



Australian Government

Australian Public Service Commission

D Watson
By email: foi+request-4880-a8fd2cee@righttoknow.org.au

Reference: C19/396

Dear Sir / Madam

Request for internal review

1. I refer to your request dated 10 April 2019 for internal review of an access refusal decision under the *Freedom of Information Act 1982* (FOI Act).
2. The FOI Act is publicly available from www.legislation.gov.au.

Background

3. On 12 March 2019, Ms Catherine Seaberg responded to a Freedom of Information (FOI) request made by you on 13 October 2018 (your request). Ms Seaberg decided that a number of the documents you requested access to were partially exempt from disclosure or contained material irrelevant to your request.
4. Ms Seaberg's decision on your request included a schedule listing the documents relevant to your FOI request. You now seek internal review of Ms Seaberg's decision in respect the following three documents listed in that schedule (see **Attachment A**):
 - Document 10 (folios numbered 20 to 22);
 - Document 26 (folios numbered 45 to 46); and
 - Document 32 (folios numbered 55 to 61).

Irrelevant material and document 32

5. In your FOI request you excluded three categories of information from the scope of your request. One of those categories was personal information about third parties (ie. parties other than Mr Lloyd or Mr Hadgkiss).
6. Most of the material redacted from document 32 by Ms Seaberg was redacted on the basis that it was irrelevant to the scope of your request. In your request for review, you contest that the material redacted from document 32 was irrelevant to the scope of your request.
7. I have examined document 32 and confirm that the material redacted from it is personal information about a third party. I am of the view that it was appropriate for this material to be redacted from document 32 on the basis of the scope of your request.

8. For the purpose of this internal review, however, I will disregard your exclusion of third-party personal information from the scope of your FOI request in respect of document 32 only. In other words, I will treat your request as applying to document 32 in full regardless of whether it includes third-party personal information.

Decision on your request for internal review

9. This letter sets out my decision on your request for internal review of an access refusal decision under the FOI Act. I am authorised under subsection 23(1) of the FOI Act to make decisions in relation to requests for internal review of access refusal decisions.
10. My role is to bring a fresh, independent and impartial mind to your request for review. I was not involved in or consulted in the making of Ms Seaberg's decision. Internal review is a merit review process and I may exercise all the powers available to the original decision maker.
11. Where the Schedule at **Attachment A** indicates an exemption has been applied to a document or part of a document, my findings of fact and reasons for determining the specified exemption applies are set out below.

Section 47C – Deliberative material

12. Section 47C of the FOI Act provides that a document is conditionally exempt if its disclosure would disclose deliberative matter in the nature of opinion, advice or recommendations prepared, or considerations that have occurred, in the course of a deliberative process involved in the functions of an agency, a Minister or the Government of the Commonwealth.
13. Documents 10 and 26 contain communications between the then Department of Employment and Mr Hadgkiss. As noted in Ms Seaberg's decision, Mr Hadgkiss was the Australian Building and Construction Commissioner at the time of the communications and the Australian Building and Construction Commission (ABCC) was an agency in the Department of Employment portfolio.
14. Please note that the email message in document 26 dated "30 January 2017 at 2:51:00 PM ACDT" is the same email message in document 10 dated "Monday, 30 January 2017 3:21 PM". The date in the email of document 26 is expressed in Australian Central Daylight Time (ACDT), which explains the difference of exactly 30 minutes.
15. I agree with Ms Seaberg's broad description of documents 10 and 26. Namely, the communications included in documents 10 and 26 contain advice from:
 - Minister Cash to the Department of Employment and to the ABCC;
 - the Department of Employment to the ABCC; and
 - the ABCC to the Department of Employment and to Minister Cash.
16. As noted at paragraph 6.55 of the FOI guidelines (emphasis added):

The deliberative processes exemption differs from other conditional exemptions in that no type of harm is required to result from disclosure. The only consideration is

whether the document includes content of a specific type, namely deliberative matter.

17. In document 10, the first paragraph of the email dated Monday, 30 January 2017 3:21 PM includes the following words:

“... and I met with the Minister and her Office this morning to discuss the strategy and priorities for the year. In terms of ABCC, the Minister was keen for me to follow up with you on a couple of things.”

18. This part of the email message of 30 January clearly indicates the deliberative nature of the material that follows.

19. This email message was a communication from the Department of Employment to one of its portfolio agencies about a meeting that had taken place with the portfolio Minister. In any portfolio, the Minister will meet with officials of the Department and portfolio agencies.

20. It is not unusual for a Minister to communicate with his or her Department about matters relating to any of the Minister’s portfolio agencies. It is not unusual for a Department to forward information to portfolio agencies on behalf of the Minister. It is not unusual for a Department to request information from portfolio agencies on behalf of the Minister. The email message of 30 January represents a common means of communication between:

- a. a Minister and his or her portfolio agencies;
- b. a Department and one of its portfolio agencies.

21. This email message comprises advice, opinion and consultations from both the Minister and from the Department to the ABCC. The email also comprises a request from the Department, on behalf of the Minister, for advice about certain matters from the ABCC.

22. In document 10, the email dated Friday 3 February 2017 4:52 PM is the ABCC’s reply to the earlier email message. This email message therefore comprises advice to both the Department and to the Minister.

23. In this email, Mr Hadgkiss includes two statements indicating his willingness to brief the Minister directly about the relevant matters. This clearly indicates the deliberative nature of the document. Namely, the email clearly contains information in the nature of advice and opinion about certain matters communicated to the Department with the intention that they be further communicated to the Minister.

Your submissions on section 47C

24. In your request for internal review, you make a number of submissions in respect of the application of section 47C to documents 10 and 26.

25. Firstly, you suggest that the fact that the email messages of 30 January and 3 February were communicated to the Australian Public Service Commissioner deprives these messages of their exempt status. I do not accept this suggestion.

26. I note that section 47C does not operate like a confidence, which can be breached, or a privilege, which can be waived. Section 47C is concerned only with the nature of the material in question. The fact that material is forwarded to other parties may be relevant in considering the public interest test of section 11A, but is not relevant to the determination of whether material is conditionally exempt from disclosure under section 47C.
27. In your request for internal review, you assert that Ms Seaberg's decision indicates that documents 10 and 26 contain instances of Minister Cash directing the ABCC in certain respects. I reject this assertion. I have examined Ms Seaberg's decision and it is not apparent to me on what basis this assertion could be made. Even if this assertion was correct, I do not consider this to be relevant to an assessment of whether section 47C applies.
28. You refer to the fact that the ABCC is an independent statutory body which should not be subject to direction from the Minister. While this may be the case, it is not unusual for a statutory body to communicate with its Minister about a range of matters. The Minister with responsibility for the ABCC may have a range of functions under the legislation administered by the ABCC. Even if this is not the case, it would not be unusual for a statutory body to provide advice on a range of topics to its Minister. I do not consider this issue relevant to the question of whether section 47C applies to documents 10 and 26.
29. You assert that the age of documents 10 and 26 deprives the documents of their status of being exempt from disclosure. I acknowledge that this factor is relevant to a consideration of the public interest for the purposes of section 11A. However, I do not consider this factor relevant in determining whether the material in documents 10 and 26 is conditionally exempt for the purposes of section 47C.

Conclusions on section 47C

30. I have considered the nature of the material included in documents 10 and 26 and I am satisfied that this material is deliberative matter for the purposes of section 47C of the FOI Act. Therefore, I find that parts of documents 10 and 26 are conditionally exempt from disclosure under section 47C of the FOI Act.

Section 47F – personal privacy

31. Section 47F of the FOI Act provides that a document is conditionally exempt from disclosure if disclosure would involve the unreasonable disclosure of personal information about any person.
32. In Ms Seaberg's decision, no claims of conditional exemption under section 47F were made in respect of documents 10 and 26. In document 32, only two claims of exemption on the basis of section 47F were made. These were two instances of Mr Hadgkiss' telephone numbers.

33. You contested Ms Seaberg's decision that parts of document 32 were irrelevant to the scope of your request. As explained above, I am treating your request as if it was not your intention to exclude such material from the scope of your request.
34. In your request for internal review you state that document 32 "*relates to Mr Hadgkiss' illegal activity in public office*". You further state:
- "I'm of the view that you have refused access to the contents of document #32 (folios 55-61) because they will tend to demonstrate misconduct engaged in by a Commonwealth Minister and others – being matters of public interest that promote the objects of the FOI Act (see 6.19 of the FOI Guidelines)."*
35. Document 32 comprises two categories of personal information. These categories are:
- a. Mr Hadgkiss' telephone numbers (two instances); and
 - b. information concerning the performance of an employee of the ABCC.
36. The first email message at the top of document 32 comprises Mr Hadgkiss forwarding a longer email thread to Mr Lloyd. All other email messages in document 32 are internal ABCC email messages between only Mr Hadgkiss and an employee of the ABCC.
37. The Australian Public Service Commissioner (APS Commissioner) has a range of statutory functions relating to personnel management in the Australian Public Service. The APS Commissioner is routinely consulted by agency heads and other senior officials about personnel matters.
38. In determining whether the disclosure of a document would involve an unreasonable disclosure of personal information, subsection 47F(2) of the FOI Act provides that an agency must have regard to the following matters:
- the extent to which the information is well-known;
 - whether the person to whom the information relates is known to be (or to have been) associated with the matters dealt with in the document;
 - the availability of the information from publicly accessible sources; and
 - any other information that the agency considers is relevant.
39. I am satisfied that the personal information in document 32:
- is not well-known;
 - concerns individuals who are not known to be associated with the specific details included in documents; and
 - is not available from publicly accessible sources.

Other relevant factors

40. I have had regard to the factors set out at paragraphs 6.142 and 6.143 of the FOI Guidelines. Those factors, and my consideration of those factors are set out in the following table.

Factor	Consideration of factor
Whether the author of the document is identifiable.	The ABCC employee is identifiable from the document.
Whether the documents contain third party personal information.	The document contains personal information about an ABCC employee.
Whether release of the documents would cause stress on the third party.	In my opinion, disclosure of parts of the document would cause significant stress on the ABCC employee whose personal information is included in the document.
Whether any public purpose would be achieved through release.	In my opinion, disclosure of parts of the document would not achieve any public purpose.
The nature, age and current relevance of the information.	The information in the document is relatively recent and remains relevant.
Any detriment that disclosure may cause to the person to whom the information relates.	In my opinion, disclosure of the personal information would cause detriment to the ABCC employee. Disclosure would breach the privacy of the employee and would cause the individual to suffer stress.
Any opposition to disclosure expressed or likely to be held by that person.	The ABCC employee was not consulted but would be highly likely to oppose disclosure. The ABCC opposed disclosure of the document.
The circumstances of an agency's collection and use of the information.	The relevant information was created by the individuals in the performance of their duties.
The fact that the FOI Act does not control or restrict any subsequent use or dissemination of information released under the FOI Act	I note that disclosure of the document to you would result in the immediate publication of the document on the Right to Know web site.
Any submission an FOI applicant chooses to make in support of their application as to their reasons for seeking access and their intended or likely use or dissemination of the information.	I have taken into account the submissions you have made in your email messages to the APSC, including the submissions in your request for internal review.
Whether disclosure of the information might advance the public interest in government transparency and integrity.	Disclosure would advance the public interest in government transparency and integrity by disclosing how an agency head may consult with the APS Commissioner about a performance matter.

41. Paragraph 6.145 of the FOI Guidelines states the following:

Disclosure that supports effective oversight of government expenditure may not be unreasonable, particularly if the person to whom the personal information relates may have reasonably expected that the information would be open to public scrutiny in future.

42. The personal information in document 32 is ordinarily regarded as confidential and the relevant individuals would have had no expectation that the information would be open to public scrutiny.

43. I acknowledge that personal information about public servants performing their usual duties will not generally be conditionally exempt from disclosure. However, I draw your attention to paragraph 6.157 of the FOI guidelines (emphasis added):

*There needs to be careful consideration of the exemption where the personal information does not relate to the public servant's usual duties and responsibilities. For example, if a document included information about an individual's disposition or private characteristics, disclosure is likely to be unreasonable. **This would generally include the reasons a public servant has applied for personal leave, information about their performance management or whether they were unsuccessful during a recruitment process.***

44. In my opinion, the public disclosure of information about an individual's work performance is unreasonable. The public disclosure of that information would be embarrassing to the individual and have detrimental effects. The disclosure of such information would adversely affect the individual's capacity to be considered for other positions and, by extension, could have a detrimental financial impact on the individual.

45. Taking into account the matters above, it is my opinion that disclosure of the personal information in document 32 would involve an unreasonable disclosure of personal information. Therefore, I find that parts of document 32 are conditionally exempt from disclosure under section 47F of the FOI Act.

Alternative grounds for exemption

46. I note that it is likely that the personal information in document 32 would also be exempt under paragraph 47E(c) of the FOI Act because disclosure would have a substantial adverse effect on the management of personnel by the Commonwealth.

Section 11A – public interest considerations

47. I have determined that parts of documents 10, 26 and 32 are conditionally exempt from disclosure under sections 47C and 47F of the FOI Act.

48. Subsection 11A(5) of the FOI Act provides that an agency must give access to a document if it is conditionally exempt unless (in the circumstances) access to the document would, on balance, be contrary to the public interest.

49. I have had regard to the factors set out at subsection 11B(3) of the FOI Act as being public interest factors in favour of granting access to a document. These factors include:

- disclosure would promote the objects of the Act (including all the matters set out in sections 3 and 3A);
- disclosure would inform debate on a matter of public importance; and
- disclosure would promote effective oversight of public expenditure.

50. I have not had regard to the factors set out at subsection 11B(4) of the FOI Act which are deemed to be irrelevant in determining whether access would be in the public interest.

Documents 10 and 26

51. Ms Seaberg identified the following public interest factors as favouring access of the deliberative material in documents 10 and 26:

- *“disclosure would provide the public with insight into the working relationships between a Minister, his or her Department and his or her portfolio agencies;*
- *disclosure would provide the public with insight into the working relationship between a Department of State and one of its portfolio agencies;*
- *disclosure would provide the public with insight into the management of a statutory agency and its relationship with its Minister”.*

52. I agree that these are public interest factors favouring access to the deliberative material in documents 10 and 26.

53. I agree with the public interest factors against disclosure identified by Ms Seaberg in respect of the conditionally exempt deliberative material in documents 10 and 26:

- *“disclosure would adversely affect the proper and efficient functioning of Government because it would restrict the free flow of written communications between Ministers, Departments of State and portfolio agencies;*
- *disclosure would adversely affect the interest in establishing a working and trusting relationship with a Minister;*
- *disclosure would adversely affect the interest in appropriately maintaining a confidential relationship between Ministers, Departments of State and agencies in circumstances where policy options are being actively explored and developed; and*
- *disclosure may cause agency employees to feel constrained in providing comprehensive written briefings in the future because of possible disclosure”.*

54. The manner and the nature of the communications in documents 10 and 26 are common in the sense that they represent one of the usual ways in which Ministers, Departments and portfolio agencies communicate. The content of these documents, however, is advice, opinions and deliberations between a Minister and senior officials in the Minister’s office, the Department and one of the Minister’s portfolio agencies.

55. The proper functioning of government requires the free flow of information between Ministers and public service Departments and agencies in the Minister's portfolio. The routine disclosure, under the FOI Act, of communications such as those within documents 10 and 26 would undermine the flow of information because Ministers and officials would be less willing to communicate freely about matters in writing.
56. In your request for review you refer to paragraph 6.83 of the FOI Guidelines, which states:
- “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.”*
57. I have taken this assumption into account. However, this assumption is rebuttable and paragraph 6.82 of the FOI Guidelines acknowledges that the inhibition of frankness and candour may have some application.
58. The adverse effects arising from disclosure include, but also go beyond, the inhibition of frankness and candour on the part of public servants. In particular, the routine disclosure of communications of the type contained in documents 10 and 26 would restrict the free flow of information by all parties. Ministers and their offices would be less willing to receive or solicit written information from the public service if such communications were to be routinely disclosed in response to FOI requests. Similarly, Ministers and their offices would be less willing to make written requests for advice. This would adversely affect the effective and efficient functioning of government.
59. In your request for review, you refer to the age of documents 10 and 26 and whether the subject matter of the documents is currently being considered. In my opinion, the adverse effects that would flow from disclosure would occur regardless of whether the subject matter is currently under consideration, or of the age of the documents.
60. In your request for review, you express a concern that you were refused access to documents because they tend to demonstrate alleged misconduct. I acknowledge there is a public interest in potential misconduct by public officials. Having examined the content of the relevant documents I do not consider this public interest factor in favour of disclosure to be relevant.

Document 32

61. In relation to the personal information in document 32 concerning the agency head's comments about an employee's performance, I have identified the following public interest factors as favouring access to this information:
- disclosure would provide the public with insight into how an agency head manages his or her employees, including the manner in which an agency head communicates with an employee about the performance of the employee's duties;

- disclosure would provide the public with insight into the relationship between agency heads and the APS Commissioner and the manner in which agency heads may communicate with the APS Commissioner about APS employment matters.
62. I have identified the following public interest factors against disclosure of the personal information in document 32:
- disclosure would breach the privacy of one or more APS employees;
 - disclosure may adversely affect an individual's future employment prospects, with potential flow-on financial effects;
 - disclosure of communications of this nature would restrict the free flow of information between agency heads and their employees because either or both parties may fear the disclosure of such information;
 - to the extent that the flow of information between agency heads and employees is restricted, this would adversely effect the proper and efficient management of personnel by agency heads; and
 - disclosure would adversely affect the flow of information between agency heads and the APS Commissioner because agency heads would be less willing to seek advice about personnel management matters from the APS Commissioner.
63. In your request for review you state that document 32 has some connection with alleged illegal activity. Document 32 does not appear to disclose or refer to any conduct of an illegal nature. I do not consider this factor to be relevant.
64. In your request for review you refer to the fact document 32 is marked "Sensitive: Legal". You assert that any privilege in the document was waived when the document was sent to the APS Commissioner. I do not consider these submissions to be relevant to the question whether disclosure of the document is contrary to the public interest.
65. In relation to document 32, you again state that you were refused access because disclosure would tend to demonstrate alleged misconduct. As noted above, I acknowledge there is a public interest in potential misconduct by public officials. Having examined the content of document 32 I do not consider this public interest factor in favour of disclosure to be relevant.
66. In the final paragraph of your request for review you refer to certain communications between you and Ms Black of this office and you make certain speculative allegations. I do not consider this information to be relevant to the request for internal review.

Conclusions on section 11A – public interest considerations

67. I am of the view that the public interest factors in favour of disclosure are outweighed by the public interest factors against disclosure. Therefore, I find that it would, on balance, be contrary to the public interest to disclose the conditionally exempt parts of documents 10, 26 and 32. I therefore find these parts of the documents to be exempt from disclosure under the FOI Act.

Deletion of exempt matter or irrelevant material

68. Section 22 of the FOI Act requires an agency to provide access to an edited version of a document where it is reasonably practicable to edit the document to remove exempt material or material that is irrelevant to the scope of a request.
69. I have attached to this letter copies of documents 10, 26 and 32. These documents have been edited to remove material that is either exempt material or material that is irrelevant to the scope of your request.

Review rights

70. You are entitled to seek review of this decision. Your review rights are set out at **Attachment B**.

Publication

71. The Commission must publish information relating to material that has been released in response to each FOI access request. This publication is known as a 'disclosure log'.
72. The disclosure log requirement does not apply to personal information about any person if it would be unreasonable to publish the information or to information about the business, commercial, financial or professional affairs of any person if publication of that information would be unreasonable.
73. The Commission is not required to consult you on any decision to publish information that is released to you and the decision to publish information is not subject to review internally by the Commission or externally by the Australian Information Commissioner. Any person can however, make a complaint to the Australian Information Commissioner about how an agency handles an FOI request.

Contacts

74. If you require clarification of any of the matters in this letter you may contact the Commission's FOI co-ordinator by telephone on (02) 6202 3500 or by email at foi@apsc.gov.au.

Yours sincerely



Richard Bartlett
Authorised FOI decision maker
7 May 2019

ATTACHMENT A

FOI request – D Watson						
Schedule of documents relevant to request						
Document	Folio(s)	Date	Author	Recipient	Description	Basis of redaction(s)
10	20-22	3/02/2017	Nigel Hadgkiss	John Lloyd	Email	s.22, s.47C
26	45-46	30/01/2017	Nigel Hadgkiss	John Lloyd	Email	s.22, s.47C
32	55-61	25/09/2017	Nigel Hadgkiss	John Lloyd	Email	s47F

Rights of Review

Asking for a full explanation of a Freedom of Information decision

If you are dissatisfied with this decision, you may seek review. Before you seek review of an FOI decision, you may contact us to discuss your request and we will explain the decision to you.

Applying for external review by the Australian Information Commissioner

If you do not agree with the original FOI decision or the internal review decision, you can ask the Australian Information Commissioner to review the decision. You have 60 days to apply in writing for a review by the Office of the Australian Information Commissioner (OAIC) from the date you received this letter or any subsequent internal review decision.

You can **lodge your application**:

Online: www.oaic.gov.au
Post: Australian Information Commissioner
GPO Box 5218
SYDNEY NSW 2001
Email: enquiries@oaic.gov.au

The OAIC encourage applicants to apply online. Where possible, to assist the OAIC you should include your contact information, a copy of the related FOI decision and provide details of your reasons for objecting to the decision.

Complaints to the Information Commissioner and Commonwealth Ombudsman

Information Commissioner

You may complain to the Information Commissioner concerning action taken by an agency in the exercise of powers or the performance of functions under the FOI Act. There is no fee for making a complaint. A complaint to the Information Commissioner must be made in writing. The Information Commissioner's contact details are:

Telephone: 1300 363 992
Website: www.oaic.gov.au

Commonwealth Ombudsman

You may complain to the Ombudsman concerning action taken by an agency in the exercise of powers or the performance of functions under the FOI Act. There is no fee for making a complaint. A complaint to the Ombudsman may be made in person, by telephone or in writing. The Ombudsman's contact details are:

Phone: 1300 362 072
Website: www.ombudsman.gov.au

FOI

From: HADGKISS,Nigel
Sent: Friday, 3 February 2017 16:55
To: LLOYD,John
Subject: FW: Meeting with Minister Cash this morning [DLM=Sensitive:Legal]

Sensitive: Legal

FYI, John.

Regards,

Nigel

From: HADGKISS,Nigel
Sent: Friday, 3 February 2017 4:52 PM
To: s.22
Cc: [REDACTED]
Subject: RE: Meeting with Minister Cash this morning [DLM=Sensitive:Legal]

Sensitive: Legal

Hi s.22

Apologies for not replying sooner. s.22 and I briefly discussed the contents of your email this morning during our vidcon. In terms of the five matters raised, I can say as follows:

- s.47C [REDACTED]
- [REDACTED]
- [REDACTED]

s.47C

happy to brief the Minister on this.

however, I am

s.47C

Again, I am happy to brief the Minister on this.

s.47C

Kind regards,

Nigel

From: s.22
Sent: Monday, 30 January 2017 3:21 PM
To: HADGKISS,Nigel
Cc: s.22
Subject: Meeting with Minister Cash this morning [DLM=Sensitive:Legal]

Sensitive: Legal

Hi Nigel

s.22 and I met with the Minister and her Office this morning to discuss the strategy and priorities for the year. In terms of ABCC, the Minister was keen for me to follow up with you on a couple of things:

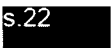
s.47C

s.47C



Can you let me know if you have any concerns with any of this?

s.22



s.22



Australian Government
Department of Employment



www.employment.gov.au

FOI

From: HADGKISS,Nigel
Sent: Monday, 30 January 2017 17:59
To: LLOYD,John
Subject: Fwd: Meeting with Minister Cash this morning [DLM=Sensitive:Legal]

FYI

From: s.22
Date: 30 January 2017 at 2:51:00 PM ACDT
To: HADGKISS,Nigel
Cc: s.22
Subject: Meeting with Minister Cash this morning [DLM=Sensitive:Legal]

Sensitive: Legal

Hi Nigel

s.47C



s.22



Australian Government
Department of Employment



www.employment.gov.au

FOI

From: HADGKISS, Nigel
Sent: Monday, 25 September 2017 15:12
To: LLOYD, John
Subject: s.47F [REDACTED] [DLM=Sensitive:Legal]

Sensitive: Legal

John

s.47F [REDACTED]

For confidential information only.

Nigel

Nigel Hadgkiss, Commissioner
Australian Building & Construction Commission

s.47F [REDACTED]
509 St Kilda Rd, Melbourne, Vic 3004
PO Box 9927, Melbourne, VIC 3001
nigel.hadgkiss@abcc.gov.au

From: HADGKISS, Nigel
Sent: Monday, 4 September 2017 1:18 PM
To: s.22 [REDACTED]
Subject: RE: s.22 [REDACTED] [DLM=Sensitive:Legal]

Sensitive: Legal

Dear s.22 [REDACTED]

s.22 [REDACTED]

s.22



Nigel

From: s.22
Sent: Tuesday, 29 August 2017 7:26 PM
To: HADGISS, Nigel
Subject: RE: s.22 [SEC=UNCLASSIFIED]

Hi Nigel

s.22



From: HADGKISS,Nigel
Sent: Friday, 25 August 2017 3:08 PM
To: s.22
Subject: RE: s.22 [DLM=Sensitive:Legal]

Sensitive: Legal

Dear s.22

s.22



s.22



s.22



s.22

Nigel

Nigel Hadgkiss, **Commissioner**
Australian Building & Construction Commission

Tel s.47F
509 St Kilda Rd, Melbourne, Vic 3004
PO Box 9927, Melbourne, VIC 3001
nigel.hadgkiss@abcc.gov.au

From: s.22
Sent: Tuesday, 22 August 2017 11:40 AM
To: HADGKISS,Nigel
Subject: RE: s.22 [DLM=Sensitive:Legal]

Sensitive: Legal

Hi Nigel

s.22

From: HADGKISS,Nigel
Sent: Monday, 21 August 2017 6:19 PM
To: s.22
Subject: Re: s.22 [DLM=Sensitive:Legal]

s.22

Nigel

From: s.22
Date: 21 August 2017 at 3:55:26 PM AEST
To: HADGKISS,Nigel <Nigel.Hadgkiss@abcc.gov.au>
Subject: s.22 [DLM=Sensitive:Legal]

Sensitive: Legal

Hi Nigel

s.22

