



Your ref:  
Our ref: LEX 841

'Me'  
By email: [foi+request-10581-3e83befc@righttoknow.org.au](mailto:foi+request-10581-3e83befc@righttoknow.org.au)

Dear Me

### **Freedom of Information – Internal review decision**

1. I refer to your email of 17 November 2023 requesting an internal review of the Department of Education's (the department) freedom of information (FOI) decision dated 16 November 2023 made under the *Freedom of Information Act 1982* (FOI Act).
2. I am authorised to make internal review decisions under the FOI Act.

#### **Decision summary**

3. For the reasons set out below, I have decided to vary the primary decision dated 16 November 2023 (the primary decision). I have decided to release information contained on pages 13, 25, 26, 29, 30, 36, 37, 39 and 40 of the document bundle that was previously redacted under section 47C(1) of the FOI Act.
4. In respect of the balance of the material, I affirm the primary decision that the material identified in the attached Schedule of Documents (Attachment B) is exempt from disclosure under sections 34 (Cabinet-related material), 42 (legal professional privilege), 47C (deliberative material), 47E(d) (certain operations of the agency) and 47F (personal privacy).

#### **Background**

5. On 17 August 2023, the department received your request for access to documents under the FOI Act.
6. On 8 September 2023, the department advised you that the preliminary estimate of the charge for processing your request was \$117.50. On 11 September 2023, you contended the calculation of the charge. On 11 October 2023, the department decided to reduce the charge to \$87.50.
7. On 9 November 2023, an authorised decision maker decided to set aside the decision dated 11 October 2023 and substitute a decision not to impose a charge following notification from the Office of the Australian Information Commissioner that you had sought Information Commissioner review of the department's charge decision dated 11 October 2023.
8. On 16 November 2023, the primary decision maker advised you that 17 documents consisting of 67 pages fall within the scope of your request. The primary decision maker granted access to 12 documents in part. In summary, the primary decision maker decided that certain documents

and/or parts of documents captured by the scope of your request were exempt under the FOI Act because they contain:

- information, the disclosure of which would reveal a Cabinet deliberation or decision (section 34 exemption)
- material subject to legal professional privilege (section 42 exemption)
- deliberative matter, the disclosure of which would be contrary to the public interest (section 47C conditional exemption)
- information, the disclosure of which would, or could reasonably be expected to, have a substantial adverse effect on the proper and efficient conduct of the operations of an agency, contrary to the public interest (section 47E(d) conditional exemption)
- personal information, the disclosure of which would be unreasonable and contrary to the public interest (section 47F conditional exemption).

9. On 17 November 2023, the department received your request for internal review.

### **Reasons for decision**

10. In accordance with section 54 of the FOI Act, FOI applicants have a right to apply for internal review of an 'access refusal decision', as defined in section 53A of the FOI Act. An access refusal decision includes a decision refusing access to a document in accordance with a request.

11. In reaching my decision, I took the following material into account:

- the primary decision dated 16 November 2023
- your correspondence dated 17 November 2023 seeking internal review of the department's primary decision
- consultations with relevant departmental officers
- consultations with another Commonwealth Government agency who was consulted at the primary decision stage
- the FOI Act
- the guidelines issued by the Australian Information Commissioner under section 93A of the FOI Act (the FOI Guidelines).

### **Scope of your request for internal review**

12. Your request for internal review states *"I am writing to request an internal review of Department of Education's handling of my FOI request 'LEX71589 corro - DoE'. It relates specifically to the s 47C exemptions."* You then go on to provide contentions with regard to the application of section 47C to the documents in the primary decision. For this reason, I understand your request for internal review to be limited to the application of section 47C to parts of the documents.

13. However, in accordance with part VI of the FOI Act, an internal review of a decision involves the making of a "fresh" decision. On this basis, I have also considered whether the documents identified in the Schedule of Documents are exempt under the other exemption provisions applied by the primary decision maker.

## Section 22 of the FOI Act

14. I have decided that some of the documents falling within the scope of your request contain exempt and/or irrelevant material. In this regard, sections 22(1) and (2) of the FOI Act provide that:

### *Scope*

*(1) This section applies if:*

*(a) an agency or Minister decides:*

- (i) to refuse to give access to an exempt document; or*
- (ii) that to give access to a document would disclose information that would reasonably be regarded as irrelevant to the request for access; and*

*(b) it is possible for the agency or Minister to prepare a copy (an edited copy) of the document, modified by deletions, ensuring that:*

- (i) access to the edited copy would be required to be given under section 11A (access to documents on request); and*
- (ii) the edited copy would not disclose any information that would reasonably be regarded as irrelevant to the request; and*

*(c) it is reasonably practicable for the agency or Minister to prepare the edited copy, having regard to:*

- (i) the nature and extent of the modifications; and*
- (ii) the resources available to modify the document; and*

*(d) it is not apparent (from the request or from consultation with the applicant) that the applicant would decline access to the edited copy.*

### *Access to edited copy*

*(2) The agency or Minister must:*

- (a) prepare the edited copy as mentioned in paragraph (1)(b); and*
- (b) give the applicant access to the edited copy*

15. In your FOI request dated 17 August 2023, you excluded personal information about any “sub-SES staff” from the scope of your request. You also excluded documents that were processed in response to your FOI requests to Services Australia with reference numbers Lex 71589 and 73069 and your request for internal review with reference number Lex 74480. Accordingly, I have maintained the deletion of this material consistent with the primary decision.

16. Consistent with the primary decision, I have also retained the deletion of material that falls outside the scope of your request, namely:

- information relating to the *Family Assistance Legislation Amendment (Cheaper Child Care) Bill 2022*
- material relating to general departmental processes, and
- details about other FOI requests received by the department.

17. In accordance with section 22 of the FOI Act, I have redacted exempt and irrelevant material where possible from the documents and have decided to release the remaining material to you.

### **Section 34 of the FOI Act**

18. The primary decision maker decided that the documents identified in the Schedule of Documents attached to the primary decision are exempt under section 34 of the FOI Act (Cabinet-related material).
19. I agree with the reasons given by the primary decision maker and affirm the primary decision that the material identified in the Schedule of Documents is exempt under this provision.

### **Section 42 of the FOI Act**

20. The primary decision maker found that some of the content contained in the documents is exempt under section 42 of the FOI Act (legal professional privilege).
21. I have considered the basis on which the primary decision maker made this decision and concur with the primary decision maker's findings regarding the application of this exemption to parts of the documents. Accordingly, I affirm the primary decision that the material identified in the Schedule of Documents is exempt under section 42 of the FOI Act.

### **Section 47C of the FOI Act**

22. The primary decision maker decided that certain documents, identified in the Schedule of Documents, contain material that is exempt under section 47C(1) of the FOI Act.
23. In your request for internal review, you stated:

I put to DoE that they have dressed mutton up as lamb. That is, contrary to s 11B(4)(a), DoE has expressly and unlawfully considered whether access to the documents 'could result in embarrassment to the Commonwealth government'. If it were not embarrassing, then on what basis could its disclosure 'reasonably be expected to have an adverse impact on the effectiveness of interagency consultations in the future'?

Further, to the extent that the information is both deliberative matter and embarrassing, I submit that the text, context, and purpose of the FOI Act requires s 11B(4)(a) to trump s 47C. Otherwise, the Commonwealth would routinely do exactly what DoE has done, and cloak their s 11B(4) considerations in the neutral colours of ss 47B-47J. Moreover, unless s 11B(4) trumps s 47C, applicants are left with no ability to remedy the Commonwealth's intentional thwarting of ss 3-3A of the FOI Act.

Alternatively, if embarrassment is not the mutton, 'inhibition of frankness and candour' is. 'Reasonably be expected to have an adverse impact on the effectiveness of interagency consultations in the future' is simply a different way of complaining that it would inhibit frankness and candour, given DoE has become aware that inhibition of frankness and candour is a weak ground of exemption. Because, as the IC Guidelines ('ICG') say:

- 'Agencies should start with the assumption that public servants are obliged by their position to provide robust and frank advice at all times and that obligation will not be diminished by transparency of government activities' (ICG [6.83])
- '... transparency of the work of public servants should be the accepted operating environment and fears about a lessening of frank and candid advice correspondingly diminished' (ICG [6.84])
- There is nothing 'special and specific' that justifies DoE's claim (ICG [6.85]).

In addition, the s 47C exemption does not apply because:

- Freedom of information requests are not a function of DoE (ICG [6.60])
- The information is procedural or day to day content (ICG [6.66])

- Disclosure would 'reveal the reason for a government decision and any background or contextual information that informed the decision' (ICG [6.19(a)(ii)])
- Disclosure would 'inform the community of the Government's operations, including, in particular, ... practices ... followed by the Government in its dealings with members of the community' (ICG [6.19(a)(i)]) with regards to the FOI Act itself, of which there is arguably no higher way to 'promote the objects of the FOI Act' (s 11B(3)(a))
- Consequently, the decision that 'the benefit to the public resulting from disclosure is outweighed by the benefit to the public of withholding the information' (ICG [6.27]) is plainly wrong.

24. In regard to the documents exempted by the primary decision maker under section 47C(1) of the FOI Act, I have decided to vary the primary decision and release information contained on pages 13, 25, 26, 29, 30, 36, 37, 39 and 40 of the document bundle that was previously redacted under this provision.

25. I have decided to affirm the primary decision to withhold from release some of the content redacted under section 47C(1) appearing on page 13 of the document bundle, as identified in the Schedule of Documents.

26. As set out in paragraph 6.52 of the FOI Guidelines, section 47C conditionally exempts documents containing deliberative matter. Deliberative matter is content that is in the nature of, or relating to either:

- an opinion, advice or recommendation that has been obtained, prepared or recorded or
- a consultation or deliberation that has taken place, in the course of, or for the purposes of, a deliberative process of the government, an agency or a minister.

27. The main requirements of this conditional exemption are that a document (FOI Guidelines, paragraph 6.52 to 6.88):

- contains or relates to 'deliberative matter' that was prepared for a 'deliberative purpose' (section 47C(1))
- the material is not 'purely factual' or non-deliberative (section 47C(2)), and
- it would be 'contrary to the public interest' to give access at this time (section 11A(5)).

28. As noted above, I have decided to vary the primary decision with respect to all material previously redacted under section 47C(1) except for some of the material appearing on page 13 as identified in the Schedule of Documents. I am satisfied this material was prepared for the purpose of consulting and obtaining advice about the application of an FOI exemption to material on which the department was consulted by Services Australia.

29. In your submissions, you contend that '*freedom of information requests are not a function of DoE (ICG [6.60]).*' While processing FOI requests is not explicitly listed in the discussion at paragraph 6.60 of the FOI Guidelines, which you cited in your submissions, it is my view that the functions discussed in paragraph 6.60 of the FOI Guidelines are examples to help guide FOI decision-makers in deciding whether section 47C(1) applies to documents captured by an FOI request and are not intended to be exhaustive. I also note that paragraph 6.60 states that '*the non-policy decision making processes required when carrying out agency, ministerial or governmental functions, such as code of conduct investigations, may also be deliberative processes.*' I am satisfied managing FOI requests constitutes a non-policy decision making process as contemplated in this part of the FOI Guidelines. Accordingly, it is my view that processing FOI requests is a function of the department and, as such, material revealing

deliberative processes relating to this function is capable of falling within the section 47C(1) conditional exemption.

30. I am satisfied that any factual material in the documents is an integral part of the deliberative content and is intertwined with the deliberative content such that it is not possible to release it without also releasing deliberative material. I am also satisfied that the information is not operational information as defined in section 8A of the FOI Act.
31. Accordingly, I have decided that the material identified in the Schedule of Documents is conditionally exempt under section 47C(1) of the FOI Act.

*Public interest*

32. Section 11A(5) of the FOI Act provides:

The agency or Minister must give the person access to the document if it is conditionally exempt at a particular time unless (in the circumstances) access to the document at that time would, on balance, be contrary to the public interest.

33. When weighing the public interest for and against disclosure under section 11A(5) of the FOI Act, I have taken into account the following submissions you made in your request for internal review that are relevant to the public interest test:

- *“Disclosure would ‘reveal the reason for a government decision and any background or contextual information that informed the decision’ (ICG [6.19(a)(ii)])*
- *Disclosure would ‘inform the community of the Government’s operations, including, in particular, ... practices ... followed by the Government in its dealings with members of the community’ (ICG [6.19(a)(i)]) with regards to the FOI Act itself, of which there is arguably no higher way to ‘promote the objects of the FOI Act’ (s 11B(3)(a))*
- *Consequently, the decision that ‘the benefit to the public resulting from a disclosure is outweighed by the benefit to the public of withholding the information’ (ICG [6.27]) is plainly wrong.”*

34. While I consider disclosure may promote the objects of the FOI Act to a small extent, I consider this factor is outweighed by the factors weighing against disclosure. In particular, I have considered the extent to which disclosure could reasonably be expected to prejudice the department’s ability to efficiently and effectively manage FOI consultation requests received from other Australian Government agencies and prejudice the department’s ability to obtain similar information in the future.
35. With respect to your submissions, I do not accept that disclosure of the information would reveal the reason for a government decision and any background or contextual information that informed the decision, nor do I accept that disclosure would inform the community of the Government’s operations, including, in particular, practices followed by the Government in its dealings with members of the community. The content I have decided to withhold from release under section 47C(1) does not reveal the reason for a government decision or any meaningful background or contextual information that informed a decision, nor does it disclose information which would have the effect of informing the community about practices followed by the Government in its dealings with members of the community.
36. For completeness, I note that I have not taken into account any of the irrelevant factors set out in section 11B(4) of the FOI Act in making this decision. These irrelevant factors are:

- access to the document could result in embarrassment to the Commonwealth Government, or cause a loss of confidence in the Commonwealth Government
- access to the document could result in any person misinterpreting or misunderstanding the document
- the author of the document was (or is) of high seniority in the agency which the request for access to the document was made
- access to the document could result in confusion or unnecessary debate (section 11B(4)).

#### **Section 47E(d) of the FOI Act**

37. The primary decision maker found that certain parts of the documents are conditionally exempt under section 47E(d) of the FOI Act. I have reviewed the primary decision maker's reasoning in this regard as well as the relevant parts of the documents and agree with the primary decision maker. Accordingly, I affirm the primary decision regarding the application of section 47E(d) of the FOI Act, including the public interest considerations set out in the primary decision.

#### **Section 47F of the FOI Act**

38. The primary decision maker decided that certain documents, identified in the Schedule of Documents attached to the primary decision, contain personal information that is exempt under section 47F(1) of the FOI Act.

39. I have had regard to the reasons given by the primary decision maker and have decided to affirm the primary decision to withhold this material from release in accordance with this conditional exemption on the same basis as set out in the primary decision, including the public interest considerations.

#### **Rights of review**

40. I have enclosed information about your rights of review under the FOI Act at Attachment A.

41. Should you have any questions, please do not hesitate to contact me via email at [foi@education.gov.au](mailto:foi@education.gov.au).

Yours sincerely

*Genevieve*

Genevieve  
Authorised decision maker  
Freedom of Information Team  
Department of Education

15 December 2023

## YOUR RIGHTS OF REVIEW

### Applying for external review by the Australian Information Commissioner

If you do not agree with this decision, you can ask the Australian Information Commissioner to review the decision.

You will have 30 days to apply in writing for a review by the Australian Information Commissioner.

You can lodge your application in one of the following ways:

Online:

[https://forms.business.gov.au/smartforms/servlet/SmartForm.html?formCode=ICR\\_10](https://forms.business.gov.au/smartforms/servlet/SmartForm.html?formCode=ICR_10)

Email: [foidr@oaic.gov.au](mailto:foidr@oaic.gov.au)

Post: Australian Information Commissioner  
GPO Box 5218  
SYDNEY NSW 2001

### Complaints to the Australian Information Commissioner

*Australian Information Commissioner*

You may complain to the Australian Information Commissioner about action taken by an agency in the exercise of powers or the performance of functions under the FOI Act.

A complaint to the Australian Information Commissioner must be made in writing and can be lodged in one of the following ways:

Online:

[https://forms.business.gov.au/smartforms/servlet/SmartForm.html?formCode=ICCA\\_1](https://forms.business.gov.au/smartforms/servlet/SmartForm.html?formCode=ICCA_1)

Email: [foidr@oaic.gov.au](mailto:foidr@oaic.gov.au)

Post: Australian Information Commissioner  
GPO Box 5218  
SYDNEY NSW 2001



## SCHEDULE OF DOCUMENTS – Internal review decision - Me

Number	Internal review pages	Date	Description	Primary Decision	Exemption	Comments
1.	1-3	07.02.2023 at 8.49 am	Emails	Grant access in part	s 47F(1)	<p><u>Primary decision</u></p> <p>Page 1: Personal information deleted under section 47F(1)</p> <p>Exempt and irrelevant material deleted under section 22</p> <p><u>Decision on internal review</u></p> <p>Affirm primary decision.</p> <p>Exempt and irrelevant material deleted under section 22.</p>

Number	Internal review pages	Date	Description	Primary Decision	Exemption	Comments
2.	4-8	07.02.23 at 9.30 am	Emails	Grant access in part	s 47F(1)	<p><u>Primary decision</u></p> <p>Page 6-7: Personal information deleted under section 47F(1)</p> <p>Exempt and irrelevant material deleted under section 22</p> <p><u>Decision on internal review</u></p> <p>Affirm primary decision.</p> <p>Exempt and irrelevant material deleted under section 22.</p>

Number	Internal review pages	Date	Description	Primary Decision	Exemption	Comments
3.	9-10	09.02.2023 at 3.04 pm	Emails	Grant access in part	s 47E(d)	<p><u>Primary decision</u></p> <p>Page 10: operations of an agency information deleted under section 47E(d)</p> <p>Exempt and irrelevant material deleted under section 22</p> <p><u>Decision on internal review</u></p> <p>Affirm primary decision.</p> <p>Exempt and irrelevant material deleted under section 22.</p>
4.	11-12	09.02.2023 at 3.19 pm	Emails	Grant access in full	N/A	<p><u>Primary decision</u></p> <p>Irrelevant material deleted under section 22</p> <p>Document not subject to internal review decision as it was released in full by the primary decision maker.</p>

Number	Internal review pages	Date	Description	Primary Decision	Exemption	Comments
5.	13-15	09.02.2023 at 4.20 pm	Emails	Grant access in part	s 34(3) s 47C s 47E(d)	<p><u>Primary decision</u></p> <p>Page 13: Cabinet material deleted under section 34(3)</p> <p>Page 13: deliberative processes material deleted under section 47C</p> <p>Page 14: operations of an agency information deleted under section 47E(d)</p> <p>Exempt and irrelevant material deleted under section 22</p> <p><u>Decision on internal review</u></p> <p>Vary the primary decision to release content previously redacted under section 47C on page 13.</p> <p>Affirm primary decision in relation to the redaction of the balance of the material under sections 34(3), 42, 47C(1) and 47E(d).</p> <p>Exempt and irrelevant material deleted under section 22.</p>

Number	Internal review pages	Date	Description	Primary Decision	Exemption	Comments
6.	16-17	09.02.2023 at 5.29 pm	Emails	Grant access in full	N/A	<p><u>Primary decision</u></p> <p>Irrelevant material deleted under section 22</p> <p>Document not subject to internal review decision as it was released in full by the primary decision maker.</p>
7.	18-19	10.02.2023	Teams message	Grant access in full	N/A	<p><u>Primary decision</u></p> <p>Irrelevant material deleted under section 22</p> <p>Document not subject to internal review decision as it was released in full by the primary decision maker.</p>
8.	20-24	10.02.2023 at 4.04 pm	Emails	Grant access in full	N/A	<p><u>Primary decision</u></p> <p>Irrelevant material deleted under section 22</p> <p>Document not subject to internal review decision as it was released in full by the primary decision maker.</p>

9.	25-28	13.02.2023	Emails	Grant access in part	s 34(3) s 42 s 47C s 47E(d)	<p><u>Primary decision</u></p> <p>Page 26: Cabinet material deleted under section 34(3)</p> <p>Page 26: legal professional privilege material deleted under section 42</p> <p>Pages 25-26: deliberative processes material deleted under section 47C</p> <p>Page 27: operations of an agency information deleted under section 47E(d)</p> <p>Exempt and irrelevant material deleted under section 22</p> <p><u>Decision on internal review</u></p> <p>Vary the primary decision to release content previously redacted under section 47C on pages 25-26 and to delete material previously redacted under section 47C on page 25 as irrelevant material under section 22.</p> <p>Affirm primary decision in relation to the redaction of the balance of the material under sections 34(3), 42 and 47E(d).</p> <p>Irrelevant and exempt material deleted under section 22.</p>
----	-------	------------	--------	----------------------	--------------------------------------	--

Number	Internal review pages	Date	Description	Primary Decision	Exemption	Comments
10.	29-32	14.02.2023 at 9.57 am	Emails	Grant access in part	s 34(3) s 42 s 47C s 47E(d)	<p><u>Primary decision</u> Page 30: Cabinet material deleted under section 34(3)</p> <p>Page 30: legal professional privilege material deleted under section 42</p> <p>Pages 29-30: deliberative processes material deleted under section 47C</p> <p>Page 31: operations of an agency information deleted under section 47E(d)</p> <p>Exempt and irrelevant material deleted under section 22</p> <p><u>Decision on internal review</u></p> <p>Vary the primary decision to release content previously redacted under section 47C on pages 29 and 30.</p> <p>Affirm primary decision in relation to the redaction of the balance of the material under sections 34(3), 42 and 47E(d).</p> <p>Irrelevant and exempt material deleted under section 22.</p>

Number	Internal review pages	Date	Description	Primary Decision	Exemption	Comments
11.	33-35	14.02.2023 at 2.58 pm	Emails	Grant access in part	s 47E(d)	<p><u>Primary decision</u></p> <p>Page 34: operations of an agency information deleted under section 47E(d)</p> <p>Exempt and irrelevant material deleted under section 22</p> <p><u>Decision on internal review</u></p> <p>Affirm primary decision.</p> <p>Exempt and irrelevant material deleted under section 22.</p>



Number	Internal review pages	Date	Description	Primary Decision	Exemption	Comments
12.	36-38	14.02.2023 at 4.34 pm	Emails	Grant access in part	s 47C s 47E(d)	<p><u>Primary decision</u></p> <p>Pages 36-37: deliberative processes material deleted under section 47C</p> <p>Page 37: operations of an agency information deleted under section 47E(d)</p> <p>Exempt and irrelevant material deleted under section 22</p> <p><u>Decision on internal review</u></p> <p>Vary the primary decision to release content previously redacted under section 47C on pages 36 and 37.</p> <p>Affirm primary decision in relation to the redaction of the balance of the material under section 47E(d).</p> <p>Irrelevant and exempt material deleted under section 22.</p>

Number	Internal review pages	Date	Description	Primary Decision	Exemption	Comments
13.	39-42	15.02.2023 at 9.38 am	Emails	Grant access in part	s 47C s 47E(d)	<p><u>Primary decision</u></p> <p>Pages 39-40: deliberative processes material deleted under section 47C</p> <p>Page 40: operations of an agency information deleted under section 47E(d)</p> <p>Exempt and irrelevant material deleted under section 22</p> <p><u>Decision on internal review</u></p> <p>Vary the primary decision to release content previously redacted under section 47C on pages 39 and 40.</p> <p>Affirm primary decision in relation to the redaction of the balance of the material under section 47E(d).</p> <p>Irrelevant and exempt material deleted under section 22.</p>

Number	Internal review pages	Date	Description	Primary Decision	Exemption	Comments
14.	43-57	15.02.2023 at 12.17 pm	Email and attached report	Grant access in part	s 47E(d) s 47F	<p><u>Primary decision</u></p> <p>Page 43: operations of an agency information deleted under section 47E(d)</p> <p>Page 44: personal information deleted under section 47F</p> <p>Exempt and irrelevant material deleted under section 22</p> <p><u>Decision on internal review</u></p> <p>Affirm primary decision.</p> <p>Exempt and irrelevant material deleted under section 22.</p>

Number	Internal review pages	Date	Description	Primary Decision	Exemption	Comments
15.	58-61	21.02.2023 at 2.01 pm	Emails	Grant access in part	s 47F	<p><u>Primary decision</u></p> <p>Page 58-59: personal information deleted under section 47F</p> <p>Exempt and irrelevant material deleted under section 22</p> <p>Attachment to email dated 21 February 2023 at 2.01 pm is a document subject to Services Australia Lex 71589 and is therefore out of scope.</p> <p><u>Decision on internal review</u></p> <p>Affirm primary decision.</p> <p>Exempt and irrelevant material deleted under section 22.</p>

Number	Internal review pages	Date	Description	Primary Decision	Exemption	Comments
16.	62-64	21.02.2023 at 2.01 pm	Emails	Grant access in part	s 47F	<p><u>Primary decision</u></p> <p>Pages 62-63: personal information deleted under section 47F</p> <p>Exempt and irrelevant material deleted under section 22</p> <p><u>Decision on internal review</u></p> <p>Affirm primary decision.</p> <p>Exempt and irrelevant material deleted under section 22.</p>
17.	65-67	16.05.2023	Emails	Grant access in full	N/A	<p><u>Primary decision</u></p> <p>Irrelevant material deleted under section 22</p> <p>Document not subject to internal review decision as it was released in full by the primary decision maker.</p>