



**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: TCCSFOI 2018-072

Information to be published	Status
1. Access application	Published
2. Decision notice and schedule	Published
3. Documents	Not published
4. Additional information identified	No
5. Fees	Waived
6. Processing time (in working days)	30 days (extension granted)
7. Decision made by Ombudsman	n/a
8. Additional information identified by Ombudsman	n/a
9. Decision made by ACAT	n/a
10. Additional information identified by ACAT	n/a

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**From:** [REDACTED]  
**Sent:** Wednesday, 22 August 2018 10:03 PM  
**To:** TCCS\_FreedomOfInformation  
**Subject:** Freedom of Information Request - [REDACTED]  
**Attachments:** signature.asc

I am making a request under the Freedom of Information Act 2016 (the Act) to the Transport Canberra and City Services Directorate; more specifically to Transport Canberra.

I am requesting emails, calendar entries, internal messaging logs and any other documents created, sent, received or modified by [REDACTED] or [REDACTED] of Transport Canberra, relating to the following phrases, persons and accounts:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. Access Canberra question reference number #180607-[REDACTED]

In order to limit the scope and size of this request, I require only those items created, sent, received or modified since 6/8/2018.

If there are any questions regarding this request, or to provide the documents, please contact me at [REDACTED]. I do not consent to be contacted by any other staff in TCCS directorate except those handling the FOI request.

As there does not appear to be any approved form published as a notifiable instrument on the ACT Legislation Register, as required under s108 of the Act if use of an "official form" is to be required, I expect this submission in email format to be accepted as a valid request.

I would request that the fee be waived under s105 of the Act as this request related to personal information under the relevant definition.

Kind Regards  
[REDACTED]



**ACT**  
Government

Transport Canberra and  
City Services

[REDACTED]

Dear [REDACTED]

**Freedom of information request: Reference 18-072**

I refer to your access application made under the *Freedom of Information Act 2016* (the FOI Act) and received by Transport Canberra and City Services Directorate (TCCS) on 22 August 2018, in which you sought access to:

Emails, calendar entries, internal messaging logs and any other documents created, sent received or modified by [REDACTED] or [REDACTED] of Transport Canberra, relating to the following phrases, persons and accounts:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. Access Canberra question reference number #180607-[REDACTED]

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.

TCCS is required to provide a decision on your access application by 20 September 2018, however, I note that a number of extensions have been agreed to and the final due date is 5 October 2018.

#### **Identification of documents**

Searches were conducted seeking emails, calendar entries, internal messaging logs and other documents held by [REDACTED] and [REDACTED] in relation to the six search areas. By searching [REDACTED] and [REDACTED] records, any records that they created, sent, received or modified have been captured.

A number of emails were identified which relate to your request and two documents which provide a chronology of events from 15 August 2018 prepared separately by [REDACTED] and the Chief Information Officer respectively and sent to both [REDACTED] and [REDACTED]. A (draft) briefing note to the Minister was also identified.

No internal messaging logs (Cisco Jabber) were identified as having been created, sent, received or modified in relation to the search criteria by [REDACTED] and [REDACTED].

To ensure that no documents were missed that may not have been in the possession of [REDACTED] and [REDACTED] a search of documents held by other officers involved in the matter was also undertaken by the FOI officer. The additional searches covered the records of Transport Canberra's Systems Project Manager, who had primary carriage of the matter, the Chief Information Officer and myself as Chief Operating Officer.

I have not sought documents held by [REDACTED] in relation to legal advice. On 17 August 2018, advice was sought and provided by the Government Solicitor's Office through the TCCS Legal and Contracts Branch in relation to this matter. Documents which request or provide legal advice are legal professional privileged. Under schedule 1, 1.2, *information that is subject to legal professional privilege* is information the disclosure of which is taken to be contrary to the public interest.

In not identifying documents which are legal professional privilege, I am relying on section 43 (e) of the Act which provides that I may refuse to deal with an access application, in part or full, if the government information requested is of a kind which is taken to be contrary to the public interest to disclose under schedule 1.

#### **Decision**

My decision is to refuse to deal with the request to the extent that it captures documents created on the 17 August 2018 that are legal professional privileged for the reasons outlined above.

Documents, and parts of documents, identified as within the scope of your request (other than subject to legal professional privilege) contain information that I consider to be, on balance, contrary to the public interest to disclose under the test set out in section 17 of the Act.

The schedule of documents at Attachment A provides specific details about the reasons for non-disclosure of information and form part of this decision.

I have decided to grant access, under section 50 of the Act, to copies of documents (Attachment B) with deletions applied to information that I consider would be contrary to the public interest to disclose.

#### **Statement of Reasons**

In reaching my decision, I have taken the following into account:

- The Act, in particular:
  - Section 43 (e) – Refusing to deal with application - general
  - Schedule 1, Section 1.2 - Information subject to legal professional privilege
  - Schedule 1, Section 1.4 (1) (a), (b) and (f), (4)(b) – Relating to law enforcement
  - Schedule 2 Section 2.1, Factors favouring disclosure in the public interest
  - Schedule 2, Section 2.2, Factors favouring nondisclosure in the public interest
- *Information Privacy Act 2014*
- *Human Rights Act 2004*

As part of this process, when considering factors under schedule 2, I must consider factors favouring disclosure and non-disclosure.

**Factors favouring disclosure (Schedule 2.1):**

- Disclosure could reasonably be expected to
  - Inform the community of the government's operations (Schedule 2, 2.1, (a)(iii));
  - Contribute to the administration of justice generally including procedural fairness (Schedule 2, 2.(a)(iv));
  - Allow or assist inquiry into possible deficiencies in the conduct or administration of an agency or public official (Schedule 2, 2.(a)(v)).

**Factors favouring non-disclosure (Schedule 2.2):**

- Disclosure could reasonably be expected to
  - Prejudice security, law enforcement or public safety (Schedule 2, 2.2(a)(iii));
  - Prejudice the protection of an individual's right to privacy or any other right under the *Human Rights Act 2004* (Schedule 2, 2.2 (a)(ii));
  - Prejudice trade secrets, business affairs or research of an agency or person (Schedule 2, 2.2 (a)(xi));
  - Prejudice the competitive commercial activities of an agency (Schedule 2, 2.2(a)(xiii));
  - Privileged from production (Schedule 2, 2.2 (b)(ii)).

**Law enforcement (Schedule 1)**

A large number of the documents contain information that I have decided would be contrary to the public interest to release as the disclosure of the information could reasonably be expected to:

- Prejudice the investigation of a contravention or possible contravention of the law in a particular case (schedule 1, 1.14 (1)(a));
- Identify the existence or identity of a confidential source of information in relation to the enforcement or administration of the law (schedule 1, 1.14 (1)(b));
- Prejudice the effectiveness of a lawful method or procedure for preventing, detecting, investigating or dealing with a contravention or possible contravention of the law (schedule 1, 1.14 (1)(f)).

The redacted information reveals security processes, strategies and considerations about an identified, potential contravention of the law. It also reveals how information of a security nature is captured and identified by the directorate through alternative information sources. I consider that for operational purposes these sources are confidential and to reveal the detail of the information could reasonably be found to undermine and put at risk the effectiveness of the government's, and specifically this Directorate's, security operations.

I considered whether the information fell under the exception contained at Schedule 1, 1.14 (4) (b) of the Act. The exception relates to information which contains a general outline of the structure of a program adopted by an agency for dealing with a contravention or possible contravention of the law.

In this case, while the information would reveal a general process in relation to the TCCS security program, it goes far further and would reveal detail that could prejudice the effectiveness of the Directorate's investigation and security operations in relation to unlawful activity. It could reasonably be expected to prejudice the effectiveness of prevention measures when detecting, investigating and dealing with a contravention or possible contravention of the law.

I therefore have decided that the exception does not apply and that the information is information the disclosure of which is taken to be contrary to the public interest. I am not required to consider further factors favouring release in respect to the information redacted under schedule 1.4.

#### **Schedule 2 considerations**

In weighing the public interest, I also considered if the public interest was favoured by the release of information not captured by Schedule 1.14 considerations. My considerations took account of factors contained in Schedule 2 of the Act.

I concluded that the factors favouring disclosure in the public interest are that the information may:

- Inform the community of the government's operations (Schedule 2, 2.1, (a)(iii));
- Contribute to the administration of justice generally including procedural fairness (Schedule 2, 2.(a)(iv));
- Allow or assist inquiry into possible deficiencies in the conduct or administration of an agency or public official (Schedule 2, 2.(a)(v)).

In this case, I have released information that I believe is supported by these factors. I did not find other factors for release persuasive. This is because the subject of the documents and the documents that were identified focused closely on the lawfulness of your actions about which Transport Canberra had formed a view would undermine security and could potentially lead to unlawful behaviour of fare avoidance through the undermining of the [REDACTED]

The release of information shows action taken by TCCS when potential breaches of ICT security are identified (though I have found it is not in the public interest to reveal the specifics of that action).

I understand that the source of your request may be to establish how your inquiry to Access Canberra (#180607-██████████) on 7 July 2018 was received and progressed. In this respect there is public interest in releasing documents to provide procedural fairness to you in revealing ██████████ and ██████████ decisions about your presentation. Release in this context may also allow or assist inquiry into the possible deficiency in the conduct of administration.

It is not required of me to make a decision on the public interest or otherwise of your ██████████ and thus my decision is focused only on the subject of the documents.

Factors that I considered favoured nondisclosure in the public interest where disclosure of the information could reasonably be expected to:

- Prejudice security, law enforcement or public safety (Schedule 2, 2.2(a)(iii));
- Prejudice the protection of an individual's right to privacy or any other right under the *Human Rights Act 2004* (Schedule 2, 2.2 (a) (ii));
- Prejudice trade secrets, business affairs or research of an agency or person (Schedule 2, 2.2 (a)(xi));
- Prejudice the competitive commercial activities of an agency (Schedule 2, 2.2(a)(xiii));
- Be privileged from production (Schedule 2, 2.2 (b) (ii)).

Information has been redacted from a number of folios because that information is commercial-in-confidence and its release could prejudice the competitive commercial activities of Transport Canberra. In addition, the information names a service provider and discloses business affairs of that provider which could affect that business.

I find that this outweighs the reasons that I have identified above for releasing the information. The information redacted is, on balance, not in the public interest to release as it is information shared between the ██████████ and TCCS about the claims you were to make in your proposed presentation about the ██████████. This information is commercial-in-confidence and to reveal the outcome of the discussion could reasonably be taken to prejudice the competitive commercial activities of TCCS and indeed the security of the system.

I consider that the release of the information is contrary to the public interest but I am satisfied that the factors in favour of release can still be met while protecting this specific information.

I have already discussed the issues of security and law enforcement. While I believe that these issues fall under schedule 1 and are therefore taken to be contrary to the public interest, the theme of these issues can also be weighed more generally against factors that support release.

In this case, I believe that the weight is in favour of nondisclosure in the public interest. The information would prejudice security and law enforcement by revealing the security operations of this agency and the deliberations and strategy that is used when such matters are identified by the Directorate. Knowledge of this information, if revealed, could be used to undermine security protocols and response to issues in the future. Further, revealing such information could undermine relationships between enforcement and regulatory agencies that TCCS deals with and limit access to information in the future.

There is a small amount of information that has been redacted as information that is subject to legal professional privilege. This information is taken to be contrary to the public interest as explained above.

Finally, I have identified information that may prejudice the protection of an individual's right to privacy or other right under the *Human Rights Act 2004*. Documents containing personal information about individuals, including names and contact details have been removed. As a general rule, an agency that holds personal information about an individual that has been collected for a particular purpose must not disclose the information to a third party without consent (*Information Privacy Act 2014* (Territory Privacy Principle 6)). Considering the type of information, I am satisfied that the factors in favour of release can still be met while protecting the personal information of the individuals involved, therefore, I have decided to release the information with deletions applied to information that I consider would be contrary to the public interest to disclose.

#### **Charges**

The first 50 pages of a release of information are provided free of charge. While your request has exceeded the threshold of 50 pages, I am satisfied that you have a personal interest in the information and in this respect have waived the fee.

#### **Online publishing – disclosure log**

Under section 28 of the Act, TCCS maintains an online record of access applications called a disclosure log. Your original access application and my decision will be published in the TCCS disclosure log from 3 days after the date of this decision. Your personal details will not be published.

As this information is not part of the Open Access Information Scheme it will not be published online. You may view TCCS' disclosure log at [www.tccs.act.gov.au/about-us/freedom\\_of\\_information](http://www.tccs.act.gov.au/about-us/freedom_of_information).

#### **Ombudsman review**

My decision on your access request is a reviewable decision under section 73 of the Act. An application to review must be made 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](mailto: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(1) 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  
Level 4, 1 Moore Street  
GPO Box 370  
CANBERRA CITY ACT 2601  
Telephone: (02) 6207 1740

[www.acat.act.gov.au](http://www.acat.act.gov.au)

If you have any questions concerning the directorate's processing of your request, or would like further information, please contact the directorate's FOI Coordinator on 6205 5408 or email [tccs.foi@act.gov.au](mailto:tccs.foi@act.gov.au).

Yours sincerely



Cherie Hughes  
Information Officer

5 October 2018

## Freedom of Information - SCHEDULE

<p>Please be aware that under the <i>Freedom of Information Act 2016</i>, some of the information provided to you will be released to the public through the ACT Government's Open Access Scheme.</p> <p>Personal information or business affairs information will not be made available under this policy. The Open Access release status column of the table below indicates what documents are intended for release online through open access. If you think the content of your request has been accessed incorrectly and could contain personal or business affairs information, please notify the FOI Officer immediately by email <a href="mailto:TCCS_freedomofinformation@act.gov.au">TCCS_freedomofinformation@act.gov.au</a></p> <p>Information about what is published on open access is available online at: <a href="http://www.tccs.act.gov.au/about-us/freedom_of_information">http://www.tccs.act.gov.au/about-us/freedom_of_information</a></p>						
File reference no.						
<p>TCCS FOI 18-072</p> <p>Emails, calendar entries, internal messaging logs and any other documents created, sent, received or modified by [REDACTED] or [REDACTED] of Transport Canberra, relating to the following phrases, persons and accounts:</p> <ol style="list-style-type: none"> <li>1. [REDACTED]</li> <li>2. [REDACTED]</li> <li>3. [REDACTED]</li> <li>4. [REDACTED]</li> <li>5. [REDACTED]</li> <li>6. Access Canberra question reference number #180607-[REDACTED]</li> </ol> <p>*to be removed prior to publication</p>						
Document Ref no	No. of folios in document	Type of document	Date on Document	Access Status	Reason for non-release or deferral (folio no.)	Open access release status
All documents					Mobile numbers from all documents have been removed as personal information (except those documents addressed and sent to you)	
All documents						Non-release: no documents will be published as part of open access release
1	1-4	Email	19 August 2018	Full access		

2	5-6	Email	17 August 2018	Full access	
3	7-9	Email	17 August 2018	Full access	
4	10-11	Email	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (Schedule 2, 2.2(a) (iii)) (10)
5	12-14	Email	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (13) Personal information relating to personal travel movements of author (Schedule 2, 2.2 (a) (ii)) (14)
6	15-19	Email	16 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (15, 16, 17) Out of scope information removed relating to an unrelated meeting (18, 19)
7	20-21	Email	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (21)
8	22-24	Email	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (23) Personal information relating to personal travel movements of author (24)
9	25-27	Chronology (attachment to email)	Undated	Partial access	Prejudice the competitive commercial activities of an agency and relate to the business affairs of another named party (25, 26) Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (26, 27)

10	28-31	Email	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (28, 29, 30) Prejudice the competitive commercial activities of an agency and relate to the business affairs of another named party (Schedule 2, 2.2, (e) (xi) and (xii)) (29)	
11	32-37	Email	18 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (33, 34, 35, 36, 37) Prejudice the competitive commercial activities of an agency and relate to the business affairs of another named party (33, 34, 35)	
	38-41	Attachment: Email 1	16 August 2018	Full access	Out of scope information removed relating to an unrelated meeting (39-41)	
	42-47	Attachment: Email 2	16 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (42, 43, 44) Out of scope information removed relating to an unrelated meeting (46, 47)	
	48	Attachment: Email 3	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (48) Personal information relating to personal travel movements of author (48)	
	49-52	Attachment: Email 4	16 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (49, 50) Out of scope information removed relating to an unrelated meeting (51, 52)	
	53-61	Attachment: Email 5 and attached Chronology	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (53, 54, 55, 56, 57, 59, 60, 61) Out of scope information removed relating to an unrelated meeting (57, 58)	

62-66	Attachment: Email 6	16 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (62, 63, 64) Out of scope information removed relating to an unrelated meeting (65, 66)	
67-73	Attachment: Email 7	17 August 2018	Partial access	Privileged from production (Schedule 2, 2.2 (b) (f)) (67) Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (67, 68, 69, 71) Out of scope information removed relating to an unrelated meeting (72, 73)	
74-76	Attachment: Email 8	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (75) Personal information relating to personal travel movements of author (76)	
77-81	Attachment: Email 9	16 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (77, 78, 80) Personal information relating to personal travel movements of author (80) Out of scope information removed relating to an unrelated meeting (80, 81)	
82-89	Attachment: Email 10	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (82, 83, 84, 85, 86) Privileged from production (67) Out of scope information removed relating to an unrelated meeting 88, 89)	

90-94	Attachment: Email 11	16 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (90, 91, 92) Out of scope information removed relating to an unrelated meeting (93, 94)	
95-102	Attachment: Email 12	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (95, 96, 97, 98, 100) Out of scope information removed relating to an unrelated meeting (101, 102)	
103-105	Attachment: Email 13	16 August 2018	Partial access	Out of scope information removed relating to an unrelated meeting (104, 105)	
106-111	Attachment: Email 14	17 August 2018	Partial access	Prejudice the competitive commercial activities of an agency and relate to the business affairs of another named party (106) Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (106, 107, 108, 110) Out of scope information removed relating to an unrelated meeting (110, 111)	
112-113	Attachment: Email 15	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (113) Personal information relating to personal travel movements of author (113)	
12	Email	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (115) Personal information relating to personal travel movements of author (115)	
13	Email	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (117)	

14	119-120	Email	17 August 2018	Full access	
15	121-123	Email	17 August 2018	Full access	
16	124-127	Email	16 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (124, 125, 126) Out of scope information removed relating to an unrelated meeting (126, 127)
17	128-132	Email	16 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (128, 129, 130, 131) Personal information (Schedule 2, 2.2 (a) (ii) (128) Out of scope information removed relating to an unrelated meeting (131, 132)
18	133-137	Email including incident reference #180607	17 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (133)
19	138-143	Email	18 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (138, 139, 140, 141, 142, 143) Prejudice the competitive commercial activities of an agency and relate to the business affairs of another named party (139, 140, 141)
20	144-146	Timeline -	Undated	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (144, 145, 146) Personal information (145) Privileged from production (145)
21	147-149	Email	17 August 2018	Full access	
22	150-152	Email	17 August 2018	Full access	
23	153-154	Email	17 August 2018	Full access	

24	155	Email	17 August 2018	Full access	
25	156-161	Email	18 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (156, 158, 159, 160, 161) Prejudice the competitive commercial activities of an agency and relate to the business affairs of another named party (158, 159)
26	162-167	Draft brief	Undated	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (165, 166) Prejudice the competitive commercial activities of an agency and relate to the business affairs of another named party (166) Privileged from production (166)
27	168-172	Email	18 August 2018	Full access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (168, 169, 170, 171, 172)
28	173-177	Email including incident reference #180607 [REDACTED]	17 August 2018	Partial access	Mobile phone number removed
29	178-179	Email	17 August 2018	Full access	
30	180	Email	17 August 2018	Full access	
31	181-184	Email	18 August 2018	Full access	
END					

32	185	Part of Email chain	18 August 2018	Partial access	Prejudice the competitive commercial activities of an agency and relate to the business affairs of another named party (185)	
33	186-188	Email	17 August 2018	Full access		
34	189-194	Email	18 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (189, 191, 192, 193, 194) Prejudice the competitive commercial activities of an agency and relate to the business affairs of another named party (191, 192)	
35	195-200	Draft brief	Undated	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (195, 196, 198, 199) Prejudice the competitive commercial activities of an agency and relate to the business affairs of another named party (198) Privileged from production (198, 199)	
36	201-207	Email	19 August 2018	Partial access	Schedule 1, 1.14, Law enforcement and prejudice security, law enforcement or public safety (202, 203, 204, 205, 206, 207) Prejudice the competitive commercial activities of an agency and relate to the business affairs of another named party (203, 204, 205)	