

15 August 2024

Our reference: LEX 80273

Ben Fairless (Right to Know)

Only by email: foi+request-11562-13dd6aa1@righttoknow.org.au

Dear Ben Fairless

Decision on your Freedom of Information Request

I refer to your request, dated and received by Services Australia (the Agency) on 25 June 2024 and revised on 1 July 2024 for access under the *Freedom of Information Act 1982* (the FOI Act) to the following documents:

Can you please make the below documents available under the Information Publication Scheme, and publish them on the Operational Information portal

106-02000000 Delivery standards for Centrelink payments and services (CLK)

106-02020000 Centrelink service standards and procedures for pre-release and post-release prison customers

106-03010000 First Contact Service Offer (FCSO) workflow

106-03020000 Claim lodgement of Centrelink claims

My decision

The Agency holds 4 documents (totalling 46 pages) that relate to your request.

I have decided to:

- grant you full access to one document (Document 1); and
- grant you part access to 3 documents (Documents 2, 3 and 4) with some of the content removed.

I have decided certain parts of the documents, you have requested are exempt under the FOI Act as they include operational information, the disclosure of which would have a serious or significant effect on the Agency's ability to conduct its operation efficiently and properly (section 47E(d) conditional exemption).

As certain parts of the documents include operational information and are exempt under the FOI Act they cannot be made available under the Information Publication Scheme or published on the Operational Information portal.

Please see the schedule at **Attachment A** to this letter for a detailed list of the documents and the reasons for my decision, including the relevant sections of the FOI Act.

How we will send the documents to you

The documents are attached.

You can ask for a review of our decision

If you disagree with any part of the decision, you can ask for a review. There are two ways you can do this. You can ask for an internal review from within the Agency, or an external review by the Office of the Australian Information Commissioner. See **Attachment B** for more information about how to request a review.

Further assistance

If you have any questions, please email freedomofinformation@servicesaustralia.gov.au

Yours sincerely

Tracy
Authorised FOI Decision Maker
Freedom of Information Team
FOI and Reviews Branch | Legal Services Division
Services Australia



Attachment A

SCHEDULE OF DOCUMENTS FOR RELEASE

FAIRLESS, Ben (Right to Know) - LEX 80273

Doc No.	Pages	Date	Description	Decision	Exemption	Comments
1.	1	29/09/2023	Agency Operational Blueprint: 106-02000000 - Delivery Standards for Centrelink payments and services (CLK)	Release in full		Out of scope information removed under s22 Please note: The relevant business area intends to make this document publicly available.
2.	2 - 27	18/06/2024	Agency Operational Blueprint: 106-02020000 - Centrelink service standards and procedures for pre-release prior customers	Release in part	s 47E(d)	Operational information redacted under s47E(d) Out of scope information removed under s22
3.	28 - 40	26/06/2024	Agency Operational Blueprint: 106-03020000 - Claim lodgement of Centrelink claims	Release in part	s 47E(d)	Operational information redacted under s47E(d) Out of scope information removed under s22
4.	41 – 46	07/06/2024	Agency Operational Blueprint: 106-03010000 - First Contact Service Offer (FCSO) workflow	Release in part	s 47E(d)	Operational information redacted under s47E(d) Out of scope information removed under s22



REASONS FOR DECISION

What you requested

Can you please make the below documents available under the Information Publication Scheme, and publish them on the Operational Information portal

106-02000000 Delivery standards for Centrelink payments and services (CLK)

106-02010000 Timeliness standards - Claims processing

106-02020000 Centrelink service standards and procedures for pre-release and post-release prison customers

106-02030000 Standards for helping customers complete claims and forms

106-03010000 First Contact Service Offer (FCSO) workflow

106-03020000 Claim lodgement of Centrelink claims

On 27 June 2024, I wrote to you about your original request and provided you with details of publicly available information which may satisfy part of your request for documents. You responded on 1 July 2024 and agreed to withdraw the following two Operational Blueprints from your request:

106-02010000 - Timeliness standards - Claims processing

106-02030000 - Standards for helping customers complete claims and forms

This revised your request to the following:

Can you please make the below documents available under the Information Publication Scheme, and publish them on the Operational Information portal

106-02000000 Delivery standards for Centrelink payments and services (CLK)

106-02020000 Centrelink service standards and procedures for pre-release and post-release prison customers

106-03010000 First Contact Service Offer (FCSO) workflow

106-03020000 Claim lodgement of Centrelink claims

On 3 July 2024 the Agency acknowledged your revised request. You consented to exclude personal details about our staff (such as their names) therefore, staff details have been redacted in accordance with section 22(1) of the FOI Act.

On 15 and 19 July 2024, the Agency sent you emails advising we required additional time to process your request under section 15AA of the FOI Act. You confirmed your agreement to a 14 day extension of time on 23 July 2024, making the new due date for the decision 8 August 2024. The Office of the Australian Information Commissioner (OAIC) was advised of the extension.

On 2 and 5 August 2024, I wrote to you again to request a further extension of time of an additional 16 days. You responded on 5 August 2024 agreeing to 7 days, making new due date for the decision 15 August 2024. The Office of the Australian Information Commissioner (OAIC) was advised of the extension.

What I took into account

In reaching my decision I took into account:

- your original request dated 25 June 2024
- your revised request on 1 July 2024
- other correspondence with you
- the documents which fall within the scope of your request
- whether the release of material is in the public interest
- consultations with Agency officers about:
 - the nature of the documents
 - o the Agency's operating environment and functions
- guidelines issued by the Australian Information Commissioner under section 93A of the FOI Act (the Guidelines), and
- the FOI Act.

Reasons for my decision

I am authorised to make decisions under section 23(1) of the FOI Act.

I have decided that parts of the documents that you requested are exempt under the FOI Act. My findings of fact and reasons for deciding that the exemption applies to those documents are discussed below.

Section 47E(d) of the FOI Act – Operations of the Agency

I have applied the exemption in section 47E(d) of the FOI Act to parts of Documents 2, 3 and 4.

This section of the FOI Act allows the Agency to redact material from a document if its disclosure would have a serious or significant effect on the Agency's ability to conduct its operations efficiently and properly.

The requested documents contain a guide for Agency staff when assessing claims. I am satisfied this information is relevant to the implementation, delivery and management of a process administered by the Agency, and therefore is relevant to the conduct of the Agency's operations.

I consider that providing this material to you, which is not publicly available, would negatively affect the conduct of the Agency's operations because it may allow individuals to circumvent elements of the Agency's processes for their own financial advantage, and provide insight to malicious users about navigating the Agency's internal systems.

While I have no reason to believe you would misuse the exempt material in this way, the FOI Act does not control or restrict use or dissemination of the information once released, so I must consider actions any member of the public might take if the information is in the public domain.

Public interest considerations

Access to conditionally exempt material must be given unless I am satisfied it would not be in the public interest to do so. I consider disclosure of the material would promote the objects of the FOI Act, including increasing public participation in Government processes.

However, I also consider disclosure of the exempt material would prejudice the Agency's ability to deliver services properly and efficiently to the public, by providing information containing detailed system coding instructions for staff, could be used as a 'how to' guide by a malicious user to navigate the Agency's system, and therefore presents a cyber security risk. Disclosure of this exempt cyber material would increase the likelihood that individuals could use process information to circumvent or manipulate steps in securing a favourable outcome for receiving payments. This in turn would significantly prejudice the Agency's ability to deliver services promptly and effectively to the Australian public.

Based on these factors, I have decided that in this instance, the public interest in disclosing the information in the above-mentioned documents are outweighed by the public interest against disclosure. Accordingly, I have decided not to release the documents in full to you.

Out of scope or irrelevant information has been deleted in accordance with section 22 of the FOI Act.

I have not taken into account any of the irrelevant factors set out in section 11B(4) of the FOI Act in making this decision.



Attachment B

INFORMATION ON RIGHTS OF REVIEW

FREEDOM OF INFORMATION ACT 1982

Asking for a full explanation of a Freedom of Information (FOI) decision

Before you ask for a formal review of a FOI decision, you can contact us to discuss your request. We will explain the decision to you. This gives you a chance to correct misunderstandings.

Asking for a formal review of a FOI decision

If you still believe a decision is incorrect, the *Freedom of Information Act 1982* (FOI Act) gives you the right to apply for a review of the decision. Under sections 54 and 54L of the FOI Act, you can apply for a review of an FOI decision by:

- 1. an Internal Review Officer in Services Australia (the Agency), and/or
- 2. the Australian Information Commissioner.

Applying for an internal review by an Internal Review Officer

If you apply for internal review, a different decision maker to the Agency delegate who made the original decision will carry out the review. The Internal Review Officer will consider all aspects of the original decision and decide whether it should change. An application for internal review must be:

- made in writing
- made within 30 days of receiving this letter
- sent to the address at the top of the first page of this letter or by email to freedomofinformation@servicesaustralia.gov.au

Note: You do not need to fill in a form. However, it is a good idea to set out any relevant submissions you would like the Internal Review Officer to further consider, and your reasons for disagreeing with the decision.

Applying for external review by the Australian Information Commissioner

If you do not agree with the original decision or the internal review decision, you can ask the Australian Information Commissioner to review the decision.

If you do not receive a decision from an Internal Review Officer in the Agency within 30 days of applying, you can ask the Australian Information Commissioner for a review of the original FOI decision.

You will have 60 days to apply in writing for a review by the Australian Information Commissioner.

You can lodge your application:

Online: <u>www.oaic.gov.au</u>

Post: Australian Information Commissioner

GPO Box 5218 SYDNEY NSW 2001

Email: enquiries@oaic.gov.au

Note: The Office of the Australian Information Commissioner generally prefers FOI applicants to seek internal review before applying for external review by the Australian Information Commissioner.

Important:

- If you are applying online, the application form the 'FOI Review Form' is available at Information Commissioner Review Application form
- If you have one, you should include with your application a copy of the Agency's decision on your FOI request
- · Include your contact details
- Set out your reasons for objecting to the Agency's decision.

Complaints to the Australian Information Commissioner and Commonwealth Ombudsman

Australian Information Commissioner

You may complain to the Australian Information Commissioner concerning action taken by an agency in the exercise of powers or the performance of functions under the FOI Act, there is no fee for making a complaint. A complaint to the Australian Information Commissioner must be made in writing. The Australian Information Commissioner's contact details are:

Telephone: 1300 363 992
Website: www.oaic.gov.au
Smart Form: FOI Complaint Form

Commonwealth Ombudsman

You may also complain to the Commonwealth Ombudsman concerning action taken by an agency in the exercise of powers or the performance of functions under the FOI Act. There is no fee for making a complaint. A complaint to the Commonwealth Ombudsman may be made in person, by telephone or in writing. The Commonwealth Ombudsman's contact details are:

Phone: 1300 362 072

Website: www.ombudsman.gov.au

The Commonwealth Ombudsman generally prefers applicants to seek review before complaining about a decision.