



31 January 2025

Our reference: 82944

Mr Glenn Hamiltonshire

Only by email: foi+request-12628-c0bb78ce@righttoknow.org.au

Dear Mr Hamiltonshire

Decision on your Freedom of Information Request

I refer to your request, dated 14 December 2024, and 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:

Style Guides/Brand Guides/Writing Guides currently used for Services Australia

My decision

The Agency holds four documents (totalling 75 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 three documents (documents 2, 3 and 4) with some of the content removed.

I have decided that parts of documents that you have requested are exempt under the FOI Act, including material that would, or could reasonably be expected to have a substantial adverse effect on the proper and efficient conduct of the operations of the Agency (section 47E(d) conditional exemption).

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 your 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. You do not have to pay for a review of the decision. See **Attachment B** for more information about how to request a review.

Further assistance

If you have any questions please email FOI.LEGAL.TEAM@servicesaustralia.gov.au.

Yours sincerely

Alyssa
Authorised FOI Decision Maker
Freedom of Information Team
FOI & Reviews Branch | Legal Services Division
Services Australia



SCHEDULE OF DOCUMENTS FOR RELEASE
HAMILTONSHIRE, Glenn (Right to Know)

Doc No.	Pages	Date	Description	Decision	Exemption	Comments
1.	1-3	15 September 2023	Brand policy	Release in full	N/A	
2.	4-24	Various	Logos	Release in part	s 47E(d)	Agency operational information redacted under s 47E(d)
3.	25-57	Various	Tools and resources: <ul style="list-style-type: none"> • Corporate template library • Corporate image library • Signature blocks • The writing guide 	Release in part	s 47E(d)	Agency operational information redacted under s 47E(d)
4.	58-75	Various	Brand rules	Release in part	s 47E(d)	Agency operational information redacted under s 47E(d)



REASONS FOR DECISION

What you requested

On 14 December 2024, you requested access to:

Style Guides/Brand Guides/Writing Guides currently used for Services Australia

On 14 December 2024, the Agency acknowledged your request.

On 15 December 2024, you provided your agreement by email to a 30-day extension of time for the agency to process your request, making the new due date 12 February 2025. The Office of the Australian Information Commissioner was advised of the extension.

What I took into account

In reaching my decision I took into account:

- your request dated 14 December 2024
- the documents that 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
 - 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 decisions

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

I have decided that parts of 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.

Conditional Exemption - 47E(d) of the FOI Act

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

Section 47E(d) of the FOI Act provides that:

'A document is conditionally exempt if its disclosure under this 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.'

Parts of these documents contain specific guidelines for staff on the correct use of the agency's branding. I am satisfied this information is relevant to the conduct of the agency's operations.

I consider that releasing this information to you could have a substantial adverse effect on the proper and efficient conduct of the agency's operations as the information, if made publicly available, could assist third parties to create convincing impersonations of the agency's brand. This may result in increased scam activity and improved effectiveness of scams against the agency, its customers or the Australian public. It would be increasingly difficult for the agency, customers and the Australian public to recognise scams or false documents, impacting the agency's ability to deliver essential services and payments to customers simply, accurately and efficiently. Customers impacted by scams may not receive the payments they need when they need them and this may place them at greater harm to their mental wellbeing, physical and financial safety. This would result in a loss of customer trust in the agency, increased investigations and complaints and increased workloads across many areas of the agency.

In addition, increased scam activity may necessitate changes to Commonwealth branding, more complex security processes and increased staffing to identify scams and respond to affected customers.

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 in response to an FOI request, so I must consider actions any member of the public might take once the information enters the public domain. Further, I am aware that all information released to 'Right to Know' applicants through FOI processes is published online to the 'Right to Know' website.

Public interest considerations

Section 11A(5) of the FOI Act provides the following:

'The agency or Minister must give the person access to the document if it is conditionally exempt at a particular time unless (in the circumstances) access to the document at that time would, on balance, be contrary to the public interest.'

When weighing up the public interest for and against disclosure under section 11A(5) of the FOI Act, I have taken into account relevant factors in favour of disclosure. In particular, I have considered the extent to which disclosure would promote the objects of the FOI Act.

I have also considered the relevant factors weighing against disclosure, indicating that access would be contrary to the public interest. In particular, I have considered the extent to which disclosure could reasonably be expected to harm the interests of the agency's customers and members of the wider Australian public, including particularly vulnerable members of the Australian community, who may be more susceptible and affected by scams.

If this information is released, bad actors could effectively impersonate the agency and issue official looking documents such as debts or requests for personal and financial information. Due to the official appearance of these documents, people may assume these are legitimate and act on them to their detriment.

I have also considered the extent to which increased scam activity could reasonably be expected to harm customer trust in the agency and wider Australian Government's ability to

safely and accurately deliver essential services. This in turn would significantly prejudice the agency's ability to promptly and effectively deliver services to the Australian public.

Based on these factors, I have decided that in the circumstances of this particular matter, the public interest in disclosing the information is outweighed by the public interest against disclosure.

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.

Summary of my decision

In conclusion, I have decided to:

- grant you full access to one document, and
- grant you part access to three documents.

I have decided that documents 2, 3 and 4 are conditionally exempt in part under section 47E(d) of the FOI Act, and disclosure would be contrary to the public interest for the purposes of section 11A(5).



INFORMATION ON RIGHTS OF REVIEW

FREEDOM OF INFORMATION ACT 1982

Requesting 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 allows you to correct any misunderstandings.

Requesting a formal review of a FOI decision

If you consider the decision is incorrect, you have the right to apply for a review under sections 54 and 54L of the *Freedom of Information Act 1982* (the FOI Act).

You can apply for:

1. an **internal review** by an Internal Review Officer of Services Australia (the agency), and/or
2. an **external review** by the Australian Information Commissioner.

Note: There are no fees for these reviews.

Applying for an internal review by an Internal Review Officer

In an 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 make a fresh decision on your request and will consider all aspects of the original decision and identify any relevant additional factors.

An application for an 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 disagree with the original or internal review decision, or if you have not received a decision within 30 days of applying for an internal review, you will have 60 days to apply in writing for a review by the Australian Information Commissioner.

Note: The Australian Information Commissioner generally prefers FOI applicants to seek an internal review before applying for an external review.

You can lodge your application:

Online: www.oaic.gov.au

Post: Australian Information Commissioner
GPO Box 5218
SYDNEY NSW 2001

Email: FOIDR@oaic.gov.au

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 original and internal review decisions 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.