

The Auditor-General
Audit Report No.27 2003-04
Performance Audit

Management of Internet Portals at the Department of Family and Community Services

Australian National Audit Office

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of Australia 2004

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Canberra ACT
9 February 2004

Dear Mr President
Dear Mr Speaker

The Australian National Audit Office has undertaken a performance audit in the Department of Family and Community Services in accordance with the authority contained in the *Auditor-General Act 1997*. Pursuant to Senate Standing Order 166 relating to the presentation of documents when the Senate is not sitting, I present the report of this audit and the accompanying brochure to the Parliament. The report is titled *Management of Internet Portals at the Department of Family Community and Services*.

Following its tabling in Parliament, the report will be placed on the Australian National Audit Office's Homepage—<http://www.anao.gov.au>.

Yours sincerely



P. J. Barrett
Auditor-General

The Honourable the President of the Senate
The Honourable the Speaker of the House of Representatives
Parliament House
Canberra ACT

AUDITING FOR AUSTRALIA

The Auditor-General is head of the Australian National Audit Office. The ANAO assists the Auditor-General to carry out his duties under the *Auditor-General Act 1997* to undertake performance audits and financial statement audits of Commonwealth public sector bodies and to provide independent reports and advice for the Parliament, the Government and the community. The aim is to improve Commonwealth public sector administration and accountability.

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Abbreviations/Glossary

AGLS	Australian Government Locator Service
ANAO	Australian National Audit Office
BARAC	Business Planning and Resource Allocation Committee
CMU	Communications and Media Unit. Part of the Ministerial and Communications Branch
EDMS	Electronic Document Management System
e-Permanence	A set of guidelines developed by the NAA for the permanent retention of electronic records
FaCS	The Department of Family and Community Services
HTML	HyperText Markup Language
ICT	Information and Communications Technology
ICTC	Information and Communications Technology Committee
MCB	Ministerial and Communications Branch
NAA	National Archives of Australia
NOIE	National Office for the Information Economy
RAAC	Risk Assessment and Audit Committee

Summary and Recommendations

Summary

Background

1. The Department of Family and Community Services (FaCS) has responsibility for implementing three Internet portals created in accordance with the Government's November 2000 commitment to make access to government services available through Internet portals. The main entry point for Australian Government portals is www.australia.gov.au. The site currently lists 19 websites identified as being for individuals and seven identified as being for business. FaCS is the lead agency for three of these portals, www.youth.gov.au, www.community.gov.au, and www.families.gov.au.

2. The Family and Community Services portfolio is responsible for a broad range of social policy issues affecting Australian society and the living standards of Australian families, communities and individuals. FaCS is the principal policy formulating and advising body in the portfolio and is responsible for around one third of total government outlays. FaCS is responsible for:¹

- putting to work the Government's social support policies for families, working-age people and retirees; and
- managing the delivery of a wide range of support services through thousands of provider organisations located across Australia.

3. The primary objective of the audit was to assess FaCS' management of the Internet portals for which it had responsibility. The ANAO also included in the audit a website directed towards youth, *The source*², which provided many of the services expected of a portal. The audit considered: governance structures for the portals; measurement and/or assessment of efficiency and effectiveness; and control factors, such as change management, security, and legal issues.

Key audit findings

FaCS' governance of portals (Chapter 2)

4. The ANAO found that responsibility for departmental structures and budgets relating to the FaCS' portals and *The source* website were at an appropriate level. FaCS has developed its three portals to meet the basic

¹ FaCS, *Annual Report 2002–03*, Volume 1, p.20.

² <www.thesource.gov.au>.

level of functionality as required by the Government. However, FaCS' business case for the development of the portals identified costs but did not identify any benefits accruing to FaCS from providing the portals. The lack of a robust business case for the FaCS' portals means there is no basis for a business driver for further developments.

5. The implementation of the Government's portal policy did not include funding to agencies to develop and maintain the portals. At the commencement of the audit, the Families portal had no staffing resources allocated. As well, the department's Business Planning and Resource Allocation Committee (BARAC) had not approved funding bids for further development of all portals on the basis that other departmental priorities were more important. The ANAO considers it would be appropriate for FaCS to develop a sound business case for further portal developments, which would also be useful for performance management.

6. The ANAO found that, following allocation of responsibility for oversight of portal development to the Ministerial and Communications Branch (MCB) in November 2002, the Branch had commenced developing a framework for the operation of the portals. MCB was also developing a broader framework, the *eCommunications Strategic Framework*, which was intended to cover electronic and traditional communications, together with online marketing. At the time of the audit, both frameworks were still under development.

7. The absence of a completed *eCommunications Strategic Framework* meant that FaCS did not have agreed development plans for the portals. As well, allocation of responsibilities between MCB and other branches with responsibility for portal content was unclear.

8. The ANAO noted that potential audits of FaCS' portals and Internet use were included in FaCS' Internal Audit program. However, as the potential audit of FaCS' portals was one of a group of several possible information technology audits, and the group was 37th on the priority list of audits, it was unlikely to be an early item for action.

Measuring efficiency and effectiveness of FaCS' portals (Chapter 3)

9. The ANAO found limited measures of effectiveness, (that is, whether the portals were achieving their objectives) or efficiency (that is, comparison of benefits achieved compared with resources utilised in developing and maintaining the portals). Basically, the only measure used by FaCS is the number of users accessing the websites. FaCS has not identified any targets or measures of success for the portals. Surveys of

users are not undertaken. However, entries by users in the 'Talk It Up'³ feature of *The source* provided some indication of the popularity of the site.

10. Creating a website on the Internet does not automatically guarantee its discovery by the target audience. The site must be discoverable by search engines and marketed to relevant customers. The ANAO found that FaCS' portals and *The source* were appropriately discoverable by various search engines.

11. The ANAO also found that marketing had taken place for all these websites. However, the Families and the Community portals had limited funding and hence limited marketing. Both produced offline media and advertising products (for example mouse mats and bookmarks) for distribution at relevant events and to libraries. The Youth portal and *The source* had significantly greater funding, albeit that funding is now being reduced. The greater funding allowed *The source* to be advertised in youth magazines and on buses, as well as to pay for search engine optimisation. However, FaCS has no measures in place to determine the success, or otherwise, of its marketing strategies.

FaCS' Management and control of Internet portals (Chapter 4)

Quality and currency of information

12. The ANAO found that there was no formal quality assurance process for content placed on FaCS' portals or on *The source* website. The ANAO identified a number of FaCS' guidelines for operational processes relating to management and control of content and structure of websites and the portals. However, while the FaCS portal managers normally obtained agreement from more senior officers for links or information of a contentious nature, each portal manager, while working within an approved linking policy framework, was solely responsible for updating the content of the sites with no independent check on the quality of the work.

13. The ANAO noted that the Youth portal was not updated for several months before being withdrawn in August 2003. The Families portal had limited updates for several months. In contrast, the Community portal and *The source* remained current throughout the audit.

Security

14. While a security threat and risk analysis of FaCS' portals was undertaken using consultants in March 2002, specific action to address the

³ 'Talk It Up' is a forum where registered persons are allowed to put their views on the website and discuss topics with other registered users.

risks identified took some time and was incomplete in November 2003, some 20 months after the initial threat and risk analysis report.

15. The ANAO also found it was unclear who had responsibility for action on the consultant's recommendations, or, more generally, for the enforcement of security policies and practices relating to the portals. In November 2003, FaCS advised the ANAO that the Information and Communications Technology Committee (ICTC) was the responsible body for overall ICT security, and that the ICT security section is able to enforce security policies and practices. FaCS also advised the ANAO that the role of the Director of that section was being reviewed.

Electronic records

16. The ANAO found that FaCS lacked documented policies and procedures for retaining records of changes to portals and *The source*. While FaCS does keep records of changes to its portals and *The source*, FaCS' retention of records in electronic form does not fully meet the legislative requirements of the *Archives Act 1983*.

17. The ANAO has recently completed an audit of record-keeping in several agencies, including FaCS.⁴ FaCS' response to this report was that it was seeking to improve its record-keeping policies, systems and procedures in line with the recommendations in the report. Those recommendations are applicable to the electronic records of the portals and *The source*. Therefore, the ANAO has not repeated them in this audit report.

Privacy and legal

18. FaCS has developed a compliance checklist for its website 'owners'⁵ to complete. The checklist addresses privacy, security, accessibility and legal approvals, amongst other issues. At the time of the audit fieldwork, the checklist had only been completed for the Community portal. Following the ANAO's request, checklists were subsequently completed for the Families portal and *The source*.

19. FaCS' internal Administrative Law Unit has conducted a review of the portals and *The source* against the Federal Privacy Commissioner's guidelines to check compliance with the guidelines.

⁴ ANAO Audit Report No.7 2003-04, *Recordkeeping in Large Commonwealth Organisations*, Canberra.

⁵ A site 'owner' is the FaCS branch responsible for the delivery of services to that section of the community serviced by the portal. The 'owner' is responsible for the structure and content of the portal, and for updating the information provided on the portal.

20. However, the ANAO found that a legal threat and risk analysis of FaCS' portals and *The source* had not been completed at the time of audit fieldwork. The ANAO considers the 'Talk It Up' feature of *The source* to be a particular risk. FaCS advised the ANAO that a legal threat and risk analysis of *The source* was subsequently conducted late in 2003.

FaCS' use of Metadata and the NOIE repository

21. The ANAO found that FaCS was using metadata⁶ appropriately on its own portals.

22. The National Office for the Information Economy (NOIE) is responsible for the Federal Metadata Repository. Each week NOIE harvests metadata information from over 700 Australian Government sites. The information is then placed in the repository so that it is available for agencies to download. The intention is that agencies will be able to extract from the repository links to government agencies relevant to the client or customer group being targeted. The ANAO found that, of the three FaCS' portals and *The source*, only the Families portal was using the NOIE repository to extract information. However, in extracting this information, a high level of manual input was required before the metadata created by site owners could be used on the portal.

Overall audit conclusion

23. The ANAO concluded that, in response to the Government's directive, FaCS had developed basic portals. However, at the time of the audit, the portals were in a static phase with no further development planned and no funding was available to undertake any such development.

24. The ANAO concluded that FaCS should consider developing a robust business case or business drivers to take the portals beyond the basic requirements identified by the Government. In the absence of identified business drivers, FaCS has placed low priority on the further development of the portals. Whilst funding and other resources for basic maintenance were made available (with the exception of the Youth portal which was discontinued during the audit), provision of further funds and resources is not currently considered to rank highly against competing departmental priorities.

⁶ Metadata is sometimes defined literally as 'data about data,' but the term is normally understood to mean structured data about resources that can be used to help support a wide range of operations. These might include, for example, resource description and discovery, the management of information resources and their long-term preservation. [Source Michael Day, UKOLN, Available: <<http://www.ukoln.ac.uk/metadata/publications/nutshell>>. Metadata is further discussed in paragraph 4.56 onwards.]

Recommendations

25. The ANAO made five recommendations for improvements to FaCS' management of its Internet portals. At the conclusion of the audit, FaCS advised that it had begun to address all of these recommendations. However, FaCS also advised the ANAO that full implementation of the recommendations is dependent on the allocation of additional funding, and that decisions on funding of the portals must take place against FaCS' overall priorities. The latter is FaCS' management prerogative but must be fully informed by appropriate information and analysis.

Agency response

26. FaCS welcomes the audit and its recommendations. A governance framework is currently being developed that will improve decision-making about resources and development, incorporate strategies for measuring the efficiency and effectiveness of the portals and provide Portal Owners with the tools to manage the portals effectively.

27. FaCS notes that all work associated with the portals, including the development and implementation of the governance framework, must be funded from existing agency resources. Improvement to the portals will therefore take place within the context of FaCS overall strategic direction and priorities.

28. FaCS also notes that the Portals are treated by FaCS as a referral service rather than one which would invite any substantial level of interaction with users. This is an important distinction between the FaCS' portals and *The source* (which the report uses as a comparison site for the portals) and perhaps other government portals.

Recommendations

Set out below are the ANAO's recommendations and FaCS' abbreviated response to each recommendation. FaCS' more detailed responses are shown in the body of the report after each recommendation.

- Recommendation No.1**
Para. 2.23
- The ANAO recommends that FaCS:
- (a) develop an appropriate framework for the governance and operation of the portals;
 - (b) examine the business case for further development of the portals, including potential benefits to FaCS; and
 - (c) include FaCS' use of the Internet and portals in its future Internal Audit program.

FaCS response: Agreed.

- Recommendation No.2**
Para. 3.34
- The ANAO recommends that FaCS examine how it might:
- (a) identify means by which the efficiency and effectiveness of the portals and *The source* can be measured and/or assessed; and
 - (b) develop appropriate marketing policies and marketing strategies for the portals to promote their use by all stakeholders.

FaCS response: Agreed.

- Recommendation No.3**
Para. 4.13
- The ANAO recommends that FaCS:
- (a) develop a quality assurance process for entry of content on FaCS' portals and websites; and
 - (b) regularly review all its portals and websites to provide assurance that information presented is current and relevant.

FaCS response: Agreed.

**Recommendation
No.4
Para. 4.27**

The ANAO recommends that FaCS:

- (a) identify a position, or body, to take responsibility for ensuring recommendations resulting from security threat and risk analyses are properly acted on;
- (b) promptly address the risks identified in the March 2002 consultants' report and the subsequent *Security Action Plan*;
- (c) include penetration testing of FaCS' websites and portals in future threat and risk assessments; and
- (d) conduct a further review of security for its websites and include *The source* in that review.

FaCS response: Agreed.

**Recommendation
No.5
Para. 4.52**

The ANAO recommends that FaCS:

- (a) institute appropriate arrangements for all its websites to have a completed compliance checklist; and
- (b) complete a legal threat and risk analysis for all websites.

FaCS response: Agreed.

Audit Findings and Conclusions

1. Introduction

This chapter provides background information on the Government's policy on the development of Internet portals, and on FaCS and NOIE. It explains the objectives, approach and methodology of the audit.

Portals

1.1 In November 2000, the Australian Government committed to making access to government services available to all Australians through Internet portals.⁷ In the context of this report, an Internet portal can be considered as a single online entry point with information about available online and transactional services from all levels of government for a customer or subject group. A portal is intended to simplify the process of finding the services and information that a customer is looking for, and eliminate the need for the public to understand the administrative structure of government to get access to information. The vision is for integrated services across government, including Federal, State and local governments, to be accessed through customer-focussed Internet portals. The notion is to have seamless service delivery which is fully user friendly.

1.2 The Government initially identified 18 customer/subject groups for which a portal would be appropriate; and also nominated a lead agency for carriage of the development of each portal. The lead agency was to form a consortium of agencies with a relevant interest in the portal customer or subject group.

1.3 The responsibilities of each multi-agency consortium included:⁸

- development and management of the portal;
- development of appropriate resource discovery mechanisms for the portal customer group;
- application and tailoring of Australian Government Locator Service (AGLS)⁹ metadata¹⁰ elements (and their qualifiers and

⁷ GovernmentOnline newsletter, Issue 3, January 2001, NOIE.

⁸ Customer Focussed Portals Framework. Available online: <http://www.noie.gov.au/projects/egovernment/Better_Services/portalsframework.htm>.

⁹ The National Archives of Australia is the maintenance agency for the AGLS Metadata Standard.

¹⁰ Metadata is sometimes defined literally as 'data about data,' but the term is normally understood to mean structured data about resources that can be used to help support a wide range of operations. These might include, for example, resource description and discovery, the management of information resources and their long-term preservation. [Source Michael Day, UKOLN, Available: <<http://www.ukoln.ac.uk/metadata/publications/nutshell>>. Metadata is further discussed in paragraph 4.56 onwards.]

extension sets if appropriate) to improve resource identification and discovery;

- identification of impediments and areas where there is a need to develop standards;
- examination of potential integration of services across relevant agencies to improve service delivery from a customer perspective; and
- development of business cases for further development.

1.4 The main Australian Government entry point, www.australia.gov.au, is the initial entry point for the portals. The site currently lists 19 websites identified as being for individuals and seven identified as being for business. FaCS is the lead agency for three of these portals, www.youth.gov.au, www.community.gov.au, and www.families.gov.au.

Department of Family and Community Services (FaCS)

1.5 The FaCS portfolio is responsible for a broad range of social policy issues affecting Australian society and the living standards of Australian families, communities and individuals.¹¹ The portfolio responsibilities include income support, housing policy, community support, disability services, childcare services and family issues, including family payments, child support and family relationships.

1.6 The portfolio spends around \$62 billion a year on providing its programs and services, that is about one third of Australian Government Budget spending. FaCS has a departmental budget of \$2.5 billion (generally FaCS staff salaries and administrative expenses, the latter includes payments of some \$1.7 billion to Centrelink).

1.7 The portfolio consists of:

- FaCS, which incorporates the Child Support Agency and the Social Security Appeals Tribunal;
- Centrelink, which delivers income support payments and services on behalf of FaCS and a range of other Australian Government agencies; and
- the Australian Institute of Family Studies.

¹¹ Taken from FaCS website <www.facs.gov.au>.

1.8 FaCS has its National Office in Canberra and employs about 4 500 staff at locations around Australia. It advises the Government on all policy issues within the portfolio; and manages the delivery of FaCS' services through a range of service providers, including Centrelink. It also advises the Government on the social policy implications of wider Government policy including taxation, superannuation and savings policy.

1.9 As well as families, FaCS focuses on groups with differing needs such as young people and students, people living in rural and remote areas, Aboriginal and Torres Strait Islander peoples and people from diverse cultural and linguistic background.

1.10 FaCS has, as its focus, the three key social policy outcomes identified in Figure 1.1, to which the portals are intended to contribute.

Figure 1.1

FaCS Budget 2003–04

Outcome Group	Description	Departmental Budget \$	Administered Budget \$	Average Staffing Level (Number)
Outcome 1	Families are strong.	1 106.0m	16 198.2m	3 589
Outcome 2	Communities are strong.	55.4m	1 407.0m	291
Outcome 3	Individuals reach their potential.	1 316.2m	42 264.9m	794
Totals		2 477.6m	59 870.1m	4 674

Source: FaCS, *Annual Report 2002–03*, Canberra, October 2003.

The FaCS' portals and *The source website*

1.11 In its 2001–02 Annual Report, FaCS made the following comments on its portals:¹²

Families portal

We developed a national web site—the Families portal at www.families.gov.au—so that families can find government information and services in one place without having to know first which agency to go to. The site links to more than 1000 information sources on the range of Commonwealth sites. It went live in September 2001, and we are continually building content and refining accessibility. More content from state, territory and local government and the community sector is planned, building on the current federal focus.

¹² FaCS, *Annual Report 2001–02*, Canberra, October 2002.

Youth portal

Our new national youth web site—the Youth portal at www.youth.gov.au—makes a huge amount of information available online about Commonwealth Government services, programs, research, policies, events and publications for and about young people aged 12 to 25 years. The portal links to more than 5000 different Commonwealth resources. It went live in July 2001 and was officially launched in April 2002 during National Youth Week. In the Hitwise ranking of all 375 Commonwealth Government web sites visited by Australian Internet users, the Youth portal is consistently ranked in the top 150.

Community portal

A new national web site—the Community portal at www.community.gov.au—has given communities and community organisations better online access to a wealth of relevant information. The portal links to more than 1800 sites, spanning all levels of government as well as the spectrum of non-government, academic and community organisations. An average hit-rate of 46 000 a month confirms its value as a resource for communities.

Operation of the portals and *The source* website

1.12 The Families portal commenced in September 2001 in a basic form. It was significantly enhanced in November 2002. The Community portal was initially launched as a families and communities website in October 2001, then developed into the Community portal in March 2002.

1.13 The Youth portal went live in July 2001. There is also another website directed towards youth, *The source*, that provides many of the services expected of a portal. *The source* has a much longer history, being first launched in 1998 by the then Department of Education, Training and Youth Affairs (DETYA) which initially developed both *The source* and the Youth portal.

1.14 There are significant differences between the operation of the four portals/websites as follows:

- **Content and links:** The Families portal obtains a significant portion of its content and links to other sites from a repository created and updated weekly by the National Office for the Information Economy (NOIE). This repository provides a consolidated list of links to government websites from which agencies can extract links relevant to their subject (see paragraph 1.17 below). The Youth and Community portals and *The source* website do not retrieve information from the NOIE repository, instead relying on other methods of discovering and including appropriate links on the site (see paragraph 4.56 to 4.68).

- **Client group participation:** *The source* is the only one of the four access points to provide a forum for its client group to participate in discussions of topics relevant to the group. The three portals are limited to a feedback mechanism directed to the manager of the site. *The source* facilitates discussion through:
 - a forum called ‘Talk It Up’ where registered persons are allowed to put their views on the website and discuss topics with other registered users;
 - encouraging users to send a message to the Federal Government through ‘have your say’; and
 - regular online polls on topics of current interest.
- **Lotus Notes:** The Families and the Community portals use Lotus Notes as the base for the website (although there are differences in they way they use Notes). The Youth portal and *The source* are HTML¹³ sites.

The role of NOIE

1.15 An Executive Agency in the Communications, Information Technology and the Arts portfolio, NOIE has direct responsibility for the development and coordination of advice to the Government on information economy issues, including:¹⁴

- strategic advice to the Government on the key factors driving the information economy;
- coordination of the application of new technologies to government administration, information and service provision, including assistance to public sector bodies to deliver services online;
- promotion of the benefits of, and Australia's position in, the information economy; and
- undertaking such other tasks related to the above functions as the Minister may require from time to time.

1.16 NOIE takes an advisory role on Australian Government portals. Agency management teams are responsible for the structure of the portal.

¹³ HyperText Markup Language. A language used to create web documents.

¹⁴ NOIE Overview <www.noie.gov.au/about/index.htm>.

However, NOIE guidelines do require that each portal must meet a minimum set of requirements, namely:¹⁵

- a single point of access to on-line information and transactional services from Australian Government agencies for the relevant customer/subject;
- customer-focussed discovery processes and mechanisms (for example, the application of AGLS Metadata); and
- customer feedback mechanisms to enable continual improvement.

1.17 NOIE's role includes the weekly harvesting of metadata from around 700 Australian Government websites within Australia. The information is harvested weekly on Monday and made available to portal 'owners' via a repository. The portal 'owners' can then extract from the repository details of the websites related to their particular portal; and include a link to each website from the portal. The successful harvesting of information from websites depends on the websites conforming to AGLS metadata standards set by the National Archives of Australia (NAA).

Audit objectives

1.18 The ANAO commenced this audit in May 2003, some 2½ years after the introduction of the Government policy requiring the establishment of customer-focussed portals. Given the role of the FaCS portfolio, and the fact that FaCS is responsible for three portals, the ANAO considered that a timely audit of the implementation of the portals in FaCS had the potential to add significant value to this emerging area of government service delivery.

1.19 The objectives of the audit were to determine whether FaCS:

- had an appropriate governance structure for its portals;
- had measures in place to determine the efficiency and effectiveness of the portals; and
- effectively manages content and changes to the portals; has appropriate controls in place; and whether the portals meet applicable standards and guidelines.¹⁶

¹⁵ GovernmentOnline Progress Report December 2000, p.7.

¹⁶ Applicable controls and standards are discussed in Chapter 3 and include such controls as management of change and security, and standards and guidelines such as archiving of records, application of metadata, and privacy, copyright and disclaimers.

Audit scope, focus and methodology

1.20 The audit examined the three portals for which FaCS is responsible as the lead agency. These are the Families, Community, and Youth portals. Also included in the audit was the FaCS website directed towards youth, *The source*, as this provided many of the services expected of a portal.

1.21 The ANAO focussed on the services delivered by the portals and *The source*, and considered those services against the objectives as stated by the Government policy for establishing the portals. These objectives were enunciated by NOIE guidelines that established a minimum set of requirements that portals should meet. (The NOIE guidelines and these requirements are discussed in paragraph 3.10).

1.22 The ANAO reviewed the operation of the portals against NOIE's minimum set of requirements. The ANAO:

- tested the portals by searching for typical services expected to be required by users of each portal, for example maternity services from the Families portal;
- where applicable, signed on as a user of the portal, for example to be notified of changes to the Youth portal;
- examined FaCS' policies and practices related to the portals and *The source*;
- examined FaCS' documents relating to the establishment and operation of the portals and *The source*;
- discussed the operation of the portals and *The source* with the site 'owners' and other relevant FaCS staff; and
- clarified Government portal requirements and standards with NOIE and the NAA.

1.23 At the time of audit fieldwork, the Youth portal was not being updated, and was withdrawn in August 2003 with users attempting to access the site being diverted to *The source*. During the audit, the ANAO was informed of FaCS' intention to combine the Youth portal and *The source* website. Accordingly, FaCS' responses to some issues raised by the ANAO for FaCS' portals generally (for example, a FaCS compliance checklist of legal, security and other issues), were not pursued for the Youth portal.

1.24 Audit fieldwork was conducted over a period May 2003 to August 2003. The audit was conducted in accordance with ANAO auditing standards at a cost of \$280 000.

2. Governance

This chapter examines the governance arrangements for FaCS' portals, including the involvement of the FaCS Executive Board and senior committees. The chapter also discusses the need for an appropriate framework for the management of FaCS' portals.

Background

2.1 Governance is the set of responsibilities and practices exercised by an organisation's executive with the goal of providing strategic direction; ensuring stakeholder and organisation objectives are achieved; managing risks appropriately; and using resources responsibly.¹⁷

2.2 In examining the governance of FaCS' portals, the ANAO reviewed them against the following principles:¹⁸

- responsibility for approving strategies, budgets and structures resides at board level;
- a framework for the operation and control of portals is in place, including clear definition of responsibilities, objectives and policies (including Government policies where appropriate);
- plans are in place for the further development of the portals; and
- FaCS' use of the Internet and portals is included in the program of internal audits; and FaCS' internal audit committee, (the Risk Assessment and Audit Committee (RAAC)), reviews the results of audits, and follows up the implementation of agreed recommendations in a timely fashion.

2.3 These principles are discussed below.

Governance at FaCS

2.4 The Executive Board is the main committee/group advising the Secretary. Other committees at FaCS relevant to governance of FaCS' portals and FaCS' use of the Internet are: the Business Planning and Resource Allocation Committee (BARAC); the Information and

¹⁷ *SAIs' Involvement in System Development: Opportunities and Risks*. SAI Australia Response to SAI UK Principal Paper: 18th Commonwealth Auditors-General Conference Kuala Lumpur, Malaysia 6-10 October 2002.

¹⁸ These principles, and other requirements used as a basis for this audit, were developed by the ANAO derived from several sources including CobiT (Control Objectives for Information and Related Technology) issued by the IT Governance Institute <www.itgi.org>, the ANAO's Better Practice Guide *Internet Delivery Decisions: A Government Program Manager's Guide*, and guidelines issued by NOIE.

Communications Technology Committee (ICTC); and the Risk Assessment and Audit Committee (RAAC). Details of these committees are set out in Figure 2.1.

Figure 2.1

Governance structure relevant to FaCS use of the Internet and portals

Executive Board

The FaCS Executive Board meets monthly. The Secretary chairs the Board; members include the Deputy Secretaries, the Executive Directors, the General Manager of the Child Support Agency, the Chief Financial Officer, and two Assistant Secretaries on rotation. Centrelink is also represented. The Board provides strategic leadership, considers matters of significant strategic importance, and monitors departmental performance against goals in the strategic plan.

Business Planning and Resource Allocation Committee (BARAC)

BARAC is responsible for guiding business planning, and determining and monitoring resource allocation and expenditure. A Deputy Secretary chairs BARAC. Membership includes the Chief Financial Officer and three Executive Directors on rotation.

Information and Communications Technology Committee (ICTC)

The function of the ICTC is to facilitate ICT-based support for FaCS business activities. To do this, the Committee coordinates strategic directions and technical architecture standards for ICT investments in the Department, while seeking to foster a business-centred ICT asset management culture. The committee meets at least quarterly. The committee is chaired at Executive Director level and includes several Assistant Secretaries and Directors, the latter on a rotating basis, and a State/Territory Manager on a rotating basis.

Risk Assessment and Audit Committee (RAAC)

The RAAC consists of a Deputy Secretary as chair, two Executive Directors, the General Manager of the Child Support Agency, and two independent members. The RAAC's objectives are to: ensure the Department's approach to implementation of its control framework is effective; and provide assurance to the Secretary on the preparation and review of the financial statements of FaCS. The Committee has no decision-making authority; it functions in an oversight, review, and advisory role. It has authority to request any information it requires from any employee of FaCS, and to obtain any independent advice it considers necessary. The Committee meets quarterly.

Source: FaCS, *Annual Report 2001–02*, and Committee Terms of Reference from FaCS intranet.

Strategies, structures and budgets

Strategies and structures

2.5 In August 2002, the Secretary of FaCS revised the structure of the department. The restructure included allocating responsibility for the Internet (from Information Strategies Branch) and the oversight of portal development (from the Family Payments and Child Support Policy

Branch, the Community Branch, and the Youth Bureau—Policy and Promotions Branch) to the Ministerial and Communications Branch (MCB). The restructure was effective from 1 November 2002.

2.6 When responsibility for oversight of the portals was moved, no details of the actual move were given to staff, and there was no specification or differentiation of responsibilities between the portal ‘owners’ and MCB. At the time of the audit fieldwork, some 8 months later, a framework for the operation of the revised structure was still being discussed. Clarification of responsibilities for content, structure, and marketing; and the processes for managing content changes to the websites between the portal ‘owners’ and MCB; had not been resolved.

2.7 The ANAO examined the minutes of the Executive Board, the RAAC and of the ICTC. The ANAO found no indication that the portals or FaCS’ use of the Internet had been discussed by any of the committees. Following discussions between the ANAO and FaCS during the fieldwork phase, the department prepared a paper outlining a proposal to develop a governance framework for the portals and submitted it to the Executive Board. At its 28 July 2003 meeting, the Board agreed that the ICTC would take on an oversight role for the portals against a framework and a set of standards that would be developed by MCB.

Budgets

2.8 The portals strategy was a government initiative of November 2000. The expectation was that lead agencies would take responsibility for the development of the portals with the assistance of a consortium of other agencies. The *Government Online Progress Report* of December 2000 recognised that the development of portals to the level of sophistication outlined in that document would require significant funds. However, no funds were provided to agencies to develop the portals. Responsibility for funding each portal defaulted to the lead agency responsible for developing and managing the portal. In the abovementioned July 2003 paper to the FaCS’ Executive Board, FaCS commented

In essence they (the portals) were imposed by NOIE and it is not clear that they are value for money, insofar as FaCS’ business priorities are concerned.

2.9 NOIE responded to that comment as follows:

The decision to implement a framework of customer-centric portals was taken by the Government after an extensive consultation process which included FaCS.

The implementation process for the portals, which is managed by NOIE, is flexible. It recognises that the framework of portals might need to change to accommodate new circumstances and the Minister for

Communications, Information Technology and the Arts is authorised to approve changes.

2.10 FaCS provided initial funding for the Families and Community portals. BARAC is the main body responsible for determining funding to National Office branches, and to State and Territory Offices. The ANAO was informed that FaCS uses a zero based resource allocation process. That is, a branch must identify its core and non-core funding for each financial year and BARAC allocates funding against those needs. Further development of the portals was not included in the core funding of any branch for the 2002–03 and 2003–04 financial years. The Families and the Community portals were implemented as ‘thin’ portals. That is, as a basic service to meet stated policy needs, but at the lowest cost.

2.11 The then Department of Employment, Training and Youth Affairs (DETYA) initially funded the Youth portal (2000–01) and *The source* website (1997–98). The Youth portal and *The source* were included in the overall youth support strategies, with responsibility for the sites placed with the Multimedia and Online Services Unit of the relevant branch. This unit provided multimedia and web development support for a number of youth-related events such as the Youth Media Awards and National Youth Week. In November 2003, FaCS advised the ANAO that:

The Youth portal began in the Department of Education, Training and Youth Affairs with funding for 4 years. This funding was not continued upon the transfer of the Youth Portfolio to the Department of Family and Community Services. An unsuccessful funding bid was made to BARAC for the 2002–2003 financial year. A minor amount of funding was secured within the Youth Bureau—Policy and Promotions Branch. However, this funding has been insufficient because of competing resources.

2.12 Responsibility for youth services was transferred to FaCS in November 2001. The ANAO was advised that, in the 2002–03 financial year, FaCS reduced funding for the branch by around 15 per cent and that requests for funding to further develop the portals were not approved by BARAC on the basis that other departmental priorities were more important. At the time of the audit fieldwork, the branch managing the youth portal had abandoned updates to the portal in early 2003, due to cuts in funding and staff resources for that branch. Instead, the branch concentrated on *The source* website. From August 2003 onwards, users trying to access the Youth portal were redirected to *The source* website. The Youth Bureau within FaCS is now developing a business case to amalgamate the Youth portal and *The source* with a view to launching the revised site in August 2004, in line with International Youth Day at that time. In November 2003, FaCS advised the ANAO that the business case for amalgamation would address a number of issues raised in this audit

report, including setting targets, measuring success, and archiving (see chapters 3 and 4).

2.13 At the time of the audit fieldwork, the Families portal had also not been updated since late 2002. Revisions to the Families portal recommenced in August 2003 and appeared on the website in October 2003. However, downloading of data from the NOIE repository was not recommenced.

Strategies, structures and budgets audit conclusion

2.14 Responsibility for departmental structures relating to portals resides, in the first instance, with the Secretary of FaCS. Approval of budgets relating to FaCS' investment in the portals is the responsibility of BARAC. The ANAO therefore considers that these responsibilities reside at an appropriate level within the department. However, in the course of the audit the ANAO was also advised that funding of further development of the portals was not a priority for FaCS.

eCommunications framework

2.15 The ANAO considered whether FaCS had a framework for the operation of its portals and *The source* website. The ANAO found that, in accordance with the Secretary's November 2002 decision to allocate overall responsibility to MCB, that branch had commenced the development of a framework for the operation of the portals. In addition, MCB was also working on a broader framework, an *eCommunications Strategic Framework* that would include both portals and websites. A May 2003 proposal to develop the latter framework stated:

A strategic framework for the management of electronic communication is needed to maximise the benefits of a consolidated approach to communication and prepare for the future FaCS business environment. A management framework will provide a model for the integration of electronic and traditional communication channels and an overarching approach to online marketing and investment in new technologies.

2.16 At the time of completion of the audit fieldwork, both frameworks were still under development.

Future developments

2.17 The NOIE guidelines for portals state that 'each portal is to have an agency development plan and business case'. The ANAO sought from FaCS a development plan and business case for each portal. Scoping papers were provided for the Families and Community portals that identified the initial purpose, objectives, client target group, and consortia members. They also identified likely costs. However, no benefits from the

implementation of the portals were identified. The lack of a robust business case for the portals means there is no basis for a business driver for further developments.

2.18 The scoping papers were developed to support the initial creation of the portals. Since then, a number of papers have been developed proposing further development of some portals. However, lack of funding has meant that the proposals could not proceed. The ANAO observed that, at the time of the audit fieldwork, FaCS' portals were in a static phase with no further developments 'on the table'. The ANAO also noted that further development of the portals could only occur if additional funding were provided. There was no indication that such funding would be available. The ANAO noted that, at the commencement of fieldwork, there were no staffing resources allocated to maintaining the Families portal.

2.19 The ANAO found that FaCS did not have an agreed development plan for the portals. The department, in now proposing a framework for the operation of the portals, also has the opportunity to consider the relationships between the three portals, and the future development of those portals. In particular, it has the opportunity to consider whether to improve the portals by:

- extending portal links to all levels of government;
- customising search responses to the enquirer, for example by first displaying search results relevant to the enquirer's geographic region; and
- engaging the client by allowing site users to enter events on to the site, and to discuss matters of interest in a similar manner to *The source* website feature 'Talk It Up'.

2.20 In November 2003, FaCS advised the ANAO that:

The functionality to return search results ordered in some way such as geographically, or by a demographic characteristic is one of the points noted by NOIE as expected of a 'mature' portal. This level of functionality was never expected of first stage portals. To date the Families portal has been developed to the initial 'thin' stage only.¹⁹ However, the Families portal does have a 'Life Events' presentation of its content on the homepage.

Internal audit

2.21 The ANAO noted that some ICT aspects of FaCS' operations were included within the internal audit program. A potential audit of FaCS'

¹⁹ The ANAO notes that FaCS made a similar comment about the Youth portal.

portals and FaCS' use of the Internet was included in a group of possible audits. However, the group was the 37th potential audit in a list of 57 presented to the RAAC in March 2003. It was expected that funding would allow 23 audits to be undertaken. Hence, early action on the audit was unlikely.

2.22 The July 2003 submission to the Executive Board which proposed developing a framework for governance of the portals also recommended including an evaluation of the framework in the FaCS internal audit program for 2004–05.

Recommendation No.1

2.23 The ANAO recommends that FaCS:

- (a) develop an appropriate framework for the governance and operation of the portals;
- (b) examine the business case for further development of the portals, including potential benefits to FaCS; and
- (c) include FaCS' use of the Internet and portals in its future Internal Audit program.

FaCS response.

2.24 (a) Agreed. FaCS is currently developing a framework for the governance and operation of the portals.

2.25 (b) Agreed. The portal governance framework will include a requirement that Portal Owners develop annual business cases for further development of the portals.

2.26 (c) Agreed. As noted in the audit report, the current audit work program includes an audit on this topic. The priority of this audit will be reviewed on a regular basis.

3. Measuring Efficiency and Effectiveness

This chapter considers whether FaCS appropriately measures and/or assesses the efficiency and effectiveness of its portals.

Efficiency and effectiveness

3.1 'Effectiveness' means the achievement of the objectives or other intended effects of activities.²⁰ A program can be considered to be effective if it accomplishes the objectives the program set out to achieve. Effectiveness is basically about delivering the 'right' results.

3.2 'Efficiency' means the use of financial, human, physical and information resources such that output is maximised for any given set of resource inputs, or input is minimised for any given quantity and quality of output.²¹ Efficiency can be defined as the competency with which individuals or organisations accomplish their objectives. It can also be considered as the ratio between benefits achieved and the resources used in developing and delivering the project or program, otherwise known as Return on Investment. Measuring efficiency is an important part of an organisation's ability to assess its performance against its objectives. It creates an environment of responsible resource allocation and management; and allows the organisation to develop and support sound business practices.²²

3.3 This audit examined both effectiveness: that is, is FaCS measuring whether the portals achieve their objectives; and efficiency: that is, does FaCS measure, and/or assess the cost of each portal and the benefits achieved.

3.4 The ANAO considered whether objectives had been set for the FaCS' portals, either by FaCS or by the Government, and whether FaCS had monitored its performance against those objectives. In particular, the ANAO assessed whether FaCS had:

- an approved business case for the initial development of the portals;

²⁰ Certified Practising Accountants Australia, Members Handbook December 2002, AUS806 Performance Auditing.

²¹ *ibid.*

²² ANAO Report No.33 2002–03, *Management of e-Business in the Department of Education, Science and Training.*

- included objectives and performance measurement targets in the business case;
- established a process of ongoing evaluation and improvement of the portals and *The source* website;
- identified and tracked the costs and benefits of developing and maintaining the portals and *The source* website; and
- effectively marketed the portals and *The source*.

Measurement of efficiency and effectiveness at FaCS

Business case

3.5 The ANAO sought from FaCS information on the rationale for developing the portals, that is, a credible business case for the investment decision. A number of issues would be expected to be addressed in a business case, including:

- an estimate of the costs and benefits, including how it is to be funded;
- the objective of the proposal and an indication of how meeting the objective will be measured and/or assessed;
- an evaluation methodology to determine the success or otherwise of the proposal;
- an identification and analysis of the risks involved in the proposal; and
- a statement of the proposed controls for the project, including security controls.

3.6 The ANAO found few of these issues addressed in the documents FaCS supplied to the ANAO in relation to the development of its portals.

3.7 The only rationale recorded for developing the portals was that the Government had decided to implement a customer-focused portals network. Given that no additional funding was provided to agencies to implement the Government's decision, FaCS proposed that initial development would 'aim to meet the minimum requirements as outlined in the Government decision of November 2000'.²³ In November 2003, FaCS advised the ANAO that:

²³ Families Portal Scoping Paper.

It should be noted that up to at least the commencement of the audit fieldwork in April 2003, the Families portal had been focussed on intensive preliminary site development and redevelopment albeit in a context of scarce resources. Task priority in this environment was given to basic system development and content identification issues.

3.8 The documents for the Families and Community portals described the scope, objectives, target clientele, and estimated the costs of the portals. No benefits for FaCS were identified in the documents, other than compliance with Government policy. The NOIE *GovernmentOnline Progress Report* of December 2000 gave the rationale for portals as 'to enable people to interact online with the Government, without needing to understand how Government is structured'. No specific benefits for agencies were identified. The document also stated that 'These portals will not replace the existing set of agency-based and subject-oriented websites'. In November 2003, FaCS advised the ANAO that:

Portals were therefore expected to impose additional costs on FaCS and, while offering some service to customers who indirectly accessed them, would do little for the agency's ability to meet its overall priorities and the needs of its broader customer base. In other words, it is not clear to FaCS that the portals represent value for money.

3.9 The absence of clearly defined benefits to FaCS or to FaCS' customers has resulted in the lack of a business driver as a basis on which to further develop the portals.

Objectives and targets

3.10 In its *GovernmentOnline Progress Report* of December 2000, NOIE advised that it expected a mature portal would:

- have its own unique web presence;
- provide a single point of access to a range of resources that are developed and maintained by many government agencies, including:
 - online information;
 - information about offline resources, such as the nearest relevant office;
 - online transactional services; and
 - integrated services covering several agencies and/or levels of government; and
- provide resources from all tiers of government;
- provide discovery of a comprehensive array of information and services that relate to the portal theme;

- provide customer focussed discovery processes that suit the customer group, eg a Families portal may have life events, such as birth of a baby and going to school;
- provide customisable features to enable users to personalise the portal around what is important to them; and
- be developed and managed by a consortium of agencies that have primary responsibility for the delivery of services to the portal audience.²⁴

3.11 The FaCS scoping papers for the Families and Community portals each listed identical objectives. The portals aimed to:

- meet the Government Online Strategy's requirements;
- meet users' needs and expectations;
- be widely publicised and easy to locate;
- be intuitive and easy to use; and
- require minimal additional work and resources for the Consortium agencies.

3.12 The objectives of *The source* website are stated in its monthly report to the relevant Branch head to be:

Objective — *The source* is funded by the Commonwealth Government to provide:

- information on Government initiatives and services that are relevant and interesting to young Australians;
- a web site that's accessible to all young Australians; and
- a vehicle for young people to have their voice heard by Government.

Objective — measure, update, report and evolve the source in order to:

- find out what young Australian's changing needs are via interactive research and feedback mechanisms such as the 'online poll', 'Talk It Up', and 'have a say';
- provide new content to meet the changing needs, inform and empower young Australian's life choices;
- demonstrate that the Australian Government is listening and interested in what young Australian's say and feel by interacting in 'Talk It Up' and reporting new youth issues to the Minister;

²⁴ GovernmentOnline Progress Report December 2000, p.6.

- measure the performance of *The source* editorial and promotional activities; and
- report popular sections of *The source*.

3.13 The ANAO asked FaCS for the key performance indicators by which it determined whether the portals meet the stated objectives. FaCS advised the ANAO that there are no such indicators. In the absence of such performance indicators, it is clearly difficult to say whether any of the portals are meeting their objectives.

3.14 The ANAO notes that many of the above objectives are subjective, for example 'meet users' needs and expectations', and could only be assessed by surveying users of the service. This is not done. Others, for example 'customer-focussed discovery processes' and 'enable users to personalise the portal' are either not being met or are only met to a limited extent. Some objectives, for example 'provide discovery of a comprehensive array of information and services that relate to the portal theme' are being met to a large extent, as measured by the number of links to other websites provided on the portal site.

3.15 In November 2003, FaCS advised the ANAO:

User testing of the Families portal site was conducted in September 2001 immediately following its initial release. The redeveloped version to the site has been a focus of user testing by Tactics Consulting, as part of a NOIE initiative aimed at developing portal manager skills in user testing which was conducted between June and September 2003.

Ongoing evaluation and improvement

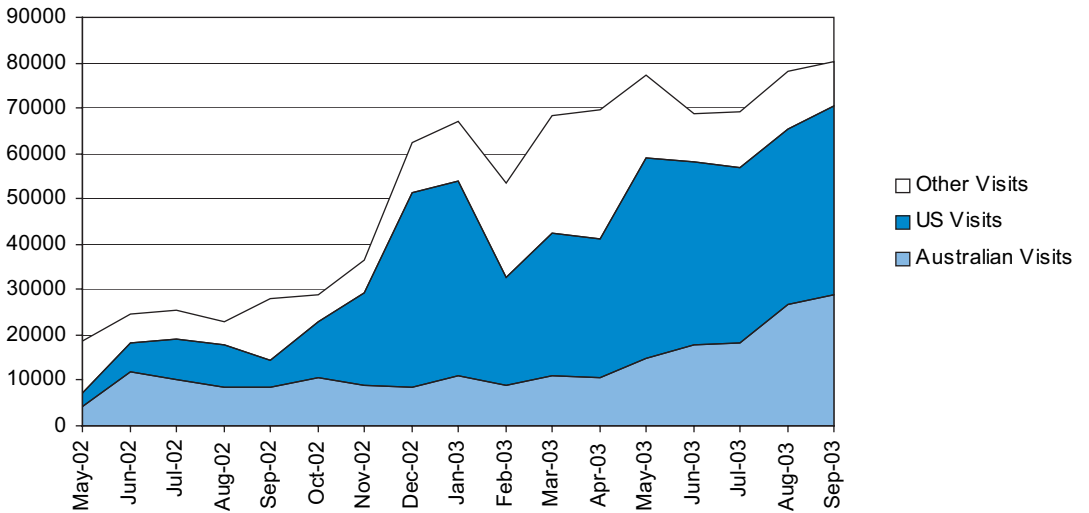
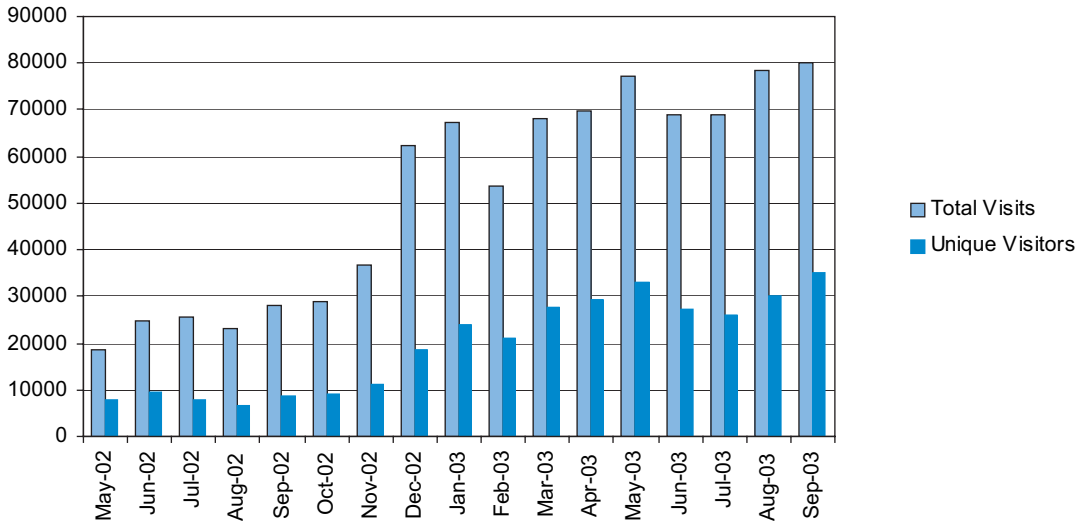
3.16 Ongoing evaluation of effectiveness and efficiency, and identification of improvement opportunities, are basic management tasks expected for any government activity.

3.17 The performance of the Community portal and *The source* website are monitored on an ongoing basis by the portal managers. Each of the latter produces monthly reports on the performance of the sites. Included in the reports are statistics on numbers of visits to the sites and on the ranking of the sites compared with other government sites. This monitoring is undertaken by a private organisation as part of an overall website monitoring program. The results are provided to FaCS and other organisations for a fee. The ANAO noted that the January 2003 monthly report for the Community portal recorded that 'the ...[monitoring] contract will expire in April ... we cannot afford to pay for it'.

3.18 The Community portal report consists of technical matters, and issues of importance to FaCS (such as liaison with internal and external

organisations), as well as including visitor numbers. *The source* report includes the number of visits to the site (Figure 3.1) and the number of comments posted on 'Talk It Up'. The latter is a forum where registered users are allowed to put their views and discuss topics of interest with other registered users. 'Talk It Up' also provides useful feedback to both FaCS, on the content and functioning of the website, and to the Government, on the views of young Australians.

Figure 3.1
The source Visitor Numbers



Source: Information supplied by FaCS.

3.19 FaCS has also undertaken evaluations of the adherence of the portals to technical requirements, such as accessibility by disadvantaged persons, adherence to the privacy principles, and inclusion of a disclaimer

of responsibility for completeness of, accuracy of, or reliance on, the material on the site.

3.20 A June 2002 evaluation of the Community portal considered a range of performance issues for the portal including: the number of links to other sites; the number of other sites linking to the portal; use of the feedback mechanism; and the number of visitors to the site. The document also proposed a draft evaluation strategy for the portal, which has not progressed beyond the draft stage. No further evaluation of the Community portal has been done.

3.21 Similar monitoring of the Families portal has not been undertaken. At the time of the audit, the Youth portal was not being updated or monitored.

3.22 In November 2003, FaCS advised the ANAO that:

Between June and September 2003, CMU [the Communications and Media Unit of the Ministerial and Communications Branch] engaged the services of a contractor to work on the development of a web metrics, analysis and reporting framework for a range of FaCS' websites including the three portals and to advise on measurement requirements for the portals. A final report is expected within the next few weeks.

3.23 However, FaCS also stated that:

defining and measuring success is costly and may not rate as a priority.

3.24 The ANAO concluded that evaluation of the performance of the FaCS' portals was inconsistent and unstructured.

3.25 In late 2002, NOIE commissioned consultants to undertake an evaluation of the Australian Government portals framework. FaCS, along with other agencies managing portals, provided information and views to the consultants. The consultants' report had not been finalised by NOIE at the time of printing this audit report.

Tracking costs of resources

3.26 The ANAO asked FaCS to provide a statement of the ongoing costs of the portals and of *The source*. FaCS provided costs as detailed in Figure 3.2 below. However, there was no evidence that costs were being monitored to determine efficiency or effectiveness of the portals. There was also no attempt to identify whether any savings, for example to other service delivery mechanisms, accrued from the use of the portals and/or *The source*.

Figure 3.2
Estimated Portal Resources

Year	Families ^a	Community ^a	Youth	<i>The source</i>
2000–01	\$180 588	\$186 000	1.5 staff	2 staff ^b
2001–02	\$293 612	\$149 973	\$243 343 marketing Plus 2 staff	\$94 702 marketing Plus 2 staff
2002–03	\$108 020	\$149 973	\$88 039 ^c zero staff allocation	\$95 000 marketing \$152 862 salaries ^d

Notes:

^a The Families and Community costs include staff, between 1 and 2 in each case. The Families and Community portals had a small marketing budget. However, it is not clear how much was spent on marketing for those two portals.

^b Following the transfer of responsibility for youth to FaCS in November 2001 earlier data on costs is not available.

^c Administered funds were used to pay for a contractor. No funds provided for marketing.

^d Approximately two staff years spread amongst several staff.

Source: Information provided by FaCS.

Marketing

3.27 Creating a website on the Internet does not automatically guarantee its discovery, and access, by the target audience. The site must be discoverable by search engines such as Google and Yahoo. If it is to be effective in reaching the target audience, the site should also be marketed to relevant clients and to the relevant community or business groups.

3.28 The ANAO used major search engines (Google and Yahoo) to search Australian sites for key words that would be expected to return the portals and *The source* (for example: families, community, youth). In all cases, the search resulted in the appropriate website being returned within the first 20 results. Accordingly, the ANAO considers the sites appropriately discoverable by the major search engines.

3.29 The ANAO found that marketing had taken place for all the websites. However, the Families and the Community portals had limited funding and hence limited marketing. Both produced offline media and advertising products (for example mouse mats and bookmarks) for distribution at relevant events and to libraries. The Youth portal and *The source* had significantly greater funding, albeit that funding was being reduced. Funding for the youth websites was also supplemented by funds from other government agencies for which FaCS created micro sites. The greater funding allowed *The source* to be advertised in youth magazines and on buses, as well as to pay for search engine optimisation.

3.30 The movement, in November 2002, of responsibility for oversight of development of the portals to MCB has provided an opportunity for FaCS to reconsider its marketing strategies for its portals. This branch has particular responsibility and expertise for external communications and was already responsible for a number of other FaCS websites. Previously, this branch had assisted with the development of communications strategies and the development of products for marketing of the Community and Families portals, under instructions and funding from the relevant FaCS branch. Now, with consolidated responsibility for all of the portals, MCB is in a position to coordinate the development and marketing of all of the portals as part of a broader FaCS *eCommunications Strategic Framework*.

Audit conclusion

3.31 The ANAO concluded that the business cases developed for the Community and Families portals did not provide a sound basis for evaluating whether the portals had met their objectives, particularly as performance measures and indicators were not included.

3.32 The ANAO concluded that FaCS viewed the portals as being of some benefit to direct users but not representing value for money overall in assisting the agency to meet the needs of its broader customer base. No analysis of benefits has been conducted. The ANAO found that both the Community portal and *The source* have monthly reports on performance. However, the monitoring and evaluation of the performance of the portals lacks structure and consistency.

3.33 The ANAO found that marketing does take place for *The source*. The growth in visitor numbers is an indication of its success. On the other hand, marketing of the Families and Community portals has been limited with no indication of the success or otherwise of the marketing strategy. This situation has led to a variety of marketing strategies with no agency-wide policy framework in place.

Recommendation No.2

3.34 The ANAO recommends that FaCS examine how it might:

- (a) identify means by which the efficiency and effectiveness of the portals and *The source* can be measured and/or assessed; and
- (b) develop appropriate marketing policies and marketing strategies for the portals to promote their use by all stakeholders.

FaCS response.

3.35 (a) Agreed. The portal governance framework will include a requirement for a single measurement and monitoring strategy for each of the FaCS' portals. The strategy will include identification of objectives for each portal and alignment of monitoring against those objectives.

3.36 FaCS has commenced work on developing a standard measurement format for the portals.

3.37 (b) Agreed. FaCS recognises the importance of marketing the portals among target audiences. Marketing will be based on promotion to key stakeholders, such as client intermediaries and peak bodies, and cross-promotion with existing programmes.

4. Management and Control

This chapter examines aspects of the operational policies and procedures that FaCS has in place. Considered in this chapter are the quality, currency, security and archival storage of its portal and website information. The chapter also examines privacy and legal aspects, together with the use of metadata and extraction of information from the NOIE repository.

Information quality and currency

Background

4.1 The increasing awareness of the ability of, and need for, the public to electronically access government information highlights the importance for that information to be of the highest quality. It is important that the portals provide information that is accurate, complete, timely and current, to serve the changing needs of the community, and to make sure that correct government information is available to all citizens.

4.2 Importantly, a citizen accessing government services through the Internet is quickly aware whether or not the system is working, and whether it is delivering the required information. This situation raises the public's expectations of government service delivery. Attention to quality and currency of information helps to provide assurance that both the Government and citizens get value for money, and maintains customer confidence.

4.3 In examining the quality of the information made available through the portals, the ANAO first looked for evidence of a culture of quality in FaCS. This was evidenced through the existence of an emphasis in agency documentation, such as in FaCS' Service Charter, on producing quality products. The ANAO then considered whether processes, procedures, and an ongoing evaluation and improvement methodology were in place to be confident that appropriate quality standards for the content and management of each of the FaCS' portals existed. This included documentation relating to change control methodologies and quality assurance processes.

4.4 During the audit, the ANAO viewed each portal and *The source* at regular intervals over several months to establish the frequency of changes to the portals, and to determine whether the information provided was relevant and current.

Quality at FaCS

4.5 The ANAO found that FaCS does not have a specific document addressing quality (for example, service, processes, information provision) for the department as a whole. However, it does have documents that address aspects of quality, including its service charter. At the time of audit fieldwork, FaCS was undergoing a review of its 2000–2003 Service Charter. The then current charter, displayed on the FaCS main website, outlined the standard of service that could be expected from FaCS. The charter also described the department's services; and its standards of conduct with regards to accuracy, confidentiality, and professionalism. The charter also provided for client feedback on any aspect of the charter, FaCS services, or other issues for complaint.

4.6 A major consideration in ensuring the quality of information provided on portals and websites is the management of changes to these facilities. Arguably, websites as a whole, and portals in particular, can be considered to have two main functions: firstly, to provide relevant and timely information; and secondly, to provide links to other subject related sites. The ANAO, therefore, examined the policies and guidelines for making changes to the portals to deliver those two functions.

4.7 FaCS has a number of guidelines for managing changes to Internet websites, including *FaCS Internet Change Control Guidelines*. These guidelines cover issues such as Internet change requests, assessment of changes, design and development, and testing and implementation. The Guidelines also outline the responsibilities of people involved in the Internet change process. They are directed towards those changes carried out by the FaCS Internet Team based in MCB for websites for which MCB has responsibility. However, the Guidelines are not applied to the portals and *The source*. Individual portal managers at FaCS have delegated responsibility, within approved policy guidelines, for entering content and links to content on the portals, but with no independent check for accuracy and/or errors. In November 2003, FaCS advised the ANAO that:

The Families portal includes an automated change management control system (that can be configured to include approval from more senior officers). Up to December 2002 the portal was being intensively developed. To facilitate this development, requirements for senior officer approval within the change management guidelines were relaxed. The portal manager had responsibility for content changes and the addition of new government sites within the content policy framework agreed at Branch Manager level. The Families portal linking policy is restricted to Federal and State Government sites to minimise some potential quality control issues.

4.8 The ANAO identified various documents detailing operational processes directed to portal managers. Examples are:

- the Community portal content manager was provided with guidelines on a policy for providing links to other sites. The policy provides for automatic approval for linking to government agencies by the content manager. Links to other sites to be approved by the content manager according to existing risk analysis guidelines, and high-risk sites to be approved at Director level; and
- standards for Internet sites, and for placing new or amended content on Internet sites, were available on the FaCS' Intranet. The procedures required changes to be managed through the MCB. However, the portals and *The source* did not adhere to those standards as the 'owners' managed and updated content.

4.9 As noted earlier, *The source* has a feature, 'Talk It Up', where registered users are allowed to enter their views on a wide range of topics onto the website. Views entered by users are subject to post entry moderation by the FaCS editor of *The source*, assisted by selected non-FaCS users of the feature. 'Talk It Up' has clear rules about what is allowed, and not allowed, to be placed on the site. Users breaking the rules have their privileges withdrawn.

4.10 FaCS also has a *Website Compliance Checklist* that covers issues such as: privacy, security, accessibility, legal approval, record-keeping and metadata, electronic publishing and online information service obligations (OISOs). The ANAO sought a completed *Website Compliance Checklist* for each of the portals and *The source*. The checklist had already been completed for the Community portal. The checklist was completed for *The source* and the Families portal, following the ANAO's request.²⁵

Audit findings

4.11 The ANAO found that quality assurance processes were limited to written linking policies for the content links placed on FaCS' portals.

4.12 The ANAO examined each portal and *The source* regularly from January 2003 through to July 2003. The ANAO found that the Youth portal was not updated during that time. It was withdrawn in August 2003. The Families portal only had limited updates for several months, that is minor changes were made to date dependent events mentioned on the site to eliminate outdated information. Links to other websites were not updated.

²⁵ The Youth portal was withdrawn in August 2003.

In contrast, *The source* and the Community portal remained essentially current throughout the period of the audit.

Recommendation No.3

4.13 The ANAO recommends that FaCS:

- (a) develop a quality assurance process for entry of content on FaCS' portals and websites; and
- (b) regularly review all its portals and websites to provide assurance that information presented is current and relevant.

FaCS response

4.14 (a) Agreed. A quality assurance process, including quality standards for, and appropriate approval of, content, will be included in the portal governance framework.

4.15 (b) Agreed. The quality assurance process developed for the portal governance framework will include periodic quality checking of content.

4.16 Quality assurance for other FaCS websites will be addressed as part of a broader content management strategy with the eCommunications Framework.

Security

4.17 The ANAO considered FaCS' approach to security of its portals. In particular, the ANAO examined whether FaCS reviewed the security threats and risks related to the portals, and whether it acted on the recommendations of any such reviews.

4.18 In January 2002, FaCS engaged external consultants with appropriate expertise to perform a security threat and risk assessment, as well as a NOIE checklist review, of several FaCS websites, including the Families and Community portals. The Youth portal and *The source* were not included as they had yet to be transferred to FaCS from the then Department of Education, Training and Youth Affairs.

4.19 In March 2002, the consultants provided a *Threat Risk Assessment* and a *Web Site Security Gap Analysis*. From these documents, FaCS developed a *Security Action Plan* to address the identified risks. The Plan included a date by which each risk should be addressed, and identified the group that was responsible for action on the risk. A number of 'high' and 'significant' risks were identified.

4.20 The ANAO sought to identify what actions had been taken against the *Security Action Plan* and who, if anyone, was responsible for ensuring

that action had been completed. During audit fieldwork, the ANAO was informed that no specific action had been taken against any of the items identified, although some had been addressed as opportunities arose. The ANAO was also informed that no position, or group, had overall responsibility for ensuring that action was taken.

4.21 However, in November 2003, FaCS advised the ANAO that:

Progress has been made against the Security Action Plan, notably:

- the hardening builds for the Windows 2000 servers, currently in progress;
- the formal rack and cabinet mounting of all servers has been completed;
- the piloting of an IDS and Huntsman auditing software is underway;
- the development of the incident reporting system is being undertaken by the ASA; and
- the backup policy of backing up source data within the Homeworld Centre has superseded the requirement to backup web servers.

In addition, all remaining action items have been reviewed with effort and costs determined. Progress is dependent upon funding and an internal funding proposal is currently being prepared as part of a broader security review of the FaCS network.

4.22 The ANAO understands funding was provided in the 2002–2003 financial year to undertake a second similar threat and risk analysis. This did not proceed, due to actions not being completed from the first analysis.

4.23 ANAO notes that the March 2002 threat and risk analysis did not include penetration testing of FaCS Internet websites. Penetration testing²⁶ is an important practical test of the security of Internet websites.

4.24 The ANAO noted that Business Information Solutions Branch included a position of Director, IT Security. The Branch Functional Directory states that the IT Security Section sets strategic direction for FaCS IT security and is responsible for: IT security advice; IT security policies and procedures; IT security and new projects; IT security audit; and compliance reviews of IT security. In November 2003, FaCS advised the ANAO that:

²⁶ Penetration testing is a security-oriented probing of a computer system or network, from an external source via the Internet, to identify vulnerabilities that an attacker could exploit.

The section is able to enforce security policies and practices. Furthermore the role of the IT Security Director is currently being reviewed.

The ANAO was also informed that:

...overall responsibility [for ICT security] remains with the ICTC.

4.25 The ICTC is an appropriate committee to oversee ICT security. However, the ANAO noted that the ICTC Terms of Reference do not specifically address ICT security.

Audit findings

4.26 The ANAO found that, while a security threat and risk analysis of FaCS' portals had been undertaken using consultants in March 2002, specific action to address the risks identified took some time and was still incomplete in November 2003, some 20 months after the initial threat and risk analysis report.

Recommendation No.4

4.27 The ANAO recommends that FaCS:

- (a) identify a position, or body, to take responsibility for ensuring recommendations resulting from security threat and risk analyses are properly acted on;
- (b) promptly address the risks identified in the March 2002 consultants' report and the subsequent *Security Action Plan*;
- (c) include penetration testing of FaCS websites and portals in future threat and risk assessments; and
- (d) conduct a further review of security for its websites and include *The source* in that review.

FaCS response

4.28 (a) Agreed. The IT Security Management Section is responsible for ensuring that recommendations resulting from the threat and risk analyses are properly acted upon. Recruitment action is being undertaken which will allow this role to be carried out.

4.29 (b) Agreed. This will occur through the additional staff being recruited into IT Security Management, thereby ensuring sufficient resources to address the risks identified in the reports.

4.30 (c) Agreed. FaCS will include penetration testing of portals in biennial threat and risk assessments for the portals.

4.31 (d) Agreed. The portal governance framework will include a requirement for biennial threat and risk assessments for the portals.

Archival storage

4.32 The ANAO considered whether FaCS was providing adequate assurance that electronic records and documents for the portals and *The source* website were being appropriately archived according to the National Archives of Australia (NAA) e-Permanence policy and guidelines, and the relevant legislation (the *Commonwealth Archives Act 1983*).

4.33 The NAA, in addition to its role as custodian of Australian Government records, provides advice to Australian Government agencies on record-keeping activities, including electronic records. It also has a primary role in the development and promotion of the Australian Government Locator Service (AGLS) metadata standards discussed later in paragraph 4.56.

4.34 The NAA has developed guidelines for keeping electronic records, including records of web-based activity, termed e-Permanence. e-Permanence provides the tools so that electronic information can be captured in a way that allows it to be utilised, shared, protected and preserved. e-Permanence comprises a comprehensive range of policies, standards and guidelines that help agencies to identify their electronic record-keeping requirements and to determine the most effective and efficient way of documenting their transactions with the public. e-Permanence also helps agencies to review and monitor their record-keeping capability and to meet their mandated government online requirements for e-commerce and web-based activities.

Website record-keeping at FaCS

4.35 Changes to the Families and Community portals are made through the computer system Lotus Notes. In the case of the Families portal, Lotus Notes is set to automatically archive the replaced information. For the Community portal, the archiving is not automatic but is done manually. These archives are not available to users to alter. However, they are not totally in an unchangeable format. Privileged users of FaCS' Lotus Notes system are able to access and change the archived records. While this system may not fully comply with the requirements of e-Permanence, it is a reasonable interim compromise until a permanent solution is installed.

4.36 At the time of audit fieldwork, the Youth portal was not being updated.

4.37 Major changes to *The source* are recorded in a word document but, in common with the portals, no documented process of archiving and record-keeping is in place.

4.38 During the audit, FaCS completed a tender for an Electronic Documents Management System (EDMS) that would enable the department's electronic records to be appropriately archived. However, the ANAO was advised that web pages and portal pages would not be included until late in the three-year time line of the EDMS project, following higher priority records.

4.39 The ANAO concluded that FaCS lacked documented policies and procedures for retaining records of changes to portals and *The source*. While FaCS does keep records of changes to its portals and *The source*, FaCS' retention of records in electronic form does not fully meet the legislative requirements of the *Archives Act 1983*, in relation to alteration of Commonwealth records.²⁷ The difficulty is in demonstrating that the electronic record has not been altered if the capacity to alter the record is available.

4.40 A recent ANAO audit on record-keeping in large Australian Government organisations,²⁸ including FaCS, made a number of recommendations to the agencies reviewed regarding electronic records. In that audit report, the ANAO concluded that the audited organisations met Government policies, legislation and accepted standards and principles to varying degrees. Although all organisations had taken steps to improve their record-keeping frameworks and practices, their policies and procedures were at different stages of development.

4.41 The ANAO also concluded in that report that there was a significant risk of the non-capture and unauthorised disposal of records because organisations had not placed sufficient attention on the risks associated with record-keeping. The audit also found that limited controls were in place over electronic records and that staff awareness of the organisations' record-keeping requirements, including those for web-based activity was low.

4.42 FaCS' response to this audit report was that it was seeking to improve its record-keeping policies, systems and procedures in line with the recommendations in the report. Those recommendations are applicable

²⁷ Archives Act 1983, Section 24 Disposal, destruction etc of Commonwealth records, subsection (5).

²⁸ ANAO Audit Report No.7 2003-04, *Recordkeeping in Large Commonwealth Organisations*, Canberra.

to the electronic records of the portals and *The source* and are not repeated in this audit report.²⁹

Archiving and record-keeping conclusion

4.43 The ANAO concluded that, while FaCS does not currently fully comply with the current NAA electronic record-keeping policies and the *Archives Act 1983*, it is working towards implementing appropriate systems that will allow it to comply with these legislative requirements.

Privacy and legal

4.44 The ANAO Better Practice Guide *Internet Delivery Decisions* states 'If your agency intends to provide services and information online, you should conduct a legal risk analysis ...'. The ANAO considered whether privacy and legal aspects of the FaCS' portals and *The source* had been the subject of an analysis of the risks involved in providing information on the sites. In particular, the ANAO considered whether FaCS had obtained legal advice on its use of copyright notices, disclaimers, and adhered to the Federal Privacy Commissioner's Guidelines for Government websites.

FaCS' situation

4.45 In June 2002, emails promoting a competition were sent to email addresses of contestants entering a previous competition held on *The source*. Following complaints, the Office of the Federal Privacy Commissioner investigated and concluded there appeared to have been a breach of the *Information Privacy Principle 10.1*.³⁰

4.46 The Privacy Commissioner then conducted an audit of *The source* and raised a number of issues. The issues included such matters as: the website did not have one consistent privacy statement; *The source* privacy

²⁹ Recommendation numbers 1, 2, 4, 5, and 6 are particularly relevant to electronic records.

³⁰ Information Privacy Principle 10.1 states:

A record-keeper who has possession or control of a record that contains personal information that was obtained for a particular purpose shall not use the information for any other purpose unless:

- (a) the individual concerned has consented to use of the information for that other purpose;
- (b) the record-keeper believes on reasonable grounds that use of the information for that other purpose is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or another person;
- (c) use of the information for that other purpose is required or authorised by or under law;
- (d) use of the information for that other purpose is reasonably necessary for enforcement of the criminal law or of a law imposing a pecuniary penalty, or for the protection of the public revenue; or
- (e) the purpose for which the information is used is directly related to the purpose for which the information was obtained.

statement did not set out the purpose for which personal information collected would be used; *The source's* privacy statement did not warn users of the risk of transmitting data across the Internet, nor did it provide an alternative means of communication for users who did not wish to use unencrypted email; and the website provided some personal details of individuals. Subsequently, FaCS satisfactorily addressed all these issues.

4.47 Following that incident, FaCS' Administrative Law Unit conducted a review of a number of FaCS' websites, including the three portals and *The source*, against the Federal Privacy Commissioner's guidelines, and ensured compliance with the guidelines.

4.48 FaCS has a checklist for each website 'owner' to complete. The checklist addresses privacy, security, accessibility, and legal approvals, amongst other issues. When the ANAO requested copies of the checklists for the portals and *The source* in June 2003, only the checklist for the Community portal had been completed. Checklists for *The source* and the Families portal were subsequently completed and provided to the ANAO.

4.49 The three portals and *The source* contain FaCS' standard disclaimer and copyright notices, with one minor variation. That variation is very similar to the standard notice and provides adequate coverage. FaCS was unable to provide evidence of a legal risk analysis or specific legal advice given for each portal and *The source*. The ANAO was provided with an example of general advice to all website 'owners' that addressed some legal issues.

4.50 As mentioned earlier (paragraph 4.9) *The source* feature 'Talk It Up' allows registered participants to enter views on to the website. The views are post-moderated by FaCS staff and by selected registered participants, that is, non-FaCS persons. There would appear to be some risk to FaCS that the information placed on the site may compromise FaCS. At the time of audit fieldwork, FaCS had not reviewed the legal implications of this feature. A legally based threat and risk analysis of *The source* was subsequently commenced in November 2003.

Privacy and legal conclusion

4.51 The ANAO concluded that FaCS had addressed privacy, copyright, and disclaimers for each of the websites examined, although a specific legal risk analysis for each site had not been completed. The ANAO also found that the legal risks of a feature of *The source*, 'Talk It Up', had not been reviewed. 'Talk It Up' is a significant feature of *The source* for engaging the target audience. FaCS may wish to implement a similar feature on other websites. Therefore, the ANAO suggests that FaCS

consider undertaking an analysis of the threats and risks to which it may be exposed by the adoption of this feature.

Recommendation No.5

4.52 The ANAO recommends that FaCS:

- (a) institute appropriate arrangements for all its websites to have a completed compliance checklist; and
- (b) complete a legal threat and risk analysis for all websites.

FaCS response

4.53 (a) Agreed. The portal governance framework will include a requirement for a biennial review of privacy and legal compliance.

4.54 (b) Agreed. The portal governance framework will include a requirement for legal threat and risk analyses for the portals.

4.55 The implementation of threat and risk analyses for other websites will be included in the FaCS eCommunications Framework.

FaCS' use of Metadata and the NOIE repository

4.56 The ANAO considered whether FaCS was effectively managing and meeting the metadata standards applicable to the portals. In particular, the ANAO considered whether the portals met the AGLS metadata standards promoted by the NAA.

4.57 Metadata is structured information that describes and allows users to find, manage, control and understand other information. In a web environment metadata acts like a virtual library catalogue—it helps government search engines to accurately and efficiently identify and retrieve web-based resources in response to search requests. For metadata to be most useful, it is important that it is applied consistently by agencies across the Australian Government.³¹

4.58 Metadata is sometimes defined literally as 'data about data', but the term is normally understood to mean structured data about resources that can be used to help support a wide range of operations. These might include, for example, resource description and discovery, the management of information resources, and their long-term preservation.

4.59 In the case of FaCS' portals, metadata is used in two ways. The first is that metadata is used to describe the main aspects of the portal/website,

³¹ *Interoperability Technical Framework for the Federal Government*, NOIE, June 2003.

including keywords, that can be used by search engines to present the site as a potential solution to a search. The second use of metadata by portals and *The source* is to identify related websites and to place links to those websites on the portals/*The source*.

4.60 There are many metadata standards worldwide. The standard most in use in the Australian Government is the AGLS standard, primarily developed under the sponsorship of the NAA. This standard is based on an international standard called the Dublin Core Standard.³²

4.61 NOIE is responsible for the Federal Metadata Repository. Each week NOIE harvests metadata information from over 700 Australian Government sites, and verifies that the data comply with five mandatory elements. The check is for presence of these elements not for the quality of the content. The information is then placed in the repository so that it is available for agencies to download. Using the metadata, agencies are able to extract from the repository links to government agencies relevant to the client or customer group being targeted.

FaCS use of Metadata

4.62 The ANAO assessed the three portals and *The source* against three mandatory and five conditional mandatory elements as defined in the *AGLS Metadata Element Set*.³³ The ANAO concluded that the sites included all eight of these elements.

4.63 The Families portal is the only one of the three portals and *The source* website which retrieves information from the NOIE repository to install links from the portal to other websites. The Community portal does not use the repository as its structure is not compatible with repository metadata downloads. The Youth portal, which at the time of the audit was inactive, and *The source* site were being populated with links which did not use government standard (AGLS) metadata. Where the repository is not used, links must be discovered and installed individually.

4.64 The Families portal was experiencing difficulties with using the repository's metadata information. The main issue was that much of the data that FaCS was receiving in its downloads from the repository needed to be manually modified before it could be used on the public site. The initial expected outcome was that close to 5000 records would be available from the repository on a weekly basis for the portal to use. The actual initial figure was closer to 500 records. Subsequent downloads contained

³² Further information can be obtained from the Dublin Core website: <www.dublincore.org>.

³³ AGLS Metadata Element Set, National Archives of Australia, December 2002.

more records but many were of poor quality and deemed unusable without manual modification.

4.65 A progress report for a June 2002 meeting of the consortium of agencies involved in the Families portal recorded that ‘the filters previously used to extract only “families relevant” data from the federal repository have been removed. We now have (from 22 May 2002) over 6,000 records which are being ‘cleaned’ and enhanced for use in the Families portal. Two contractors have been employed to complete this work ...’ Up to January 2002, FaCS had only managed two successful downloads of information from the repository from a number of attempts. The two subsequent downloads in May and September 2002 required a high level of manual input before the information could be used on the public site.

4.66 FaCS advised the ANAO that it considered NOIE could do more to identify poor metadata on agency websites. NOIE advised the ANAO that it considered it was the responsibility of the agency identifying a website with poor metadata to liaise with the agency owning the website to improve their use of metadata.

4.67 Until late 2002, the NAA provided an AGLS accreditation service at no charge to agencies. That is an agency could ask the NAA to examine a website and identify where AGLS standards were not being met. The NAA accredited over 100 sites before discontinuing the service due to lack of funding and support.

4.68 The ANAO concluded that FaCS was using metadata appropriately on its own portals. The ANAO also found that FaCS was using the NOIE repository to add links to only one of its portals/websites. This use contributed only around 30 per cent of the links on that portal. However, considering the amount of manual input to repository records that the Families portal has needed to employ in using the NOIE repository, the ANAO makes no recommendation for extending extraction of links from the repository to other FaCS’ portals.



Canberra ACT
9 February 2004

P. J. Barrett
Auditor-General

Appendix

Appendix 1: FaCS' Response to the Audit Report in Full



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Dear Mr Meert

Thank you for providing the proposed audit report on *Management of Internet Portals at the Department of Family and Community Services* for our comment, pursuant to section 19 of the *Auditor-General Act 1997*.

FaCS' comments are as follows:

Agency response

FaCS welcomes the audit and its recommendations. A governance framework is currently being developed that will improve decision-making about resources and development, incorporate strategies for measuring the efficiency and effectiveness of the portals and provide Portal Owners with the tools to manage the portals effectively.

FaCS notes that all work associated with the portals, including the development and implementation of the governance framework, must be funded from existing agency resources. Improvement to the portals will therefore take place within the context of FaCS overall strategic direction and priorities.

FaCS also notes that the Portals are treated by FaCS as a referral service rather than one which would invite any substantial level of interaction with users. This is an important distinction between the FaCS portals and *The source* (which the report uses as a comparison site for the portals) and perhaps other government portals.

Recommendation No 1

(a) The ANAO recommends that FaCS develop an appropriate framework for the governance and operation of the portals.

Agreed. FaCS is currently developing a framework for the governance and operation of the portals.

(b) The ANAO recommends that FaCS examine the business case for further development of the portals, including potential benefits to FaCS.

Agreed. The portal governance framework will include a requirement that Portal Owners develop annual business cases for further development of the portals.

(c) The ANAO recommends that FaCS include FaCS's use of the Internet and portals in its future internal Audit program.

Agreed. As noted in the audit report, the current audit work program includes an audit on this topic. The priority of this audit will be reviewed on a regular basis.

Recommendation No 2

(a) The ANAO recommends that FaCS examine how it might identify means by which the efficiency and effectiveness of the portals and The source can be measured and/or assessed.

Agreed. The portal governance framework will include a requirement for a single measurement and monitoring strategy for each of the FaCS portals.

The strategy will include identification of objectives for each portal and alignment of monitoring against those objectives.

FaCS has commenced work on developing a standard measurement format for the portals.

(b) The ANAO recommends that FaCS examine how it might develop appropriate marketing policies and marketing strategies for the portals to promote their use by all stakeholders.

Agreed. FaCS recognises the importance of marketing the portals among target audiences. Marketing will be based on promotion to key stakeholders, such as client intermediaries and peak bodies, and cross-promotion with existing programmes.

Recommendation No 3

(a) The ANAO recommends that FaCS develop a quality assurance process for entry of content on FaCS portals and websites.

Agreed. A quality assurance process, including quality standards for and appropriate approval of content, will be included in the portal governance framework.

(b) The ANAO recommends that FaCS regularly review all its portals and websites to provide assurance that information presented is current and relevant.

Agreed. The quality assurance process developed for the portal governance framework will include periodic quality checking of content.

Quality assurance for other FaCS websites will be addressed as part of a broader content management strategy with the eCommunications Framework.

Recommendation No 4

(a) The ANAO recommends that FaCS identify a position, or body, to take responsibility for ensuring recommendations resulting from security threat and risk analyses are properly acted on.

Agreed. The IT Security Management Section is responsible for ensuring that recommendations resulting from the threat and risk analyses are properly acted upon. Recruitment action is being undertaken which will allow this role to be carried out.

(b) The ANAO recommends that FaCS promptly address the risks identified in the March 2002 consultant's report and the subsequent Security Action Plan.

Agreed. This will occur through the additional staff being recruited into IT Security Management, thereby ensuring sufficient resources to address the risks identified in the reports.

(c) The ANAO recommends that FaCS include penetration testing of FaCS websites and portals in future risk threat and risk assessments.

Agreed. FaCS will include penetration testing of portals in biennial threat and risk assessments for the portals.

(d) The ANAO recommends that FaCS conduct a further review of security for its websites and include The source in that review.

Agreed. The portal governance framework will include a requirement for biennial threat and risk assessments for the portals.

Recommendation No 5

(a) The ANAO recommends that FaCS institute appropriate arrangements for all its websites to have a completed compliance checklist.

Agreed. The portal governance framework will include a requirement for a biennial review of privacy and legal compliance.

(b) The ANAO recommends that FaCS complete a legal threat and risk analysis for all websites.

Agreed. The portal governance framework will include a requirement for legal threat and risk analyses for the portals.

The implementation of threat and risk analyses for other websites will be included in the FaCS eCommunications Framework.

Yours sincerely

Mark Sullivan

15 January 2004

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