



What the Change Log Covers

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What the Change Log Covers

Version 1.0, 4 September 2026. This assessment examines whether a framework's own record of what changed between releases is complete, over the releases this corpus holds. It reads one chapter of the Australian Signals Directorate's *Information security manual*, the *Guidelines for procurement and outsourcing*, in ten quarterly releases from June 2024 to September 2026, and the three release change logs held, for March, June and September 2026. It reads the manual's control lists for the same three releases, the pages that publish each release, and the March 2026 release archive. Every claim rests on an artefact pinned by hash in this case's register, or on an artefact already pinned in this corpus. No reporting is pinned and none is cited.

Scope

What is assessed. Twenty-seven register rows. **Six artefacts are this case's own and twenty-one are inherited from ism-procurement-2026-08; the list below sums to twenty-seven against the register.** Ten releases of the chapter [I-ISM-10 to I-ISM-16, I-ISM-7, I-ISM-2, I-ISM-18]; three release change logs [I-ISM-23, I-ISM-4, I-ISM-20]; three control lists [I-ISM-24, I-ISM-5, I-ISM-21]; the March 2026 release archive and its *Using the Information security manual* chapter [I-ISM-6, I-ISM-25]; the chapter's page as served in June and September 2026 [I-ISM-1, I-ISM-17]; the publisher's archived-releases index as served in August and September 2026 [I-ISM-8, I-ISM-22]; two Internet Archive captures of the chapter's page of 15 and 16 March 2026 [I-IA-20260315134750, I-IA-20260316091721]; and one of the manual's landing page of 2 September 2026 [I-IA-20260902025519]; and the June and September 2026 full manuals [I-ISM-3, I-ISM-19], held and not read beyond their covers, because the manual-wide comparison is made over the control lists. $10 + 3 + 3 + 2 + 2 + 2 + 2 + 1 + 2 = 27$. Thirteen of the inherited rows sit in the originating case's two side registers and name them, on the form recorded at OPEN-ITEMS 115.

What is not assessed. Any chapter of the manual other than the procurement chapter, except at control level through the control lists for two release pairs. The change logs of the seven releases before March 2026, which sit inside release archives held out of this corpus's git and were not extracted. Why any change was made or logged. Whether any change was correct.

How the negatives are stated. Every negative below states the population it was established over in the sentence that makes it. Every count names its test. Every nil states the width of the search and the control that proves the method, and states in the same sentence what the control reaches.

The method, so a reader can re-execute it and see what it cannot. Each chapter was extracted with `pdftotext -layout`; the page headers and footers “ISM | Guidelines for procurement and outsourcing N” were removed, whitespace collapsed to single spaces, a stray page number immediately before a control line removed, and a hyphen followed by a space and a lowercase letter rejoined as a line-wrap artefact. A control is the run beginning “Control: ISM-nnnn; Revision: n; Updated: Mon-yy;” followed by either “Applicability: ... Essential Eight: X”, the form used from June 2024 to December 2024, or “Applicable: ... Essential 8: X”, the form used from December 2024 onward; its text is what follows up to the first full stop that precedes a capital letter, the next control line, or the end of the chapter. A control change is any difference in identifier, revision, date, applicability, Essential Eight marking or text, and the counts below separate text changes from applicability-format changes. Narrative is the chapter body from “Cyber supply chain risk management” to the last “Contact details” with every control run removed, split into sentences at a full stop or colon followed by a space and a capital letter, sentences under 26 characters dropped. A differing narrative line is a line the unified diff of the two releases’ sentence lists marks as added or removed, with zero context; a rewritten sentence counts twice, once removed and once added, and every count below states removed and added separately. The manual-wide comparison reads the “Controls” sheet of each release’s System security plan annex template on the Identifier, Revision, Updated and Description fields and nothing else. A change log citation is the presence of a control identifier anywhere in the log’s extracted text. **What this cannot see:** a change inside a list rendered with glyphs the text layer drops; a change in layout, emphasis or heading level that leaves sentence text identical; a sentence the splitter divides differently in two releases, which counts as two lines; text in images; the text of any chapter not held, which is every chapter but one for every release but March 2026; and control text in any release whose control list is not held. It reads text layers, never page images.

1 The releases held

The manual is released quarterly, and ten releases of the chapter are held. The publisher’s archived-releases index, as served on 17 August 2026 [I-ISM-8, sha256 f4a2410022bdc271...], links nine release archives, June 2024 to June 2026; as served on 4 September 2026 [I-ISM-22, sha256 9ff74712ef632c25...], it links nine, September 2024 to September 2026, the June 2024 archive having left its “last 24 months”. The chapter of each of the ten releases from June 2024 to September 2026 is held. **Each self-dates to its release: the “Last updated:” line on page 1 of each chapter, read from its text layer, equals the release month in 10 of 10.**

Three change logs and three control lists are held, for March, June and September 2026: the March pair extracted from the March release archive [I-ISM-6, sha256 10daaaeea199ad69...], each extracted file’s CRC32 equal to the archive’s central-directory entry; the June and September pairs retrieved from the publisher [I-ISM-4, I-ISM-5, I-ISM-20, I-ISM-21].

2 What changed, pair by pair

Across the nine consecutive pairs, a control was added or its text changed in six, and the narrative differed in nine. Counted by the method in Scope, population the ten chapters:

Pair	Controls	Added	Text changed	Other	Narrative lines removed / added
Jun 2024 to Sep 2024	36 to 36	none	none	none	5 / 6
Sep 2024 to Dec 2024	36 to 38	ISM-1971, ISM-1972	ISM-1793, ISM-1570	33 applicability-format changes, “All” to “NC, OS, P, S, TS”	6 / 6
Dec 2024 to Mar 2025	38 to 38	none	ISM-1568, ISM-1882, ISM-1632, ISM-0141	none	16 / 20
Mar 2025 to Jun 2025	38 to 38	none	12	none	16 / 16
Jun 2025 to Sep 2025	38 to 38	none	none	ISM-1737 and ISM-1638 differ in the text layer by list glyphs and the control-line format only	13 / 11
Sep 2025 to Dec 2025	38 to 38	none	ISM-0141	none	5 / 7
Dec 2025 to Mar 2026	38 to 38	none	none	none	1 / 1
Mar 2026 to Jun 2026	38 to 38	none	7	none	12 / 12
Jun 2026 to Sep 2026	38 to 40	ISM-2124, ISM-2125	5	none	11 / 22

The twelve text changes of Mar 2025 to Jun 2025 are ISM-1631, 1452, 1568, 1882, 1632, 1787, 1788, 1790, 1791 and 1792, each gaining “operating systems”, and ISM-1073 and ISM-1576, each narrowed to “systems”. The seven

of Mar 2026 to Jun 2026 are ISM-1452, 1569, 1736, 1637, 0072, 1738 and 1574. The five of Jun 2026 to Sep 2026 are ISM-1737, 1971, 1638, 1972 and 1576. **The Dec 2025 to Mar 2026 pair's one removed and one added line are the copyright lines, 2025 and 2026; nothing else in the chapter's text layer differs.**

One control's revision number goes backward. ISM-0141 reads "Revision: 7; Updated: Dec-22" in December 2024 [I-ISM-12], "Revision: 8; Updated: Mar-25" in March 2025 [I-ISM-13] with "cyber security" become "cybersecurity", and "Revision: 7; Updated: Dec-22" again in December 2025 [I-ISM-16] with the earlier wording restored. This is what the three control lines print; nothing here says why.

Two narrative changes are quoted, because later sections turn on them. Between March and June 2026, in the passage on data ownership, "such as when legal action is taken and a service provider is asked to provide access to, or data from, their assets" [I-ISM-7] became "such as when a service provider is legally required to provide access to, or data from, their assets" [I-ISM-2]; in the same pair "foreign owned suppliers" gained its hyphen, and the passage on foreign lawful access was rewritten, quoted in section 3. Between June and September 2026, "For example, outsourced artificial intelligence applications or cloud services may be located offshore and subject to lawful and covert data collection without their customers' knowledge." [I-ISM-2] became "For example, managed services or outsourced cloud services may be located offshore and subject to lawful and covert data collection without their customers' knowledge." [I-ISM-18]; the same pair added a "Context" subsection on artificial intelligence applications and managed services and rewrote the passage on service-provider access from four sentences to eight.

3 What the change log records

For the three pairs whose change log is held, every control change in the chapter is cited in that log. Population: the fourteen control changes in those pairs, 0, 7 and 7. The March 2026 log [I-ISM-23, sha256 3cd7aeead67dbc53...] has 0 to cite against Dec 2025 to Mar 2026. The June 2026 log [I-ISM-4, sha256 4780b0c27a1faf76...] cites all seven of Mar 2026 to Jun 2026, each in its *Miscellaneous* section under "Minor grammar corrections were made to principles and controls that did not affect their intent." The September 2026 log [I-ISM-20, sha256 c299a5b6b5f0339f...] cites all seven of Jun 2026 to Sep 2026: ISM-2124, ISM-2125 and ISM-1576 in a *Guidelines for procurement and outsourcing* section, the other four in *Miscellaneous* under "A number of existing security controls referencing security assessments were amended to reference security control assessments." **The test is the identifier's presence anywhere in the log's extracted text; its control is that ISM-1631 and ISM-1567, unchanged across all three pairs, occur 0 times in each of the three logs, which shows the search does not find identifiers that are absent and shows nothing about the sections it finds them in.**

No narrative change in the chapter is recorded in any of the three logs. Population: the three logs entire, 9, 6 and 10 pages. The March and June logs carry no *Guidelines for procurement and outsourcing* section. The September log's section holds three entries, each citing a control identifier, and reads in full:

"Access to systems by service providers A new security control was introduced recommending ac-

cess by a service provider to an organisation's systems be restricted to remote management tools, source network addresses and time windows explicitly approved by the organisation. [ISM-2124] The existing security control recommending an organisation be immediately notified if their systems are accessed or administered by a service provider in an unauthorised manner was amended to recommend such events be treated as a cyber security incident. [ISM-1576] A new security control was introduced recommending all access to an organisation's systems by a service provider be independently logged by the organisation in a manner that the service provider cannot modify or delete, and analysed in a timely manner to detect any anomalous, unexpected or unauthorised activity. [ISM-2125]"

The section's heading and its three entries are set on separate lines in the log and are run together here; a page number falls between "manner" and "or delete" in the source and is omitted.

Width, and what the control reaches. Four phrases from the June narrative changes, "artificial intelligence applications or cloud services", "legally required to provide access", "foreign-owned suppliers" and "shared responsibility model that clearly defines", occur 0 times in the June log; three from the September changes, "managed services or outsourced cloud services", "originates outside Australia" and "An outsourced cloud service may also constitute a managed service", occur 0 times in the September log, and "Context" occurs once there, in an entry about another chapter. **The control for the September search is "treated as a cyber security incident", a phrase of the September log's own ISM-1576 entry, found once; the control for the June search is the June log's own sentence "Minor grammar corrections were made to principles and controls that did not affect their intent", found once; each control shows that the search reads the text of the log it is run on, and neither shows anything about phrases the log does not contain.**

One passage of the chapter was rewritten in two consecutive releases, and neither rewrite is recorded. The chapter's opening narrative, in March 2026 [I - ISM-7]:

"This includes identifying and managing jurisdictional, governance, privacy and security risks associated with the use of suppliers, such as software developers, IT equipment manufacturers, OT equipment manufacturers, service providers and other organisations involved in distribution channels. For example, outsourced cloud services may be located offshore and subject to lawful and covert data collection without their customers' knowledge. Additionally, use of offshore services introduces jurisdictional risks as foreign countries' laws could change with little warning. Finally, foreign owned suppliers operating in Australia may be subject to a foreign government's lawful access to data belonging to their customers."

In June 2026 [I - ISM-2]:

"Furthermore, this also includes identifying and managing jurisdictional, governance, privacy and security risks associated with the use of suppliers, such as software developers, IT equipment manufacturers, OT equipment manufacturers, service providers and other organisations involved in distribution channels. For example, outsourced artificial intelligence applications or cloud services may be located offshore and subject to lawful and covert data collection without

their customers' knowledge. Additionally, use of offshore services introduces jurisdictional risks as foreign countries' laws could change with little warning. Finally, foreign-owned suppliers operating in Australia may be subject to a foreign government's lawful access to data belonging to their customers."

Three of the four sentences differ between March and June: the first gained "Furthermore, this also"; the second gained "artificial intelligence applications or"; the fourth gained a hyphen. In September 2026 [I-ISM-18] the second sentence reads "For example, managed services or outsourced cloud services may be located offshore and subject to lawful and covert data collection without their customers' knowledge." and the other three are identical to June's, character for character. The passage carries no control identifier. The June log's only entry touching this chapter is the sentence over seven controls quoted above, which describes them as corrections "that did not affect their intent"; this passage is not among the seven, and "foreign owned suppliers", "foreign-owned suppliers", "lawful access", "jurisdictional", "lawful and covert data collection" and "artificial intelligence applications or cloud services" each occur 0 times in the June log. "managed services or outsourced cloud services", "foreign-owned suppliers", "lawful access" and "jurisdictional" each occur 0 times in the September log. Whether either rewrite affected the passage's intent is not a question this assessment answers; AOS-ISM-2026-001 reads the June passage.

The logs are silent on this chapter's narrative and are not silent on narrative as a class. The March log's first entry reads "Important contextual information was included on how the Information security manual's cyber security principles should be implemented by organisations.", a narrative change in another chapter, recorded.

4 What the change log says about its own coverage

Nothing, on the record held. Population: the three logs entire; the chapter's page as served on 3 September 2026 [I-ISM-17, sha256 66917ad7a551242d...]; the manual's landing page as captured on 2 September 2026 [I-IA-20260902025519, sha256 319c650248a73cf4...]; and the *Using the Information security manual* chapter of March 2026 [I-ISM-25, sha256 44de1d494735ec22...]. Each log opens with its title, a "Last updated" line and its first section; none carries a preamble. **Width:** over each log's text, "narrative", "wording", "summary of changes" and "changes made" occur 0 times in all three; "this document" occurs once in each, in the licence sentence "For the avoidance of doubt, this means this license only applies to material as set out in this document."; every occurrence of "cover", "scope" and "guidance" sits inside an entry about a control or principle, or in the contact line "If you have any questions regarding this guidance". The chapter's page names its attachment as "Guidelines for procurement and outsourcing (September 2026) 913KB .pdf" and describes no change log. The landing page lists "ISM June 2026 changes (June 2026) 728KB .pdf" among its attachments with no description. The *Using* chapter contains "changes" twice, both in a list of events that may prompt a review of a system, and "change log" 0 times. **The control is the licence sentence, found once in each log; it shows that the search reads each log's text, and shows nothing about sentences the logs do not contain.**

5 The manual-wide comparison

At control level, the logs cite every control added or removed and all but a handful of those changed.

Population: every row of the “Controls” sheet of each release’s control list, compared on Identifier, Revision, Updated and Description.

March to June 2026. [I-ISM-24, sha256 b9b5ab0fd90604ef..., 1,081 controls; I-ISM-5, sha256 c7e2f6dc52ae558f..., 1,101] 20 added, 0 removed, 119 changed. The June log cites 121 distinct identifiers: every one of the 20 added and 100 of the 119 changed. **The 19 uncited** are ISM-0402, 0536, 0714, 1924, 2060, 2061, 2062, 2072, 2074, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094 and 2103; 14 of them carry an unchanged revision number, and each read against its June row is an abbreviation, case or wording edit, thirteen of them “artificial intelligence” to “AI”.

June to September 2026. [I-ISM-5; I-ISM-21, sha256 5db3d188bdd70c48..., 1,143] 44 added, 2 removed (ISM-0521, ISM-1448), 105 changed. The September log cites 149 distinct identifiers: every addition, both removals, and 100 of the 105 changed. **The 5 uncited** are ISM-0556, 1823, 1944, 1948 and 1957, three with an unchanged revision number, each a case or abbreviation edit by reading. **The September log also cites three identifiers whose rows are identical in both lists:** ISM-1832, ISM-1562 and ISM-1984.

The control for the citation test is the same as in section 3, ISM-1631 at 0 in both logs, and it reaches the same distance: it shows the search does not find absent identifiers. The sheet comparison has no control beyond its own arithmetic, which reconciles: $1,081 + 20 = 1,101$ and $1,101 + 44 - 2 = 1,143$.

6 When the change logs were produced, and what the pages say

The three logs were produced on 18 March, 28 May and 4 September 2026, by their own metadata. March: CreationDate 2026-03-18T09:43:23+11:00, ModDate 09:44:25 [I-ISM-23]. June: 2026-05-28T14:07:05+10:00, ModDate 14:26:50 [I-ISM-4]. September: 2026-09-04T10:02:15+10:00, ModDate 10:02:59 [I-ISM-20]. The chapter’s page prints “First published: 09 Jun 2026” in June [I-ISM-1, sha256 32c8af6a8f467f5a...] and “First published: 03 Sep 2026” in September [I-ISM-17]. **June’s log therefore precedes its page’s stated first publication by twelve days, and September’s follows its page’s by one day.** The March release’s page date is not established by anything held: the two captures of the page in March 2026, of 15 and 16 March [I-IA-20260315134750, sha256 df644673b4961a98...; I-IA-20260316091721, sha256 a4fb0dc84b94cfe9...], print “First published: 04 Dec 2025” and the attachment “Guidelines for procurement and outsourcing (December 2025) 905KB .pdf”. A creation date dates a file’s bytes, not its content; a re-export, a re-save or a metadata rewrite would each produce the same signature, and the files carry no producer, creator or history. That limit is stated at Limitations and is carried whole.

7 The publisher's other record of change

The March 2026 release archive records which chapters changed in its file names, and that record and the change log disagree. The archive [I-ISM-6] holds 26 numbered chapter files: 12 named “(March 2026)”, being the full manual and eleven chapters, and 14 named “(December 2025)”. Test: the file names in the archive's central directory. The March log carries seven guideline sections: cyber security principles, cyber security roles, communication infrastructure, enterprise mobility, system hardening, software development and cryptography. **Four chapters named “(March 2026)” have no section in the log:** *Using the Information security manual*, cyber security incidents, procurement and outsourcing, and cyber security terminology. The procurement chapter, named “05. ISM - Guidelines for procurement and outsourcing (March 2026).pdf” and self-dating “Last updated: March 2026” [I-ISM-7], differs from its December 2025 predecessor [I-ISM-16] by the copyright year alone (section 2).

8 The finding

Each element below is stated with its own artefact and its own date. Each is what the artefact shows.

One. Across nine consecutive pairs of releases, June 2024 to September 2026, the procurement chapter's control set changed in six pairs and its narrative in nine, one of the nine by the copyright year alone. The ten chapters, I-ISM-10 to I-ISM-16, I-ISM-7, I-ISM-2, I-ISM-18.

Two. For the three pairs whose change log is held, every control change in the chapter is cited in that log: 0 of 0, 7 of 7, 7 of 7, the June seven under “Minor grammar corrections”. I-ISM-23, I-ISM-4, I-ISM-20, with the chapters of December 2025 to September 2026.

Three. No narrative change in the chapter is recorded in any of the three logs: 2, 24 and 33 differing lines against no entry, the March and June logs having no section for the chapter and the September log's section holding three control entries. The same three logs.

Four. The change log states its own coverage nowhere on the record held: not in any of the three logs, not on the chapter's page, not on the manual's landing page, not in the *Using the Information security manual* chapter. I-ISM-23, I-ISM-4, I-ISM-20; I-ISM-17, 3 September 2026; I-IA-20260902025519, 2 September 2026; I-ISM-25, March 2026.

Five. At control level across the manual, the June log cites every one of 20 additions and 100 of 119 changes, and the September log every one of 44 additions and 2 removals and 100 of 105 changes; the 24 uncited are abbreviation, case and wording edits, 17 with the revision number unchanged. I-ISM-24, I-ISM-5, I-ISM-21, I-ISM-4, I-ISM-20.

Six. The March 2026 release archive names twelve files “(March 2026)” and fourteen “(December 2025)”, and four of the eleven chapters so named have no section in the March log; the procurement chapter is one, and its text changed by the copyright year alone. I-ISM-6, I-ISM-23, I-ISM-16, I-ISM-7.

Seven. The three logs' own metadata date their production to 18 March, 28 May and 4 September 2026; the pages state first publication on 9 June and 3 September 2026; no held capture states March's. I-ISM-23, I-ISM-4, I-ISM-20, I-ISM-1, I-ISM-17, I-IA-20260315134750, I-IA-20260316091721.

Limitations

One chapter of 25, ten releases, three change logs. Every chapter claim is about the procurement chapter. Every change-log claim is about the three logs held.

The manual-wide test is over control fields only: Identifier, Revision, Updated and Description in the control lists, and nothing in any other chapter's narrative.

March 2026's publication date is not established. The only captures of the chapter's page in the March release period show the December 2025 state, and the Internet Archive's index holds no capture of the page between 16 March and 15 August 2026.

The seven earlier change logs are not held. They sit in release archives held out of git and were not extracted.

The comparison reads text layers. Its blind spots are stated in Scope: list glyphs, layout, emphasis, splitter boundaries, images, and every chapter and control list not held.

The change logs' production dates carry a limit. They date the files' bytes, not their content. The September log's bytes were produced the day after its page's stated first publication and about an hour before this practice retrieved them; no capture of the log's address exists anywhere, and none of the chapter's page exists for 3 September, so whether a file of the same content was served that day is not established (OPEN-ITEMS 113).

Every negative is bounded by the artefacts in the register and by the population stated beside it.

What this assessment is not

It is not a finding about ASD's process or intent. No artefact records either.

It is not a finding that any change was concealed. Every change counted here is on the face of two published documents a reader can open.

It is not a finding about the manual beyond one chapter, except at control level for two release pairs, where it says what section 5 says and no more.

It is not a finding that narrative changes should be logged. It is a finding that, in the population read, they are not, and that nothing states whether they are meant to be.

It is not a finding about what any change means for a reader of the chapter. AOS-ISM-2026-001 reads one of those changes; this assessment counts them.

Every negative is bounded by the three logs and ten chapters held and by the population stated beside it.

It is not a finding that the change logs were produced late. Section 6 states three dates against two page dates and one gap, and the Limitations state what those dates can carry.

Related published assessments

- **AOS-ISM-2026-001**, *Stated, Not Required*. The June 2026 procurement chapter, and one narrative change between March and June 2026 that its change log does not record.
- **AOS-HCD-2026-001**, *What the Consultation Publishes*. What one consultation package publishes, and what it directs a reader to ask for.
- **AOS-CS0-2026-001**, *What the Certification Is Over*. What the Hosting Certification Framework's published instruments say the certification is over.

End of document.