survey?	Y	N
3. How long will do you believe it will take to complete a records survey?	Y	N
4. Does your organisation have or are you working on a file plan?	Y	N
5. Does your organisation have a disposal schedule? If yes, please provide a copy or further information on the disposal schedule	Y	N
6. Do you utilise the PARBICA <i>Record Keeping for Good Governance Toolkit for Records Management Guidelines</i> as recommended by the National Archives? <i>[If No, please explain in comments section why you do not use the program and what you use as an alternative]</i>	Y	N
7. Do you have well organised file storage facilities with sufficient space which make retrieval of filed information simple and straight forward? <i>[If No, please explain what needs to be done to improve the situation]</i>	Y	N

What assistance would you require to complete a records survey?

Additional Comments:

04. Staff Resources

The RTI Act requires the designation of an Information Officer (RIO) to handle RTI requests. Records management responsibilities also need to be assigned.

1. Is responsibility for managing records assigned to a particular member of staff? Please consider your entire organisation. <i>If Yes give position title and name of staff:</i>	Y	N
2. Is this responsibility stated in their job description? <i>[If No, advise when you will formalise the employment arrangements]</i>	Y	N
	Date: _____	

3. Has this member of staff attended any Records Management training?	
4. Have any other members of staff of the organisation attended any Records Management training?	Y N
5. Is a new member of staff likely to be recruited as Information Officer?	Y N
6. If the Right to Information Officer's role is to be assigned to a present staff member, please indicate name of person assigned, appointment and contact details. If this has not been decided yet, please update the RTI Unit when an appointment is made.	_____
7. Who will the Right to Information Officer report to?	Name: _____ Position: _____

Additional Comments:

Q5 Proactive Disclosure and Requests for Information

The RTI Act will require each entity covered to proactively publish information to increase openness.

<p>1. How do you currently provide information to the public?</p> <p>a. Assigned to one member of staff to receive requests e.g. public relations officer/ customer service representative.</p> <p>b. Our library handles requests</p> <p>c. Through our website</p> <p>d. We currently do not provide information to the public</p> <p>e. +Other</p> <p><i>If Other please indicate how information is provided:</i></p>	<p>a.</p> <p>b.</p> <p>c.</p> <p>d.</p> <p>e.</p>
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<p>2. Do you charge a fee for the provision of information or for providing copies? Does that apply to all information, or only to some information types? <i>If Yes indicate the fee charged:</i> <i>If the fee applies only to some types of information, please provide details:</i></p>	<p>Y N Fee charged VT_____</p>
<p>3. Do you make available on-line all application forms generated by your organisation?</p>	<p>Y N</p>
<p>4. Do you have a reading room for persons to view files?</p>	<p>Y N</p>
<p>5. Is it adequate? <i>If No, Explain</i></p>	<p>.....</p>
<p>6. Is your agency accessible for people with disability? (For example, wheelchair access)</p>	<p>Y N</p>
<p>6. In your organisation is there a scanner/photocopier available to staff who will be providing information to the public under RTI?</p>	<p>Y N</p>
<p>7. What are the 'hot topics' or information that is requested frequently by the public from your organisation?</p>	
<p>8. What information do you currently publish frequently?</p>	
<p>9. Is it a straight forward process for a member of the public to enter your organisation to view requested information, have it reproduced and to pay for it? <i>[If No, what can be done to improve it?]</i></p>	<p>Y N </p>

Additional Comments:

Q 6 – Identification of Special RTI Requirements and Challenges
In order to make decisions concerning resourcing and response capability, each entity needs to assess the likely impact of RTI requests and any special challenges that will be faced.

<p>1. Do you think you will have a lot of requests for information under the RTI Act? <i>If Yes, state the type/areas of information to which you think this will apply:</i></p>	<p>Y N</p>
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<p>2. Do you envisage challenges pertaining to RTI requests at certain times of the year? Take into account whether the volume of requests will be cyclical, peak at certain times or be sustained throughout the year. Please explain:</p> <p>.....</p> <p>.....</p> <p>.....</p>	
<p>3. Do you think you will have any complex requests under the RTI Act? If Yes, what kind of requests which would be of concern:</p> <p>.....</p> <p>.....</p> <p>.....</p>	<p>Y N</p>

Additional Comments:

<p>Q 7 -ICT Readiness [May be completed by IT Technician] <i>It will be critical to use Information Technology to provide information to the public from each public or relevant private body.</i></p>	
<p>1. Who is responsible for Information Technology in your organization</p>	<p>Name:</p> <p>E-mail:.....</p>
<p>2. Do you have links to the Government Network?</p>	<p>Y N</p>
<p>3. Does your organization have a website?</p>	<p>Y N</p>
<p>4. Indicate website address</p>	<p>.....</p>
<p>5. Is www.gov.vu updated with new content from your organisation i.e. do you have the following minimum information on your website?</p> <p>a. Frequently asked questions</p> <p>b. Press releases</p> <p>c. Forms</p> <p>d. Head of organisation</p> <p>e. Address and Contact details</p> <p>f. Hours of opening and closing</p> <p>g. Documents</p> <p>h. Legislation and other regulations</p>	<p>a. Y N</p> <p>b. Y N</p> <p>c. Y N</p> <p>d. Y N</p> <p>e. Y N</p> <p>f. Y N</p> <p>g. Y N</p> <p>h. Y N</p>

6. Do you have a general e-mail address for the organization? <i>If Yes, state e-mail address</i>	Y N
7. How is your website updated (e.g. database drive, html edits, by external contractor)	
8. What type of Email server is your agency email hosted on
9. Is your email hosted in-house?	Y N
10. What is your standard desktop browser (e.g. Internet Explorer 6.0)
11. Do you have the ability to create mail distribution groups that are accessible from outside your organization?	Y N
12. Is internet access readily available to agency staff? If No, explain below in additional comments	Y N
13. Do your policies prevent your staff accessing an application on the Government network via a web browser in your agency? If Yes explain below in additional comments	Y N
14. Do you have a policy of filing your emails (such as 'print and file')?	Y N
15. Do you have a policy on filing emails (such as 'print and file')	Y N
16. Does your agency have records in the following forms?	
a Records in writing	a. Y N
b Maps	b. Y N
c Plans	c. Y N
d Graphs	d. Y N
e Drawings	e. Y N

<p>f Soundtracks</p> <p>g Film including micro film negative tape or device</p> <p>h Other <i>Please give details:</i></p>	<p>f. Y N</p> <p>g. Y N</p>
<p>17. Does your agency have the ability to provide information in the following formats within 30 working days?</p> <p>a. Photocopy</p> <p>b. Compact Disk</p> <p>Microfiche</p> <p>c. Compact Disk</p> <p>d. DVD</p> <p>e. Digital file</p>	<p>a. Y N</p> <p>b. Y N</p> <p>c. Y N</p> <p>d. Y N</p> <p>e. Y N</p> <p>f. Y N</p>

Additional Comments:

Comments/Questions for the RTI Unit:-

ANNEX III

MODEL ORGANISATIONAL ACTION PLAN

Explanatory Notes:

1. This Model Action Plan is designed for Public Bodies and Relevant Private Bodies to follow in order to coordinate, and where appropriate delegate, actions to assist in meeting the requirements of the RTI Act. The Model may be amended as necessary. Explanatory Notes should be deleted from the approved version of this Plan.
2. The Action Plan is laid out for the strategic level of the organisation (e.g. Ministry/Portfolio) to complete Section 4 (to help effect coordination between departments) with the remainder of the document to be completed by both the Ministry itself and its agencies and departments.
3. **Scope:** The organisations covered by these strategic guidelines are:

[insert all entities falling under the Entity's portfolio]

4. Leadership and Management

Objective: To ensure that the Ministry/Portfolio of has the necessary leadership and management in place to Coordinate the preparation of the organization for the successful implementation of the RTI Act.

Activity	Responsible Person(s)	Completion Timeframe	Resource Requirements
Appoint a person in the Entity to lead the process of completing Action Plan(s) and ensuring implementation within all agencies under the Ministry			
Appoint a project team to assist (as necessary)			
Identify any pooling of staff and physical resources			
Coordinate departmental Action Plans, setting internal milestones and reporting requirements as necessary			

Explanatory Notes:

1. Sections 3 and 4 are to be completed by the strategic level of the entity and should be completed by a senior level official.
2. To manage cost, Ministries and other entities should seek to pool RTI resources. Small departments/units should seek to develop joint arrangements or work in association with the parent Ministry/Portfolio. Contingency planning should be considered for times when RTI staff is away from work (e.g. on leave or sick) and in the event of unexpected RTI request overload. Arrangements for pooling of staff or contingencies should be formally documented and staff involved should be informed.
3. It is recommended that Ministries/Portfolios ensure their departments' Action Plans are coordinated to achieve efficiencies and to develop centres of staff expertise.

ACTION PLAN COMPONENTS

5. Staffing & Planning

Objective: To ensure that [insert name of Entity] has the necessary leadership, resourcing and planning in place to properly prepare for successful implementation of the RTI Act.

Activity	Responsible Person(s)	Completion Timeframe	Resource Requirements
Appoint an RIO (Designate (if necessary) to act as the RIO/ Records Officer)			
Appoint a project team leader and project team to complete and implement this Action Plan			
Complete the Baseline (Readiness) Assessment and submit to RTI Unit			
Identify any pooling of staff and physical resources			
Develop contingency arrangements in the event of RTI request overload and staff absences			

Explanatory Notes:

1. This Part of the Plan must be completed by all departments and agencies falling under the portfolio of the parent Ministry/Entity
2. RIOs must be identified as early as possible to take advantage of training opportunities and begin laying the groundwork for Proactive Disclosure
3. Ideally the project team leader should be the RIO
4. A Baseline (Readiness) Assessment template will be provided by the RTI Unit. It is designed to assist with identifying staffing, physical and process requirements, as well as any special challenges that may exist. It helps in developing this Action Plan.
5. Entities should seek to pool resources for RTI
6. Contingency planning must be considered for times when RTI staff is away from work (e.g. on leave or sick) and in the event of unexpected RTI request overload. One solution is to pool RTI staff (either permanently or temporarily).

6. Training & Sensitisation

Objective: To ensure that staff is trained and capable of responding to requests for information, and that all staff are aware of their obligations contained in the RTI Act.

Activity	Responsible Person(s)	Completion Timeframe	Resource Requirements
Arrange with the RTI Unit for the RIO and Records Officers, to be trained in RTI			
Nominate Records Officers (and RIOs as required) for Records Management training with the National Archives			

Arrange with the RTI Unit for RTI sensitization sessions for general staff			
Identify customer-facing staff for customer service training. This training is to be done by RIO with the assistance of the RTI Unit or VIPAM			
Arrange for staff to undertake training in the use of RTI IT systems as is developed			

Explanatory Notes:

1. Records Officers will need some RTI training but not at the same level as RIOs.
2. Effective records management systems are critical for implementation of the RTI Act. The National Archives' records management training is designed for staff in Records Officers roles. RIOs will also need to be exposed to an appropriate level of training in order to have a sound understanding of records management.
3. Sensitisation sessions provide general "RTI awareness"

7. Records and Information Management

Objective: To establish information management systems and practices that will allow the Entity to know what information it holds, where it is located, and to be able to retrieve and distribute information and to respond to information requests in a timely and efficient way.

Activity	Responsible Person(s)	Completion Timeframe	Resource Requirements
Develop a File Plan in accordance with Records Management standards issued by the National Archives			
Complete a Records Survey in accordance with Records Management standards issued by the National Archives			
Develop a Disposal Schedule in accordance with Records Management standards issued by the National Archives			
Adopt the Code of Practice on Records Management			
Identify any third party information that may be held			

Explanatory Notes:

1. The National Archives' records management courses provide appropriate training in relation to the first three activities listed.
2. Records Management Standards are issued by the National Archives as part of the PARBICA toolkit developed at the regional level.
3. The RTI Code of Practice on Records Management will be developed and published by the RTI Unit in collaboration with the National Archives and is a requirement under the RTI Act.

4. Entities should identify information that they hold that they have received from private organisations or companies and the terms under which the information is held. Any contractual arrangements under which this information is held should be reviewed for any confidentiality requirements and reviewed within the context of the exemptions under the RTI Act.

8. Systems & Procedures

Objectives:

- a. *To ensure the development of a comprehensive Publication Scheme for access by the public.*
- b. *To ensure that systems and procedures for handling, responding to and monitoring requests comply with the duties and obligations under the RTI Act.*

Activity	Responsible Person(s)	Completion Timeframe	Resource Requirements
Develop an action plan for any special requirements to implement RTI that are applicable to your Public Authority			
Develop and implement a provisional Publication Scheme for the Authority			
For certain Public Authorities, develop internal RTI protocols and procedures specific to the organisation for the release of information under the RTI Act			
Complete test run of new RTI systems & procedures			
Ensure Public Authority staff are aware of RTI protocols and procedures and how they will affect them			

Explanatory Notes:

1. The Baseline Assessment provides an assessment of the special requirements or challenges that will be faced by the organization in administering the RTI Act. Special requirements are those issues outside the norm which are identified because of technical or procedural complexity and need to be treated in a special way by the organization.
2. The Publication Scheme must be published on the organization's website and should also be available in hardcopy. The RTI Act provides that it must be completed within 6 months of your organization being specified by the Minister to commence administration of the law.
3. Organizations should appoint an independent person to 'walk' several information requests through the system, as a quality check.
4. Staff needs to be aware of how they will be affected by the RTI Act, the detail of their responsibilities and where they fit into the RTI processes. Organizations should use the testing period to do final familiarisation for their staff.

9. Budgeting

Objective: To ensure that public Body has taken into account the budgetary requirements that will be necessary to successfully implement the RTI Act.

ITEM	BUDGET \$ <i>[insert financial period]</i>	BUDGET \$ <i>[insert financial period]</i>
<u>PERSONNEL COSTS</u> Salaries		
<u>OPERATING EXPENSES</u>		
<p><i>Supplies & Materials</i></p> <ul style="list-style-type: none"> • Computer & communication supplies • Office supplies • Printing • Reproduction reports/plans • Postal supplies • Miscellaneous supplies <p><i>Utilities</i></p> <p>Telephone costs Facsimile costs etc</p> <p><i>Other Operating & Maintenance Expenses</i></p> <ul style="list-style-type: none"> • Software Licensing • Information systems services • Web-site • etc <p>Reference & other</p> <ul style="list-style-type: none"> • Audio • etc 		
<u>CAPITAL COSTS</u>		

Explanatory Notes:

1. Personnel
Consider the salary implications associated with revising positions and expanding the scope of existing jobs

2. Operating Expenses.
Consider increased costs for:
 - a. Consumables associated with employing any extra RTI staff and for information dissemination to staff
 - b. Responding to RTI requests – e.g. added paper use and printing costs
 - c. The possible need to purchase services from an external or government provider to respond to specialized RTI requests such as providing data on audio cassette, video cassette, compact disk, DVD, microfiche.
 - d. Communication – telephone, facsimile, email
 - e. Software licensing costs etc Additional electronic storage capacity
 - f. Changes in records management methodologies

3. Capital Costs.
 Consider the need for:
- New or refurbished offices for staff
 - Additional office furniture and equipment for RTI staff
 - Increased file storage capacity
 - An area for the public to inspect records, and possibly upgrade public receptiv.
 - Additional photocopier(s)
 - Additional computers (networked)
 - Any specialised equipment (the need to provide data on audio-cassette, compact disk, DVD, microfiche)

10. Infrastructure

Objective: To ensure that the infrastructure necessary to support the implementation of the RTI Act is in place.

Activity	Responsible Person(s)	Completion Timeframe	Resource Requirements
Ensure RTI staff office needs are met e.g. refurbished office, furniture etc			
Ensure appropriate copying equipment is available e.g. photocopier, scanner etc			
Ensure availability of specialist reproduction facilities, if required e.g. for audio cassette, video cassette, compact disk, DVD, microfiche etc			
Ensure physical and electronic file storage capacity is adequate			
Ensure appropriate communication facilities are available for RTI staff e.g. facsimile, computer, email, web-site (as appropriate)			
Establish/identify a place for the public to inspect records			
Establish facilities/processes for the collection of revenues			

Explanatory Notes:

1. This Section must be coordinated with *Section 9 Budgeting*
2. Entities covered by the Act will need to be able to copy/reproduce records when requested. The RIO must have ready access to a photocopier and scanner. Please note that confidential and personal information should be protected during the copying process.
3. There may also be a requirement to provide copies of records on audio cassette, video cassette, compact disk, DVD, microfiche etc. Public Bodies will need to evaluate if this will be an issue and how to address it. Please note that confidential and personal information should be protected during copying and that there are government agencies that can meet most reproduction requirements.
4. All Entities should develop a straight forward process for payment of fees/costs by the public.

11. Approval

This Organizational Action Plan was compiled by to whom any queries or comments should be referred.

Name and Post

Approved by:

Name and Post

ANNEX IV

SAMPLE INFORMATION OFFICER JOB DESCRIPTION

Job Title: Information Manager
Grade: [For Evaluation]
Salary Range:
Reports To: [Insert Position Title of Supervising Officer]

Job Purpose

To facilitate the right of the public to information held within the [insert name of Ministry/Portfolio/Department] in accordance with the Right to Information Act (RTI) 2016 and provide efficient records management services in line with the directives and guidance of the National Archives of Vanuatu.

Background Information

The RTI Act is a result of a commitment by the Government of Vanuatu to ensure increased accountability and transparency and improved governance in Vanuatu. With the introduction of this law, the provision of access to information and records management responsibilities of each public entity has expanded significantly.

The information officer role has been created to ensure a coordinated response in the area of information disclosure and records management within the [insert name of Ministry/Portfolio/Department].

Dimensions

- Deliver training to current and future employees within the organization.
- Manage an annual budget of \$ [insert amount]
- Respond to requests for access to information.
- Develop and implement procedures and systems that enable the organization to respond efficiently and lawfully to applications for access to information in line with the RTI Act and policies and procedural obligations established by the Right to Information Unit.
- Develop and implement records and information management systems that enable the organization to manage records in line with the policies developed by the National Archives regarding the creation, maintenance, classification, retention and destruction of records.
- Facilitate the right to information by assisting members of the public to understand their request requirements and by receiving, processing, researching, coordinating, and responding to applications.
- Compile statistics and reports to assist the Right to Information Unit to monitor the adherence of the organization to the RTI Act.

Principal Accountabilities

- Provide reports, information and testify before the RTI Information Commissioner with regard to applications for information that have been appealed.
- Liaise with staff of the RTI Unit and the National Archives regarding RTI related matters and records management requirements applicable to the organization.

- Attend RTI training and sensitization sessions provided by the RTI Unit
- Complete an Organizational Action Plan and manage its implementation
- Spearhead the establishment of a Project team to assist with implementation of Organizational Action Plan
- Promote awareness and understanding of the right to information and best practices in Records Management to all staff within the organization and externally via the maintenance of the organization's web-site.
- Promote awareness and understanding of the Right to Information externally by assisting members of the public to understand their rights and through the maintenance of an entity specific web-site.
- Prepare the organization's publication scheme and observe the proactive disclosure obligations in accordance with the National Implementation Plan and any Guidelines developed.
- To undertake any other duty that is appropriate to the role.

Reporting Responsibilities

[Specific to Ministry/Portfolio/Department]

Knowledge, Experience, and Skills

Preferred Knowledge:

- (i) A good understanding of Right to Information and privacy issues.
- (ii) A good understanding of principles, concepts and international best practice of Records Management, through a relevant B.A. or tertiary level (course in, or relevant to, Records and/or Information Management or the willingness to acquire relevant education and training).
- (iii) An understanding of relevant legislation, regulations and procedures governing the organisation.
- (iv) An understanding of the work of the organization and the public sector at large.
- (v) An understanding of information technology issues relating to records and information management.
- (vi) Previous participation in the National Archive's Records Management courses is desirable

Preferred Experience:

- (vii) Experience in developing policy and procedures for implementation across different parts of an organization, preferably three years relevant experience relating to Right to Information and/or Records Management or information disclosure.
- (viii) Experience in providing training for internal staff.

Skills

- (i) Time management and prioritisation skills which enable the adherence to strict reporting deadlines.
- (ii) Ability to apply complex professional standards and ethical practices relating to Right to Information and Records Management, pertaining to the fair and balanced provision of access to information, intellectual control over, integrity of, and physical safety of public records.
- (iii) Ability to develop, implement and monitor record keeping procedures and systems effectively within the entity.
- (iv) Excellent oral and written communication skills and the ability to communicate effectively in person and in writing with the general public, Chief Officer/CEO, Head of Department, Senior Management, RTI Unit, National Archives, departmental records management staff, ICT staff, and other stakeholders.
- (v) Computer literacy

Assignment and Planning of Work

The post-holder receives general but not continuous direction from the entity's senior management team.

The work will be demand driven by requests from the public which have to be delivered within timelines outlined by the Right to Information Law. The post holder must be able to priorities and manage requests without supervision.

Supervision of Others

N/A

Other Working Relationships

The post holder will liaise predominantly with:

- Members of the public
- The RTI Unit and National Archives to access specialist training, policy guidance and technical support.
- The Attorney General's Department and the Office of the Information Commissioner in the investigation of complaints.

Decision Making Authority and Controls

The post holder is responsible for:

- Interpreting the RTI Act and Regulations in relation to the appropriateness and legality of disclosure of each information application, including assessing whether information meets the criteria for exclusion.
- Adhering to professional and ethical standards recommended by international records management and right to information organisations and professional bodies abroad, or those drawn up by the post holder's supervisors, as appropriate.

Problems/Key Features

The implementation of the RTI Act requires a change in the culture within Government to one of openness, transparency and customer rights.

Historically records management has not been undertaken in a structured manner and the locating of relevant records may be time consuming.

Working Conditions

The post holder may occasionally work in unventilated storage rooms and basements where records may have been placed. The majority of work will involve long periods of computer based activity.

Agreed By:

Date:

Head of Department:

Job Holder: