

**JR Cumpston Pty Ltd**

consulting actuaries

7 May 2009

Assistant Secretary  
Privacy and Freedom of Information Policy Branch  
Department of the Prime Minister and Cabinet  
PO Box 6500, Canberra ACT 2600

Dear Sir

**Freedom of Information Amendment (Reform) Bill 2009**

My submission of 7/4/09 (attached) said in part

*"some reports published by ABS and Treasury do not meet professional standards..."*

*ABS's population projections for Australia mention their mortality, fertility, immigration and emigration assumptions, but do not provide enough details to allow their results to be replicated"*

On 9/4/09 I received from ABS a quote for \$935, covering

*Assumptions data from the 2006 to 2101 population projection for fertility rates, net overseas migration, net interstate migration, single year of age, states and territories 2008-2056"*

If ABS was required to meet the reproducibility requirements of major scientific and economic publications, then these assumptions would be available in their published reports.

Yours sincerely



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**Freedom of Information Amendment (Reform) Bill 2009**

As a consulting actuary, I have used the Freedom of Information Act 1982 to obtain information from ABS, APRA, Comsuper, Department of Climate Change and Treasury. I have also used the FOI Acts in NSW, Victoria, Queensland and SA.

In summary

- requiring agencies to publish information is excellent, and may be cheaper than ad-hoc responses to FOI requests
- some reports published by ABS and Treasury do not meet professional standards
- improving agency reports would help in the quality control processes of agencies, and improve the flow of information to and from the public
- During public consultation, APRA accepts confidential submissions, and will not provide access to any part of such submissions
- APRA collects but does not publish valuable information from general insurers
- Treasury restarts the 30 day response period under 15(5)(b) from the completion of any clarification of the request, but any time extension should be limited to the consultation period
- Under section 22(1), Treasury deletes any information not explicitly requested, thus wasting Treasury's time and reducing the value of the information
- Information should be provided in printed or electronic form, at the request of the applicant
- No charges should be made for finding documents, or for decision-making about their availability under FOI.

I will be happy to discuss any aspect of these comments.

## **Failure to meet professional standards**

ABS's population projections for Australia mention their mortality, fertility, immigration and emigration assumptions, but do not provide enough details to allow their results to be replicated.

Treasury's intergenerational reports do not provide enough material to replicate some of their projections, or to assess the reasonableness of the underlying assumptions. For example, no details are provided of the RIMGROUP projections mentioned on pages 111-114 of "Intergenerational report 2007".

These ABS and Treasury reports would not meet the reproducibility requirements of major scientific and economic publications. They would probably not meet the reporting standards of the Institute of Actuaries of Australia, or the expert witness requirements for Australian courts.

The Freedom of Information Act could require that reports by Commonwealth agencies

- state the purpose of the report
- provide the data on which the report is based, or references to where the data can be found
- comment on the reliability of the data
- describe in full the assumptions made, and why they were made
- describe the calculation procedures
- provide enough information to allow all the results to be replicated
- quantify the uncertainty inherent in the results.

## **Undesirability of confidential submissions**

During one set of consultations with general insurers about changes to APRA's statistical publications, APRA accepted submissions on a confidential basis, and subsequently refused to provide any part of the confidential submissions under FOI.

Confidential submissions were also made to the Garnaut review, and to the Department of Climate Change on the proposed carbon pollution reduction scheme.

As a matter of public policy, confidential submissions should be accepted only in extreme circumstances, with the confidential part of the submission identified and limited.

## **Publication of collected information**

APRA collects detailed information from general insurers, but only publishes summaries of part of it. For example, it collects details by accident year of claim payments and provisions, and all-insurer summaries of this information would be valuable to insurers and their actuaries.

Given the cheapness of electronic publication, all information collected by Commonwealth agencies should be available in summary form. Unpublished data may become progressively less reliable, as those supplying the data realise their time is being wasted.

Yours sincerely

Richard Cumpston

