From: [redacted]
To: [redacted]
Subject: Internal review of Freedom of Information request - Detailed results of entity Data Maturity Ratings, including each agencies individual responses
Date: Tuesday, 21 January 2025 11:04:44 AM

Dear Department of Finance,

Please pass this on to the person who conducts Freedom of Information reviews.

I am writing to request an internal review of Department of Finance's handling of my FOI request 'Detailed results of entity Data Maturity Ratings, including each agencies individual responses'.

The exemptions in 47E(a) and 47E(b) are about preserving the accuracy and reliability of testing, auditing, and examination processes. 47E(a) deals with the method and process, and 47E(b) with the integrity of the result and the object/aim of the process itself. The documents covered by those exemptions are ones that reveal the how and why of an agency's investigative and assessment procedures. If disclosure would allow people to undermine, manipulate or avoid detection then it is likely that these exemptions would be engaged.

My FOI request is for the results of Government entities' self-assessment of their Data Maturity, including the individual responses provided by each agency. My request does not relate to the methodology of the DMAT, or the processes used by the Department of Finance to collect, review or assess the responses. As such, 47E(a) and (b) do not apply to my request. In exempting the documents I have requested from release under 47E(a) or 47E(b), this implies that the release of this information, which is purely data submitted in response to the DMAT, would be used by the entities subject to the "examination", i.e., Government Departments, to "game the system", and this argument is unconvincing.

The decision maker also cited 47E(d), with the claim that releasing detailed entity ratings would "have a substantial adverse effect on the proper and efficient conduct of the operations of an agency". My request is not for any documents that could impact the operations of an agency. My request is for the responses submitted by each agency, and there is no reasonable expectation that this information could negatively impact the efficient operations of an agency. It is not clear what operational impact is being claimed by the decision maker, and it is not clear how the release of this data would impact operations. Furthermore, releasing this information is in the public interest, as it is important to ensure transparency and accountability of government operations, and it is vital to understand how the public money is being spent. The data maturity of government agencies directly impacts the efficiency and effectiveness of government services, and therefore impacts the public expenditure and efficiency of agencies. Therefore, the public interest in disclosure clearly outweighs the reasons put forward by the decision maker for non-disclosure.

I note that in the Data Maturity Assessment Tool Guide, it states:

"The Department of Finance regards sign-off for the assessment by the recognised agency head as assurance that the Tool has been completed accurately and accountability by the agency in accordance with governance responsibilities including the Public Governance, Performance and Accountability Act 2013."

To me, this indicates agencies are required to complete the assessment as per their obligations under the PGPA, which would lead me to view with scepticism the decision maker's argument that public scrutiny of the detailed assessment would result in agencies withdrawing from the process - why would agencies be allergic to public accountability? It would be expected that a transparent system of accountability would actually assist agencies in meeting their obligations and provide an additional incentive for them to improve their data maturity. It appears that the reasons for non-disclosure are related to a fear of embarrassment of/operational damage, rather than protecting the integrity of the DMAT.

Finally, the decision maker cites security concerns. I note that if there are specific responses the decision maker considers would open agencies to cyber security attack, there are exemptions that could be applied to deal with those questions specifically, rather than exempting the entirety of my requested documents. I would be open to redaction of specific questions and responses that the decision maker considers a legitimate cyber security threat, although I note that only 3 of the 57 questions mention security, and I would not expect any questions that do not mention security to be exempt from release under security concerns. Again, embarrassment is not valid under the FOI Act for withholding information.

For the reasons set out above, the decision to exempt the requested documents is invalid. Therefore, I respectfully request that the original decision be overturned, and that my documents be released.

A full history of my FOI request and all correspondence is available on the Internet at this address: https://urosf01.safelinks.protection.outlook.com/?
url=https%3A%2F%2Fwww.righttoknow.org.au%2Frequest%2Fdetailed_results_of_entity_datadata=05%7C02%7CFOIA%40finance.gov.au%7C78216bb0f9304f0b3140f0bd2f0e2212%7C08954cce47824f89ad51997dcce49d0%7C0%7C0%7C638730146835527549%7CUnknown%7CTWFpbGZsb3dzIkFtYXBpIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiIn0%3D%7C0%7C%7C%7C&sdata=6xzg0UL%2BxyMPhkfDEt8IkmQ%2fJPpPA%2FgqVCU3kpnA0ud%2fDk&reserved=0

Yours faithfully,

MatureData

Please use this email address for all replies to this request:
xxxxxxxxxxxxxxxxxxxxxxxx@xxxxxxxxxx.xxx.xx

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