Annex D

REASONS FOR APPLYING SECTION 43(2) EXEMPTION

Ref No	**DOF/2026-0456**			
Information		**Exemption applied**	**Reasons for Disclosure**	**Reasons for Non Disclosure**
RE: FOI **Vacancy Prioritisation** 1. Documentation relating to rationale for determining suitability for filling posts and specifically to the decision to include and prioritise the ICT-designated Deputy Principal post, including any business justification, prioritisation assessment, approval process, or comparison against other vacancies being filled from the competition. **Candidate Allocation Process/ Competition Scope** 2. Copies of any records showing the vacancies identified at the time the competition was		Section 43(2)- Prejudice to commercial interests	• To show compliance with the FOI Act by disclosing information held by the Department as a Public Authority; • Disclosure would demonstrate transparency and accountability in relation to recruitment decisions, including how vacancies are identified, funded and approved. • Disclosure would improve public understanding of how staffing resources and funding are allocated, particularly where public funds are involved.	• It would not be in the public interest to disclose internal documents containing NICSHR internal information required when submitting a vacancy, or comparison exercises to initiate an NICS competition. • The Funding & Headcount forms contain commercially sensitive information about workforce planning, staffing requirements and resource allocation. Disclosure would be likely to prejudice the organisation's commercial interests by revealing internal resourcing strategies. The Funding and Headcount forms contain detailed information regarding current and anticipated workforce requirements, critical skills shortages, recruitment priorities and resource allocations. Disclosure would reveal information that could be

commissioned and launched.			used by recruitment agencies, consultancy firms and other market participants to better understand the Department's resourcing pressures and organisational dependencies. This could place the Department at a commercial disadvantage in future procurement exercises by enabling suppliers to tailor pricing strategies or service offerings in a manner that reduces competitive tension and limits the Department's ability to secure best value for money. • The vacancy referrals and supporting documentation reveal recruitment intentions, organisational priorities and business needs. Disclosure would be likely to prejudice the organisation's commercial interests by exposing workforce strategies to external parties.The vacancy referrals and supporting documentation reveal future recruitment intentions, succession planning considerations, operational priorities and areas where

			specialist skills are required. Disclosure would provide external organisations with advance knowledge of the Department's recruitment strategy and anticipated workforce needs. Such information could be exploited by suppliers operating within the recruitment market when bidding for future contracts or providing recruitment services, potentially increasing costs to the public purse and prejudicing the Department's commercial interests • The requested records contain funding and budget approval information linked to recruitment decisions. Disclosure would be likely to prejudice the organisation's commercial interests by revealing financial planning and resource commitments that are not publicly available. Disclosure of correspondence and records evidencing departmental input into allocation decisions would reveal internal methodologies, decision-making processes and

			strategic workforce management practices that are not publicly available. • The requested records contain information relating to funding approvals, budgetary considerations and internal assessments underpinning recruitment decisions. Disclosure would reveal levels of investment the Department is prepared to commit in addressing workforce requirements and could weaken the Department's negotiating position in future engagements with recruitment providers, consultancy firms and other service suppliers. This could adversely affect the Department's ability to obtain services on the most favourable commercial terms. • Disclosure of correspondence and records evidencing departmental input into allocation decisions would reveal internal decision-making

			frameworks, prioritisation methodologies and strategic workforce management practices. This information has commercial value because it provides insight into how the Department identifies and responds to workforce pressures. Releasing such information would enable external organisations to gain a greater understanding of the Department's operational requirements and recruitment drivers, potentially influencing supplier behaviour and diminishing the Department's ability to conduct future recruitment and procurement activities on an equal commercial footing.
In balancing where the public interest lies, the Department contends that public interest considerations against disclosure are predominant, and the public interest is better served by non-disclosure of the of the information at this time. Signed: Moyra Rooney Date: 28/08/26			