



**Australian Government**  
**Department of Defence**

Defence Reference: FOI 112/20/21

**FOI 112/20/21 STATEMENT OF REASONS UNDER THE FREEDOM OF INFORMATION ACT**

1. I refer to the application by ‘ClearPseudonym’ under the *Freedom of Information Act 1982* (FOI Act) for access to:

*“I am seeking technical/architectural/service & system design documentation and status reports to executives the Department holds about a project known as "ICT 2270 - 21st Century Security Vetting" for the Australian Government Security Vetting Agency.*

*In particular, I am seeking:*

*[Item 1] Requirements documents provided to external systems integrators on the provisioning of the ICT 2270 system*

*[Item 2] Approved (i.e. signed off by a DoD executive) overarching “System Design” and/or “Enterprise Architecture” document for ICT 2270*

*[Item 3] Documentation/results of user research and Service Design consultations especially for the externally-facing ePack component. This document must exist, as for the project to meet Criterion 1 of the Digital Service Standard as mandated by cabinet (see MT15/0199/DTC) If this document does not exist, the exemption signoff will suffice.*

*[Item 4] Any interim formal or self-assessments against the Digital Service Standard*

*[Item 5] The most recent report provided to AGSVA executives and the AGSVA Governance Board regarding the progress of ICT 2270.”*

Personal email addresses, signatures, PMKeyS numbers and mobile telephone numbers contained in documents that fall within the scope of the FOI request, duplicates of documents, and documents sent to or from the applicant are excluded from this request. Defence has only considered final versions of documents.

**FOI decision maker**

2. I am the authorised officer pursuant to section 23 of the FOI Act to make a decision on this FOI request.

**Documents identified**

3. I identified one document as matching the description of the request, *Item 5 - The most recent report provided to AGSVA executives and the AGSVA Governance Board regarding the progress of ICT 2270.*

**Decision**

4. I have decided to deny access to Item 5 of the request under subparagraph 47E(d) [Public interest conditional exemptions – certain operations of agencies] of the FOI Act.

### **Material taken into account**

5. In making my decision, I had regard to:
- a. the terms of the request;
  - b. the content of the identified documents in issue;
  - c. relevant provisions in the FOI Act;
  - d. the Guidelines published by the Office of the Australian Information Commissioner under section 93A of the FOI Act (the Guidelines); and
  - e. advice received from within the department from Chief Information Officer Group and Defence Executive Support.

### **Reasons for decision**

#### **Section 47E - Certain operations of agencies**

6. Section 47E(d) of the FOI Act provides that a document is conditionally exempt from disclosure requirements if its disclosure under the Act would, or could reasonably be expected to have a substantial adverse effect on the proper and efficient conduct of the operations of an agency.

7. I found that the documents identified contain Defence's intended processes and disclosure of this information could reasonably be expected to prejudice Defence's ability to properly conduct its activities.

8. The Guidelines at paragraph 6.120 state that "*An agency's operations may not be substantially adversely affected if the disclosure would, or could reasonably be expected to lead to a change in the agency's processes that would enable those processes to be more efficient*".

9. Taking the above into consideration, I have decided that the specified material requested at Item 5, is conditionally exempt under subsection 47E(d) of the FOI Act.

#### **Sections 47E - Public interest considerations**

10. Section 11A(5) of the FOI Act requires an agency to allow access to an exempt document, unless, in the circumstances, access to the document would, on balance, be contrary to the public interest.

11. As part of my consideration on the relevant factors affecting the balance of public interest, I gave consideration to the objectives of the FOI Act, and the factors against disclosure as set out in the FOI Guidelines.

16. The Guidelines at paragraph 6.22 state that public interest factors against disclosure include:

- (c) *could reasonably be expected to prejudice security, law enforcement, public health or public safety*
- (n) *could reasonably be expected to prejudice the management function of an agency*
- (o) *could reasonably be expected to prejudice the effectiveness of testing or auditing procedures.*

17. I have considered all relevant considerations, and I am satisfied that the expected effect of disclosing the document could, or would reasonably be expected to, have a substantial adverse effect on the proper and efficient conduct of the operations of the agency. Therefore, I am of the opinion that the factors favouring denying access to the document outweigh any of

the factors supporting its disclosure. Accordingly, I find that on balance, the public interest is best served by not disclosing the document and by deeming the information exempt under subparagraph 47E(d) of the FOI Act.

Mrs Joanne Groves  
Accredited Decision Maker  
Associate Secretary Group