



8 January 2025

Our reference: LEX 82935

Nosey Rosey (Right to Know)

Only by email: foi+request-12573-d72b6cea@righttoknow.org.au

Dear Nosey Rosey

Your Freedom of Information Request

I refer to your request, received by Services Australia (the Agency) on 14 December 2024 for access under the *Freedom of Information Act 1982* (the FOI Act) to the following documents:

Part 1

I seek access to records held by Services Australia that detail who has been granted access to the Verification of Entitlement (VoE) system within the last ten years, the reasons such access was permitted, the date on which each instance of access was granted, and the scheduled date for any subsequent review or re-approval of that access. I refer specifically to the VoE functionality administered by Services Australia, as described on the Centrelink Confirmation eServices (CCeS) page found at: <https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.servicesaustralia.gov.au%2Fcentrelink-confirmation-eservices-cces&data=05%7C02%7Cfreedomofinformation%40servicesaustralia.gov.au%7C625c8c9399bf4e48231508dd1bebb000%7C627250e63e294861a084aad68ccfcccc%7C0%7C0%7C638697421416048358%7CUnknown%7CTWFPbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIYiOiIwLjAuMDAwMCIsIiAiOiJXaW4zMilslkFOIjoiTWFPbClldUljoyfQ%3D%3D%7C80000%7C%7C%7C&sdata=ma42%2FcOhyEwdpWW5%2B0fgvJXtshY%2B0E02C2WZjUebGPA%3D&reserved=0>.

I request documents that identify any company or organisation granted access to the VoE system, along with the name of that company or entity, the reason why access was granted, the initial date on which that access was approved, and the date when the approval for that access is next scheduled to be reviewed. Where an individual has been granted access in their own right, rather than as part of a company or organisation, I request disclosure of the individual's name. If this would cause unreasonable disclosure of personal information, I ask that you consider whether

identifying the individual by a first name and a role description, or a similar method, would be feasible while still satisfying the public interest in understanding who is permitted to use the VoE system. I am not seeking any personal contact details or sensitive personal information about these individuals beyond their names as they appear in the context of approved users of the VoE system.

Part 2

I also request copies of any documents that outline the policies, procedures, criteria, or internal guidelines governing how access to the VoE system is approved, managed, and periodically reviewed. This includes any instructions to staff, procedural manuals, or policy statements that describe the processes by which certain entities or individuals become authorised users, the factors considered in approving or denying access requests, the review mechanisms that are in place, and the intervals at which access privileges are re-evaluated.

If the requested information is stored in a database or can be readily extracted from electronic records, I request that you provide it in a machine-readable format, such as CSV or Excel, where that is reasonably practicable. If the records are contained in written documents, I ask that you provide scanned copies or PDFs. I understand that some documents may contain information that is not relevant to my request, and I am willing to receive redacted versions of documents if it assists in processing this request in a timely manner. Should you consider that identifying details of individuals require redaction to comply with the FOI Act, I ask that you consult with me under section 24AB before making a decision, so that we may discuss whether a refinement of the request is possible.

I believe that the disclosure of these documents serves the public interest, as it will enable greater transparency and accountability regarding how access to the VoE system is managed. This system affects a wide range of stakeholders, and understanding who has been granted permission to use it, as well as the reasons for doing so, contributes to the public's confidence that personal information managed by Services Australia is properly safeguarded and that access is granted for legitimate purposes only.

Note: For ease of consulting with you, I have separated your request into Part 1 and Part 2.

Your request involves too much work for the Agency

Your Freedom of Information (FOI) request covers a wide range of documents. We are asking you to revise your request to give us more specific details about the information you are after because of the amount of work involved for the Agency.

If you decide not to make any revisions, I will have to refuse your FOI request as a 'practical refusal reason' exists.

For a more detailed explanation of what this means see **Attachment A**.

How to send us a 'revised request'

Before I make a final decision on your request, you can narrow the size of your original request and submit a revised request.

Within the next 14 days you must do one of the following, in writing:

- withdraw the request
- make a revised request, or
- tell us you do not want to revise your request.

Your response will be expected by **22 January 2025**. If you do not contact us during the 14 day consultation period, your matter will be taken as withdrawn by operation of the FOI Act.

See **Attachment A** for relevant sections of the FOI Act.

If you decide to make a revised request, you should be specific about the documents you want. This could help the Agency find the documents in less time and use fewer resources to process them.

We have 30 days to give you a decision about your request, however the time taken to consult with you now is not included in this 30 day time period.

Contact officer

I am the contact officer for your request. During the consultation period you are welcome to ask for my help in revising your request. You can contact me:

- via email to arrange a phone call, by providing a contact number and advising of a suitable time
- in writing to the address at the top of this letter, or
- via email to freedomofinformation@servicesaustralia.gov.au

Note: When you contact us, please quote the reference number **FOI LEX 82935**.

Further assistance

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

Yours sincerely

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

What I took into account

You requested access under the FOI Act to the documents outlined on Page 1 and 2 of this letter.

Because of the amount of work involved for the Agency, under sections 24AA(1)(a)(i), 24 and 24AA(2) of the FOI Act I intend to refuse your FOI request as a 'practical refusal reason' exists. Under the FOI Act, the practical refusal reason is that processing your request 'would substantially and unreasonably divert the resources' of the Agency.

To assist you, I liaised with the relevant business area of the Agency that would hold the types of documents and information you are seeking. I am advised the following:

Part 1 of your request

I seek access to records held by Services Australia that detail who has been granted access to the Verification of Entitlement (VoE) system within the last ten years, the reasons such access was permitted, the date on which each instance of access was granted, and the scheduled date for any subsequent review or re-approval of that access.

I am advised the information you requested is not captured in an existing document or able to be produced via an automated process. Therefore, manual interrogation of each business / organisation record would be required to review, analyse, extract and collate this information.

As there are over 3,000 businesses / organisations, with an estimated time of 10 minutes to interrogate each record, we estimate it would take more than 500 hours to produce a document.

Additionally, the Agency would need to consider formally consulting with each third party under section 27 of the FOI Act, about the potential release of their information (i.e. their name). Based on a conservative estimate of 30 minutes to prepare and send individual consultation notices and to consider responses from each of the 3,000 third parties, we estimate the consultation process alone would take in excess of 1,500 hours.

In conclusion, Part 1 of your request is too much work for the Agency to process and a 'practical refusal reason' exists.

Part 2 of your request

I also request copies of any documents that outline the policies, procedures, criteria, or internal guidelines governing how access to the VoE system is approved, managed, and periodically reviewed. This includes any instructions to staff, procedural manuals, or policy statements that describe the processes by which certain entities or individuals become authorised users, the factors considered in approving or denying access requests, the review mechanisms that are in place, and the intervals at which access privileges are re-evaluated.

I am advised that some documents pertaining to this part of your request are already publicly available. These documents can be accessed at the following links:

- CCeS policy, terms and procedural guide for businesses
<https://www.servicesaustralia.gov.au/centrelink-confirmation-eservices-policy-terms-and-procedural-guide?context=23236>

You can access these documents via the link above or by visiting the Agency's website at www.servicessaustralia.gov.au and navigating to *Businesses > Top payments > Centrelink Confirmation eServices (CCes) for businesses > How to apply > Policy, terms and guides*

- Operational Blueprint Centrelink Confirmation eServices 101-09010000
<https://operational.servicessaustralia.gov.au/public/Pages/additional-products-and-services/101-09010000-05.html>
- Operational Blueprint Registration for Income Management deductions, Electronic Verification of Rent (EVoR) or Centrelink Confirmation eServices (CCes) 101-09010040
<https://operational.servicessaustralia.gov.au/public/Pages/additional-products-and-services/101-09010040-01.html>

Should you wish to revise your request, we ask that you review the publicly available material first and revise your request to only be for any additional documents you require.

Additional Information

The Agency does not have a 'Verification of Entitlement' system. However, we have interpreted your FOI request to be in relation to Centrelink Confirmation eServices (CCes), noting the link provided in your request relates to CCes information on the Agency's website.

Assistance with your request

To assist you in revising your request, and with the view of removing the practical refusal reason, please consider the following:

- Removing Part 1 from your request (as this part would require an unreasonable diversion of resources to process), and
- Reviewing the publicly available material for Part 2 and revising your request to only be for any additional documents of interest. Please be specific about the subject matter or content of the documents. For example, the specific aspects of the CCes program / process that are of interest.

If you do not revise your request, I intend to refuse your FOI request as a 'practical refusal reason' exists under sections 24AA(1)(a)(i), 24 and 24AA(2) of the FOI Act. The practical refusal reason is that processing your request would substantially and unreasonably divert the resources of the agency from its other operations.

Relevant sections of the *Freedom of Information Act 1982*

Section 24AA(1)(a)(i) of the FOI Act provides a practical refusal reason exists in relation to a FOI request if the work involved in processing the request would substantially and unreasonably divert the resources of the Agency from its other operations.

Section 24AA(2) of the FOI Act sets out certain factors which the Agency must consider when determining whether providing access in relation to a request would substantially and unreasonably divert the Agency's resources. The Agency must specifically have regard to the resources which would have to be used for:

- identifying, locating or collating the documents within Services Australia's filing system
- deciding whether to grant, refuse or defer access to a document to which the request relates, or to grant access to an edited copy of such a document, including resources that would have to be used for examining the document or consulting in relation to the request
- making a copy, or an edited copy, of the document, and
- notifying any interim or final decision on the request.

Section 24AB(6) of the FOI Act provides the applicant must, before the end of the consultation period, do one of the following, by written notice to the Agency or the Minister:

- withdraw the request,
- make a revised request, or
- indicate that the applicant does not wish to revise the request.

Section 24AB(7) of the FOI Act provides the request is taken to have been withdrawn at the end of the consultation period if:

- the applicant does not consult the contact person during the consultation period in accordance with the notice, or
- the applicant does not do one of the things mentioned in subsection (6) before the end of the consultation period.