



OFFICIAL: Sensitive

Your Ref : 18297143
Our Ref: 24-0512
Telephone: 7322 3347
Facsimile: 7322 4180

[Redacted]

[Redacted]

Dear [Redacted]

Re: Freedom of Information Act application

In reference to your application made pursuant to the *Freedom of Information Act 1991* (FOI Act), access was sought to:

"I request a copy of the full SAPOL General Order, Information - Access and Release."

South Australia Police (SAPOL) has located documents that fall within the scope of your request. The documents are numbered and described in the following schedule. The schedule contains the details of the determination in compliance with section 23. In particular, note the grounds on which access has been refused, including the reasons which are contained in the schedule.

SA POLICE - FREEDOM OF INFORMATION UNIT SCHEDULE				
No.	Document Description	Status	Act	Reason
1	General Order, Information Access & Release	Part Release	4(2)(a)(iv) 4(2)(b)	A portion of the redacted text relate to the Agencies pro-active disclosure activities and the internal decision-making processes that support them. If this was to be become common knowledge, it may dissuade offenders from volunteering such information where they might otherwise not be compelled to do so. In addition there is also the risk that knowledge gained from the release of this information could lead to the destruction of



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				evidence, creating a risk of further offending occurring. Although the subject of the exempt content is not particularly controversial, it is the process described in the document that may be disrupted if routinely disclosed, thereby creating an increased risk and danger to the public should offenders be armed with this information. It is for this reason that release of this information is considered against the public's interest.
			4(2)(a)(v) 4(2)(b)	A portion of the redacted text contains internal intranet URLs which are not available to the public. The release of this information poses a threat to the security of the agency in that it creates a simpler method for cybercriminals to target the organisation by way of spear phishing or social engineering. Whilst there is the potential for any organisation to be hacked, providing an internal URL would render it easier for a hacker to pivot inside an organisations network to gain access to sensitive data and/or damage systems and infrastructure thus creating a safety risk for the public as well as the organisation should such data be made available to the world at large. For this reason, release of such information would be against the interests of the public.
			4(2)(a)(vi) 4(2)(b)	A portion of the redacted text contains email addresses which are not available to the public and are critical to the internal processing of information concerning matters related to data management. Revealing these email addresses creates a security risk for the agency and members of the public with the potential for the email addresses to be used in phishing attacks or for other cyber-crimes where user credentials are harvested under

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				<p>the pretence of being a reliable email. Such attacks could result in public information being obtained for illegitimate purposes and on balance are contrary to the public interest.</p> <p>I have identified the following relevant public interest factors that would favour disclosure:</p> <ul style="list-style-type: none"> • promoting the objects of the FOI Act • increasing transparency and promoting accountability in an agency's decision-making functions • providing information to members of the public that have a special interest in the matter • the right of the public to obtain access to information held by the government <p>I consider the following public interest factors are against disclosure:</p> <ul style="list-style-type: none"> • the information is not personal to the applicant • providing the agency an ability to record information that will assist police in upholding the law without providing an opportunity for offenders to evade police detection or circumvent police • allowing internal communications to occur in a reasonably uninhibited manner where discussions may involve sensitive subject matter or directly involve the applicant • the documents do not contain information already known to the applicant and is not available to the public • ensuring that disclosure of information not already available to the public does not interfere with the overall function of the agency • release of information which poses a security threat to the release of SAPOL information also poses a threat to the public by virtue of the information held.

CLAUSES FOR REFUSAL

Clause 4(2)(a)(iv), 4(2)(a)(v), 4(2)(a)(vi) & 4(2)(b) of Schedule 1 of the FOI Act which states:

*“A document is an exempt document if it contains matter the disclosure of which could reasonably be expected to prejudice the maintenance or enforcement of any lawful method or procedure for protecting public safety; or endanger the security of any building, structure or vehicle; or
to prejudice any system or procedure for the protection of persons or property; and would, on balance, be contrary to the public interest.*

Your rights to review

If you are dissatisfied with this determination, you are entitled to exercise your right of internal review in accordance with section 29(1) of the FOI Act by completing a PD362 Application for Internal Review form, which can be downloaded from <https://www.police.sa.gov.au/services-and-events/freedom-of-information> or available upon request at your nearest police station. Alternatively, an application may be made in writing to the SAPOL Freedom of Information Unit. This application must be lodged within 30 (calendar) days after you receive this letter with a fee of \$40.75, if applicable.

Yours sincerely



Senior Sergeant Kelly Johnson
Acting Officer in Charge
Freedom of Information Unit
(Accredited Freedom of Information Officer)

6 October 2023