



**OFFICIAL: Sensitive**

Your Ref :  
Our Ref: 23-0741  
Enquiry:  
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Hon Ms Heidi Girolamo  
Parliament House  
ADELAIDE SA 5000

Email: [Girolamo.office@parliament.sa.gov.au](mailto:Girolamo.office@parliament.sa.gov.au)

Dear Hon Ms Girolamo,

**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:

*“Please provide copies of all Audit Management Letters and their corresponding audit reports from the 30 June 2022 Auditor-General’s Department Audit period.”*

On 7 October 2022 I wrote to you seeking clarification with regards to your request. As a result, the scope of your request was confirmed and agreed as:

*“All Audit Management Letters to and from the Auditor-General’s Department for the 2021-2022 financial year and any corresponding audit reports which arose from such correspondence during this audit period.”*

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	Letter from AGD to SAPOL dated 22 December 2021 – Risk of fraud in South	Access Refused	Schedule 2 – Exempt Agencies	This document is considered to be an Audit working document and represents the body of information and documentation requested or gathered during the course of



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2	Australia Police Letter from SAPOL to AGD dated 17 January 2022 – Inquiries regarding the risk of fraud in SAPOL			<p>undertaking audits or examinations, upon which the Auditor-General or his Department will review, consider and assess, and which may give rise to audit findings that will be subject to natural justice, and subsequently communicated in audit management letter correspondence to agencies and/or reporting to Parliament.</p> <p>As the Auditor-General is an exempt agency, SAPOL has received advice these documents are the working documents of the Auditor-General and are therefore exempt from disclosure.</p>
3	Letter from SAPOL to AGD dated 17 January 2022 – Audit strategy for South Australian Police for 2021-22			
4	Letter from AGD to SAPOL dated 19 January 2022 – Audit strategy for South Australia Police for 2021-22			
5	Letter from AGD to SAPOL dated 9 March 2022 – 2021-22 South Australia Police Chris21 user access review	Partial Release	<p>13(1)(a)</p> <p>15(a) 15(b)</p> <p>16(1)(a)(iv) 16(1)(b)</p>	

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				contains sensitive information including personal & financial affairs. I am therefore of the view that protecting such information far outweighs the public interests.
6	Letter from AGD to SAPOL dated 11 March 2022 – Follow up of Expiation Notice System information technology general controls issues at South Australia Police for 2021-22	Partial Release	4(2)(a)(i) 4(2)(a)(iii) 4(2)(a)(iv) 4(2)(b)	<p>A portion of the redacted text contains information detailing deficiencies that if disclosed, have the potential for disruption to operations, loss of data &amp; unauthorised access of information via the mechanism exposed in the audit findings. The information accessed as a result of the disclosure and potential unlawful use could pose a serious threat to any investigation and adjudication as data could easily be deleted, amended or disseminated. Access to such information would also prejudice the effectiveness of investigating a contravention or possible contravention of the law particularly if the information was accessed and/or disseminated to a party subject to investigation. I am therefore of the view that protecting such information far outweighs the public interests.</p>
			9(1)(a) 9(1)(b)	<p>A portion of the redacted text represents information requested and gathered during the course of undertaking audits upon which the Auditor-General or his Department will review, consider and assess, and which includes recommendations and advice to improve controls and measures to mitigate risks to the agency. The free and frank recording of this information is crucial in providing a critical view point from which the agency can make an informed decision to implement the necessary changes. I am therefore of the view that protecting such information far outweighs the public interests.</p>
			13(1)(a)	<p>A portion of the redacted text contains information obtained and supplied in confidence to enable a</p>

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				fair and just audit process to be conducted and identify areas of risk to the organisation and areas for improvement. Disclosure of this information would be a breach of confidence.
7	Letter from AGD to SAPOL dated 28 March 2022 - Interim audit of workers compensation expenses at South Australia Police for 2021-22		Full Release	
8	Letter from SAPOL to AGD dated 30 March 2022 – 2021-22 South Australia Police Chris21 user access review	Partial Release	13(1)(a)  15(a) 15(b)	<p>A portion of the redacted text contains information obtained and supplied in confidence to enable a fair and just audit process to be conducted. Disclosure of this information would be a breach of confidence.</p> <p>A portion of the redacted text contains information which would expose SAPOL to the risk of its financial data being compromised by way of the method detailed within the document. Release of this information would provide the mechanism with which one of SAPOLs systems could be breached and should this occur, would have a substantial adverse effect on the financial interests of the agency. I am therefore of the view that protecting such information far outweighs the public interests.</p>
9	Letter from SAPOL to AGD dated 1 April 2022 - Follow up of Expiation Notice System information technology general controls issues at South Australia Police for 2021-22	Partial Release	6(1)  4(2)(a)(i) 4(2)(a)(iii) 4(2)(a)(iv) 4(2)(b)	<p>A portion of the redacted text is the personal affairs of a party other than the applicant. The information relates to a mobile phone number. I am of the view that disclosure of such information is unreasonable given the need to protect the person’s privacy and personal information.</p> <p>A portion of the redacted text contains information detailing deficiencies that if disclosed, have the potential for disruption to operations, loss of data &amp;</p>

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				unauthorised access of information. The information accessed as a result of the disclosure and potential unlawful use could pose a serious threat to any investigation and adjudication as data could easily be deleted, amended or disseminated. Access to such information would also prejudice the effectiveness of investigating a contravention or possible contravention of the law particularly if the information was accessed and/or disseminated to a party subject to investigation. I am therefore of the view that protecting such information far outweighs the public interests.
10	Letter from AGD to SAPOL dated 5 April 2022 – Interim audit of Cash at South Australia Police for 2021-22	Full Release		
11	Letter from SAPOL to AGD dated 21 April 2022 - Interim audit of workers compensation expenses at South Australia Police for 2021-22	Full Release		
12	Letter from SAPOL to AGD dated 28 April 2022 – Interim Audit of Cash at South Australia Police for 2021-22	Full Release		
13	Letter from AGD to SAPOL dated 14 July 2022 – Interim audit of contract management at South Australia Police for 2021-22	Full Release		
14	Letter from AGD to SAPOL dated 8 August 2022 – Audit of South Australia Police’s implementation of the new government procurement framework	Full Release		

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15	Letter from SAPOL to AGD dated 9 August 2022 – Auditor General’s interim audit of contract management at South Australia Police for 2021-22	Full Release		
16	Letter from AGD to SAPOL dated 9 August 2022 – Interim audit of employee expenses and liabilities at South Australia Police for 2021-22	Full Release		
17	Letter from AGD to SAPOL dated 11 August 2022 – Outcomes from our Shield Program review for 2021-22	Full Release		
18	Letter from AGD to SAPOL dated 19 August 2022 – 2021-22 South Australian Computer Aided Dispatch System information technology general controls review	Full Release		
19	Letter from SAPOL to AGD dated 23 August 2022 – Auditor General’s audit of South Australia Police’s implementation of the new Government procurement framework	Full Release		
20	Letter from SAPOL to AGD dated 24 August 2022 – Outcomes from Shield Program Review for 2021-22	Full Release		
21	Letter from SAPOL to AGD dated 9 September 2022 – 2021-22 South Australian Computer Aided Dispatch System information technology general controls review	Full Release		

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22	Letter from SAPOL to AGD dated 9 September 2022 - Interim audit of employee expenses and liabilities at South Australia Police for 2021-22	Full Release		

### CLAUSES FOR REFUSAL

Clause 4(1)(a) and 4(1)(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 endanger the life or physical safety of any person; or to prejudice the fair trial of any person or the impartial adjudication of any case;"*

Clause 4(2)(a)(i) & 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 investigation of any contravention or possible contravention of the law (including any revenue law) whether generally or in a particular case; and would, on balance, be contrary to the public interest."*

Clause 4(2)(a)(iii) & 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 effectiveness of any lawful method or procedure for preventing, detecting, investigating or dealing with any contravention or possible contravention of the law (including any revenue law); and would, on balance, be contrary to the public interest."*

Clause 4(2)(a)(iv) & 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; and would, on balance, be contrary to the public interest."*

Clause 6(1) of Schedule 1 of the FOI Act which states:

*"A document is an exempt document if it contains matter the disclosure of which would involve the unreasonable disclosure of information concerning the personal affairs of any person (living or dead)."*

Clause 9(1)(a)(i) & 9(1)(b) Schedule 1 of the FOI Act which states:

*"A document is an exempt document if it contains matter that relates to any opinion, advice or recommendation that has been obtained, prepared or recorded in the course of, or for the purpose of, the decision-making functions of the Government, a Minister or an agency; and the disclosure of which would, on balance, be contrary to the public interest."*

Clause 13(1)(a) Schedule 1 of the FOI Act which states:

*"A document is an exempt document if it contains matter the disclosure of which would found an action for breach of confidence; or if it contains matter obtained in confidence the disclosure of which might reasonably be expected to prejudice the future supply of such information to the Government or to an agency; and would, on balance, be contrary to the public interest."*

**CLAUSES FOR REFUSAL continued**

Section 15(a) & 15(b) 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 have a substantial adverse effect on the financial or property interests of the State or an agency; and would, on balance, be contrary to the public interest.”*

Section 16(1)(a)(iv) & 16(1)(b) 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 have a substantial adverse effect on the effective performance by an agency of the agency's functions; 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 \$39.00, if applicable.

Yours sincerely



Sergeant Kelly Johnson  
**Freedom of Information Unit**  
(Accredited Freedom of Information Officer)

25 November 2022