

**From:** [REDACTED]  
**To:** [Dann, Nicole](#)  
**Subject:** RE: FOI release [DLM=Sensitive]  
**Date:** Tuesday, 2 February 2016 3:17:28 PM

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Hi Nicole,

I left a voice message.

I would not be at all comfortable letting the file out with all those database names. The other document shows a methodology that I would have thought should have been protected – protection of methodology/Public Interest Indemnity

Happy to chat about this, however the final authority id [REDACTED] in Information Management however he would probably seek our advice on the content anyway.

I'm heading home shortly but can chat tomorrow.

Regards,

[REDACTED]

=====

[REDACTED]  
[REDACTED] | Information Technology Security | EST  
Australian Taxation Office  
Phone [REDACTED] | Mobile: [REDACTED] | Digital Fax Gateway [REDACTED]  
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**From:** Dann, Nicole  
**Sent:** Tuesday, 2 February 2016 3:41 PM  
**To:** [REDACTED]  
**Subject:** FOI release [DLM=Sensitive]

Hi [REDACTED],

I left a message on your phone earlier today. I'm hoping you can help me answer a question.

We have received a couple of FOI requests, one is for sql queries, the other is for the data asset register and data dictionaries. My question is, is there any risk in releasing sql queries or internal database addresses? If an external hacker has access to these documents could they gain access to our systems?

I have attached a copy of the sql queries. I have also attached a copy of one of the data dictionaries (you will need to increase the size) which has a list of database locations listed.

Could you please have a look and let me know what you think?

Thank-you in anticipation

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**Nicole Dann**

Legal Adviser, General Counsel, ATOC

Australian Taxation Office

**P** 07 3213 5345 **F** 07 3213 5005

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**From:** [REDACTED]  
**To:** [Dann, Nicole](#)  
**Cc:** [Zhu, Katy](#); [Galeotti, Julie](#); [REDACTED]  
**Subject:** RE: FOI release [DLM=Sensitive]  
**Date:** Wednesday, 10 February 2016 8:53:20 AM  
**Attachments:** [image001.png](#)  
[image002.jpg](#)

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Hi Nicole

Further to our discussion, I can confirm that I have reviewed examples the data dictionaries provided and reiterate that releasing these documents would provide identifiers, pointers and references that would compromise the security and safety of ATO systems.

Thanks

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[REDACTED]  
[REDACTED], Security Services  
Information Services, ATOC  
Australian Taxation Office  
P [REDACTED] M [REDACTED]



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**From:** [REDACTED]  
**Sent:** Friday, 5 February 2016 4:25 PM  
**To:** [REDACTED] Dann, Nicole  
**Cc:** [Zhu, Katy](#); [Galeotti, Julie](#); [REDACTED]  
**Subject:** RE: FOI release [DLM=Sensitive]

Hi all

Apologies for the delay, completely support the IT security advice below that providing this information would have significant security implications for our systems and data

Happy to discuss further and work through the specific wording as required on Monday

Thanks

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[REDACTED]  
[REDACTED], Security Services  
Information Services, ATOC  
Australian Taxation Office  
P [REDACTED] M [REDACTED]



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**From:** [REDACTED]  
**Sent:** Friday, 5 February 2016 3:13 PM  
**To:** [REDACTED]; Dann, Nicole  
**Cc:** [REDACTED]; Zhu, Katy; Galeotti, Julie; [REDACTED]  
**Subject:** RE: FOI release [DLM=Sensitive]

Absolutely agree,

In my experiences in Parliament and Human Services and in discussions with other agencies security personnel we would never provide data dictionaries, data fields, attributes and the like. As already explained by [REDACTED] this is essentially giving out a set of keys to the safe to anybody who would like them.

I'm positive that that no experienced agency would provide this sort of system information to an FOI, we just need to get the appropriate security wording around it. Any FOI request should be about data itself and not the systems (or there attributes), and how they are defined, stored, accessed etc... It is these types of requests which are seemingly innocent, which are then used to construct malicious queries or exploits to target our data illegally.

[REDACTED] I cannot recall the specific wording, however at Parliament we regular stated one the of the security controls that meant we could not release/provide such information due it compromising or putting at risk the security of our systems and the data they contain. There are many organisations who request these types of things on a full time basis now, and yes they make some noise when they do not get it, such is life.

BTW at the end of the day and as already called out [REDACTED] have the final call on the request due to this being an InfoSec query.

Regards,

[REDACTED]  
[REDACTED], IT Security  
Australian Taxation Office  
Phone: [REDACTED] | Mobile: [REDACTED]



[Reinventing the ATO](#) – join the conversation

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**From:** [REDACTED]  
**Sent:** Friday, 5 February 2016 11:58 AM  
**To:** Dann, Nicole  
**Cc:** [REDACTED]; Zhu, Katy; Galeotti, Julie; [REDACTED]  
**Subject:** FW: FOI release [DLM=Sensitive]

Hi Nicole,

I've added the IT Security [REDACTED] [REDACTED] in this discussion and our manager as this would appear to have far reaching impacts if this is released to this sort of organisation, especially if they start to accumulate additional information from further FOI requests.

To expand on what the harm is in releasing the data dictionaries – [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

I would suggest 47E (a)(b)(c)(d) all apply.

[REDACTED], I'm okay with you taking over here if you want.

Regards,

[REDACTED]

=====

[REDACTED]  
[REDACTED] | Information Technology Security | EST  
Australian Taxation Office  
Phone: [REDACTED] | Mobile: [REDACTED] | Digital Fax Gateway [REDACTED]  
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**From:**  
**Sent:** Friday, 5 February 2016 10:59 AM  
**To:** [REDACTED]  
**Cc:** [REDACTED]; Zhu, Katy; Galeotti, Julie  
**Subject:** RE: FOI release [DLM=Sensitive]

Hi [REDACTED],

I thought it may be useful to give you a bit more background.

We currently have 3 requests from the same applicant, the applicant is applying via the 'right to know' organisation, right to know has a website and everything we provide to them is published to their website for public access, it would also be published to the ATO's disclosure log. All three of the requests are around data, they are as follows;

1. A copy of the data asset register including the data dictionaries,
2. Documents which show 1) the SQL queries relevant to the 2012-2013 objection data and was used for the purposes of the IGT's 2014 review of the ATO's administration of penalty; and 2) the SQL queries relevant to the imposition of penalties for years 2009-2012 and was used for the purposes of the IGT's 2014 review of the ATO's

administration of penalty,

3. Summary/aggregated statistics and data the ATO provided to the IGT, along with corresponding emails sent from the ATO to the IGT for the purposes of the IGT's 2014 review of the ATO's administration of penalty.

I am dealing with the first request and Katy Zhu is dealing with requests 2 and 3.

█ – Thank-you for your email. Could you please expand a bit on what the harm is in releasing the data dictionaries in general? The classification of a document has no bearing on whether we can release it under FOI or not, however we do need to have regard to harm. I have attached a few more data dictionaries for your consideration.

From what we have discussed so far it seems that some of this material may be covered by section 47E of the FOI Act, which is;

#### **47E Public interest conditional exemptions—certain operations of agencies**

A document is conditionally exempt if its disclosure under this Act would, or could reasonably be expected to, do any of the following:

(a) prejudice the effectiveness of procedures or methods for the conduct of tests, examinations or audits by an agency;

(b) prejudice the attainment of the objects of particular tests, examinations or audits conducted or to be conducted by an agency;

(c) have a substantial adverse effect on the management or assessment of personnel by the Commonwealth, by Norfolk Island or by an agency;

(d) have a substantial adverse effect on the proper and efficient conduct of the operations of an agency.

Note: Access must generally be given to a conditionally exempt document unless it would be contrary to the public interest (see section 11A).

This is a conditional exemption and to be able to exempt documents under this exemption we need to take the public interest into account and give weight to arguments for and against release. Essentially we need to be able to show that the potential harm in releasing the documents outweighs the public's right to have access to the documents.

We are discussing these requests with the relevant business lines however we wanted to know from an IT perspective if the release of this sort of data could in some way make our IT security more vulnerable to someone with malicious intent.

Thank you both for your time on this.

I'm happy to answer any questions or provide any more documents you may need to consider for request 1. If you have any questions or would like to see the documents for requests 2 or 3

please contact Katy.

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**Nicole Dann**

Legal Adviser, General Counsel, ATOC  
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**From:** [REDACTED]  
**Sent:** Friday, 5 February 2016 8:44 AM  
**To:** Dann, Nicole  
**Cc:** [REDACTED]  
**Subject:** RE: FOI release [DLM=Sensitive]

Hi Nicole,

As discussed this should come from [REDACTED] area for the last approval or rejection so I have CC'd [REDACTED] into the email if she has anything to add. From my perspective this should not be released as it provides too many identifiers, pointers and references that would compromise the security and safety of ATO systems. In addition where you suggested that it was going to an individual that may share this information additional alarms bells went off.

At the very least I would suggest we get an SQL expert to turn the SQL statements into Pseudo-code (**Pseudocode** is an informal high-level description of the operating principle of a computer program or other algorithm. It uses the structural conventions of a programming language, but is intended for human reading rather than machine reading).

The data dictionary should never leave this organisation and I would suggest the classification of such a document should be high enough to stop it leaving.

[REDACTED] I'm happy to be overruled on this – please provide comment.

Regards,

[REDACTED]

=====  
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[REDACTED] | Information Technology Security | EST  
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Phone: [REDACTED] | Mobile: [REDACTED] | Digital Fax Gateway [REDACTED]  
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**Sent:** Tuesday, 2 February 2016 3:41 PM  
**To:** [REDACTED]  
**Subject:** FOI release [DLM=Sensitive]

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