



ACT
Government

Transport Canberra and
City Services

FREEDOM OF INFORMATION COVERSHEET

The following information is provided pursuant to section 28 of the *Freedom of Information Act 2016*.

FOI reference: 24-047

Information to be published	Status
1. Access application	Published
2. Decision notice	Published
3. Schedule	Not applicable
4. Documents	Not applicable
5. Additional information identified	Not applicable
6. Fees	Not applicable
7. Processing time (in working days)	30 days
8. Decision made by Ombudsman	Not applicable
9. Additional information identified by Ombudsman	Not applicable
10. Decision made by ACAT	Not applicable

11. Additional information identified by ACAT	Not applicable
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From: [REDACTED]
To: TCCS_FreedomOfInformation
Subject: Re: phone call - Clarification request - Additional information to complete your FOI access application, reference 24-047
Date: Friday, 21 June 2024 1:54:55 AM

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Hi Sam

Thank you very much for consolidating those items. The scope is correct.



Sent from my iPhone

On 20 Jun 2024, at 9:50 AM, TCCS_FreedomOfInformation <TCCS.FOI@act.gov.au> wrote:

OFFICIAL

Hi [REDACTED]

Thank you for your advice. Can I please confirm if the scope of your application below is correct? I have highlighted additional email that I have added from our previous communications.

I am seeking data for the following maintenance activities across the ACT since 1 July 2018:

- Grass maintenance including mowing, edging, weed control
- Tree and shrub pruning including removal of prunings
- Litter removal
- Illegal dumping removal
- Graffiti removal
- Pedestrian and cycle path maintenance
- Street sweeping
- Playground maintenance

For the items listed above I am seeking data in a structured form for actual maintenance activities carried.

If actual work performed is not recorded for a requested activity, please note in the FOI response for that activity that the data is not available.

If data is not available in a structured format (such as from a database or spreadsheet) for a requested activity, please note in the FOI response that the data is not available in a structured format.

The datasets should include all available data fields from the systems used to maintain scheduling and recording of maintenance activities carried out, but excluding those fields containing personal data.

The minimum dataset anticipated from this FOI request is, for each maintenance activity carried out, a data record comprising the following data fields:

Data Field	Sample Record
1. Commencement Date	02/03/2024
2. Commencement Time	0800
3. Completion Date	02/03/2024
4. Completion Time	1430
5. Hours effort	5.5
6. Maintenance Activity Categorisation	Grass Maintenance
7. Maintenance Activity Sub-Categorisation	Edging
8. Suburb	Gordon
9. Street	McGilvray Close
10. Asset maintained	Point Hut Pond Gordon District Playground
11. GPS Coordinates	-35.45632198548108, 149.08446978744493
12. Description of work performed	Edging of pedestrian paths
13. Number of personnel deployed	2

Kind regards,

Sam

Samantha Irons | A/g Director

Phone: 02 6207 9242 | Email: TCCS.FOI@act.gov.au

Information Access | Procurement, Legal and Information Access | Transport Canberra and City Services Directorate | ACT Government

480 Northbourne Avenue, Dickson 2602 | GPO Box 158 Canberra ACT 2601 | www.act.gov.au

From: [REDACTED]

Sent: Thursday, June 20, 2024 7:13 AM

To: TCCS_FreedomOfInformation <TCCS.FOI@act.gov.au>

Subject: RE: phone call - Clarification request - Additional information to complete your FOI access application, reference 24-047

OFFICIAL

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Hi Sam

Thanks for the clarification.

I am only interested at this stage in maintenance activities where there is a record of the work being carried out, and regardless of its origin (ie programmed, Fix My Street, complaints).

From: TCCS_FreedomOfInformation <TCCS.FOI@act.gov.au>

Sent: Wednesday, June 19, 2024 2:50 PM

To: [REDACTED]

Subject: RE: phone call - Clarification request - Additional information to complete your FOI access application, reference 24-047

OFFICIAL

Good afternoon [REDACTED]

Thank you for email. I recall in our earlier conversations that you were interested in planned maintenance activities, rather than maintenance in response to Fix My Street or complaint requests. Can you please advise if your application should be considered to apply to planned maintenance activities only, or a broader approach?

Kind regards,

Samantha | A/g Director

Phone: 6207 2987 | Email: TCCS.FOI@act.gov.au

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From: [REDACTED]

Sent: Wednesday, June 19, 2024 6:30 AM

To: TCCS_FreedomOfInformation <TCCS.FOI@act.gov.au>

Subject: RE: phone call - Clarification request - Additional information to complete your FOI access application, reference 24-047

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Good Morning Samantha

In relation to my FOI request #24-047 I confirm that I am seeking data for the following maintenance activities:

- Grass maintenance including mowing, edging, weed control
- Tree and shrub pruning including removal of prunings
- Litter removal
- Illegal dumping removal
- Graffiti removal
- Pedestrian and cycle path maintenance
- Street sweeping
- Playground maintenance

For the items listed above I am seeking data in a structured form for actual maintenance activities carried.

If actual work performed is not recorded for a requested activity, please note in the FOI response for that activity that the data is not available.

If data is not available in a structured format (such as from a database or spreadsheet) for a requested activity, please note in the FOI response that the data is not available in a structured format.

I will be pleased to discuss further.

[REDACTED]
[REDACTED]
[REDACTED]

From: TCCS_FreedomOfInformation <TCCS.FOI@act.gov.au>
Sent: Tuesday, May 28, 2024 12:00 PM
To: [REDACTED]
Subject: RE: phone call - Clarification request - Additional information to complete your FOI access application, reference 24-047

OFFICIAL

Hi [REDACTED],

I hope this email finds you well. I am sorry for the delay in reply, I have been away unwell. I have discovered that an email following up with you has been stuck in my inbox; I am sorry this was not identified sooner.

I have received advice from City Presentation on other standardised categories of maintenance activities that are captured in structured systems, and advice on some of the activities described in your initial application.

Spatial export is possible for the following activities, including dates and locations. The times of actual attendance can vary, as the system allows for multiple entries at one time, and the recorded time may reflect when the record is made rather than time at location.

<!--[if !supportLists]-->• <!--[endif]-->Tree planting
<!--[if !supportLists]-->• <!--[endif]-->Tree watering
<!--[if !supportLists]-->• <!--[endif]-->Tree removals

Mowing data is seasonal, suburb based and programmed. The level of data relating to the location of an activity can vary, depending on whether the mower was fitted with GPS or the locations is manually recorded. The mowing map ([Grass mowing - City Services \(act.gov.au\)](#)) is an example of some of the data we capture, and can give you what street was mowed and when for period 7 days, 2 weeks and more than 2 weeks.

Graffiti on toilet blocks and parks are inspected weekly. The activity is completed weekly and is not recorded in a database. Only requests for graffiti removal made through fix my street are recorded in a database.

Litter removal and illegal dumping activities are reactive. Only requests made through fix my street are recorded in a database.

To complete your application, can you please provide our team with a complete list of the type of maintenance activities relevant to your application?

Kind regards,

Samantha | A/g Director

Phone: 6207 2987 | Email: TCCS.FOI@act.gov.au

Information Access | Procurement, Legal and Information Access | Transport Canberra and City Services Directorate | ACT Government

480 Northbourne Avenue, Dickson 2602 | GPO Box 158 Canberra ACT 2601 | www.act.gov.au

From: [REDACTED]
Sent: Thursday, May 23, 2024 5:58 AM
To: TCCS_FreedomOfInformation <TCCS.FOI@act.gov.au>
Subject: RE: phone call - Clarification request - Additional information to complete your FOI access application, reference 24-047

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Good Morning Sam

Could I receive an update on my FOI request 24-047, including the date that I can expect to receive the information requested.

Many thanks

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: Friday, April 12, 2024 5:24 PM

To: 'TCCS_FreedomOfInformation' <TCCS.FOI@act.gov.au>

Subject: RE: phone call - Clarification request - Additional information to complete your FOI access application, reference 24-047

Hi Sam

Thanks for your emails and phone call. You have captured my requirements very well thank you. Just a minor typo correction that 'structural' should read 'structured'.

I will look forward to hearing further from you in due course.

Kind regards

[REDACTED]

From: TCCS_FreedomOfInformation <TCCS.FOI@act.gov.au>

Sent: Friday, April 12, 2024 4:19 PM

To: [REDACTED]

Subject: RE: phone call - Clarification request - Additional information to complete your FOI access application, reference 24-047

OFFICIAL

Hi [REDACTED]

Thank you again for taking the time to speak with me this afternoon.

It is my understanding from our conversation that you are seeking access to data captured in a structural system, such as excel or a data/case management system. The type of maintenance activities that are of interest are ones which relate to the tidiness of the ACT. You are not interested in maintenance activities around the maintenance of road pavement, with the exception of street sweeping, or regular waste collection. To identify the type of maintenance activities of interest, you require our advice on the categories of urban maintenance activities captured in existing data systems.

As discussed, our team will liaise with business areas who are responsible for these works and provide you with a reply as soon as possible.

Kind regards,

Sam

Samantha Irons | Assistant Director

Phone: 02 6207 9242 | Email: TCCS.FOI@act.gov.au

Information Access | Procurement, Legal and Information Access | Transport Canberra and

From: [REDACTED]

Sent: Friday, April 12, 2024 3:29 PM

To: TCCS_FreedomOfInformation <TCCS.FOI@act.gov.au>

Subject: RE: Clarification request - Additional information to complete your FOI access application, reference 24-047

OFFICIAL

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Hi Samantha

Thank you for your email.

I am happy to discuss how I can refine my FOI request to help minimise the effort required.

In relation to the 'other maintenance activities', is it possible to obtain a list of standardised categories of maintenance activities that are used in the various systems? Whilst I have provided a sample listing I don't want to miss out on relevant data by excluding data due to different interpretations or categorisations of maintenance activities. It is likely that there are existing management reports that provide summaries of maintenance activities. These reports and the data queries that support the production of those reports could be a useful basis for identifying the full scope of maintenance activities across the ACT.

If I can be provided this list of categories I can then nominate those that are relevant to me to assist in refining the search.

In relation to the geographical scope I do require access to data for all of the ACT.

In relation to information spanning multiple systems, this was a factor in me keeping my request broad such that filtering of records would not be required, and that only those data fields which contain personal data would need to be excluded. From an IT perspective this should minimise the effort in extracting the data. Based on my experience in IT and data analysis, the scope of my request should not impose a significant diversion of resources.

I am willing however to discuss this further and explore ways in which my request can be practicably met.

Kind regards

[REDACTED]

[REDACTED]

From: TCCS_FreedomOfInformation <TCCS.FOI@act.gov.au>

Sent: Friday, April 12, 2024 11:19 AM

To: [REDACTED]

Subject: Clarification request - Additional information to complete your FOI access application, reference 24-047

OFFICIAL

Dear [REDACTED],

Transport Canberra and City Services (TCCS) received your application by transfer from the Chief Minister, Treasury and Economic Development Directorate. Your application has been transferred to us, as it is likely the information you are seeking access to falls solely within our directorate. For your application to be complete, TCCS requires additional detail about the type of information you are seeking access to. This is because we require enough detail in an application to undertake a search of our records, and for us to know that the search is exhaustive and complete before a decision on access can be made.

I thank you for providing a list of example activities. To ensure we can identify all relevant types of information, can you please advise if you are agreeable to amending the word of your application to a complete list of relevant maintenance types, and advise us on what types of 'other maintenance activities' are of interest to you?

We have also identified that the current wording of your application is likely to identify a significant amount of information, across multiple business areas and systems and may require a significant diversion of resources. To allow us to process your application effectively, can you please advise if the data you are seeking relates to a specific area, such as a suburb or collection of streets, in Canberra? While TCCS is committed to pro-disclosure and improving access to government information, under section 44 of the FOI Act, an application may be refused to be dealt with if it would require an unreasonable and substantial diversion of resources.

If you would like assistance from our team to complete your application or have any questions about this email, please contact us on (02) 6207 2987.

Kind regards,

Samantha | Assistant Director

Phone: 6207 2987 | Email: TCCS.FOI@act.gov.au

Information Access | Procurement, Legal and Information Access | Transport Canberra and City Services Directorate | ACT Government

480 Northbourne Avenue, Dickson 2602 | GPO Box 158 Canberra ACT 2601 | www.act.gov.au

From: [REDACTED]

Sent: Thursday, April 4, 2024 6:00 AM

To: CMTEDD FOI <CMTEDDFOI@act.gov.au>

Subject: Freedom of Information Request - datasets of ACT Government urban maintenance activities

You don't often get email from [REDACTED]. [Learn why this is important](#)

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Good Morning

I wish to submit an application for access under the Freedom of Information Act 2016 (the FOI Act).

I request detailed dataset(s) of all ACT Government urban maintenance activities carried out since 1 July 2018.

These activities include but are not limited to:

- Grass maintenance including mowing, edging, weed control
- Tree and shrub pruning including removal of prunings
- Litter removal
- Graffiti removal

- Pedestrian and cycle path maintenance
- Street sweeping
- Other maintenance activities

The datasets should include all available data fields from the systems used to maintain scheduling and recording of maintenance activities carried out, but excluding those fields containing personal data.

The minimum dataset anticipated from this FOI request is, for each maintenance activity carried out, a data record comprising the following data fields:

Data Field	Sample Record
1. Commencement Date	02/03/2024
2. Commencement Time	0800
3. Completion Date	02/03/2024
4. Completion Time	1430
5. Hours effort	5.5
6. Maintenance Activity Categorisation	Grass Maintenance
7. Maintenance Activity Sub-Categorisation	Edging
8. Suburb	Gordon
9. Street	McGilvray Close
10. Asset maintained	Point Hut Pond Gordon District Playground
11. GPS Coordinates	-35.45632198548108, 149.08446978744493
12. Description of work performed	Edging of pedestrian paths
13. Number of personnel deployed	2

I am assuming that this data resides in one or more IT systems used by the ACT Government to manage maintenance works. If the data resides in multiple systems, I request that the relevant data from each system be provided in a separate file.

The data fields listed above are not intended to be prescriptive but are provided to illustrate the minimum data that I anticipate to be available from these systems. The data requested may be labelled differently in these systems, or may not exist. I request that all data fields available in these systems be provided, excluding those fields which contain personal data.

For the purpose of data analysis I request, and I believe it is reasonable to do so, that the data be provided in an industry standard structured format such as Excel, CSV, delimited TXT, or JSON.

I will be pleased to discuss my request further if required.

[Redacted signature block]

This email, and any attachments, may be confidential and also privileged. If

you are not the intended recipient, please notify the sender and delete all copies of this transmission along with any attachments immediately. You should not copy or use it for any purpose, nor disclose its contents to any other person.



Dear 

Freedom of information request: Reference 24-047

I refer to your application made under the *Freedom of Information Act 2016* (the FOI Act) received by transfer from the Chief Minister, Treasury and Economic Development Directorate on 5 April 2024. I thank you for working with the Transport Canberra and City Services directorate (TCCS) to provide additional information on your application which completed your application on 21 June 2024. It is my understanding that you seek access to the following government information:

“I am seeking data for the following maintenance activities across the ACT since 1 July 2018:

- Grass maintenance including mowing, edging, weed control
- Tree and shrub pruning including removal of prunings
- Litter removal
- Illegal dumping removal
- Graffiti removal
- Pedestrian and cycle path maintenance
- Street sweeping
- Playground maintenance

“The datasets should include all available data fields from the systems used to maintain scheduling and recording of maintenance activities carried out but excluding those fields containing personal data.”

Data Field	Sample Record
1. Commencement Date	02/03/2024
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8. Suburb	Gordon
9. Street	McGilvray Close
10. Asset maintained	Point Hut Pond Gordon District Playground
11. GPS Coordinates	-35.45632198548108, 149.08446978744493

12. Description of work performed	Edging of pedestrian paths
13. Number of personnel deployed	2

Authority

I am an Information Officer appointed by the Director-General under section 18 of the Act to deal with access applications made under Part 5 of the Act.

Decision on access

On 1 August 2024, I wrote to you under section 46 of the FOI Act to consult with you on my intention to refuse to deal with your access application on the grounds that doing so would be an unreasonable and substantial diversion of resources. In my notice, I invited you to amend the scope of your application in a way which would remove the grounds for refusal. To allow time for your reply, the processing of your application was suspended for 10 business days, ending on 16 August 2024. As the statutory timeframe was paused on day 28 of the period provided under section 40 of the FOI Act, a decision is due to you on 20 August 2024.

As of 16 August 2024, we have not received a request for your application to be amended.

As the scope of your application remains, I maintain the view that that the processing of your application would be an unreasonable and substantial diversion of resources. In reaching this view, I have considered that the scope of your application has identified approximately 23,793 datasets as potentially relevant. These datasets are created between 2020 and June 2024, and relate to the eight maintenance types listed in your application. For the period between 2018 and 2020, our search did not identify the level of data as contained in the format in which you seek information.

While I acknowledge that you have sought to reduce the administrative burden on processing your application by excluding personal information, this has not removed the need for data sets to be reviewed manually to confirm relevance. Some of the reasons for manual review to be undertaken are as follows:

- Data capture does not separate ‘closed’ requests by reason. Your application seeks access to data demonstrating maintenance activities have been completed. While searches can be refined to work orders, the closure of the request may occur without maintenance having been undertaken. For example, at attendance to a site, an issue was not found, or the address is wrong. Other reasons may be that work orders were duplicated or created in error.
- Locations of reported issues are provided by the requestor. It is not uncommon for the requestor to enter their residential address rather than the location of issue. Without checking addresses there is a risk of disclosing third party personal information. A review of the case file is required to identify if the address was to a location requiring maintenance.

I have also been advised that there are some potential challenges in identifying relevant data accurately. For example:

- The number of people completing the activity may not be accurate, as only one person is required to complete entries into the system.
- Data relating to the time spent completing an activity, as well as the specific times started and completed varies. The closure of a work order can be completed after the fact and in bulk. This results in the close times reflecting the time the task is closed in the system rather than the time in which the maintenance was completed.

- The commencement date captured reflects the time the work order is created. Capturing the start date or time of maintenance work can vary, with some information captured outside of ICT systems and therefore outside of the scope of this application. For example, a report or invoice.
- Maintenance categorisation may not accurately reflect the entire maintenance activity or work carried out. For example, where there are multiple activities being carried out in a single attendance to a location.

I considered the matter of *Burdon and Suburban Land Agency*, in which the Senior Assistant Ombudsman identifies a non-exhaustive list of factors relevant when assessing what constitutes an unreasonable and substantial diversion of resources. This list includes:

- the terms of the request, especially if the request was expressed globally.
- the demonstrated importance of the documents
- the size of the respondent and the extent of its resources
- the respondent's estimate of the number of documents, pages, processing time and cost
- the reasonableness of the initial assessment and whether the applicant has been cooperative in refining the scope, and
- whether the processing time is more than 40 hours of work.

It is estimated that the number of hours to process this application is likely to exceed 1205 hours. This estimate excludes time already spent processing this application to date.

I have considered the current resourcing capacity for processing access applications in TCCS and find that your application would substantially divert those resources and inhibit our ability to deliver on nominal responsibilities, including time sensitive projects, and exercise the functions arising from obligations under the *Freedom of Information Act 2016*.

The threshold for an access application to be considered an unreasonable diversion is where the extent to which the public interest would be advanced by giving access to the information does not justify the use of the required resources.

While the disclosure of the information within these types of records are likely to inform the community of maintenance activities, the likelihood of the requested records advancing the public interest is minimal as the data sets do not meet the minimum expected in your application, vary in accuracy against the terms used in your application, and it is known that some of the information is captured in records outside of ICT systems and is outside of the scope of the application. Further, the disclosure of the information would only advance the public interest to understand actions taken in response to specific complaints at the time and in relation to that complaint. Information on upcoming programmed maintenance work is routinely published at a high level.

Considering the significant diversion of resources, and the extent to which the public interest is likely to be advanced, I am refusing to deal with this access application under section 43(1)(a) of the FOI Act.

Charges

In accordance with [Freedom of Information \(Fees\) Determination 2018](#), a fee of \$0.35 per page of information disclosed, except for the first 50 pages, may be applied to an access application. No fee is applicable to your application.

Online publishing – disclosure log

Under section 28 of the Act, TCCS maintains an online record of access applications called a disclosure log. A copy of your application and my decision will be published in 3 – 10 business days. Your personal information will be removed from these copies prior to publication. You may view the TCCS disclosure log [here](#).

Ombudsman review

My decision on your access request is a reviewable decision as identified in Schedule 3 of the Act. You have the right to seek an Ombudsman review of this outcome under section 73 of the Act within 20 working days from the day that my decision is published in TCCS' disclosure log, or a longer period allowed by the Ombudsman. If you wish to request a review of my decision, you may write to the Ombudsman at:

The ACT Ombudsman
GPO Box 442
CANBERRA ACT 2601
Via email: actfoi@ombudsman.gov.au

ACT Civil and Administrative Tribunal (ACAT) review

Under section 84 of the Act, if a decision is made under section 82 on an Ombudsman review, you may apply to the ACAT for review of the Ombudsman decision. Further information may be obtained from ACAT at:

ACT Civil and Administrative Tribunal
GPO Box 370
CANBERRA CITY ACT 2601
Telephone: (02) 6207 1740
www.acat.act.gov.au

If you have any queries concerning the directorate's processing of your request, or would like further information, please contact the TCCS FOI and subpoena team on (02) 6207 2987 or email to tccs.foi@act.gov.au.

Yours sincerely



Lisa Johnson
Information Officer

20 August 2024