



What the Certification Is Over

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Version 1.0, 27 August 2026. This assessment examines what the published instruments of the Hosting Certification Framework say the Certified Strategic certification is over, what those instruments define, and when three passages entered the published record. It rests entirely on those instruments' own text and on pinned Internet Archive captures of their addresses. **It is not an assessment of any certified provider, and it makes no claim about what any provider does at any site.**

Scope

What is assessed. What the Hosting Certification Framework's published instruments say the certification is over, what they define, and when each of three passages entered the published record. Three instruments and their archived captures: the framework document S-HCF-1, the Deed of Certification in its published standard form A-DEED-1, and the certified-provider register H-HCF-1 and S-HCF-2, together with the For Service Providers page AT-HCF-3 and forty-one pinned Internet Archive captures of those addresses.

What is not assessed. Nothing about what any certified provider does at any site. Nothing about whether any provider holds, houses or has access to any data. Nothing about whether the framework's design is sound. **Every one of those lies outside what these instruments establish**, and this document makes no claim in any of those directions. The full statement is at *What this assessment is not*.

I. The instruments, in their own words

Three instruments, and each states the object of certification differently.

The framework document says the provider. At printed page 13 (PDF page 16), under *Certification Overview*:

“Certification under the Framework provides assurance to agencies that certified hosting providers meet defined security and risk management standards and have mitigation measures in place that support the outcomes set out in the Hosting Strategy.”

The same document says the facility arrangement. At printed page 4 (PDF page 7), under *Hosting Services*:

“When applied to system integrators, managed service or cloud service providers, the Framework will include an assessment of the underlying hosting services and data centre facilities that are used. As a result, certification of system integrators, managed service and cloud service providers will occur for each data centre facility arrangement used by the provider. This may result in a certification being granted for only some, but not all data centre facilities arrangements utilised by the provider.”

The Deed says the Service. At printed pages 4 and 5 (PDF pages 6 and 7):

“**4.2** Certification for a Service will be granted in respect of the Service Provider Type applicable to the Service.”

“**4.4** Certification may be issued for one or more Services made available by the Service Provider.”

“**4.5** The Certifying Authority will issue a Certification ID for each Service for which the Service Provider has been granted Certification (including any Service for which Provisional Certification is granted). The Certification ID will also identify the Service Provider Type applicable to the Service.”

The Deed defines Service, and defines the type it is granted against. At clause 1.1, printed pages 3 to 4 (PDF pages 5 to 6):

“**Service** means a specific service made available to a Commonwealth Entity(s) by the Service Provider within the scope of the Service Provider Type.”

“**Service Provider Type** means: a. providers of data centre facilities; b. cloud Service providers; c. managed service providers; d. system integrators; and/or e. software-as-a-service providers.”

Five types in the Deed. The framework's published page names two. AT-HCF-3, the For Service Providers page as served on 5 August 2026:

“The Hosting Certification Framework currently only applies to: Data Centre Providers; and Cloud Service Providers.”

This document does not reconcile the five with the two. It records that the Deed's standard form and the framework's own page state different populations, and that both are published.

2. The three certification objects

The register divides its Certified Strategic entries into three, and names each on its face. Read from S-HCF-2, the register as served on 17 August 2026, and from H-HCF-1 as served on 21 July 2026:

“Service Provider and Certified Strategic **Facility**:”

“Service Provider and Certified Strategic **Enclave**:”

“Service Provider and Certified Strategic **Service**:”

The three headings are worded identically in every pinned capture of the register. Population: seven captures, all read, spanning 17 January 2022 to 21 July 2026, 0-IA-20220117005227, 0-IA-20241214160934, 0-IA-20250216115257, 0-IA-20250623183308, 0-IA-20250916163147, 0-IA-20251114112212 and H-HCF-1. **One distinct heading signature across all seven. The three-way division is not recent.**

Thirty-two entries at both pins. Population: the elements at positions 10 to 41 in document order, of forty-seven on the page. The remainder is the page title block at 1, site navigation at 2 to 7, the two section names at 8 and 9, and the site-links list at 42 to 47. **Seventeen sit under Data Centre facilities and fifteen under Cloud Services.** Recounted from both pins at the writing of this sentence.

3. What the framework says a hosting provider is

The framework document describes the service as space, power and, in some cases, telecommunications infrastructure. Printed page 4 (PDF page 7):

“The fundamental service provided by hosting providers to agencies is space in data centre facilities divided into segregated and secured data halls, including physical access security to this space.”

“The hosting providers also supply the core infrastructure (e.g., generators, electrical power and management of climate control through cooling and ventilation) to ensure the ongoing operation of the environment occupied by tenants.”

“In some cases, the hosting provider may also provide telecommunications infrastructure across multiple data centre facilities, or between data centre facilities and customers.”

And on the same page, under the heading *Knowledge of Data and Systems*, it says what a hosting provider knows. Quoted whole:

“Whilst hosting providers maintain data centre facilities and act as the landlord for their tenants, hosting providers typically only have access to the equipment (cabinets, racks etc.) in emergency circumstances. They do not have any knowledge of the type and sensitivity of the data hosted by its customers.”

This is a statement about a class of provider, and it assigns no provider to either side of it. Its qualifier *typically* is the framework’s own and is preserved here. **Nothing in this document says which certified providers the passage describes**, and nothing in the framework does either.

The framework draws the other side of the line in the next paragraph, and it is quoted because a reader who saw only the first would think the framework had one category where it has two:

“In circumstances where the hosting services are provided to agencies indirectly, as in-house functions of systems integrators, managed service providers and cloud service providers, additional risk mitigation measures will be put in place to account for the fact that these service providers will have both knowledge of, and responsibility for, the type and sensitivity of the data hosted by agencies.”

4. What is defined, and what is not

4.1 Enclave is defined on the For Service Providers page

The definition is on the For Service Providers page and in neither operative instrument. AT-HCF-3, under *Eligibility to apply for HCF Certification*:

“To be eligible to apply for HCF Certification: Data Centre Service Providers must be able to demonstrate: the entire data centre facility is constructed according to the appropriate zone specifications defined in the Protective Security Policy Framework (PSPF); or the data centre includes an area (enclave) used for the delivery of Government services that is constructed to the appropriate zone specifications defined in the PSPF and has a discernible perimeter that separates it from the remainder of the data centre.”

The duplicated “to to” is in the source and is reproduced. The quotation departs from the source in no other respect.

The same block states the Cloud Service Provider criterion, and it is quoted because it is the only place any instrument says what a cloud provider’s certification rests on:

“Cloud Service Providers must be able to demonstrate they only use data centre facilities, or enclaves that are either: certified under the HCF; or have been fully assessed and considered to satisfy the certification requirements.”

So an enclave, on the only published definition, is a physical area with a perimeter.

4.2 The word does not appear in either operative instrument

Enclave occurs nought times in the framework document. Population: all thirty printed pages of S-HCF-1, full text extraction, recounted at this sentence.

Enclave occurs nought times in the Deed of Certification. Population: all twenty printed pages of A-DEED-1, full text extraction, recounted at this sentence.

The instrument that certifies enclaves does not contain the word.

4.3 Facility and service are not defined on any pinned capture of the page

No pinned capture of the For Service Providers page defines facility or service. Population: eighteen captures, the earliest at each populated digest in SP-IA-CDX, spanning 7 March 2022 to 7 November 2025.

Four definitional forms were tested and each returns nought. The word *facility* appears on every capture from October 2023 and is undefined at each.

The Deed defines Service, at clause 1.1, quoted at section 1. The framework document defines neither: it has no definitions section, and its *Terminology* section defines only the two certification level names.

4.4 The register defines nothing

The register carries a provider name and a site or service code, and no definition. Population: the whole of S-HCF-2 as extracted. **Nought occurrences of *means, is defined, definition* or *refers to*. Nought occurrences of ACN or ABN.**

That an entry gives a reader a name and a scope token and nothing else, and that no entry carries a legal-entity identifier, are established in Record one of this case's claim set at R1-4 and R1-3, from the same pin. They are not re-established here.

5. What the Deed says about data

The Deed defines Agency Data by where it sits, not by who holds it. Clause 1.1, printed page 2 (PDF page 4):

“**Agency Data** means any Commonwealth Entity data or any other data relating to the Commonwealth or its operations, facilities, Commonwealth Entities, clients, personnel, assets and programs that may be provided to, or obtained by, the Service Provider or its personnel which is processed, stored or handled within a Service provided by the Service Provider. Agency Data includes data in whatever form it may exist.”

Every operative clause naming Agency Data is about exit. Clause 12.1 and 12.2 on reimbursement of “costs associated with exiting Agency Data from the Service”; clause 15.1.2, under which a Commonwealth Entity “may exit their Agency Data from the Service”; clause 15.3 on transition costs; and clause 16.1, which requires “a post-termination retrieval period no shorter than sixty (60) days for the Commonwealth Entity to remove its Agency Data from the Service”. **In each, the Commonwealth Entity removes and the Service Provider reimburses.**

The Deed nowhere states that the Service Provider holds, controls or has custody of Commonwealth data. Population: all twenty printed pages of A-DEED-1. Over those same twenty printed pages, *custody* occurs nought times, *possession* nought times, and the phrase *control of* nought times. **The word *held* occurs twice:** once at clause 23.6, a severability provision that has nothing to do with data, and once in the definition of Relevant Change at limb (d):

“...a change to the security measures and procedures, including the security measures and procedures at, or otherwise in relation to, a Service (including a Service facility) that decreases the level of security at the Service or poses a security threat to the Commonwealth or any data hosted, held or stored within the Service...”

Where the data is held within the Service, not by the Service Provider.

This negative was established by reading every operative clause bearing on data, not by counting words. The counts above support it; a count alone could not carry it, because an instrument can say a thing in words a search term does not anticipate.

6. The dating

Three passages, each dated to a pinned artefact.

6.1 The framework document has not changed since 26 November 2021

Its earliest Internet Archive capture is F-IA-20211126005423, 26 November 2021 at 00:54:23 UTC, and it is byte identical to the document pinned in this case: both 553,379 bytes, both SHA-256 7b654f6e435bb905..., compared byte for byte. The index F-IA-CDX carries twenty-three rows to 19 August 2026 and two distinct digests, and all twenty-three are accounted for: ten application/pdf captures at the document's own digest, nine revisits carrying that same digest, and four rows at the SHA-1 of zero bytes, being two redirect records, 20250315091310 and 20251107054155, and two revisits, 20251114112209 and 20251130141419. Ten and nine and four are twenty-three. The document's digest is the pinned document's own, the base32 SHA-1 of the bytes this case pins. The landlord passage at printed page 4 has been in the document throughout.

Whether the document was published before 26 November 2021 is not established. It is present in the earliest capture that exists, so the bound is one-sided.

6.2 The enclave definition entered the page between 4 March and 20 October 2023

Lower bound: SP-IA-20230304175649, the capture of 4 March 2023, in which the eligibility block and the word are absent. Upper bound: SP-IA-20231020042123, the capture of 20 October 2023, in which the block appears complete: the Data Centre criterion, the parenthesis, the duplicated *to to* and the Cloud Service Provider criterion all present together.

The interval between those two captures is two hundred and twenty-nine days, ten hours and twenty-four minutes, computed from their timestamps, 20230304175649 and 20231020042123, and the Internet Archive holds no capture of this page between them. That is a gap in the archive, not a gap in the record: the page existed throughout and was not captured.

The block has not changed since. Population: the thirteen pinned captures that carry it, 20 October 2023 to 7 November 2025, measured from *"To be eligible to apply for HCF Certification:"* to *"...satisfy the certification requirements."*: 753 characters, one distinct string at all thirteen.

6.3 The storage sentence entered the register between 23 June and 16 September 2025

Lower bound: 0-IA-20250623183308, the capture of 23 June 2025, in which the sentence is absent.

Upper bound: 0-IA-20250916163147, the capture of 16 September 2025, in which it reads:

“Strategic Certification enclave and facility providers represents the highest level of assurance to Australian Government customers and offers the most secure storage solutions for government held data.”

The number disagreement between *providers* and *represents* is in the source at every occurrence and is reproduced.

6.4 Two earlier changes to who the framework applies to

The Software-as-a-Service category was removed from the page between 23 May and 4 July 2022. Lower bound SP-IA-20220523031342, which lists “Data Centre Providers, Cloud Service Providers, Software-as-a-Service (SaaS) Providers” and applies the framework to providers that “deliver or manage” hosting services. Upper bound SP-IA-20220704220619, in which the category is gone and “deliver or manage” has become “deliver”.

An enumeration became a limit between 18 October 2022 and 4 March 2023. Lower bound SP-IA-20221018055051: “Service Providers include:”. Upper bound SP-IA-20230304175649: “The Hosting Certification Framework currently only applies to:”.

Software-as-a-Service remains one of the Deed’s five Service Provider Types, quoted at section 1 from the standard form as published.

6.5 All three were on the published record together on 16 September 2025

On 16 September 2025 the framework document, the register and the For Service Providers page each carried its passage, and two of the three are pinned from that day. The register at 16:31:47 UTC, 0-IA-20250916163147. The page at 17:22:22 UTC, SP-IA-20250916172222, fifty minutes and thirty-five seconds later. The framework document is evidenced by F-IA-CDX, whose digest is unchanged either side of that date.

7. The finding

The register divides its Certified Strategic entries into three certification objects. Two of the three are defined and one is not: Service in the Deed, Enclave on the For Service Providers page, Facility in neither and in nothing else published.

The Deed defines Service and grants certification over it. Facility is defined in none of them: population, the framework document at thirty printed pages, the Deed at twenty printed pages, the register as extracted, and eighteen pinned captures of the For Service Providers page. **Enclave is defined once,** on the For Service Providers page, in the eligibility criteria quoted at section 4.1, and it occurs nought times in the framework document at thirty printed pages and nought times in the Deed at twenty printed pages. **The definition entered the page between 4 March and 20 October 2023 and describes a physical area with a discernible perimeter.**

Three passages, each with its own subject and its own place in the record.

The framework's passage at printed page 4 is about hosting providers as a class. It says they act as the landlord for their tenants, typically have access to the equipment only in emergency circumstances, and do not have any knowledge of the type and sensitivity of the data hosted by its customers. **That page carries nought occurrences of *Strategic*, nought of *Assured* and nought of *tier*, and the framework's Certification Levels section begins at printed page 13, nine printed pages later.**

The register's sentence is about the Certified Strategic tier. It describes Certified Strategic as offering the most secure storage solutions for government held data.

The enclave definition is on the framework's own For Service Providers page, in the eligibility criteria a provider must satisfy to apply.

The dates. The framework's passage is in the document from its earliest capture, 26 November 2021. The enclave definition entered the page between 4 March and 20 October 2023. The register's sentence entered between 23 June and 16 September 2025. **All three were on the published record on 16 September 2025, and all three remain there.**

8. Limitations

1. **No executed Deed is public.** A-DEED-1 is the standard form: its cover leaf carries [Insert Service Provider Name] and an empty ABN field.
 2. **No Conditions of Certification is public.** The Deed defines it as a list “*issued by the Certifying Authority to the Service Provider*”.
 3. **No Assessment report is public.** Deed clause 14.1.3 refers to “*the locations listed in the Service Provider’s Assessment report*”, so such a document exists and this practice has not read one.
 4. **No Contract between an agency and a provider is public.**
 5. **The HCF Application and Readiness Guide was not read.** AT-HCF-3 names it as “*a comprehensive summary of the certification requirements*”; it is not held in this corpus.
 6. **The window at section 6.2 cannot be narrowed from the archive.** The Internet Archive holds no capture of the page in the two hundred and twenty-nine days between the two captures that bound it; population, SP-IA-CDX. **The gap is in the archive; the page existed throughout.**
 7. **The framework document’s availability before 26 November 2021 is not established.** The bound is one-sided.
 8. **Deed clause 20.1 requires the provider not to disclose information about the Deed or the Assessment without consent**, so items 1 to 4 are not gaps that further searching closes.
 9. **The five Service Provider Types and the two on the page are not reconciled here**, and no view is offered on which governs.
 10. **Section 4.3’s negative is bounded to eighteen captures of one page** and to four definitional forms. It is not a claim that no definition is published anywhere.
 11. **The definition at section 4.1 is carried in fifteen files under this corpus’s archive directories, and all fifteen are captures of the same page.** Population: 744 files, counted 27 August 2026; twenty-nine contain the word.
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What this assessment is not

It is not an allegation that anything is misdescribed. No instrument is said to be wrong, and no statement in any of them is contradicted here.

It is not a claim that any provider does or does not hold data. The framework's statement at section 3 is the framework's, about a class, with its own qualifier *typically*, and it assigns no provider to either side.

It is not a claim about what any certified provider actually does at any site. Nothing in the published instruments establishes that, and nothing here asserts it.

It takes no position on whether the framework's design is right. Whether a certification should define its objects, and whether a definition belongs in an instrument rather than on a page, are questions this document does not reach.

It is not a claim that the instruments contradict each other. Section 7 states three passages, each with its subject and its place in the record. It does not assert that any two of them are about the same subject, and it does not assert that any two of them are inconsistent.

It is not a criticism of drafting practice. That the enclave definition is published on the For Service Providers page rather than in the framework document or the Deed is recorded as a fact about where it appears. **Nothing here says that placement was evasion, defect or oversight**, and nothing here says where a definition ought to sit.

The archive gap at section 6.2 is not evidence the page was unpublished. The Internet Archive holds no capture of that page in the interval between the two captures that bound the window. **That is a statement about what the archive holds. The page existed throughout, and no inference is drawn from the absence of a capture.**

The Deed's silence is not a legal characterisation of custody. Section 5 records what the Deed says and does not say about Commonwealth data. **It makes no finding about who holds, controls or has custody of any data in law or in fact**, and nothing in it should be read as one.

Every one of those lies outside what the instruments establish.

Related published assessments

- **AOS-HCF-2026-001:** *Jurisdiction of Control in the Hosting Certification Framework, Strategic Tier.*
Establishes that the register entry is a name and a service code carrying no legal-entity identifier.
- **AOS-CMP-2026-001:** *The Compellability Gap in Commonwealth Cloud Assurance.*
- **AOS-HCE-2026-001:** the hosting certification exemption at section 30AB(4) of the *Security of Critical Infrastructure Act 2018*.
- **AOS-RCH-2026-001:** what the Relevant Change mechanism makes observable.

End of draft.

End of document.