



2 June 2022

Concerned Citizen
BY EMAIL: foi+request-7892-c85daf7c@righttoknow.org.au

In reply please quote:

FOI Request: FA 21/09/01245
File Number: OBJ2021/29399

Dear Concerned Citizen

Decision on Internal Review – Freedom of Information Act 1982

I refer to your correspondence dated 26 October 2021 in which you requested that the Department of Home Affairs (the Department) review its decision on access to documents dated 26 October 2021 under the *Freedom of Information Act 1982* (the FOI Act).

1 Scope of original request received 24 September 2021

The scope of your original request for access to documents under the FOI Act was as follows:

Could you please provide any correspondence between the department and Atlassian about the COVIDSafe app?

Specifically:

- *any emails sent from the department to Atlassian or from Atlassian to the department containing any of the terms: COVIDSafe, Trace Together, Bluetooth, Contact Tracing, covidcare, coronavirus.*
- *any emails in reply*
- *any attachments*

Revised scope

On 19 October 2021 the Department advised you that it considered a practical refusal reason existed under section 24AB of the FOI Act as the work involved in the processing would substantially and unreasonably divert the resources of the Department from its other operations.

On the same day we received your instructions to revise the scope of your request as follows as follows:

Please provide any correspondence between the department and Atlassian about the COVIDSafe app between the 1st of March 2020 and the 31st of March 2020.

Specifically:

- *any emails sent from the department to Atlassian or from Atlassian to the department containing any of the terms: COVIDSafe, Trace Together, Bluetooth, Contact Tracing, covidcare, coronavirus.*
- *any emails in reply*
- *any attachments*

2 Original decision on access dated 26 October 2021

The Department conducted searches and found that no documents that fell within the scope of your original request. As such, a decision was made to refuse your request under section 24A of the FOI Act.

3 Request for internal review

On 26 October 2021 you requested the Department review its decision dated 26 October 2021. The terms of your review request were as follows:

I am writing to request an internal review of Department of Home Affairs' handling of my FOI request 'Correspondence with Atlassian about COVIDSafe'.

Frankly, I am struggling to understand the process at which the 'decision maker' has arrived at a 'decision' with respect to my freedom of information request.

I honestly wonder if the 'decision maker' has taken this process seriously.

My original request (made on the 24th of September) was for (and I quote): "Could you please provide any correspondence between the department and Atlassian about the COVIDSafe app?"

Specifically:

- *any emails sent from the department to Atlassian or from Atlassian to the Department containing any of the terms: COVIDSafe, Trace Together, Bluetooth, Contact Tracing, covidcare, coronavirus,*
- *any emails in reply,*
- *any attachments*

The first response I received from the Department suggested that I contact the Department of Health as they are now responsible for the COVIDSafe app.

I explained that (and I quote) "In evidence to the Senate Select Committee on COVID 19 on the 5th of May 2020, the department's secretary indicated that the Department of Home Affairs "engaged with some commercial parties to assist in the conceptual prototype. That was all handed off to the DTA in early April".

I explained my request related to any correspondence between the department of Home Affairs and Atlassian as it related to this conceptual prototype.

The next response I received from the Department indicated that the department would not meet the statutory timeframes in responding to my request.

I responded that my expectation was that the statutory timeframes would be met.

The next response I received indicated that the "decision maker" intended to refuse my request on the grounds that initial searches had identified 889 pages of

documents and that to examine them in detail would (and I quote) "result in a substantial and significant drain on the capacity of the business areas within the department, to the extent that it would substantially detract from the area's ability to carry out their normal functions". I replied that it is not believable that responding to a freedom of information request would interfere with the department carrying out its normal functions.

However, in the interest of helping the process to proceed I agreed to narrow the scope of my request to (and I quote):

"Please provide any correspondence between the department and Atlassian about the COVIDSafe app between the 1st of March 2020 and the 31st of March 2020.

Specifically:

- any emails sent from the department to Atlassian or from Atlassian to the Department containing any of the terms: COVIDSafe, Trace Together, Bluetooth, Contact Tracing, covidcare, coronavirus,*
- any emails in reply,*
- any attachments."*

The final decision incorrectly states that I narrowed the scope of my request to (and I quote): "Please provide any correspondence between the department and Atlassian about the COVIDSafe app between the 1st of March 2020 and the 31st of March 2020." It fails to include the sentence

"Specifically:

- any emails sent from the department to Atlassian or from Atlassian to the department containing any of the terms: COVIDSafe, Trace Together, Bluetooth, Contact Tracing, covidcare, coronavirus,*
- any emails in reply,*
- any attachments"*

In reviewing this decision, could you please consider:

- the fact that the initial responses I received seemed focussed on dismissing the request on various questionable grounds rather than genuinely attempting to identify the requested information,*
- the fact that the refusal incorrectly states the revised scope of my request, and that*
- I only agreed to narrow the scope of my request because of the threat that my request would be refused if I did not agree.*

Specifically, in reviewing the decision could you answer the question:

Did the decision maker search for correspondence using all of the search terms contained in my revised scope (COVIDSafe, Trace Together, Bluetooth, Contact Tracing, covidcare, and coronavirus)? Or did the decision maker only search for correspondence using the incorrectly stated version of the scope quoted in the decision to refuse my request?

If all of the search terms were not used then could you please repeat the search using all of the terms?

If all of the search terms were used could you please consider whether it was appropriate to refuse my request when no documents were identified using the revised scope?

I would have thought a more sensible response would be to let me know that no

documents could be identified during this period and instead offering to consider some of the 889 pages of documents that were identified in the initial search.

4 Scope of internal review

Based on the terms of your internal review in paragraph 3 above, I consider you are seeking review of:

- the searches conducted by the Department in its original decision, including considerations as to whether documents could be produced from computer systems pursuant to section 17 of the FOI Act
- the Department's decision, following those searches, to refuse your request under section 24A of the FOI Act.

5 Authority to make decision

I am authorised under section 23 the FOI Act to make decisions to release and to refuse access to exempt documents and to conduct internal reviews.

6 Information considered

I have considered:

- the terms of your original request
- the submission made by you in support of your request for internal review
- the documents within the scope of the request
- the searches undertaken in the original decision
- information held on departmental systems
- the FOI Act
- advice received from relevant business area
- consultation responses from affected third parties consulted in accordance with the FOI Act
- guidelines published by the Office of the Information Commissioner under section 93A of the FOI Act (the FOI Guidelines).

7 Internal review decision

I have decided to vary the original decision of the Department dated 26 October 2021. I have set aside the decision and substituted a decision:

- that 24 documents are within the scope of the request, and in relation to those documents and :
 - to release 19 documents in part, with exempt material deleted
 - to release 5 documents in full
 - to delete irrelevant material from documents released in part or in full
 - to rely on exemptions under sections 47F and 47G(1)(a) of the FOI Act in finding material to be exempt
 - to rely on section 22 of the FOI in granting access to edited copies of documents from which exempt or irrelevant material has been deleted.

The schedule included at **Attachment A** sets out my decision on each of the documents within the scope of the internal review request.

I have provided the reasons for my decision below.

8 Third Party Consultation Review Rights

The Department has undertaken formal consultation with a number of affected third parties in relation to the above documents which fall within the scope of the FOI request. One affected third party has contended that some information within the documents is exempt from disclosure under the FOI Act.

In accordance with subsection 27(6) – *Notice of decision to give access* of the FOI Act, I am required to advise the third party of my decision. The Department must not give you access to the documents until the affected third party's opportunities for review have been exhausted.

As a result, the third party has the right to apply to the Office of the Australian Commissioner for a review of my decision. Accordingly, I will write to you to inform you of the outcome.

9 Access to the documents

As the affected third party has made submissions seeking to have information exempted from release, they now have a right of review of my decision.

Subsequently, pursuant to section 27(7) of the FOI Act, the Department must not give you access to the documents until the affected third party's opportunities for review have been exhausted.

If the third party does not exercise their right of review within the statutory timeframe, then the documents will be provided to you.

10 Reasons for internal review decision: documents within scope of request

I have reviewed the searches undertaken by the Department in its original decision and your submissions in requesting an internal review. I have determined that further reasonable searches for documents could be undertaken by the Department, including searches of departmental computer systems.

Outcomes of searches: documents identified

The Department has therefore conducted further reasonable searches to determine whether it holds further documents relevant to your request

As a result of these searches, the Department identified 41 documents as potentially falling within the scope of the request. The Department has reviewed these documents and determined that that 17 of documents fell outside of the scope of your request as they related to matters other than the COVIDsafe app.

The Department has therefore identified 24 documents that fall within the scope of your request. These documents were held by the Department on 24 September 2021, when the Department received your request for access.

11 Reasons for internal review decision: whether reasonable searches conducted

Section 24A of the FOI Act provides that the Department must take all reasonable steps to locate documents within the scope of the request, and may refuse access to documents if, following these searches, it is satisfied that the documents cannot be found or do not exist.

Searches conducted in response to original request for access

- enquiries with the relevant business area of the Department, which advised that any relevant documents would be held in email form and identifiable by searches of the Department's email systems
- searches of email holdings conducted by the Department's Security Investigations team
- searches for emails sent between the Department and Atlassian by the Department in March 2020 using the search terms 'COVIDSafe', 'Trace Together', 'Bluetooth Contact Tracing', 'covidcare' and 'coronavirus'.

Searches conducted in response to internal review request

- a review by the Department's Security Investigations team of the searches conducted in response to the original request
- a re-run of the original search, using the same search parameters as used for the original searches – that is, using the search terms 'COVIDSafe', 'Trace Together', 'Bluetooth Contact Tracing', 'covidcare' and 'coronavirus'.

These searches identified the documents indicated in paragraph 10 above.

Whether all reasonable steps taken to locate documents

Paragraph 3.88 of the FOI Guidelines notes that the Act is silent on what constitutes 'all reasonable steps' to search for a document, but suggests that the term should be:

'construed as not going beyond the limit assigned by reason, not extravagant or excessive, moderate and of such as amount, size or number as is judged to be appropriate or suitable to the circumstances or purpose'.

In accordance with Paragraph 3.89 of the FOI Guidelines, the Department's searches for documents had regard to:

- the subject matter of your request
- the capacity of the Department's reporting systems
- the record management systems in place
- the individuals within an agency who may be able to assist with the location of documents, and
- the age of the documents.

Having considered the searches conducted, the outcomes of these searches and the advice received from the relevant business area, I am satisfied that the Department has undertaken all reasonable steps to locate these documents.

In making this decision, I have taken into consideration:

- that the subject matter of your request is restricted to correspondence between the department and Atlassian about the COVIDSafe app between the 1st of March 2020 and the 31st of March 2020

- the advice of the relevant business area of the Department that any relevant documents would be held in email form
- as the Department's Security Investigations team is able to search all emails sent and received by departmental email accounts, this business area was best placed to conduct searches for documents
- while the Security Investigation team initially did not locate any documents when conducting searches in response to the original request, when it repeated the search it identified 41 documents (24 of which were determined by the Department to be relevant to your request).

I have therefore concluded that the Department has taken all reasonable steps to find documents that falls within the scope of the request as it was required to do by section 24A of the FOI Act. I am satisfied that the documents located or produced from the Department's systems contain all the information requested by you in your FOI request.

12 Reasons for internal review decision: irrelevant material

12.1 Section 22(1)(a)(ii) of the FOI Act – material irrelevant to request

Section 22(1)(a)(ii) of the FOI Act applies if an agency or Minister decides that giving access to a document would disclose information that would reasonably be regarded as irrelevant to the request for access.

I have decided that parts of the documents contain information that could reasonably be regarded as irrelevant to your request.

The material in question reveals the names and contact details of departmental officers. On 29 September 2021, the Department advised you that its policy is to exclude the personal details of officers not in the Senior Executive Service (SES), as well as the mobile and work telephone numbers of SES staff, contained in documents that fall within scope of an FOI request.

The Department also advised you at this time that if you did not inform the Department that you sought access to this material, it would consider the information containing the officers' personal details to be irrelevant to your request.

Following the receipt of the acknowledgement letter, you did not advise the Department that you sought access to the officers' personal details, and you also did not specifically indicate in making your request for an internal review that you required access to this material. I have consequently determined that this material is irrelevant to your request under section 22(1)(a)(ii) of the FOI Act

The remaining parts of the documents have been considered for release to you as they are relevant to your request.

13 Reasons for internal review decision: public interest conditional exemptions

13.1 Section 47F of the FOI Act – personal privacy

Section 47F of the FOI Act provides that a document is conditionally exempt if its disclosure under the FOI Act would involve the unreasonable disclosure of personal information of any person. 'Personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not (see s 4 of the FOI Act and s 6 of the *Privacy Act 1988*).

I consider that disclosure of the information marked '47F' in the documents would disclose personal information relating to third parties. The third parties in question are individuals employed by organisations whose names and email addresses appear in the documents within the scope of the request. The information redacted within the documents reasonably identifies a number of persons by name or their own descriptions.

The FOI Act states that, when deciding whether the disclosure of the personal information would be 'unreasonable', I must have regard to four factors set out in section 47F(2) of the FOI Act. I have therefore considered each of these factors overleaf:

- a) *the extent to which the information is well known;*
- b) *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;*
- c) *the availability of the information from publicly available resources;*
- d) *any other matters that I consider relevant.*

The information relating to the third parties involved is only known to a limited group of people with a business need to know. As this information is only known to a limited group of people, the individuals concerned are not generally known to be associated with the matters discussed in the document and this information is not available from publicly accessible sources.

I do not consider that the information revealing the third parties names or circumstances would be relevant to the broader scope of your request, as you are seeking access to information in regard to the COVIDSafe App development rather than personal information related to the individuals involved.

In making my decision I also consider relevant the views of the organisations that employ or employed the individuals in question. The Department consulted these organisations to seek their views on whether the Department should make exemption claims in relation to the documents. Each of these organisations stated that they have a legal obligation to prevent disclosure of the personal details of their employees and consider this information should remain confidential. They consider these individuals are not known publically to be associated with the matters dealt with in the documents and that publishing the identity of their staff would involve unreasonable disclosure of their personal information.

Noting that the FOI Act does not control or restrict any subsequent use or dissemination of information released I am satisfied that the disclosure of the names and contact information of the staff of all organisations referred to in the documents would involve an unreasonable disclosure of personal information about a number of individuals.

I have decided that the information referred to above is conditionally exempt under section 47F of the FOI Act. Access to a conditionally exempt document must generally be given unless it would be contrary to the public interest to do so. I have turned my mind to whether disclosure of the information would be contrary to the public interest, and have included my reasoning below

13.2 Section 47G of the FOI Act – Business Affairs

Section 47G(1)(a) of the FOI Act permits conditional exemption of documents containing business information where disclosure of that information would, or could reasonably be expected to, unreasonably affect the organisation adversely in respect of its lawful business, commercial or financial affairs.

I have considered that part of documents numbered 6 -15, 17- 18 and 22 contain information concerning the business, commercial or financial affairs of an organisation.

As indicated in paragraph 13.1 above, the Department consulted the organisation in question to seek their views on whether the Department should make exemption claims in relation to the documents. In response, the organisation advised that the certain material in the documents contains details of the skills, knowledge, technology and expertise provided by their organisation, and that this information is not well known or publically available. The organisation further advised that they considered they had provided the information to the Department on the basis of a mutual understanding that it would be treated confidentially.

In determining whether disclosure of the information within the documents would or could reasonably be expected to adversely affect the lawful business, commercial or financial affairs of an organisation, I have had regard to the following factors:

- a. *The extent to which the information is well known;*
- b. *Whether the organisation or undertaking is known to be associated with the matters dealt with in the documents;*
- c. *The availability of the information from publicly accessible sources; and*
- d. *Any other matters that the Department considers relevant.*

The information contained within these documents is not in the public domain, the organisation concerned is not generally known to be associated with the matters referred to in these documents, and the information is not available from publicly accessible sources, such as the organisation's website. The organisation have indicated that they consider release of the details in regard to their current capabilities would have an adverse effect on their business affairs.

I have also considered that the business provided the information with the expectation that the Department would securely maintain any information provided to it.

Based on these submissions I am satisfied that the disclosure of the information would, or could reasonably be expected to, unreasonably affect that organisation in respect of its lawful business, commercial or financial affairs I have decided that the disclosure of this information would be unreasonable.

Having formed the view that release of the identified material is exempt under section 47G(1)(a) and as access to a conditionally exempt document must generally be given unless it would be contrary to the public interest to do so I must also turn my mind to whether disclosure of the information would be contrary to the public interest. I have included my reasoning in paragraph 13.3 below.

13.3 The public interest - section 11A of the FOI Act

As I have decided that parts of the documents are conditionally exempt, I am now required to consider whether access to the conditionally exempt information would be contrary to the public interest (section 11A of the FOI Act).

A part of a document which is conditionally exempt must also meet the public interest test in section 11A(5) before an exemption may be claimed in respect of that part.

In summary, the test is whether access to the conditionally exempt part of the document would be, on balance, contrary to the public interest.

In applying this test, I have noted the objects of the FOI Act and the importance of the other factors listed in section 11B(3) of the FOI Act, being whether access to the document would do any of the following:

- a) *promote the objects of this Act (including all the matters set out in sections 3 and 3A)*
- b) *inform debate on a matter of public importance*
- c) *promote effective oversight of public expenditure*
- d) *allow a person to access his or her own personal information.*

Having regard to the above I am satisfied that:

- Access to the documents would promote the objects of the FOI Act.
- The subject matter of the documents has the character of public importance, and it may be of some public interest.
- No insights into public expenditure will be provided through examination of the documents.
- The documents do not contain your personal information.

I therefore consider two of the above factors favour disclosure.

Having considered factors in favour of release above I have also considered the following factors that weigh against the release of the conditionally exempt information in the documents:

- Disclosure of the personal information which is conditionally exempt under section 47F of the FOI Act could reasonably be expected to prejudice the protection of those individuals' right to privacy.
- Although the body of the documents does contain material of public interest I do not consider this extends to the name and contact details of individual employees of the service providers thus I place neutral weight on this factor in favour of release.
- The Department is committed to complying with its obligations under the *Privacy Act 1988*, which sets out standards and obligations that regulate how the Department must handle and manage personal information. It is firmly in the public interest that the Department uphold the rights of individuals to their own privacy and meets its obligations under the Privacy Act. I consider that non-compliance with the Department's statutory obligations concerning the protection of personal information would be contrary to the public interest and that this factor weighs strongly against disclosure.
- It is a core Government concern to maintain the integrity of the information it holds including information relating to any business, commercial and financial affairs of an organisation
- The Department is obliged to take action to prevent the unreasonable disclosure of information that may be of commercial or financial value to an organisation. I have given greatest weight to the Department's obligation to maintain the integrity of the information it holds. This would be contrary to the public interest. I consider that disclosure of this information would be contrary to the public interest and it is therefore exempt from disclosure under section 47G(1)(a) of the FOI Act.

I have also had regard to section 11B(4) which sets out the factors which are irrelevant to my decision, which are:

- a) *access to the document could result in embarrassment to the Commonwealth Government, or cause a loss of confidence in the Commonwealth Government*
- b) *access to the document could result in any person misinterpreting or misunderstanding the document*

- c) *the author of the document was (or is) of high seniority in the agency to which the request for access to the document was made*
- d) *access to the document could result in confusion or unnecessary debate.*

I have not taken into account any of those factors in this decision.

Upon balancing all of the above relevant public interest considerations, I have concluded that the disclosure of the conditionally exempt information in the documents would be contrary to the public interest and it is therefore exempt from disclosure under the FOI Act.

14 Reasons for decision: access to edited copies

14.1 Section 22(2) of the FOI Act – access to edited copies

Section 22(2) of the FOI Act provides that an agency must provide access to an edited copy of a document when the agency has identified that a document is exempt or contains irrelevant material, and it is possible for the agency to prepare an edited copy of the document from which it has deleted the exempt or irrelevant material.

As I have indicated above, the documents identified within the scope of the request contain exempt and irrelevant material.

I have determined that it is reasonably practicable to prepare edited copies of the documents in question.

15 Legislation

A copy of the FOI Act is available at <https://www.legislation.gov.au/Series/C2004A02562>.

If you are unable to access the legislation through this website, please contact our office for a copy.

16 Your review rights

Review by the Office of the Australian Information Commissioner

You may apply directly to the Office of the Australian Information Commissioner (OAIC) for a review of this decision. You must apply in writing within 60 days of this notice. For further information about review rights and how to submit a request for a review to the OAIC, please visit: <https://www.oaic.gov.au/freedom-of-information/reviews-and-complaints/information-commissioner-review/>.

17 Making a complaint

You may complain to the Australian Information Commissioner about action taken by the Department in relation to your request.

Your enquiries to the Australian Information Commissioner can be directed to:

Phone 1300 363 992 (local call charge)

Email enquiries@oaic.gov.au

There is no particular form required to make a complaint to the Australian Information Commissioner. The request should be in writing and should set out the grounds on which it is considered that the action taken in relation to the request should be investigated and identify the Department of Home Affairs as the relevant agency.

18 Contact

Should you wish to discuss my decision, please do not hesitate to contact via email at foi.reviews@homeaffairs.gov.au.

Signed Electronically

Claire
Position Number: 60126988
Authorised FOI Decision Maker
Department of Home Affairs

ATTACHMENT A

SCHEDULE OF DOCUMENTS REQUEST UNDER *FREEDOM OF INFORMATION ACT 1982*

FOI request: FA 21/09/01245

File Number: OBJ2021/29399

No.	Date of document	No. of pages	Page Range	Description	Decision on release	
1.	30/02/2020	1	1	Email	Released in part with exempt and irrelevant material deleted	47F(1) 22(1)(a)(ii)
2.	30/02/2020	1	2	Email	Released in part with exempt and irrelevant material deleted	47F(1) 22(1)(a)(ii)
3.	30/02/2020	5	3-7	Email attachment	Released in full	
4.	30/02/2020	1	8	Email	Released in part with exempt and irrelevant material deleted	47F(1) 22(1)(a)(ii)
5.	30/02/2020	4	9-12	Email attachment	Released in full	
6.	27/03/2020	1	13	Email	Released in part with exempt and irrelevant material deleted	47F(1) 47G(1)(a) 22(1)(a)(ii)
7.	30/03/2020	5	14-19	Email trail	Released in part with exempt and irrelevant material deleted	47F(1) 47G(1)(a) 22(1)(a)(ii)
8.	30/03/2020	6	20-25	Email trail	Released in part with exempt and irrelevant material deleted	47F(1) 47G(1)(a) 22(1)(a)(ii)

No.	Date of document	No. of pages	Page Range	Description	Decision on release	
9.	30/03/2020	3	26-28	Email trail	Released in part with exempt and irrelevant material deleted	47F(1) 47G(1)(a) 22(1)(a)(ii)
10.	28/03/2020 to 30/03/2020	5	29-33	Email trail	Released in part with exempt and irrelevant material deleted	47F(1) 47G(1)(a) 22(1)(a)(ii)
11.	28/03/2020 to 30/03/2020	4	34-38	Email trail	Released in part with exempt and irrelevant material deleted	47F(1) 47G(1)(a) 22(1)(a)(ii)
12.	28/03/2020 to 29/03/2020	3	39-41	Email trail	Released in part with exempt and irrelevant material deleted	47F(1) 47G(1)(a) 22(1)(a)(ii)
13.	28/03/2020 to 29/03/2020	4	42-45	Email trail	Released in part with exempt and irrelevant material deleted	47F(1) 47G(1)(a) 22(1)(a)(ii)
14.	28/03/2020 to 29/03/2020	4	46-51	Email trail	Released in part with exempt and irrelevant material deleted	47F(1) 47G(1)(a) 22(1)(a)(ii)
15.	28/03/2020 to 29/03/2020	6	52-57	Email trail	Released in part with exempt and irrelevant material deleted	47F(1) 47G(1)(a) 22(1)(a)(ii)
16.	30/02/2020	2	58-59	Email trail	Released in part with exempt and irrelevant material deleted	47F(1) 22(1)(a)(ii)

No.	Date of document	No. of pages	Page Range	Description	Decision on release	
17.	28/03/2020 to 29/03/2020	3	60-62	Email trail	Released in part with exempt and irrelevant material deleted	47F(1) 47G(1)(a) 22(1)(a)(ii)
18.	26/03/2020	3	63-65	Email	Released in part with exempt and irrelevant material deleted	47F(1) 47G(1)(a) 22(1)(a)(ii)
19.	26/03/2020	1	66	Email	Released in part with exempt and irrelevant material deleted	47F(1) 47G(1)(a) 22(1)(a)(ii)
20.	26/03/2020	1	67	Email trail	Released in part with exempt and irrelevant material deleted	47F(1) 22(1)(a)(ii)
21.	27/03/2020	1	68	Email	Released in full irrelevant material deleted	22(1)(a)(ii)
22.	27/03/2020	1	69	Email	Released in part with exempt and irrelevant material deleted	47G(1)(a) 22(1)(a)(ii)
23.	27/03/2020	1	70	Email	Released in full with irrelevant material deleted	22(1)(a)(ii)
24.	27/03/2020	1	71	Email	Released in full with irrelevant material deleted	22(1)(a)(ii)